

# POLICY PAPER



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## Pulp and Paper Giants Show Abject Lack of Concern for Sumatran Tiger, Despite Aggressive PR Claims

### Introduction

It is not difficult to assess the level of concern of the Indonesian pulp and paper industry – in this particular case Asia Pulp and Paper (APP) and Asia Pacific Resources International Ltd. (APRIL) – in protecting the Sumatran tiger (*Panthera tigris Sumatraensis*). In fact, the precise level of concern exhibited by the industry, which is dependent on natural forest as its source of raw materials, is clear to be seen from the micro delineation documents and work plans of their pulpwood supplier plantations in Riau and Jambi Provinces, Sumatra, Indonesia.

The assessment of APP and APRIL's concern for the protection of the Sumatran tiger needs to be carried out at the level of each pulpwood plantation concession that supplies timber to the two companies. This is essential in order to evaluate the aggregate level of concern of APP and APRIL for the protection of the Sumatran tiger.

We frequently read and hear of claims from the pulp and paper industry, particularly APP, to the effect that their operations reflect a high level of concern for the protection of the Sumatran tiger. Many of these claims, however, are based on public relations arguments designed purely to mislead the public.

It is for this reason that Greenomics Indonesia has taken the initiative of assessing the level of concern that is really exhibited by APP and APRIL for the protection of the Sumatran tiger. This initiative is intended to serve as a response to the aggressive and groundless PR arguments of the two companies, which claim that their operations exhibit a high level of concern for the protection of the Sumatran tiger.

## Methodology

In assessing the level of concern of APP and APRIL, Greenomics Indonesia employed two indicators. First, the extent to which their micro-delineation documents and work plans – which constitute the operational manuals for the development of APP and APRIL’s pulpwood plantation suppliers at the individual concession level, have regard to the corridors used by the Sumatran tiger when conducting forest clearance as part of the land preparation process for the development of the said pulpwood plantations.

Second, the area of natural forest allocated for the protection of the Sumatran tiger based on the micro-delineation documents at the level of each of APP and APRIL’s pulpwood plantation suppliers. In order to corroborate the data, the operational work plans of each concession were also employed as primary references.

As part of this endeavor, case studies were conducted on 31 pulpwood plantation suppliers of APP and APRIL that operate in Riau and Jambi provinces, whose concessions cover a total area of 1.52 million hectares. The level of concern for the protection of the Sumatran tiger on the part of APP and APRIL’s pulpwood plantation suppliers was assessed based on a level-of-concern index ranging from 0% up to 100%.

## Findings

The level of concern of APP and APRIL for the protection of the Sumatran tiger is easily measured through the use of the following two indicators:

### *1) Level of concern based on planning for the protection of the Sumatran tiger*

Of 31 micro-delineation documents and/or work plans prepared by pulpwood plantation suppliers of APP and APRIL. 19 of them recognized that Sumatran tigers were found within their concessions, with the total aggregate area involved covering almost 940,000 hectares. In other words, the concessions of the pulpwood plantation suppliers of APP and APRIL form an important part of the habitat of the Sumatran tiger.

In determining the effect area for the development of a pulpwood plantation involving the clearing of natural forest, the concessionaire is required by the Ministry of Forestry to have regard to Wildlife Protection Zones (DPSL) in preparing its micro-delineation document, which sets out the guidelines for the development of the pulpwood plantation.

The concern of the pulpwood plantation suppliers of APP and APRIL for the protection of the Sumatran tiger will accordingly be clear from the extent to which their planning documents have regard to the Wildlife Protection Zones, bearing in mind that the determination of the effective area of a pulpwood plantation is very closely link to the clearance of the natural forest that provides the habitat of the Sumatran tiger.

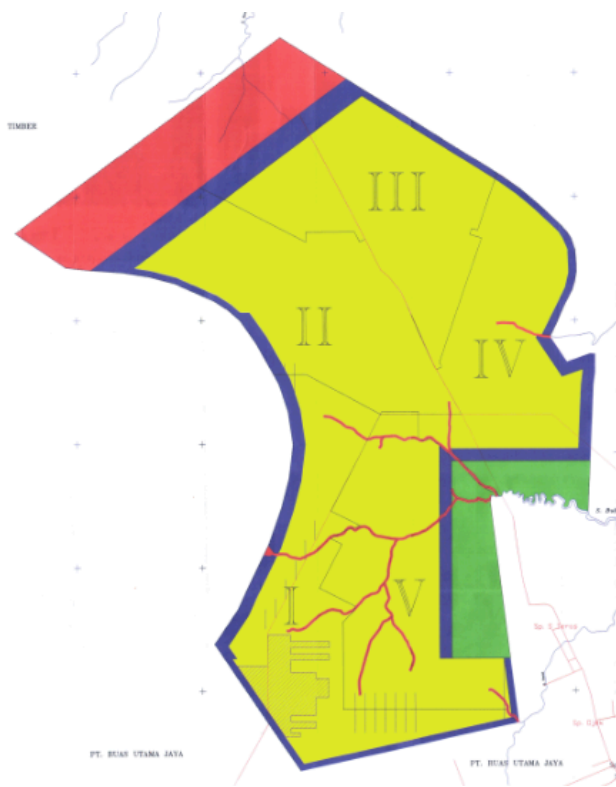
### **Box 1: Illegal deforestation of Sumatran tiger’s habitat**

An audit report by the State Audit Board (BPK-RI) in 2009 needs to be used as a reference in viewing the issue of illegal deforestation as part of the development of pulpwood plantations. The BPK found that 19 pulpwood plantation licenses had been issued in violation of the regulations between 8 June 2002 and 4 February 2008. The said licenses involved an average potential natural timber yield of between 43.12 m<sup>3</sup> and 187.64 m<sup>3</sup> per hectare in the areas earmarked for land clearing. The BPK also stated that the Head of the Riau Provincial Forestry Agency had approved Annual Work Plans (RKT) in respect of the 19 pulpwood plantation licenses covering a total of 257,497 hectares. Given this situation, the BPK stated that as the licenses for the pulpwood plantations were invalid, so also were the work plans. In other words, the land clearing work conducted on 257,497 hectares that made up the 19 pulpwood plantations – which were pulpwood plantation suppliers of APP and APRIL – was carried out illegally. In reality, this vast tract of 257,497 hectares of land also constituted the habitat of the Sumatran tiger. The BPK audit report clearly concluded that the above situation had significantly contributed to the rate of deforestation in Indonesia, which increased the risk of damage to forest ecosystems and the release of additional carbon. It is no exaggeration to say that APP and APRIL were intimately involved in this illegal deforestation of Sumatran tiger habitat.

Of the 31 micro-delineation documents and work plans prepared by the pulpwood plantation suppliers of APP and APRIL, not one of the documents prepared by the suppliers of the two pulp and paper giants afforded specific attention to in-depth planning for the protection of wildlife in general. The situation among the 19 pulpwood plantation companies that acknowledge they are operating in areas that are home to the Sumatran tiger was no different as regards efforts to protect the Sumatran tiger at the pulpwood plantation planning and development stages.

The concern exhibited by the pulpwood plantation suppliers of APP and APRIL for the protection of wildlife at the planning stage, and for the protection of the Sumatran tiger in particular, appears to be the minimum required. Why do we say the “minimum required”? Because they have to comply with the Ministry of Forestry regulations required them to have regard to “Wildlife Protection Zones” within their pulpwood plantation concessions.

Based on 19 micro-delineation documents and work plans of the pulpwood plantation companies that acknowledge they are operating in areas that are home to the Sumatran tiger, we may conclude that the aggregate level of concern of the pulpwood plantation suppliers of APP and APRIL – if viewed based on their level of concern for the protection of the Sumatran tiger in the planning of their pulpwood plantations – may be said to be 0%.



**Box 2: APP unwilling to give up concession land for protection of the Sumatran tiger’s habitat in the Senepis Forest Block in Riau**

In order to explain the low level of concern on the part of APP, one example can be seen from the efforts to protect the Sumatran tiger in the Senepis forest block. PT Suntura Gaja Pati’s Work Plan Map (see map) shows that the pulpwood plantation supplier of APP that operates the Senepis block is only willing to “lose” 3,850 hectares, or less than 4% of the total Sumatran tiger conservation area within the block, which extends to 106,000 hectares. With such a low level of “sacrifice,” it is clearly inappropriate for APP to use its PR machine to consistently trumpet its efforts to conserve the habitat of the Sumatran tiger in the Senepis block. The red area on the PT Suntura Gaja Pati Work Plan Map shows that the area allocated to the conservation of the Sumatran tiger only amounts to 3,850 hectares, while the green-yellow area reveals that the area of natural forest that will be cleared up to 2017 for the development of pulpwood plantation suppliers amounts to 23,750 hectares – land that is still the habitat of the Sumatran tiger. The timber produced by the clearing of the natural forest will be used as raw materials by APP.

**Box 3: APRIL’s pulpwood plantations not interested in wildlife protection**

The micro-delineation document of PT Riau Andalan Pulp and Paper (PT RAPP), which operates in four districts of Riau Province and whose pulpwood plantation concessions extend to 350,165 hectares, show that the company, which is a pulpwood plantation supplier of APRIL, devotes no attention whatsoever to planning for the protection of wildlife, including the Sumatran tiger. In fact, the land allocated to the protection of wildlife is combined with river basins and protection forest buffer zones and/or conservation forest areas. The river basin zones are allocated to serve the interests of soil and water conservation, particularly the protection of water bodies. PT RAPP has allocated 6,359 hectares of its concessions for these purposes. Meanwhile, some 7,455 hectares have been allocated to serve as protection forest buffer zones and/or conservation forest zones. Besides these two types of protected zones, PT RAPP has also set aside zones for the protection of genetic resources. In its micro-delineation document, PT RAPP states that the river basin zones and protection forest buffer zones and/or conservation forest zones can also function as genetic-resource protection areas. It further states that the genetic-resource protection areas also function as Wildlife Protection Zones. This clearly shows that APRIL’s pulpwood plantations are not interested in protecting wildlife. The said PT RAPP micro-delineation document are primarily only concerned with the natural forest that are available for clearance in the interests of its pulp and paper factories.

**2) Level of concern based on allocation of pulpwood plantation concession land for the protection of the Sumatran tiger**

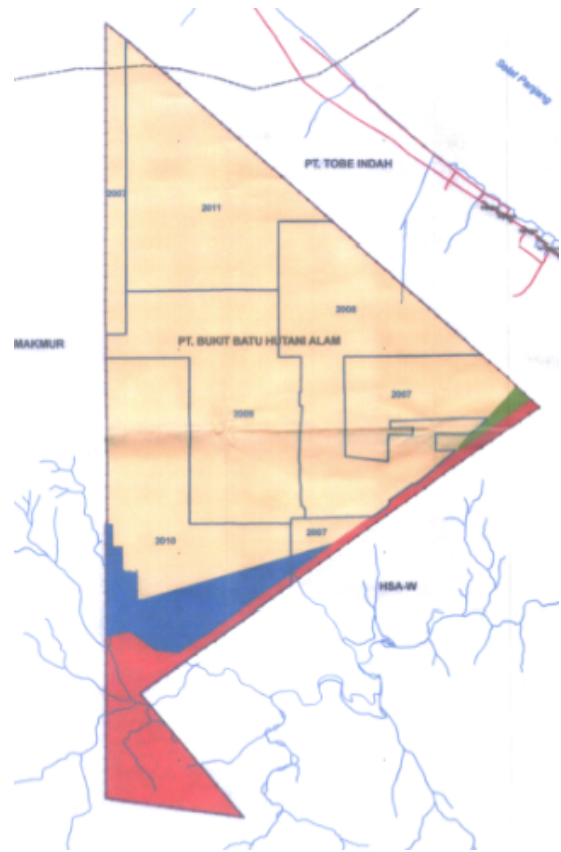
Of the 31 pulpwood plantation suppliers of APP and APRIL that were the subject of our case studies – covering an area of 1.52 million hectares in Riau and Jambi provinces – we found that the pulpwood plantation suppliers of APP and APRIL only set aside 50,709 hectares as Wildlife Protection Zones, including for the protection of the Sumatran tiger. This means that the pulpwood plantation suppliers of APP and APRIL only allocate 3.63% of their total concessions of 1.52 million hectares for such purposes.

If we focus on the area of the concessions of APP and APRIL’s pulpwood plantation suppliers that are specifically set aside for protecting the habitat of the Sumatran tiger, this amounts to only 3,850 hectares. Given this paltry figure, we may conclude that the aggregate concern index of APP and APRIL as regards the protection of the Sumatran tiger amounts to 0.25%.

In reality, given that the concessions of the pulpwood plantation suppliers of APP and APRIL form an important part of the Sumatran tiger’s habitat, and given the claims of concern by APP and APRIL, we might expect their pulpwood plantation suppliers to have set aside a sufficiently large area in each concession to ensure the proper protection of the Sumatran tiger’s habitat.

#### Box 4: APP purports to be “hero” in fight to save Sumatran tiger

The statements made by APP in connection with the proposed relocation of Sumatran tigers to Giam Siak Kecil-Bukit Batu Biosphere Reserve – such as that made in an open letter to WWF on 9 May 2011 – would at first sight make one think that APP was a “hero” in the fight to save the Sumatran tiger. In fact, the said Biosphere Reserve is nothing more than a landscape in the midst of massive forest clearance by APP’s pulpwood plantation suppliers. The operational map of PT Bukit Batu Hutani Alam provides an instructive example. The area in yellow shows natural forest that is being cleared by APP’s pulpwood plantation supplier. The said area extends to 27,320 hectares. Meanwhile, the area in red is the area that is allocated to the Giam Siak Kecil, Bukit Batu Biosphere Reserve, which only extends to an area of 3,466 (the blue and green areas are those allocated to plants other than acacia). If APP is truly concerned with the habitat corridors of the Sumatran tiger in developing its pulpwood plantations – which normally starts with the clearing of natural forest – it would of course not need to bother itself with the relocation of Sumatran tigers. APP appears to want to take the credit by trumpeting its proposed relocation of Sumatran tigers to the Giam Siak Kecil-Bukit Batu Biosphere Reserve, which it claims is a “critically important APP-supported large-landscape conservation area.” If APP was truthful, it should come clean by also admitting that its pulpwood plantation suppliers engage in “critically important APP-supported large-scale natural forest clearing of Sumatran tiger habitat.”



## Conclusions

The level of concern of APP and APRIL for the protection of the Sumatran tiger must be viewed at the level of each of its pulpwood plantation suppliers. This is necessary so as to counter the aggressive PR of the two companies that focuses on their efforts to protect the Sumatran tiger in small areas that bear no relationship to the total amount of land occupied by their pulpwood plantation suppliers, where natural forest clearance continues unabated on a massive scale, including in the Sumatran tiger’s habitat.

The lower level of concern demonstrated by APP and APRIL for the protection of the Sumatran tiger cannot be covered up by the two companies’ aggressive PR efforts. In reality, such PR is nothing more than an effort to conceal the massive clearance of natural forest taking place in the habitat of the Sumatran tiger at the level of the individual pulpwood plantation suppliers of APP and APRIL.

The micro-delineation documents for the development of APP and APRIL’s pulpwood plantations clearly do not provide manuals for sustainable operations as the proposed micro delineations submitted by them to the Ministry of Forestry are almost never verified, whether substantively or in the field, by Ministry of Forestry officials. Thus, these micro-delineation documents for the development of pulpwood plantations can often be misleading when they are employed as PR tools that purport to legitimize the massive clearance of natural forest that the two companies are involved in. A number of BPK audit reports on the operations of APP and APRIL’s pulpwood plantation suppliers can be used as primary references in countering the aggressive and misleading PR efforts of the two companies.

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