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PUBLIC RESPONSE

The recommendations provided by the Stakeholder Advisory Committee (SAC) actually encourage the clearance of natural forest in existing conservation zones located on the concessions of APRIL and its long-term supply partners

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Background

On 28 January 2014, APRIL launched its sustainability policy called "Sustainable Forest Management Policy" (SFMP), which contains one of the following statements: **"APRIL and its long-term supply partners protect and manage more than 250,000 hectares of conservation zones identified through High Conservation Value Forest (HCVF) assessment."**

These HCV areas (conservation zones) are located in protection areas and local-species enrichment blocks based on the Business Work Plans (*Rencana Kerja Usaha/RKU*) of each plantation company – both plantation companies owned by APRIL and those owned by its long-term supply partners – that were legally approved by the Ministry of Forestry (now the Ministry of Environment and Forestry).

Through its SFMP, it may be said that APRIL has reiterated that it protects and manages more than 250,000 hectares of HCV areas inside the concessions of APRIL and its long-term supply partners as a key part of the implementation of the SFMP.

To ensure transparency and the effective implementation of the SFMP, APRIL established a Stakeholder Advisory Committee (SAC).

During the second SAC meeting, which took place on 12-14 August 2014 at the APRIL complex in Pangkalan Kerinci, Riau, one of the SAC recommendations was that **"APRIL should consider developing a long-term plan for a broader landscape perspective to identify and protect conservation zones. HCV assessments by themselves do not provide the bigger picture, size, shape, connectivity, and representativeness are all important influences on biodiversity outcomes. This landscape approach should be used to achieve APRIL's 1-to-1 conservation areas target."**

The third SAC meeting was held on 8-10 December 2014, also at the APRIL complex. During this meeting, it needs to be underlined that one of the SAC's recommendations was that **"in working towards APRIL's 1-to-1 commitment, the SAC recommends developing a long-term overall spatial plan for the retention or restoration of natural forest in the entire area of APRIL's operations. The objective should be to retain landscape-scale conservation areas that are sufficiently large, effectively managed, representative and connected. This will enable greater progress to be made in ensuring the conservation of native biodiversity than the piecemeal HCV approach at present being used."**

The question that arises is whether there is anything amiss with these recommendations of the SAC?

Based on the text of the recommendations, there would appear to be nothing wrong with them. However, if we look more closely, it will be seen that they encourage the revision of the business work plans (RKU) of APRIL and its long-term partners. As a result, conservation zones (HCV areas) extending to more than 250,000 hectares which do not satisfy the criteria of "sufficiently large, effectively managed, representative and connected" will be converted into pulpwood plantation development areas.

The future impact of the SAC's recommendations will be the clearance of HCV areas that had previously been legally approved by the Ministry of Forestry. Thus, conservation zones which do not fulfill the characteristics recommended by the SAC will be cleared for the development of pulpwood plantations, and the timber resulting from such clearance will be used as natural forest fiber for APRIL's mills.

These concerns are key factors that have encouraged Greenomics Indonesia to write this public response to the SAC recommendations. The SAC needs to realize that its recommendations will actually lead to the destruction of conservation zones covering the quite significant area.

Starts with revision of RKU of APRIL and Its long-term suppliers

The decision to prepare this public response to the SAC recommendations is based on good reasons. Greenomics Indonesia has become aware of the fact that APRIL proposed the revision of parts of some conservation zones – which in the SFMP are declared to be protected and managed – during a presentation at the Ministry of Environment and Forestry.

Following a request for clarification from Greenomics Indonesia, authorized officials at the Ministry said that the request had been rejected.

The question now is whether the SAC agreed that its recommendations should be implemented by revising the business work plans of APRIL and its long-term suppliers so as to convert conservation zones that do not meet the SAC criteria into pulpwood development zones? This question needs to be publicly responded to by the SAC.

If the SAC does not agree with APRIL changing its existing conservation zones into pulpwood plantation development zones, it will need to issue new recommendations and describe in detail the full purport of the recommendations, bearing in mind that its recommendations have tended to be too general and open to interpretation.

In the event that the SAC does not respond to this public response, it may be safely assumed that the SAC is aware that its recommendations will lead to the revision of the business work plans of APRIL and its long-term supply partners. This needs to be focused on by observers of APRIL's SFMP implementation.

The SAC needs to stress that although the proposal to revise conservation zones has been rejected by authorized officials at the Ministry, there is no guarantee that the revision process will be halted by APRIL, especially if the SAC does not react to this public response.

What about conservation zones that have been encroached upon and occupied by other land users?

As regards conservation zones that have been encroached upon or occupied by other land users, Greenomics Indonesia previously recommend that APRIL conduct a comprehensive legal assessment, especially as regards the legal chronology of encroachment/occupation events in conservation zones. The findings of such a comprehensive legal assessment should then be reported to the Ministry of Forestry. Evidence of land-cover changes in time-series format and the latest evidence from the field should be important parts of the legal assessment.

This process needs to be carried out by APRIL and its long-term supply partners within the framework of determining how to protect and manage conservation zones that are affected by encroachment and occupation.

Of course, specific regulations from the Ministry of Environment and Forestry are needed to address the problems on the ground – problems that are not only faced by APRIL and its long-term supply partners, but also by other pulpwood development concessions. Law-based and community forestry partnership strategies need to be strengthened by the Ministry so as to protect conservation zones located in pulpwood development concessions from various claims and encroachment.

A comprehensive legal assessment of conservation zones would provide input for the management of conservation zones that are subject to conflict and for the formulation of the best strategies for the protection of conservation zones in the future.

Thus, it needs to be emphasized again that the revision of the business work plans of APRIL and its long-term supply partners is not based on meeting of criteria for a landscape-scale conservation zone approach, as recommended by the SAC.

If at any time APRIL does manage to obtain the approval of the Ministry of Environment and Forestry to convert some of the conservation zones into pulpwood development zones, it will still be unable to clear natural forest in such (former) conservation zones bearing in mind that based on APRIL's SFMP, per 1 January 2015, plantation development will no longer involve the clearance of natural forest in the concessions of APRIL and its long-term supply partners. This is stated as a written commitment in the SFMP.

What needs to be confirmed by the SAC?

- The SAC must be aware that its recommendations for landscape-scale conservation actually encourage the revision of the business work plans of APRIL and its long-term supply partners so as to lead to the conversion of conservation zones that do not meet the criteria recommended by the SAC into areas that can be cleared and serve as sources of natural forest fiber for APRIL's mills.
- The SAC must ensure that APRIL continues to protect and manage the more than 250,000 hectares of conservation zones that are located within its existing concessions and those of its long-term supply partners. The SAC's recommendations must strengthen the efforts to protect and manage these conservation zones.
- Counting from 1 January 2015, the SAC must ensure that APRIL no longer conducts natural forest clearance on its concessions and those of its long-term supply partners for the purpose of pulpwood plantation development, as promised in APRIL's SFMP. This should be the case, no matter what the reason given, even for the development of a landscape-scale conservation approach – something that would lead to the piecemeal clearance of conservation zones. This is because the SFMP admits of no exceptions.
- The SAC should ensure the availability of spatial monitoring system to monitor the development of the land-cover situation in the more than 250,000 hectares of conservation zones that APRIL has promised to protect and manage through its SFMP.
