



Where are the trees?

SMG/APP's new forest policy kicks in only after company has completed its planned deforestation in Riau, Sumatra



**Investigative Report
Eyes on the Forest**

Published in April 2013

Eyes on the Forest (EoF) is a coalition of environmental NGOs in Riau, Sumatra: Friends of the Earth "Walhi" Riau Office, Jikalahari "Riau Forest Rescue Network" and WWF-Indonesia, Riau Program. EoF monitors the status of the remaining natural forests in Sumatra's Province of Riau and disseminates the information worldwide.

For more news on Eyes on the Forest, go to: <http://www.eyesontheforest.or.id>

For photos and maps, go to: <http://maps.eyesontheforest.or.id>

Email: [editor\(at\)eyesontheforest.or.id](mailto:editor(at)eyesontheforest.or.id)

Front cover

Photo: Sumatran tiger forest cleared inside APP's self-declared "Senepis Tiger Sanctuary" inside the concession of PT. Suntara Gajapati, a wood supplier of SMG/APP in Riau Province. The cleared forest stood on protected peat of more than 4 meters depth. CITES-protected Ramin trees (*Gonystylus sp.*) remain standing. Photo taken by Eyes on the Forest at 2°0'52.39"N, 101°8'16.15"E on 11 January 2013.

Summary

In February 2013, Sinar Mas Group's Asia Pulp & Paper (SMG/APP) published a "forest conservation policy (FCP)" announcing "an end to the clearing of natural forest across its entire supply chain in Indonesia".

In response, Eyes on the Forest (EoF) assessed the policy's conservation benefit on forests, wildlife and peat soils in Riau. Since SMG/APP has not provided detailed data to civil society organizations, EoF combined publicly available data with information collected over many years of field investigations for its analysis.

EoF identified 21 pulpwood plantation supplier companies for SMG/APP in Riau. Their concessions covered 929,204 ha and had 188,634 ha of natural forest remaining in 2012. 89% of the remaining forest should not be cleared as it is protected by law, an extra 8% is protected by APP's own previous commitments. The company's new policy at most protects an additional 5,171 ha. These forests are small fragments scattered across several concessions, possibly too small to make a meaningful contribution to ecosystem conservation or even to survive.

EoF also assessed the legality and impact of almost three decades of natural forest pulping by SMG/APP on forests, wildlife and peat soils in Riau. SMG/APP suppliers' concessions lost 683,281 ha of natural forest between 1985 and 2012. Of that, 77% was lost in legally questionable ways as these forests had been protected by the TGHK spatial plan, the >3m peat depth limit, and/or the 10% minimum concession forest cover limit. 83% was lost in Sumatran tiger and elephant habitats, 77% was lost on peat.

The policy does not cover the restoration of these "protected yet lost" forests, forests in habitat of critically endangered species, or the rehabilitation of the peat soils, many of which continue to cause carbon emissions as they are constantly being drained to maintain and harvest acacia plantations. At the same time, SMG/APP commissioned much advertised High Conservation Value assessments for concessions in which planned deforestation had been completed and practically all remaining forest was already protected. Without restoration commitment, these assessments carry little if any value.

Despite previous public commitments by APP to become a 100% plantation wood company by 2004, 2007 and 2009, the annual average speed of forest loss in suppliers' concessions did not slow down significantly between 1995 and 2011. The exception was between 2007 and 2009, when a province-wide police investigation into alleged illegal logging by the pulp & paper industry, including SMG/APP suppliers, caused a quasi-moratorium of forest clearance in Riau. Forest loss dramatically slowed from 2011, indicating SMG/APP's suppliers had almost exhausted their available natural forest supplies before the policy announcement. A recent analysis of government wood supply data up to this year by Indonesian CSO Greenomics concluded that APP announced its FCP after their suppliers ran out of forests to pulp in Riau and two other provinces in Sumatra.

In conclusion, SMG/APP's FCP has come too late for the tropical ecosystems damaged in the suppliers' concessions in Sumatra. Combined with the lack of a restoration commitment, the conservation benefits of the policy for the company's main operational area Sumatra are minimal. The same may also be true for areas controlled by SMG/APP suppliers in Kalimantan. This still needs to be thoroughly evaluated. The process is delayed because detailed data from the company are not available.

The policy also lacks another essential commitment. It allows MTH to be delivered to SMG/APP mills indefinitely, creating a loophole that suppliers may utilize to feed wood into the mills from new deforestation in violation of the policy. Historically, various suppliers have

delivered very large volumes of MTH from legally questionable clearance and potential High Conservation Value Forests to SMG/APP mills. Recent news that two APP suppliers in West Kalimantan violated the company's moratorium vindicates concerns that MTH harvested in violation of the FCP may be "laundered" into pulp mills.

EoF calls on SMG/APP to restore selected peatlands and forests lost in protected, High Carbon Stock and High Conservation Value areas in suppliers' concessions; stop accepting all tropical forest fiber at all mills by 5 May 2013; mitigate the damages their roads and canals cause to surrounding natural forests, peat soils and wildlife; and provide detailed information on existing and new concession areas and mill expansion plans in Indonesia to allow truly independent monitoring and evaluation of conservation benefits of the FCP.

EoF recommends that APP buyers and other business partners not buy SMG/APP's products and support their business until truly independent monitoring has confirmed that the company has met the above calls and successfully implemented them.

Introduction

The Sinar Mas Group's Asia Pulp & Paper (SMG/APP) published its "Forest Conservation Policy" (FCP) on 5 February 2013 announcing "an end to the clearing of natural forest across its entire supply chain in Indonesia, with immediate effect"¹.

Eyes on the Forest (EoF) welcomes that announcement in principal. But what does it actually mean?

If implemented – as many similar announcements in the past have not been² – SMG/APP's expansion should not harm any more Indonesian forests, at least not directly. But how soon and by how much will the company expand its operations? SMG/APP appears to have been grabbing land faster than anybody else in the industry. Apparently enough land that the company announced it has enough plantation supply for its yet to be built new super mill in South Sumatra³. Will there be even further expansion? Or has the company reached saturation and had decided to consolidate its assets and work with what it has to maximize productivity of its plantations?

What does the FCP actually mean for the vast stretches of land the company controls either directly or through supply partnerships, for the ecosystems impacted by SMG/APP's almost three decades of pulping in Sumatra, Indonesia?

The company has not provided many answers. During several SMG/APP "socialization" meetings on the FCP, the company did not provide details, nor GIS data, on the status of natural forest cover in its suppliers' concessions or its corporate expansion plans.

Upon closer review, the FCP also lacks several essential commitments. SMG/APP did not commit to stop pulping mixed tropical hardwood fiber (MTH). Its mills can receive MTH indefinitely, creating a loophole suppliers may utilize to feed wood into the mills from new deforestation in violation of the FCP. SMG/APP did not commit to protect remaining forests from outside forces or to undo the long-term negative impacts company practices have had on peat soils, forests and biodiversity. Poachers and encroachers can continue to enter remaining forests via the company's logging corridors. Drainage canals will continue to dry up peat soil and cause carbon emissions^{4, 5}. Wildlife will continue to lack essential habitats like migration corridors and safe retreats.

EoF has been tracking SMG/APP for many years and today

- (1) reports on the impact the operations of SMG/APP's suppliers in Riau, Sumatra have had on forests, wildlife and peat soils,
- (2) identifies potential legal issues of past operations like compliance with the province's spatial plan, development of deep peat soils and minimum forest cover requirements, and
- (3) evaluates the conservation benefits of the FCP for the forests of Riau, the epicenter of SMG/APP's pulp production for almost three decades.

Analyses were also published on EoF's interactive on-line GIS (<http://maps.eyesontheforest.or.id>), which is utilizing Google Earth's Maps Engine platform to allow stakeholders evaluate some aspects of SMG/APP's new forest policy themselves and monitor its implementation.

EoF will update its database regularly as information from other provinces and new details about existing concessions becomes available.

Methods

Due to the lack of company supplied data, EoF combined publicly available data with information collected over many years of field investigations⁶ for this analysis.

EoF identified the companies and their respective concession blocks from which logs have been supplied to SMG/APP's mills in the past based on company information released since operations began and EoF investigations. Companies may own several concessions and each concession may consist of several distinct blocks (concession blocks). The concession blocks were mapped on EoF's web GIS (<http://maps.eyesontheforest.or.id>) and hyperlinked to relevant reports.

For each concession, EoF calculated

- Lost and remaining natural forest cover between 1985 and 2012 based on visual interpretation of Landsat images⁷ and existing scientific data⁸. EoF used its published 2012 forest cover for the analysis (<http://maps.eyesontheforest.or.id>). The satellite images on which the 2012 analysis was based were taken months before 1 February 2013, the date when SMG/APP's moratorium on all forest clearance started. EoF thus likely underestimated deforestation in concession blocks that were being cleared until the date of the moratorium. Because of that, EoF conducted one spot check of SMG/APP's PT Suntura Gajapati concession using satellite images taken in 2013. EoF alleges that clearing of forest below a 10% total coverage in any given concession block is illegal as HTI concessions are required by law to protect a minimum 10% forest coverage as "conservation area"⁹.
- Lost and remaining elephant and tiger habitat based on "original" Sumatran elephant¹⁰ and tiger¹¹ distribution ranges identified by scientists and compiled by EoF. They are both "Critically Endangered" according to IUCN¹² and represent "High Conservation Value 1.2"¹³. Scientists published the first comprehensive map of tiger ranges only 12 years after SMG/APP started its operations. EoF thus likely underestimated the company's impact on tiger habitat.
- Lost and remaining peat forest based on published information on peat distribution and depth^{14, 15}. EoF alleges that natural forest on peat more than 3 meters deep are protected, their clearing has been legally highly controversial^{16, 17}. EoF used the only peat depth data set available for Riau, applying its two depth classes 2-4 meters and >4 meters as criteria for this analysis.
- Lost and remaining protected forests based on Riau's active TGHK spatial plan (Forest Land Use Agreement, Ministry of Forestry 1986)¹⁸. EoF alleges that natural forest zoned by the TGHK as "Natural Forest Reserve & Tourism (HSA-W)", "Protection Forest (HL)" and "Limited Production Forest (HPT)" are protected from clear-cutting and clearance of such forest has been illegal¹⁹.
- Lost and remaining protected forests based on SMG/APP's previous conservation commitments, including protection of High Conservation Value Forests the company committed to in 2004^{20, 21, 22, 23}, and protection of forests in UNESCO Giam Siak Kecil-Bukit Batu Biosphere Reserve²⁴, Senepis Tiger Sanctuary^{25, 26, 27, 28, 29} and Kampar Carbon Reserve^{30, 31, 32}. EoF assumed that any clearing of such forests constitutes a violation of corporate commitments.

EoF then estimated the FCP's conservation benefit for forests in SMG/APP suppliers' concession blocks in Riau: how much natural forest would it save that was not already protected by law and / or by conservation commitments SMG/APP had made in the past.

Results

1. SMG/APP supplier companies and their concession blocks

EoF identified 47 concession blocks, with a total mapped area of 929,204 ha, owned by 21 companies who have supplied wood to SMG/APP in Riau province alone (Appendix 1, "Pulpwood concessions (HTI): APP" at <http://maps.eyesontheforest.or.id>). Following, in part, SMG/APP's terminology, EoF grouped these companies into four categories:

- A.** Five companies, publicly declared by SMG/APP as its "own" suppliers^{33, 34}, owned a total mapped area³⁵ of 509,564 ha. For these concessions, APP had issued a "forest clearance moratorium" on 5 June 2012 after completing forest clearance operations^{36, 37}. [*PT. Arara Abadi, PT. Riau Abadi Lestari, PT. Satria Perkasa Agung, PT. Satria Perkasa Agung Serapung and PT. Satria Perkasa Agung & KTH Sinar Merawang.*]
- B.** Six companies, publicly declared by SMG/APP as its "independent" suppliers³⁸, owned a total mapped area of 183,993 ha. For these concessions, APP had issued a "forest clearance moratorium" on 1 February 2013. [*PT. Balai Kayang Mandiri, PT. Bina Duta Laksana, PT. Riau Indo Agropalma, PT. Ruas Utama Jaya, PT. Suntura Gajapati and PT. Mutiara Sabuk Khatulistiwa. The last company only has a "selective logging concession" license. With or without the moratorium, large scale forest clearance and plantation development should not happen.*]
- C.** Six companies, publicly identified by SMG/APP as "independent" suppliers³⁹, owned a total mapped area of 175,493 ha. APP called these concessions "full HTI", implying they already completed natural forest clearance operation and are only operating in established plantation areas. [*PT. Bina Daya Bentala, PT. Bukit Batu Hutani Alam, PT. Mitra Hutani Jaya, PT. Perawang Sukses Perkasa Industri, PT. Rimba Mandau Lestari and PT. Sakato Pratama Makmur.*]
- D.** Four companies, for which SMG/APP provides no association information but which had been identified by Eyes on the Forest investigators as wood suppliers to APP, owned a total mapped area of 60,154 ha. [*This category includes PT. Artelindo Wiratama who has been clearing Sumatran tiger forest in Bukit Tigapuluh for years to supply MTH to APP^{40, 41}, PT. Dexter Timber Perkasa Indonesia who self-declares as "Sinar Mas Group"⁴², PT. Putra Riau Perkasa which APP declared as "Kampar Carbon Reserve"⁴³ and PT. Inhil Hutani Pratama who was identified as APP supplier by the Riau Provincial police⁴⁴.*]

The above companies were not the only suppliers of MTH to SMG/APP's PT. Indah Kiat Pulp & Paper (IKPP) mill in Riau in the past. MTH supplies from "unrecognized suppliers" without industrial timber plantation concessions (HTI) have been significant. EoF estimates that IKPP alone pulped about 1.4 million ha of forest by 2010⁴⁵, much more than the total concession area of the "recognized and identified HTI suppliers" in Riau above. That included supplies from clearing natural forests for oil palm plantation development, infrastructure or other non-forestry activities. Origin, legality and environmental impact of these supplies have been much more difficult to identify, trace and ultimately control^{46, 47, 48}.

2. Status Quo: Deforestation of SMG/APP suppliers' concession blocks

Details of this analysis are available online at <http://maps.eyesontheforest.or.id> ("Concession deforestation" layers). In summary, in Riau Province, SMG/APP suppliers lost a total of 683,281 ha of natural forest in their concessions since the company began pulping in 1984. EoF analyzed which of the often overlapping categories contributed to how much of the total forest loss:

- 569,920 ha (83%) were lost inside the ranges of Sumatran tigers and elephants (Map 1, "Concession deforestation: wildlife ranges" at <http://maps.eyesontheforest.or.id>). Historical data on elephant ranges since 1985 show declines in herd and range size in the Senepis, Libo, Giam Siak Kecil and Bukit Tigapuluh areas where APP suppliers have been clearing natural forest (Map 2)⁴⁹. Human and tiger conflicts, likely due to the loss of forest habitat, have been rampant resulting in the loss of lives on both sides⁵⁰.
- 17,254 ha (3%) were lost in HCVF blocks which APP promised to protect in 2004.
- 1,714 ha (0.3%) were lost inside "Senepis Tiger Sanctuary".
- 170,382 ha (25%) were lost inside UNESCO Giam Siak Kecil-Bukit Batu Biosphere Reserve, 3,255 ha in the core area, 7,081 ha in the transition area and the rest in the buffer zone.
- 525,722 ha (77%) were lost on peat soil (Map 3, "Concession deforestation: peat soils" at <http://maps.eyesontheforest.or.id>). These deforested peat soil continues to emit greenhouse gas every day, especially under pulpwood plantation management.
- 525,856 ha (77%) were lost in three legally questionable ways, which overlap in part:
 - 301,084 ha (44%) were lost on peat soil 2-4 and >4m deep even though clearing of forest on peat >3m deep has historically been legally highly controversial (Map 3, "Concession deforestation: peat soils" at <http://maps.eyesontheforest.or.id>).
 - 247,401 ha (36%) were forests lost even though they were legally protected by the TGHK spatial plan as HSA-W, HL and/or HPT zones (Map 4, "Concession deforestation: land use plan" at <http://maps.eyesontheforest.or.id>).
 - 27,496 ha (4%) were lost bringing the respective concession blocks' forest cover below the legally required 10% forest cover limit⁵¹.

SMG/APP has a long history of broken promises about the year it would exclusively rely on plantation fiber: APP has been pulping natural forest fiber until today, long beyond the 2004⁵², 2007⁵³ and 2009⁵⁴ target years it had promised (Figure 1).

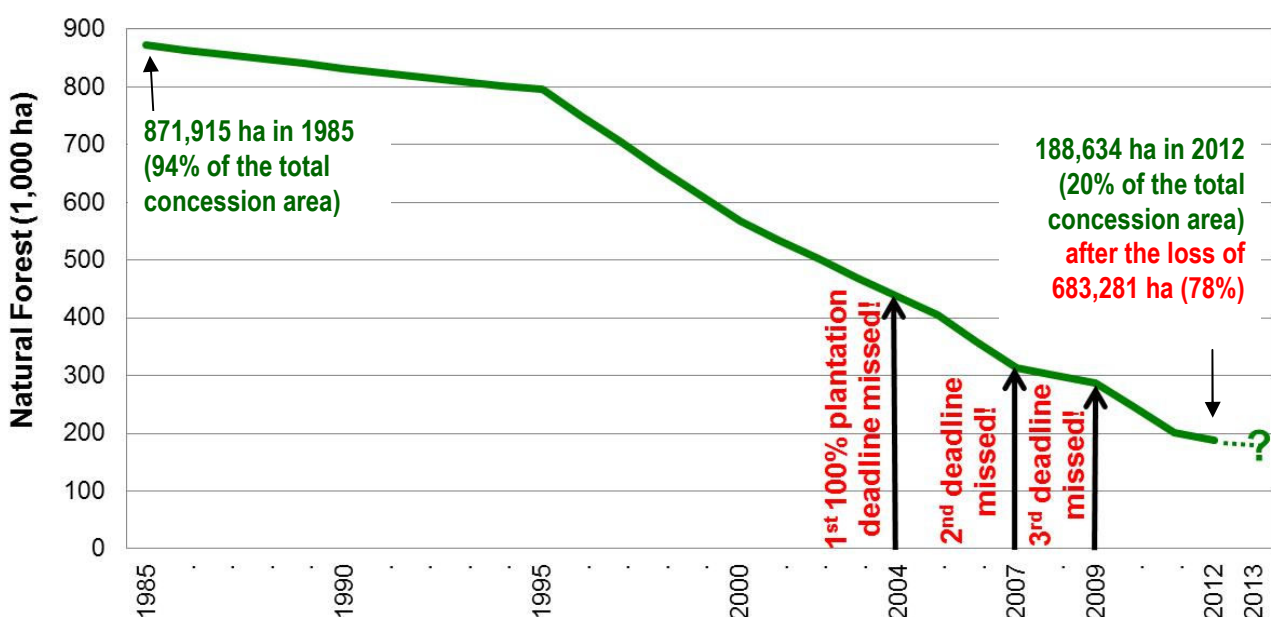
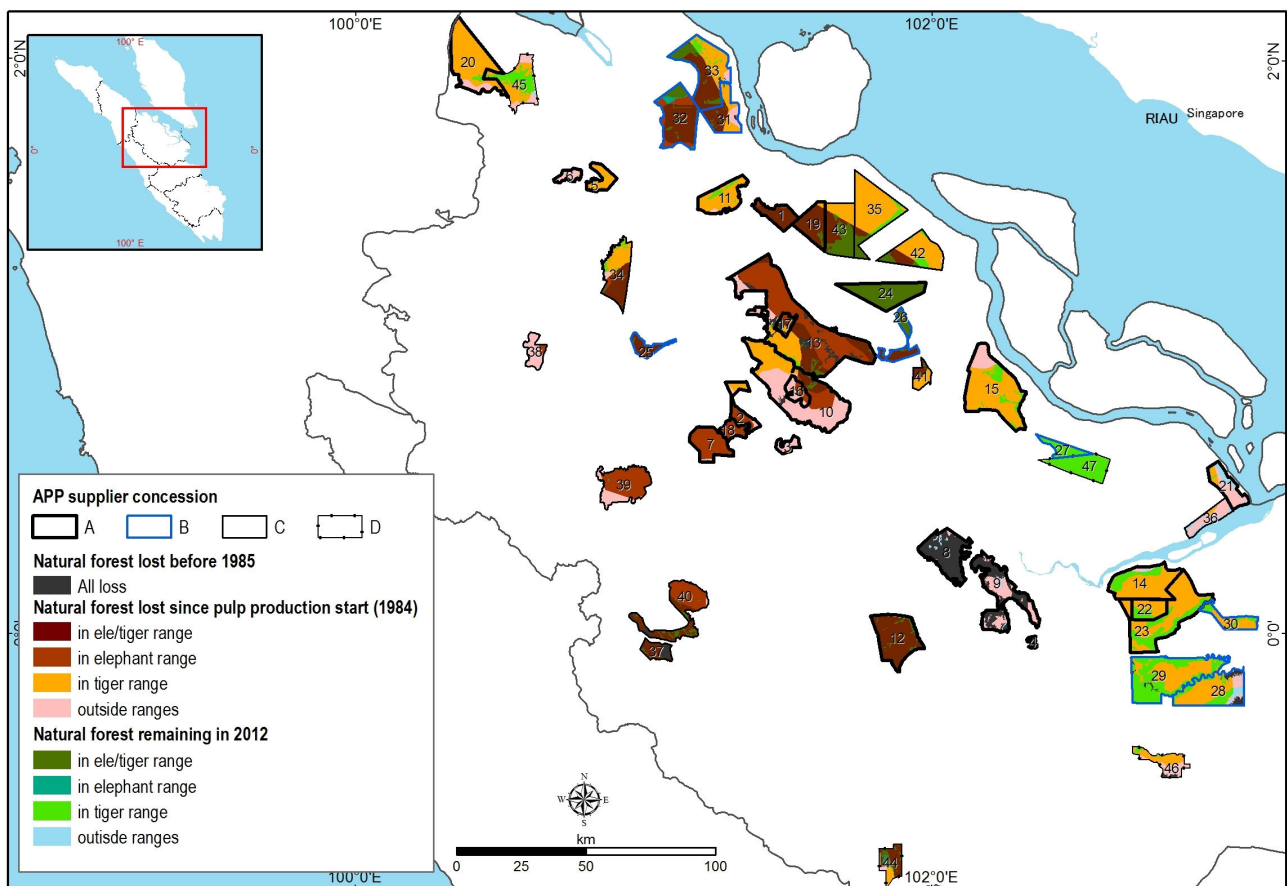


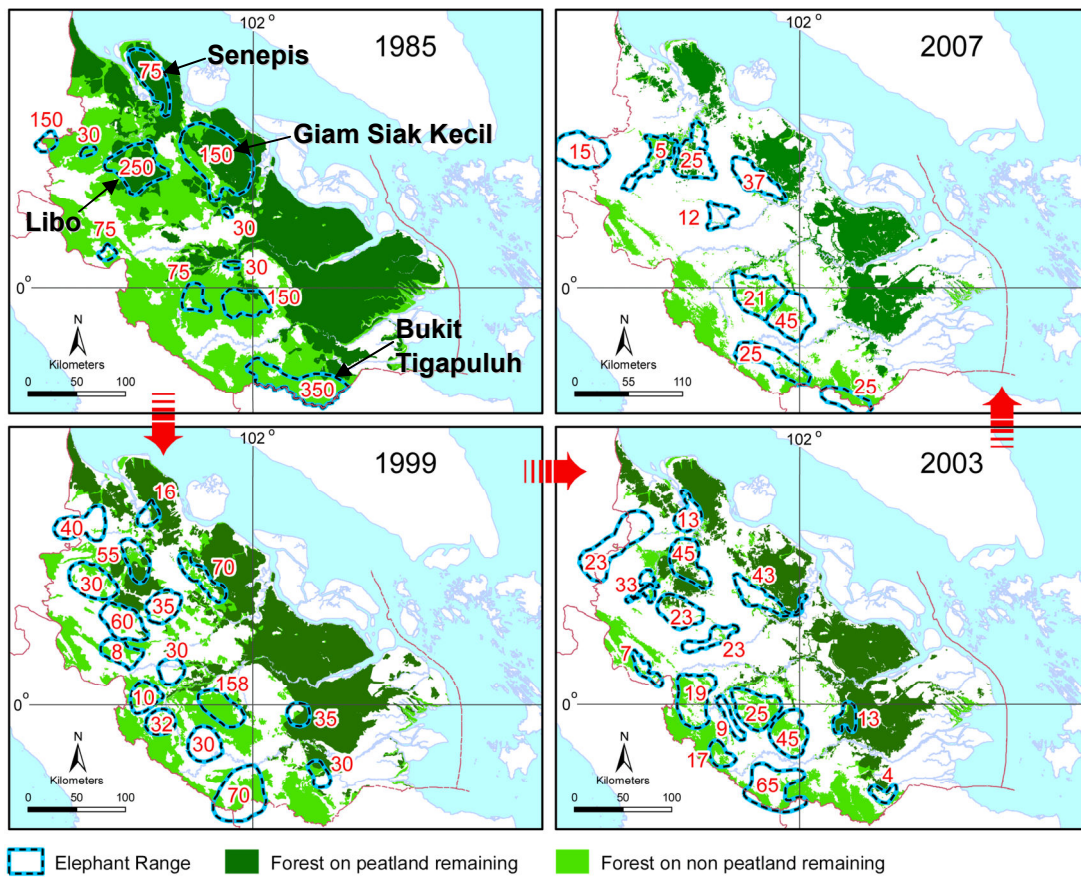
Figure 1.—Decline of natural forest cover inside APP suppliers' concessions after APP started to produce pulp in 1984.

Our analysis shows that the annual average speed of forest loss in suppliers' concessions did not decline significantly between 1995 and 2011. The exception is between 2007 and 2009, when a province-wide police investigation into alleged illegal logging by the pulp & paper industry, including SMG/APP suppliers, caused a quasi-moratorium of forest clearance in Riau^{55, 56}. After high forest losses until 2011, forest loss dramatically slowed from 2011 to the same rate as during the moratorium. Finding that most of the forest remaining in 2012 was protected by law or by APP's previous commitments (next chapter), EoF concludes that APP's suppliers in Riau had exhausted the natural forest available to them before the FCP announcement.

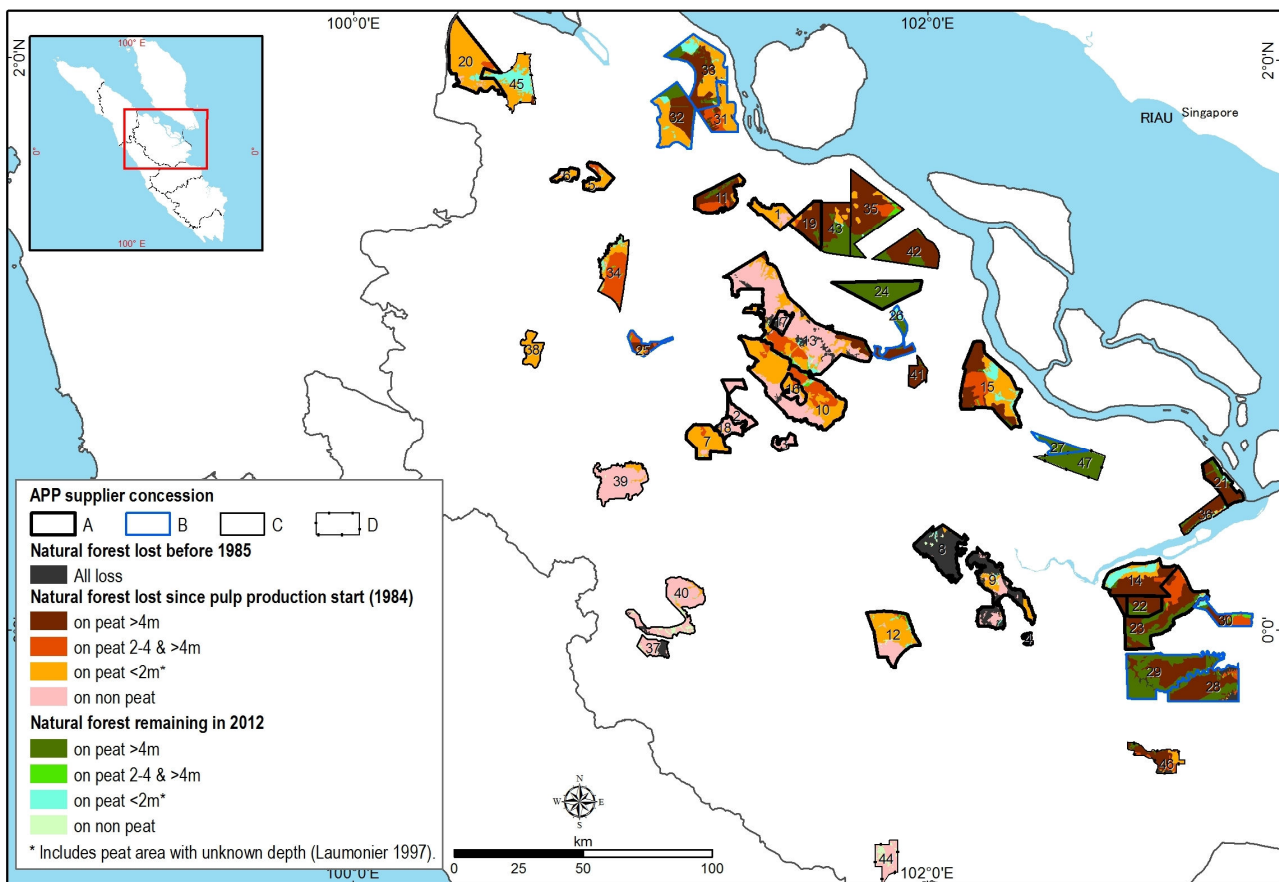
Greenomics analyzed official data by the Ministry of Forestry on the volume of natural forest wood supplies to APP mills up to 2013. The company's so-called group B suppliers in Riau, Jambi and South Sumatra falling under APP's 1 February 2013 clearance moratorium all had exhausted their natural forest before the policy announcement⁵⁷. Greenomics concluded "It would appear that commitment to the New APP Forest Conservation Policy was delayed until the clearance of natural forest and forest peatland for the development of pulpwood plantations had been completed."



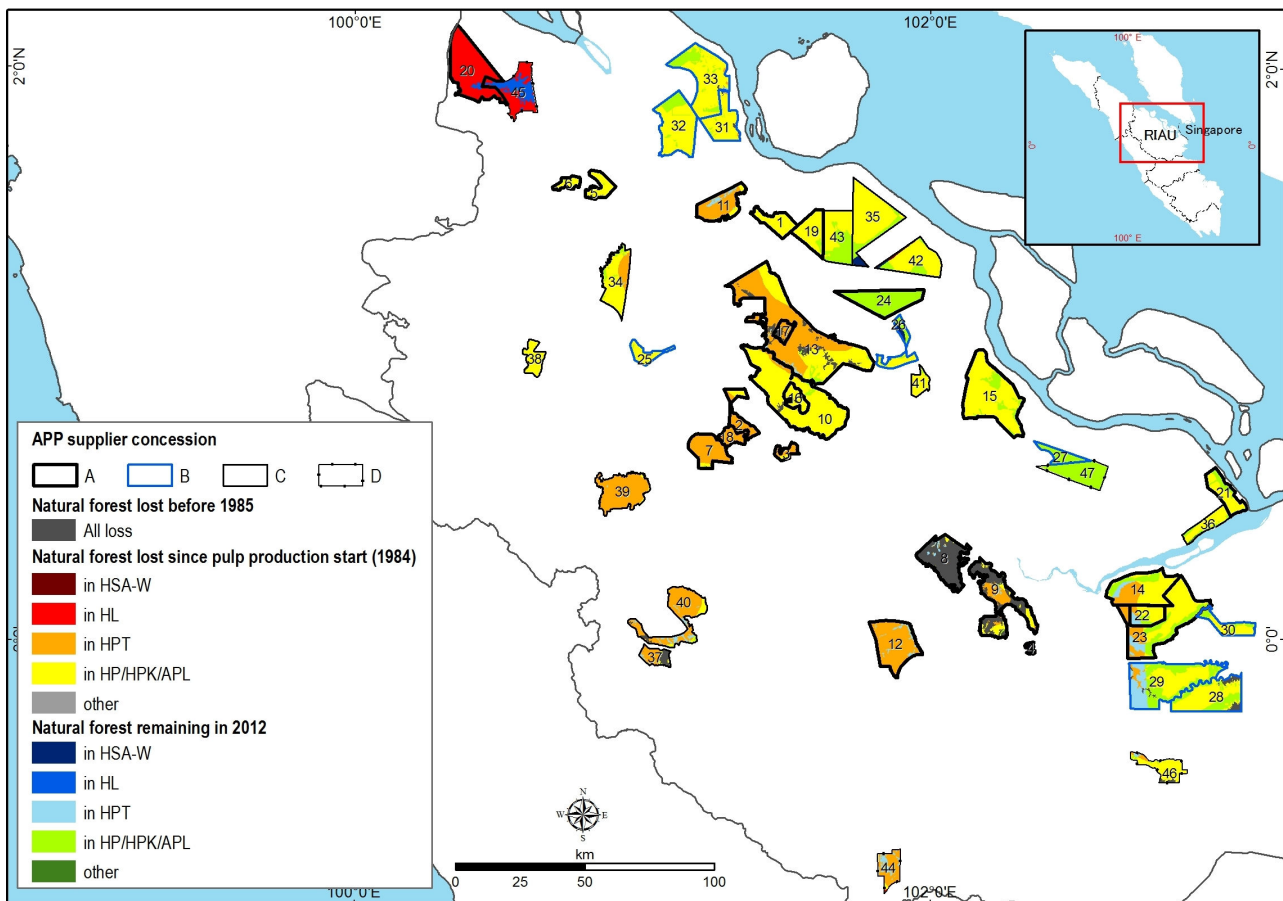
Map 1.—Forest lost and forest remaining inside the ranges of Sumatran tigers and elephants overlapping with SMG/APP suppliers' concessions.



Map 2.—Elephant ranges in Riau between 1985 and 2007 from WWF Indonesia (2008).



Map 3.—Forest lost and forest remaining on top of peat of various depths inside SMG/APP suppliers' concessions.



Map 4.—Forest lost and forest remaining inside zones of government’s TGHK spatial plan that protect natural forest from clearing, overlapping with SMG/APP suppliers’ concessions.

3. Status Quo: Forest remaining in SMG/APP suppliers’ concession blocks

Details of this analysis are available online at <http://maps.eyesontheforest.or.id> (“Concession deforestation” layers). In summary, SMG/APP suppliers’ concessions had a total of 188,634 hectares of natural forest remaining, with an average forest cover of 20%. Only 6,673 hectares of the 188,634 hectares could still be cleared because they are not protected by law or previous commitments made by the company (Figure 2, Map 5, Appendix 1).

The rest, 97% of the forest remaining in 2012, should not be cleared because of legal protection (89%) and corporate conservation commitments (8%). Several of these protection categories apply for the same forest block. The summary below lists how much forest falls into each category:

- 42,934 ha (23%) should not be cleared because they are zoned for protection (HSA-W and HL) and for selective logging (HPT) by government’s TGHK spatial plan (Map 4, “Concession deforestation: land use plan” at <http://maps.eyesontheforest.or.id>).
- 140,721 ha (75%) should not be cleared because they are on peat 2-4 and >4m deep (legal limit >3m depth) (Map 3, “Concession deforestation: peat soils” at <http://maps.eyesontheforest.or.id>).
- 65,424 ha (35%) should not be cleared because they are protected by the 10% minimum forest cover limit.
- 107,308 ha (48%) should not be cleared because they had been protected by earlier company commitments.

EoF so far has only analyzed satellite images taken many months before 1 February 2013,

the date for which SMG/APP issued its moratorium. However, one spot check of satellite images in 2013 revealed that, by the onset of SMG/APP's moratorium, SMG/APP supplier PT. Suntura Gajapati had already cleared the 1,502 hectares of forest it could clear without infringing legal issues and previous corporate conservation commitments⁵⁸. In conclusion, at most 5,171 hectares remain in SMG/APP's Riau concessions that benefit from the company's new FCP. These forests are small, scattered fragments in several concessions, possibly too small to make a meaningful contribution to ecosystem conservation or even to survive (Appendix 1). They are also so small that they are difficult to show in Map 5.

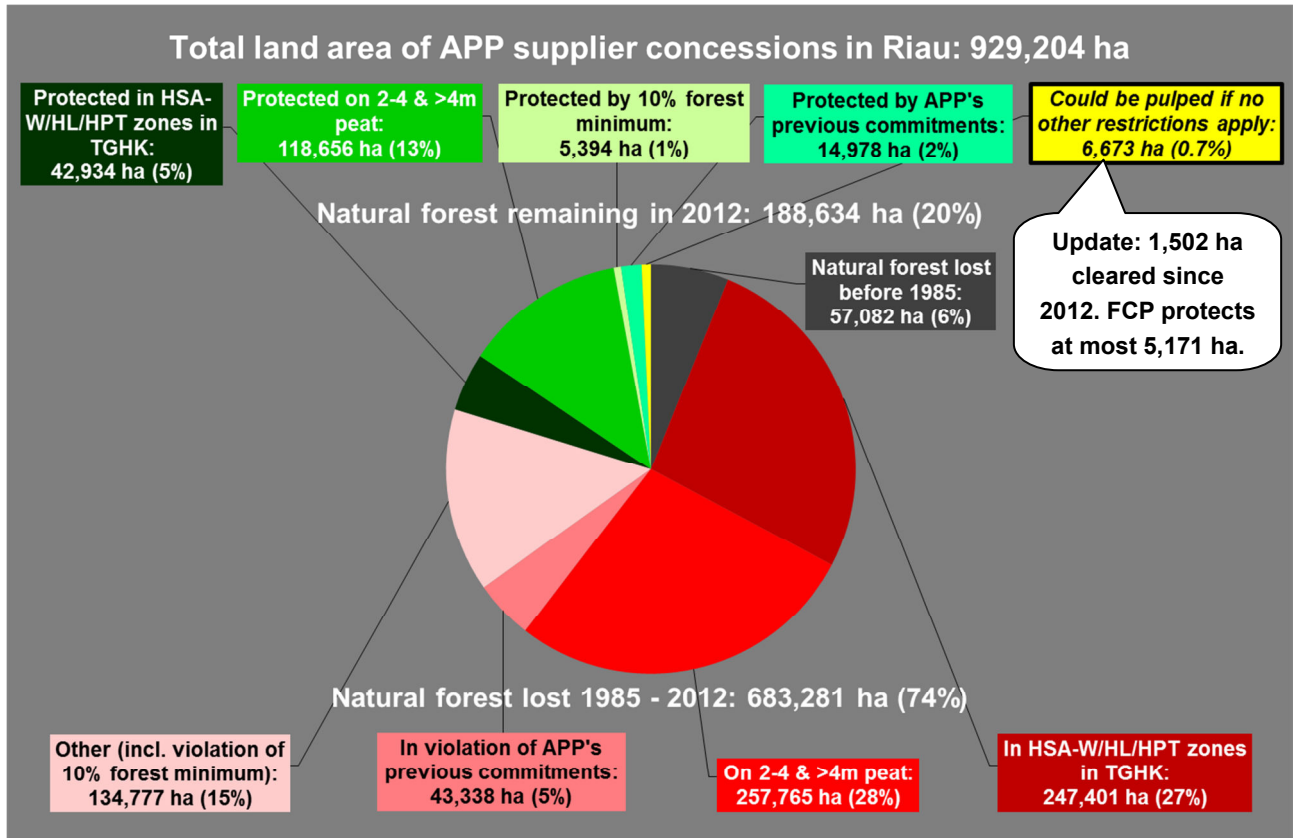
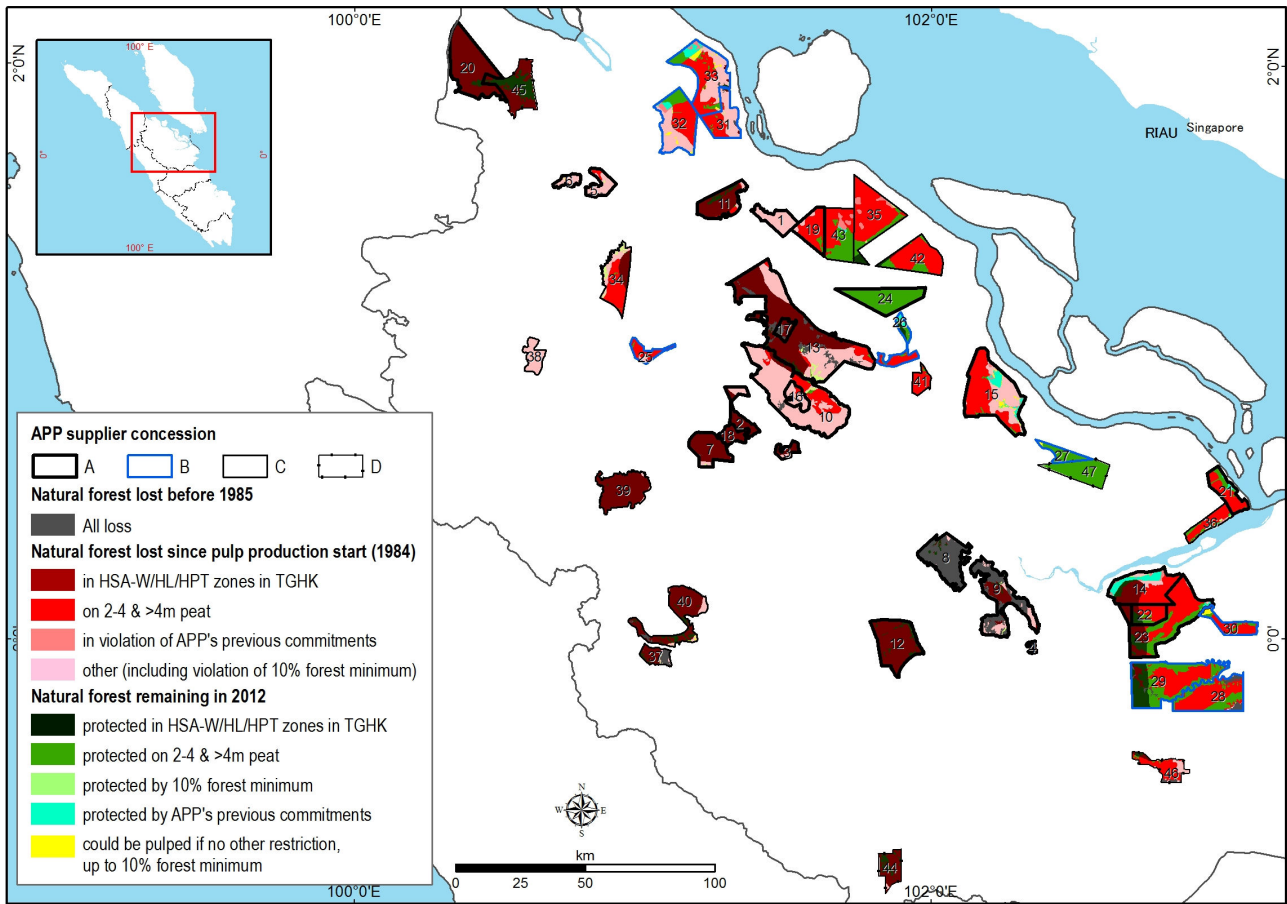


Figure 2.—Percentage of forest lost and remaining in SMG/APP suppliers' concessions in Riau, Sumatra. Any given block of lost and remaining forest may fall into several of the listed categories but here is only listed once to avoid double counting. For example a forest cleared in violation of an APP commitment on deep peat inside a zone protected by the TGHK spatial plan is only listed as forest lost in the TGHK category.



Map 5. Forest remaining in SMG/APP suppliers' concessions that is legally protected, protected by previous company commitments, or available for clearance.



Photo 1.—Mixed Tropical Hardwood cleared before the 1 February 2013 moratorium in PT. Ruas Utama Jaya in APP's self-declared "Senepis Tiger Sanctuary", waiting to be transported to APP's pulp mill. Photo taken by Eyes on the Forest at 1°51'35.48"N, 101°3'14.39"E on 14 January 2013.

Conclusions

EoF's analysis finds that

- 89% of the natural forest remaining in 2012 inside SMG/APP suppliers' 929,204 hectares Riau concession empire was already protected by law and an extra 8% protected by APP's previous conservation commitments. The FCP protects an additional 5,171 hectares at most.
- 77% of the natural forest lost between 1985 and 2012 inside SMG/APP suppliers' concessions occurred in legally questionable ways as these forests had been protected by the TGHK spatial plan, the >3m peat depth limit, and/or the 10% minimum concession forest cover limit.
- 83% of the natural forest lost between 1985 and 2012 inside SMG/APP suppliers' concessions had been habitats of Critically Endangered Sumatran elephants and tigers.
- 77% of the natural forest lost between 1985 and 2012 inside SMG/APP suppliers' concessions occurred on peat soil, which continue to cause carbon emissions from being drained to maintain and harvest acacia plantations.

EoF's analysis showed that the policy was announced only after APP suppliers had exhausted the forests they could clear, and without committing to the restoration of "protected yet lost" forests, forests in habitat of critically endangered species, or the rehabilitation of peat soils.

SMG/APP commissioned its much advertised High Conservation Value assessments for concessions which had already completed their planned deforestation and in which almost all remaining forest was already protected. Without restoration commitment, these assessments carry little if any value.

A recent study by Greenomics concluded that APP released its FCP only after their suppliers had run out of forests to clear also in other provinces in Sumatra. The same may be true for areas controlled by SMG/APP suppliers in Kalimantan. But potential benefits of the FCP for Kalimantan concessions have not yet been independently evaluated. A lack of detailed company data has delayed such an analysis.

Lack of transparency also is hindering truly independent monitoring of the current FCP's implementation. SMG/APP announced an internal monitoring program on the implementation of its FCP and wrote "APP will welcome independent 3rd party observers to verify the implementation"⁵⁹. Yet, so far the monitoring is conducted only internally without independent CSOs' participation as there is not yet an agreed protocol for "independent observation" to provide CSOs the unconditional access and data necessary to implement a truly independent monitoring program⁶⁰.

The policy also lacks another essential commitment. It continues to allow MTH to be delivered to SMG/APP mills indefinitely, creating a loophole that suppliers used to "very open mill gates" may try to exploit. As this analysis and many previous EoF investigative reports have shown, SMG/APP suppliers have delivered very large volumes of MTH from legally questionable clearance and potential high conservation value forests to the company's pulp mills for many years. There may be suppliers who try to deliver MTH from new deforestation sites instead of only FCP-allowed MTH supplies, such as those cut before 1 February 2013 or cleared "from land which is not forest, such as scrub land"⁶¹, non High Conservation Value (HCV) and non High Carbon Stock (HCS). "Business as usual" may prevail. CSOs in West Kalimantan recently found canal building and logging activities in the concessions of APP suppliers under moratorium⁶².

The fact that SMG/APP announced its policy only after their suppliers finished their planned deforestation in Sumatra, continues to accept tropical forest fiber, and has not committed to repair the damage the company's long history of clearance of Indonesia's forests has caused,

indicates that the company has no interest in conserving the country's natural resources.

Eyes on the Forest Recommendations for SMG/APP

Addressing the issues outlined in this report could make SMG/APP's new FCP truly the breakthrough forest and peat conservation Indonesia needs so badly. For that the company would need to:

1. Restore selected peatlands and forests lost in protected (according to TGHK, >3m peat, 10% forest minimum), High Carbon Stock and High Conservation Value areas in suppliers' concessions.
2. Stop accepting all tropical forest fiber at all mills by 5 May 2013, the date of the first quarterly report on the new FCP to close all potential loopholes for abuse and make the monitoring of full implementation of the new FCP straightforward and without doubt.
3. Mitigate the damage infrastructure like roads and canals cause to surrounding natural forests and wildlife.
4. Provide detailed information on all existing and past suppliers' concessions including information on concession boundaries, land cover, High Conservation Value (HCV) and High Carbon Stock (HCS) areas identified by SMG/APP contractors, and provide civil society with access to all concessions and facilities to allow truly independent stakeholder monitoring of the FCP.
5. Provide information on new concession areas and mill expansion plans in Indonesia to allow CSOs to independently evaluate future conservation benefits of the FCP.

Eyes on the Forest recommendation to APP buyers and other business partners

Do not buy SMG/APP's products until truly independent monitoring by EoF has confirmed that the company

- has committed to restore selected forests and rehabilitate peat soils it cleared or damaged in the past in HCV, HCS and protected areas in its concession,
- has stopped accepting tropical forest wood at all mills,
- has provided CSOs with all the data necessary for truly independent monitoring, and
- has demonstrated a proven track record of successful implementation of the above and its improved forest conservation policy for a period of time.

END

*For further information, please contact:
Eyes on the Forest Editor
Email: [editor\(at\)eyesontheforest.or.id](mailto:editor@eyesontheforest.or.id)*

Appendix 1. SMG/APP suppliers in Riau Province, Sumatra

| ID | Group | Relationship to SMG/APP | Company name | GIS area | | Natural forest remaining in mid 2012 | | Small natural forest blocks remaining in 2012 which might benefit from FCP. | |
|----|-------|-------------------------|---|----------|--------|--------------------------------------|--------|---|--|
| | | | | (ha) | (ha) | (%) | (ha) | (% total forest) | |
| 1 | A | "Own" | PT. Arara Abadi - Beringin | 9,542 | 0 | 0% | 0 | - | |
| 2 | A | "Own" | PT. Arara Abadi - Minas | 8,655 | 0 | 0% | 0 | - | |
| 3 | A | "Own" | PT. Arara Abadi - Minas | 3,552 | 0 | 0% | 0 | - | |
| 4 | A | "Own" | PT. Arara Abadi - Pelalawan | 848 | 7 | 1% | 0 | 0% | |
| 5 | A | "Own" | PT. Arara Abadi - Sedinginan | 7,192 | 47 | 1% | 0 | 0% | |
| 6 | A | "Own" | PT. Arara Abadi - Sedinginan | 3,623 | 94 | 3% | 0 | 0% | |
| 7 | A | "Own" | PT. Arara Abadi - Minas | 14,779 | 131 | 1% | 0 | 0% | |
| 8 | A | "Own" | PT. Arara Abadi - Pelalawan | 23,524 | 688 | 3% | 0 | 0% | |
| 9 | A | "Own" | PT. Arara Abadi - Pelalawan | 28,993 | 960 | 3% | 0 | 0% | |
| 10 | A | "Own" | PT. Arara Abadi - Duri | 57,818 | 1,659 | 3% | 0 | 0% | |
| 11 | A | "Own" | PT. Arara Abadi - Beringin | 15,857 | 1,785 | 11% | 3 | 0% | |
| 12 | A | "Own" | PT. Arara Abadi - Nilo | 26,439 | 2,510 | 9% | 0 | 0% | |
| 13 | A | "Own" | PT. Arara Abadi - Duri | 88,885 | 3,766 | 4% | 0 | 0% | |
| 14 | A | "Own" | PT. Arara Abadi - Pulau Muda | 28,218 | 6,654 | 24% | 230 | 3% | |
| 15 | A | "Own" | PT. Arara Abadi - Siak | 44,963 | 7,195 | 16% | 1,519 | 21% | |
| 16 | A | "Own" | PT. Riau Abadi Lestari | 6,259 | 0 | 0% | 0 | - | |
| 17 | A | "Own" | PT. Riau Abadi Lestari | 4,139 | 0 | 0% | 0 | - | |
| 18 | A | "Own" | PT. Riau Abadi Lestari | 5,434 | 0 | 0% | 0 | - | |
| 19 | A | "Own" | PT. Satria Perkasa Agung | 13,475 | 730 | 5% | 0 | 0% | |
| 20 | A | "Own" | PT. Satria Perkasa Agung - ex. HPHTI PT. Intipalma | 33,841 | 816 | 2% | 0 | 0% | |
| 21 | A | "Own" | PT. Satria Perkasa Agung - Serapung | 11,867 | 2,900 | 24% | 21 | 1% | |
| 22 | A | "Own" | PT. Satria Perkasa Agung & KTH. Sinar Merawang - Pulau Muda | 9,885 | 3,193 | 32% | 0 | 0% | |
| 23 | A | "Own" | PT. Satria Perkasa Agung - Pulau Muda | 40,581 | 14,229 | 35% | 54 | 0% | |
| 24 | A | "Own" | PT. Satria Perkasa Agung | 21,197 | 21,197 | 100% | 0 | 0% | |
| 25 | B | "Independent" | PT. Balai Kayang Mandiri | 6,031 | 235 | 4% | 0 | 0% | |
| 26 | B | "Independent" | PT. Balai Kayang Mandiri | 8,829 | 4,313 | 49% | 0 | 0% | |
| 27 | B | "Independent" | PT. Balai Kayang Mandiri | 6,352 | 6,352 | 100% | 311 | 5% | |
| 28 | B | "Independent" | PT. Bina Duta Laksana | 29,200 | 8,253 | 28% | 213 | 3% | |
| 29 | B | "Independent" | PT. Mutiara Sabuk Khatulistiwa | 44,314 | 25,694 | 58% | 327 | 1% | |
| 30 | B | "Independent" | PT. Riau Indo Agropalma | 9,704 | 2,842 | 29% | 1,104 | 39% | |
| 31 | B | "Independent" | PT. Ruas Utama Jaya | 16,161 | 743 | 5% | 0 | 0% | |
| 32 | B | "Independent" | PT. Ruas Utama Jaya | 28,612 | 5,835 | 20% | 697 | 12% | |
| 33 | B | "Independent" | PT. Suntara Gajapati | 34,790 | 8,970 | 26% | 1,502* | 17% | |
| 34 | C | "Independent" | PT. Bina Daya Bentala | 20,386 | 1,849 | 9% | 0 | 0% | |
| 35 | C | "Independent" | PT. Bukit Batu Hutani Alam | 33,057 | 6,200 | 19% | 0 | 0% | |

| | | | | | | | | |
|------------|---|---------------|--------------------------------------|---------|---------|------|-------|------|
| 36 | C | "Independent" | PT. Mitra Hutani Jaya | 9,672 | 2,283 | 24% | 396 | 17% |
| 37 | C | "Independent" | PT. Perawang Sukses Perkasa Industri | 6,848 | 531 | 8% | 0 | 0% |
| 38 | C | "Independent" | PT. Perawang Sukses Perkasa Industri | 7,520 | 0 | 0% | 0 | - |
| 39 | C | "Independent" | PT. Perawang Sukses Perkasa Industri | 23,084 | 40 | 0% | 0 | 0% |
| 40 | C | "Independent" | PT. Perawang Sukses Perkasa Industri | 24,540 | 2,924 | 12% | 296 | 10% |
| 41 | C | "Independent" | PT. Rimba Mandau Lestari | 5,604 | 261 | 5% | 0 | 0% |
| 42 | C | "Independent" | PT. Sakato Pratama Makmur | 21,895 | 4,414 | 20% | 0 | 0% |
| 43 | C | "Independent" | PT. Sakato Pratama Makmur | 22,888 | 10,071 | 44% | 0 | 0% |
| 44 | D | "Independent" | PT. Artelindo Wiratama | 10,232 | 2,076 | 20% | 0 | 0% |
| 45 | D | "Independent" | PT. Dexter Timber Perkasa Indonesia | 21,767 | 8,738 | 40% | 0 | 0% |
| 46 | D | "Independent" | PT. Inhil Hutani Pratama | 11,561 | 856 | 7% | 0 | 0% |
| 47 | D | "Independent" | PT. Putra Riau Perkasa | 16,594 | 16,594 | 100% | 0 | 0% |
| Total area | | | | 929,204 | 188,635 | 20% | 6,672 | 3.5% |

* This forest block no longer exists. PT Suntara Gajapati cleared it before the moratorium deadline of 1 February 2013.

References

- ¹ Asia Pulp & Paper (5 February 2013) Asia Pulp & Paper Group (APP) Commits to an Immediate Halt to All Natural Forest Clearance.
<http://www.rainforestrealities.com/newsroom/press-releases/app-commits-to-an-immediate-halt-to-all-natural-forest-clearance/>
- ² EoF (14 December 2011) The truth behind APP's greenwash.
<http://eyesontheforest.or.id/attach/EoF%20%2814Dec11%29%20The%20truth%20behind%20APPs%20greenwash%20HR.pdf>
- ³ Podium discussion at APP announcement of new forest policy, 5 February 2013, Jakarta.
- ⁴ Miettinen, J., Hooijer, A., Shi, C., Tollenaar, D., Vernimmen, R., Liew, S.C., Malins, C. & S.E. Page (2012) Extent of industrial plantations on Southeast Asian peatlands in 2010 with analysis of historical expansion and future projections. *GCB Bioenergy*, 4: 908–918. doi: 10.1111/j.1757-1707.2012.01172.x
- ⁵ Hooijer, A., S. Page, Jauhainen, J., W.A. Lee, X.X. Lu, A. Idris & G. Anshari (2012) Subsidence and carbon loss in drained tropical peatlands. *Biogeosciences*, 9, 1053-1071, doi:10.5194/bg-9-1053-2012, 2012.
<http://www.biogeosciences-discuss.net/8/9311/2011/bgd-8-9311-2011.pdf>
- ⁶ <http://www.eyesontheforest.or.id/index.php?page=content&cid=5>
- ⁷ Laumonier, Y., Uryu, Y., Stüwe, M., Budiman, A., Setiabudi, B. & O. Hadian (2010) Eco-floristic sectors and deforestation threats in Sumatra: identifying new conservation area network priorities for ecosystem-based land use planning. *Biodiversity Conservation* 19 (4): 1153-1174. <http://www.springerlink.com/content/c77376k574051178/fulltext.pdf>
- ⁸ Laumonier, Y. (1997) *The Vegetation and Physiography of Sumatra*. Kluwer Academic Publishers.
http://books.google.co.id/books/about/The_vegetation_and_physiography_of_Sumat.html?id=IOcIZ9hyCYC&redir_esc=y Laumonier, Y., Purnajaya, P. and S. Setiabudi (1987). *International Map of the Vegetation. "Northern Sumatra"*. 1:1.000.000. Institut de la Carte Internationale de la Végétation, Toulouse, France and SEAMEO-BIOTROP, Bogor, Indonesia. http://eusoils.jrc.ec.europa.eu/esdb_archive/eudasm/asia/images/maps/download/ID2014_3TO.jpg
Laumonier, Y., Purnajaya and Setiabudi (1986) *International Map of the Vegetation. "Central Sumatra"*. 1:1.000.000. Institut de la Carte Internationale de la Végétation, Toulouse, France and SEAMEO-BIOTROP, Bogor, Indonesia. http://eusoils.jrc.ec.europa.eu/esdb_archive/eudasm/asia/images/maps/download/ID2014_2TO.jpg
Laumonier, Y. (1983) *International Map of the Vegetation. "Southern Sumatra"*. 1:1.000.000. Institut de la Carte Internationale de la Végétation, Toulouse, France and SEAMEO-BIOTROP, Bogor, Indonesia. http://eusoils.jrc.ec.europa.eu/esdb_archive/eudasm/asia/images/maps/download/ID2014_1TO.jpg
Laumonier, Y. (1990) Search for phytogeographic provinces in Sumatra. In: Baas, P., Kalkman, K. & R. Geesink (Eds) *The plant diversity of Malaysia*. Kluwer Academic Publishers, Dordrecht, pp 193–211. Laumonier *et al.* (2010). *WWF Indonesia (2010) Sumatra's Forests, their Wildlife and the Climate. Windows in Time: 1985, 1990, 2000 and 2009*. http://awsassets.wwf.or.id/downloads/wwf_indonesia_2010_sumatran_forests_wildlife_climate_report_for_dkn_b_appenas.pdf Natural forest cover map since 2009 also generated with the same methodology.
- ⁹ Keputusan Menteri Kehutanan Nomor: 70/Kpts-II/95 Tentang Pengaturan Tata Ruang Hutan Tanaman Industri (http://www.dephut.go.id/files/70_95_ind.pdf) in conjunction with Keputusan Menteri Kehutanan Nomor: 246/Kpts-II/1996 Tentang Perubahan Keputusan Menteri Kehutanan Nomor 70/KPTS-II/1995 Tentang Pengaturan Tata Ruang Hutan Tanaman Industri (http://www.dephut.go.id/files/246_96.pdf), in conjunction with Peraturan Menteri Kehutanan Nomor: P.21/Menhut-II/2006 Tentang Perubahan Keputusan Menteri Kehutanan Nomor 246/Kpts-II/1996 Tentang Perubahan Keputusan Menteri Kehutanan Nomor 70/KptsII/1995 Tentang Pengaturan Tata Ruang Hutan Tanaman Industri (<http://www.dephut.go.id/index.php?q=id/node/1948>)
- ¹⁰ Blouch, R.A. & Haryanto. (1984) *Elephants in Southern Sumatra IUCN/WWF Report No: 3., Project 3033*. Bogor. Mapped in Santiapillai, C. & Jackson, P. 1990. *The Asian Elephant: An Action Plan for its Conservation*. IUCN, Gland, Switzerland. Blouch, R. A. & Simbolon, K. (1985) *Elephants in Northern Sumatra*. IUCN/WWF Report No: 9., Project 3033. Bogor. Mapped in Santiapillai & Ramono (1990)
- ¹¹ Wikramanayake, E.D., Dinerstein, E., Robinson, J.G., Karanth, U., Rabinowitz, A., Olson, D., Mathew, T., Hedao, P., Conner, M., Hemley, G. and D. Bolze (1998) *An Ecology-Based Method for Defining Priorities for Large Mammal Conservation: The Tiger as Case Study*. <https://secure.worldwildlife.org/science/pubs/AnEcologyBasedMethod.pdf>
- ¹² The IUCN Red List of Threatened Species. <http://www.iucnredlist.org/>
- ¹³ The Consortium for Revision of the HCV Toolkit for Indonesia (2009) *Guidelines for the Identification of High Conservation Values in Indonesia (HCV Toolkit – Indonesia)*
http://www.hcvnetwork.org/resources/national-hcv-interpretations/Toolkit%20HCVF%20English%20version_final-26Jan10.pdf
- ¹⁴ Laumonier, Y. (1997)

- ¹⁵ Wahyunto, S. Ritung dan H. Subagjo (2003). Peta Luas Sebaran Lahan Gambut dan Kandungan Karbon di Pulau Sumatera / Maps of Area of Peatland Distribution and Carbon Content in Sumatera, 1990 – 2002. Wetlands International - Indonesia Programme & Wildlife Habitat Canada (WHC).
<http://www.wetlands.or.id/PDF/buku/Atlas%20Sebaran%20Gambut%20Sumatera.pdf>
- ¹⁶ Presidential Decree Number 32/1990 on Management of Protected Area, in conjunction with Act of the Republic of Indonesia No. 5 of 1990 Concerning Conservation of Living Resources and Their Ecosystems (<http://faolex.fao.org/docs/pdf/ins3867.pdf>), in conjunction with Law (UNDANG-UNDANG REPUBLIK INDONESIA) Nomor 26 Tahun 2007 on Spatial Planning (http://landspatial.bappenas.go.id/peraturan/the_file/UU_No26_2007.pdf), in conjunction with Government Regulation (PERATURAN PEMERINTAH REPUBLIK INDONESIA) Nomor 26 Tahun 2008 on National Spatial Planning (http://www.bkprn.org/v2/peraturan/file/PP_26_Tahun_2008.pdf)
- ¹⁷ Wetlands International (2011) Peatlands in Indonesia's National REDD+ Strategy.
<http://www.wetlands.org/LinkClick.aspx?fileticket=9Nesl6BCI1U%3D&tabid=56> See discussion on Presidential Decree 32/1990 in page 26.
- ¹⁸ Surat Keputusan Menteri Kehutanan Nomor: 173/Kpts-II/1986 tanggal 06 Juni 1986 tentang Penunjukan Areal Hutan di Wilayah Provinsi Dati I Riau Sebagai Kawasan Hutan (Tata Guna Hutan Kesepakatan/TGHK). Map of TGHK (Forest Land Use Agreement) published by the Ministry of Forestry can be downloaded at:
<http://www.dephut.go.id/halaman/Peta%20Tematik/Tghk/TGRIAU.GIF>
- ¹⁹ Undang-Undang Republic Indonesia Nomor 41 Tahun 1999 tentang Kehutanan Dengan Rahmat Tuhan Yang Maha Esa. http://www.dephut.go.id/INFORMASI/UNDANG2/uu/41_99.htm Putusan Nomor 45/PUU-IX/2011 Demi Keadilan Berdasarkan Kehutanan Yang Maha Esa Mahkamah Konstitusi Republic Indonesia. <http://www.mahkamahkonstitusi.go.id/index.php?page=download.Putusan&id=1015>
- ²⁰ Rainforest Alliance SmartWood Program (2004) High Conservation Value Forest (HCVF) Assessment Report for: Asia Pulp & Paper/Sinar Mas Group (Pulau Muda District)
<http://eyesontheforest.or.id/attach/SmartWoodHCVFAssReport.PMuda.Final1Oct04.pdf>
- ²¹ Rainforest Alliance SmartWood Program (2005) High Conservation Value Forest (HCVF) Assessment Report for; Serapung Unit PT Arara Abadi, Asia Pulp & Paper/Sinar Mas Group. <http://eyesontheforest.or.id/attach/HCVFserapung.pdf>
- ²² Rainforest Alliance SmartWood Program (2005) High Conservation Value Forest (HCVF) Assessment Report for; Siak District PT Arara Abadi, Asia Pulp & Paper/Sinar Mas Group. <http://eyesontheforest.or.id/attach/HCVFserapung.pdf>
<http://eyesontheforest.or.id/attach/Siak.Full.pdf>
- ²³ Eyes on the Forest (2012) APP; default on environmental covenant.
<http://eyesontheforest.or.id/attach/EoF%20%28Mar12%29%20APP%20default%20on%20environmental%20covenant%20report%20FINALS.pdf>
- ²⁴ Asia Pulp & Paper: Industry preserves globally recognized conservation site.
<http://www.rainforestrealities.com/articles/industry-preserves-globally-recognized-conservation-site/> (information as of 9 March 2013)
- ²⁵ PT. Suntara Gajapati letter, 22 June 2006 and associated documents.
http://www.eyesontheforest.or.id/attach/APPSMG_Sancuarymap_Jun2006_20111216081202.rar
- ²⁶ EoF (14 December 2011)
- ²⁷ WWF (14 December 2011) Massive APP greenwash campaign is mostly hogwash, finds new report.
http://wwf.panda.org/what_we_do/how_we_work/conservation/forests/forests2/asian_pulp_and_paper/?202809/Massive-APP-greenwash-campaign-is-mostly-hogwash-finds-new-report
- ²⁸ WWF (16 December 2011) Document pulps APP's tiger sanctuary claims.
http://wwf.panda.org/wwf_news/?202873/Documents-pulp-APPs-tiger-sanctuary-claims
- ²⁹ Greenomics (December 2011) EoF Report: Fact or Fiction?
http://www.greenomics.org/docs/Report_201112_EoF_Report.pdf
- ³⁰ Asia Pulp & Paper (3 October 2010) Carbon Conservation and APP Introduce the World's First Pulpwood Plantation to Carbon Reserve REDD-Plus Initiative.
<http://www.businesswire.com/news/home/20101003005120/en/Carbon-Conservation-APPIntroduce-Worl>
- ³¹ Greenomics (23 November 2010) Pulling the wool over the public's eyes: APP deceives public over "Kampar Carbon Reserve" project. http://www.greenomics.org/docs/Report_201011_APPdeceivespublicovercarbonproject.pdf
- ³² EoF (14 December 2011)
- ³³ APP says: "First are APP-owned pulpwood plantation concessions. These are pulpwood supplier companies in which APP has equity stakes. There are six APP-owned pulpwood plantation companies that hold pulpwood plantation concession licenses in Indonesia. These concessions are located in Sumatra and Kalimantan, covering over one million hectares gross

in total. Second is APP independent wood suppliers. These are independent companies that hold pulpwood plantation concession licenses in Indonesia. APP has no ownership share in these companies. The companies have long-term contractual agreements to supply APP mills with pulpwood. Currently there are approximately 30 independent companies supplying pulpwood to APP mills." in Asia Pulp & Paper (23 May 2012a) High Conservation Values cover more than 'Natural Forest'. <https://www.rainforestrealities.com/2012/05/23/high-conservation-values-cover-more-than-%E2%80%98natural-forest%E2%80%99/>.

³⁴ Sinarmas Forestry website, "History" - http://us.sinarmasforestry.com/about_history.asp?menu=1

³⁵ "Mapped area" is the concession area published by the Indonesian Ministry of Forestry's official GIS concession information used for this analysis. It is not necessarily the same as the area specified in concession license documents.

³⁶ Greenomics (2012) Why the Indonesian Ministry of Forestry Recommends that Asia Pulp & Paper revise its "APP Sustainability Roadmap 2020 and beyond". http://www.greenomics.org/docs/Report_201210_Greenomics_MOF_Recommendation_to_APP.pdf

³⁷ Eyes on the Forest (26 July 2012) SMG/APP: The Pulping Continues. Sustainability roadmap without teeth does not end mills' pulping of Indonesia's rainforests. <http://eyesontheforest.or.id/attach/EoF%20%2826Jul12%29%20SMG%20APP%20The%20Pulping%20Continues%20FINAL.pdf>

³⁸ SMG/APP Forest Conservation Policy consultation meeting with NGOs in Jakarta, Riau and other provinces during February and March 2013.

³⁹ SMG/APP Forest Conservation Policy consultation meeting with NGOs in Jakarta, Riau and other provinces during February and March 2013.

⁴⁰ KKI Warsi *et al.* (2008) APP threatens Bukit Tigapuluh Landscape. <http://eyesontheforest.or.id/attach/KKIWARSI%20FZS%20ZSL%20YPKHS%20WWF%20Indonesia%20%288Jan2008%29%20APP%20Threatens%20Bukit%20Tigapuluh%20Landscape.pdf>

⁴¹ KKI Warsi *et al.* (2010) Last chance to save Bukit Tigapuluh. <http://eyesontheforest.or.id/attach/Warsi%20FZS%20EoF%20WWF%20%2814Dec2010%29%20Last%20chance%20to%20save%20Bukit%20Tigapuluh.pdf>

⁴² Facebook page of PT. Dexter Timber Perkasa Indonesia, Sinar Mas Group. <http://www.hs.facebook.com/pages/PTDEXTER-TIMBER-PERKASA-INDONESIA-Sinar-Mas-Group/115670725145119>

⁴³ Asia Pulp & Paper (3 October 2010)

⁴⁴ [EoF \(11 Feb 2009\) Police urged to resume logging cases.](http://www.eyesontheforest.or.id/?page=news&action=view&id=213)
<http://www.eyesontheforest.or.id/?page=news&action=view&id=213>

⁴⁵ Eyes on the Forest (14 December 2011)

⁴⁶ WWF Indonesia (16 June 2004) Monitoring of Illegal Logging Operations in Riau, Sumatra: Deliveries of Illegally Cut Wood from Proposed Tesso Nilo National Park to APP's Indah Kiat Pulp and Paper Mill in August 2003 and April 2004. http://www.savesumatra.org/app/webroot/upload/report/WWF_%2816Jun04%29_Deliveries_of_illegally_cut_wood_from_proposed_TNNP_to_APP.pdf

⁴⁷ WWF Indonesia (8 June 2004) Legality of Timber Consumed by Asia Pulp and Paper's Mills in Indonesia, January - October 2003. http://www.illegal-logging.info/uploads/Legality_of_Timber_WWF_Indonesia.pdf

⁴⁸ Barr, C. (2000) Profits on Paper: The Political-Economy of Fiber, Finance, and Debt in Indonesia's Pulp and Paper Industries. http://siteresources.worldbank.org/INTINDONESIA/FLEG/20171586/Chriss_Bar.pdf

⁴⁹ WWF-Indonesia (2008) Deforestation, Forest Degradation, Biodiversity Loss and CO2 Emissions in Riau, Sumatra, Indonesia. One Indonesian Province's Forest and Peat Soil Carbon Loss over a Quarter Century and its Plans for the Future. http://assets.panda.org/downloads/riau_co2_report_wwf_id_27feb08_en_lr_.pdf

⁵⁰ Eyes on the Forest (10 January 2013) SMG/APP deforestation and deadly human tiger conflict. http://eyesontheforest.or.id/attach/EoF%20%2810Jan13%29%20SMG%20APP%20deforestation%20and%20deadly%20human%20tiger%20conflict_FINAL.pdf

⁵¹ Keputusan Menteri Kehutanan Nomor: 70/Kpts-II/95 Tentang Pengaturan Tata Ruang Hutan Tanaman Industri (http://www.dephut.go.id/files/70_95_ind.pdf) in conjunction with Keputusan Menteri Kehutanan Nomor: 246/Kpts-II/1996 Tentang Perubahan Keputusan Menteri Kehutanan Nomor 70/KPTS-II/1995 Tentang Pengaturan Tata Ruang Hutan Tanaman Industri (http://www.dephut.go.id/files/246_96.pdf), in conjunction with Peraturan Menteri Kehutanan Nomor: P.21/Menhut-II/2006 Tentang Perubahan Keputusan Menteri Kehutanan Nomor 246/Kpts-II/1996 Tentang Perubahan Keputusan Menteri Kehutanan Nomor 70/KptsII/1995 Tentang Pengaturan Tata Ruang Hutan Tanaman Industri (<http://www.dephut.go.id/index.php?q=id/node/1948>).

- ⁵² Barr, C. (2000) Profits on Paper: The Political Economy of Fiber, Finance, and Debt in Indonesia's Pulp and Paper Industries. CIFOR. http://siteresources.worldbank.org/INTINDONESIA/FLEG/20171586/Chriss_Bar.pdf
- ⁵³ Asia Pulp & Paper (2004) APP Sustainability Action Plan.
- ⁵⁴ Asia Pulp & Paper (May 2007) APP 2005/06 Environment Report. [http://www.asiapulppaper.com/portal/APP_Portal.nsf/Web-MenuPage/1B2BBDE7FB9B64C4725739B00232E6A/\\$FILE/SR1.PDF](http://www.asiapulppaper.com/portal/APP_Portal.nsf/Web-MenuPage/1B2BBDE7FB9B64C4725739B00232E6A/$FILE/SR1.PDF)
- ⁵⁵ The Jakarta Globe (16 May 2011a) Special Report: How a \$115b Illegal Logging Probe Was Felled. <http://www.thejakartaglobe.com/nvironment/special-report-how-a-115b-illegal-logging-probe-was-felled/441679>
- ⁵⁶ The Jakarta Globe (16 May 2011b) A Timeline of the Riau Investigation. www.thejakartaglobe.com/nvironment/a-timeline-of-the-riau-investigation/441823
- ⁵⁷ Greenomics (18 March 2013) APP's artful deception. After pulping its remaining forests, APP positions itself as a conservation leader with new policy. http://www.greenomics.org/docs/APP%27s_artful_deception_with_new_policy_201303.pdf
- ⁵⁸ See also Greenomics (18 March 2013)
- ⁵⁹ Asia Pulp & Paper (5 February 2013).
- ⁶⁰ SMG/APP Forest Conservation Policy consultation meeting with NGOs in Jakarta, Riau and other provinces during February and March 2013.
- ⁶¹ Asia Pulp & Paper (5 February 2013).
- ⁶² Kalimantan Forest Monitoring NGOs (26 March 2013) Kalimantan Forest Monitoring NGOs: APP suppliers' continued natural forest clearance and peat canal development shed doubt on APP's forest conservation commitment. http://www.eyesontheforest.or.id/attach/Joint%20Press%20Release_APP%20FCP%20Violation%20in%20West%20Kalimantan_260313_English_20130326090349.pdf