



EoF Report:

FACT or FICTION?

20 December 2011

Background

In response to the **Eyes on the Forest** (EoF/Walhi-Riau, Jikalahari and WWF-Indonesia) report titled **“The Truth Behind APP’s Greenwash,”** Asia Pulp and Paper (APP/Sinar Mas Group) issued a press release titled, “APP Calls for Facts, not Fiction, about Forest Protection.” Naturally, the public at large will be inclined to ask whether the EoF investigative report is actually fiction, as implied by APP, rather

than fact.

Greenomics Indonesia feels compelled to respond to the APP in the form of a Greenomics report, given that the EoF report quoted from a number of Greenomics reports as one of the grounds on which it based its conclusions. In these Greenomics reports, all of our arguments were based on legal and official documents issued by the APP Group itself, which were submitted to and approved by the Ministry of Forestry.

In responding to APP’s press release, Greenomics Indonesia also feels it necessary to highlight a misleading PR effort directed at the Secretary General of the Ministry of Forestry on 16 December 2011 during a meeting that was attended by APP representatives at the request of the Secretary General of the Minister of Forestry in order to discuss the case of PT Ruas Utama Jaya (RUJ), an APP wood supplier operating in Riau Province that have a concession extending to 44,330 hectares. During this meeting, the APP representatives purported to explain various issues concerning the operations of RUJ, including the RUJ operations map and land cover conditions in the area.

It should be stressed here that the practice of clearing natural forest on the RUJ concession has become the principal issue that gave rise to the bitter war of words between EoF and APP in the wake of the publication of the EoF report.

In this Greenomics Indonesia report, we shall discuss four things, namely:

- Legal concession map versus commitment to the protection of Sumatran tiger habitat in the RUJ concession;
- The clearing of Sumatran tiger habitat in the RUJ concession;
- The driving of Sumatran tigers from the RUJ concession to deep-peat concession areas; and
- Misleading PR by APP in respect of the part of the RUJ concession which APP claims has been set aside for conservation purposes.

Greenomics Indonesia believes that a considered discussion of the above four issues will effectively respond to the claim by APP that the EoF report is nothing more than fiction, and make clear the extent to which APP’s PR has attempted to mislead the public through its response to the EoF report. In the final part of this paper, we will set out our conclusions and recommendations.

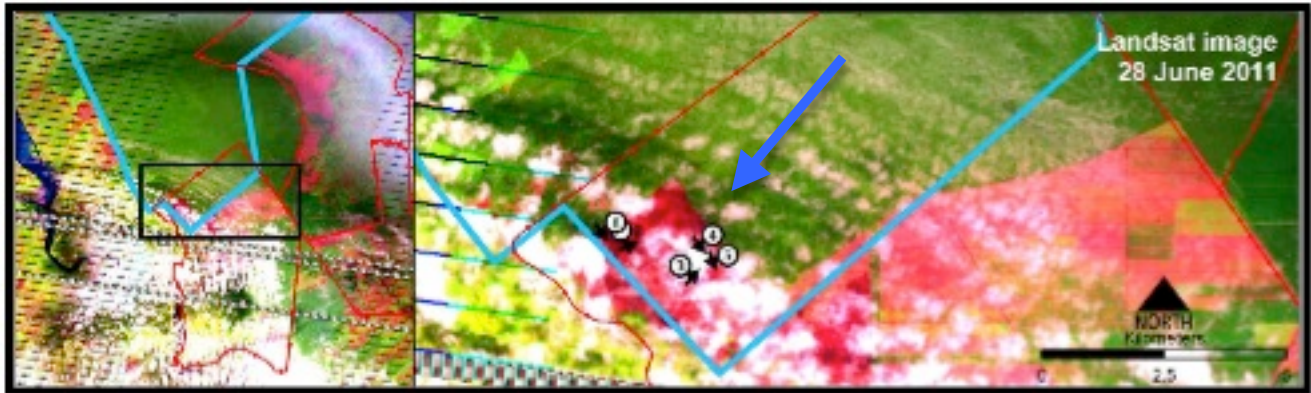
Methodology

This Greenomics Indonesia report is based on the micro-delineation report of April 2008 that was prepared as an operational document by RUJ, and which is legally binding on RUJ in developing its pulpwood plantation. This report also refers to RUJ’s 2008-2017 business plan. Further, it is supported by the presentation slides that have been shown to the Secretary General of the Ministry of Forestry, Dr Hadi Daryanto. The scope of the report is confined to the RUJ’s west block, which is the only block allocated as a so-called “Senepis tiger sanctuary” in the said concession area.

Legal concession map versus commitment

The map on page 12 of the EoF report shows the “history of clearing natural forest on deep peat” in the “Senepis Tiger Sanctuary” by two APP pulpwood suppliers, PT Suntura Gaja Pati and RUJ, and on part of the concession of PT Diamond Raya Timber, a selective logging concessionaire. This EoF map shows that the natural forest area that has been cleared by RUJ is none other than APP’s self-declared Senepis Tiger Sanctuary (see image 1).

Image 1



Thus, we should not be surprised to find that EoF makes the following statement: “By June 2011, RUJ had even begun clearing the tiny block of natural forest (less than 5,000 ha) APP had set aside for its own “Senepis Tiger Sanctuary””.



In its press release, APP attempted to deny the contents of the EoF investigative report stating that RUJ had cleared natural forest in “its own Senepis Tiger Sanctuary” by presenting legal map of the RUJ concession, which is shown in image 2 from the APP press release.

In responding to the APP denial, for its part WWF presented a map of the “proposal for collaborative management and rationalization of the Senepis Tiger Sanctuary, Buluhala, Riau Province, June 2006”. If we adhere to this map, then the EoF statement that “By June 2011, RUJ had even begun clearing the tiny block of natural forest (less than 5,000 ha) APP had set aside for its own “Senepis Tiger Sanctuary” simply cannot be denied by APP.

In other words, at the commitment level, it is only reasonable for EoF to say that RUJ, an APP wood supplier, had cleared its own Senepis Tiger Sanctuary – based on the map of June 2006 presented by WWF (see the original map in the recent news report on mongabay.com (12/16/2011), titled [WWF: Asia Pulp & Paper misleads public about its role in destroying Indonesia's rainforests.](#)

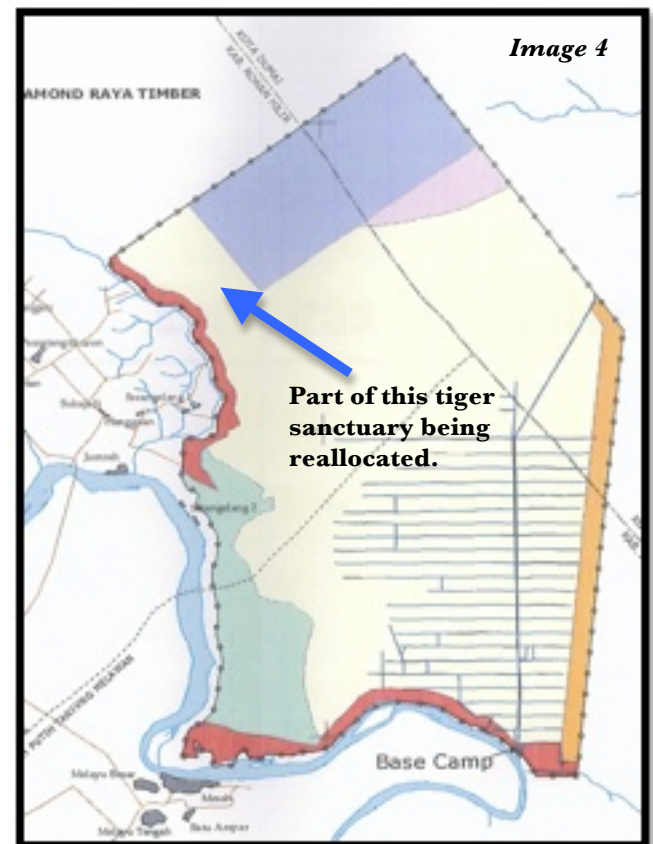
What is particularly regrettable about the APP press release is that APP only presented the legal map of the RUJ concession that is valid at this time, without showing the changes that had taken place in the RUJ legal concession map. The RUJ micro-delineation document (April 2008) clearly shows the RUJ legal concession map prior to the change, and makes it clear beyond doubt that the Senepis tiger sanctuary to which RUJ committed itself is precisely the same as that shown on the map presented by EoF (June 2006).

The map of RUJ's previous legal concession map prior to being changed as a result of the micro-delineation work is shown in image 3.



The said micro-delineation document, which is accompanied by an integrity pact signed by the executive director of RUJ and dated May 2008, contains changes to the RUJ operations map, as was shown in image 4.

Image 4 shows that the RUJ legal concession map, which previously was the area committed by RUJ as a conservation area for the Sumatran tiger, with part of this conservation area being reallocated for the planting of *acacia crassicarpa*, which process would obviously first have to be preceded by the clearing of natural forest. In other words, RUJ has without doubt cleared its own “Sumatran tiger sanctuary,” if we are to go by the changes made to the earlier RUJ legal concession map based on the micro-delineation document of April 2008.



Thus, if EoF states that APP has cleared “its own tiger sanctuary,” they are undoubtedly speaking the truth and that what they are saying is not fiction. This is because EoF’s statement is based on the legal concession map that originally set out the commitment of RUJ to protecting Sumatran tiger habitat.

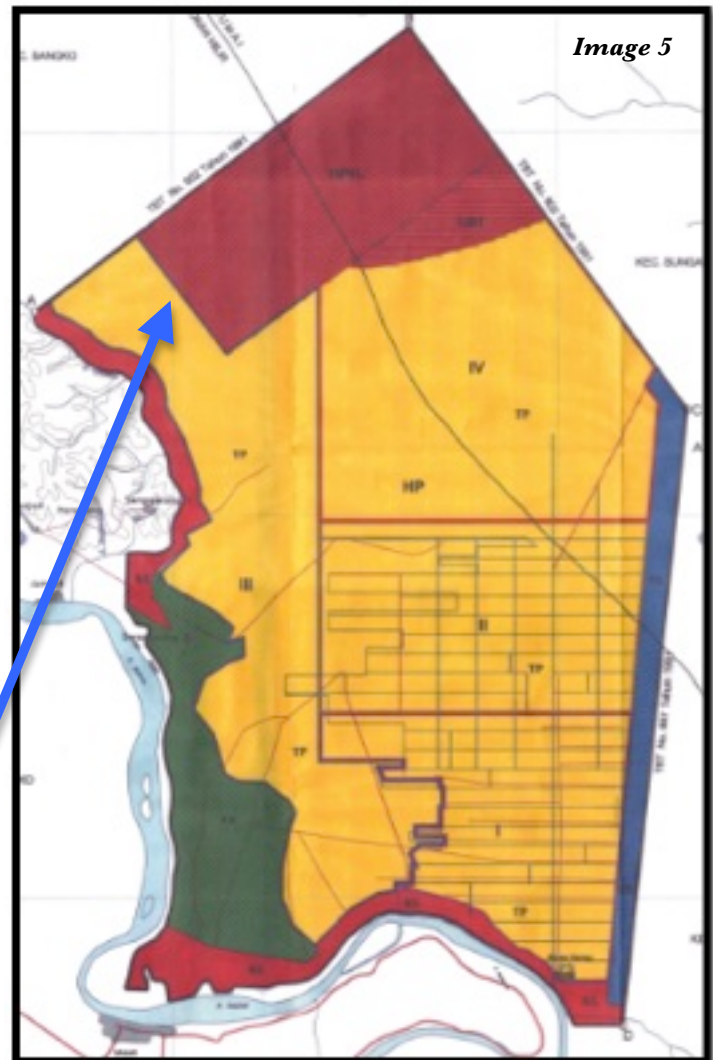
The only problem is that the Senepis tiger sanctuary shown on that map has been reduced on the new RUJ map based on the micro-delineation document prepared by this APP pulpwood plantation.

In reality, the APP press release should have explained to the public why the Senepis tiger sanctuary has been reduced in the new RUJ legal concession map. It also needs to be stressed at this juncture that the micro-delineation document does not explain why part of the Sumatran tiger conservation area has been removed from the sanctuary.

Deep peat versus Senepis tiger sanctuary

During the Greenomics Indonesia presentation to the Secretary General of the Ministry of Forestry on 16 December 2011, APP representatives stated that the area that had previously been allocated as a “Senepis tiger sanctuary” – as shown on the old RUJ legal concession map, which was subsequently reduced as a result of part of it being excluded from the “Senepis tiger sanctuary,” as shown on the new RUJ legal concession map – had been damaged as a result of encroachment by squatters.

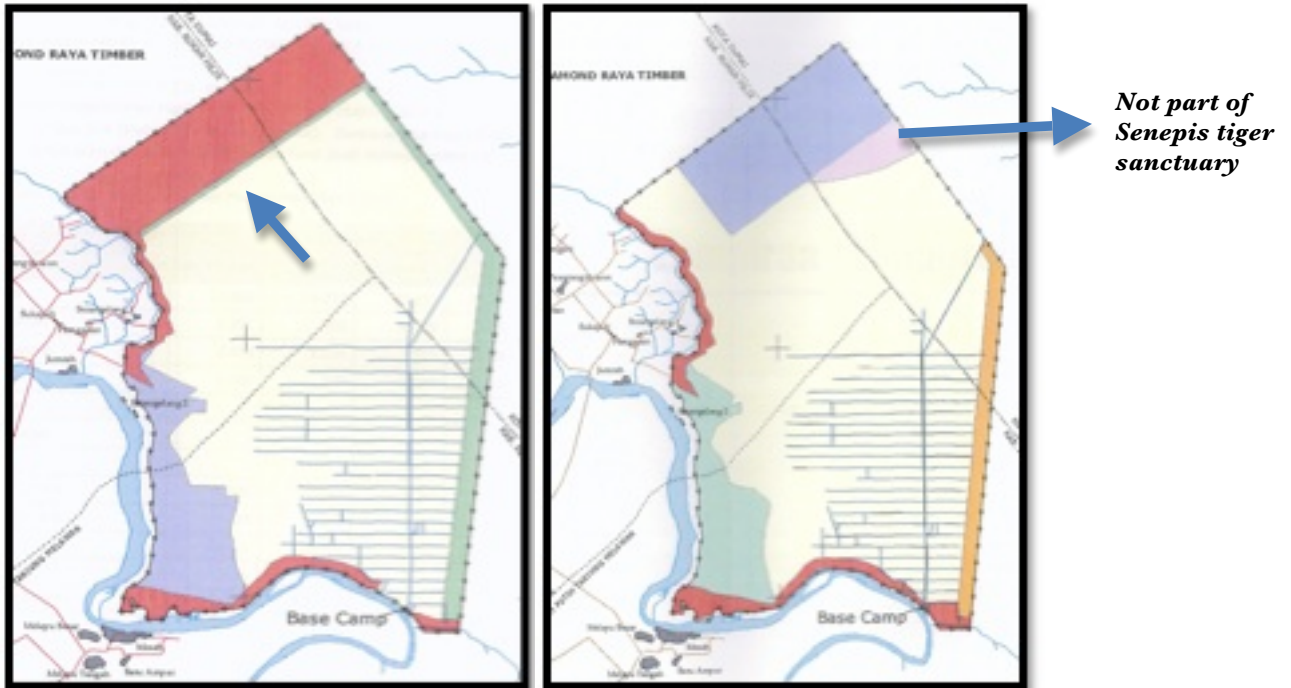
Greenomics Indonesia strongly denied this claim as the area in question was included in the land-clearing target block (yellow colored area) in the new RUJ legal concession map (see image 5).



When the Secretary General of the Ministry of Forestry asked whether the land had been included in the Annual Work Plan block (RKT), meaning that it would be subject to the legal clearing of natural forest, the APP representatives nodded their heads, signaling that this was correct.

The APP representatives who were in attendance at the presentation said that the area of the Sumatran tiger habitat conservation area in the RUJ conservation area had not experienced any reduction in its size as the reduction shown in the new RUJ legal concession map had been compensated for through the addition of extra conservation land (see comparison shown in image 6).

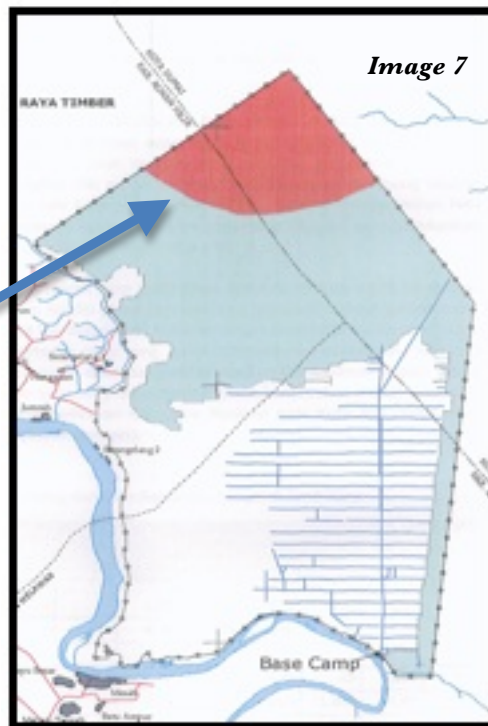
Image 6



However, in response to this, Greenomics Indonesia pointed out that the extra land in question was shown on the map, as claimed by the RUJ micro-delineation document, as consisting of peatland with a peat depth of more than 3 meters, as shown in image 7.

This area of peatland with a peat thickness of more than 3 meters had an area of 2,860 hectares, according to the micro-delineation document. Meanwhile, according to the new RUJ legal concession map, the Sumatran tiger habitat conservation area (based on the said micro-delineation document) had an area of 3,334 hectares.

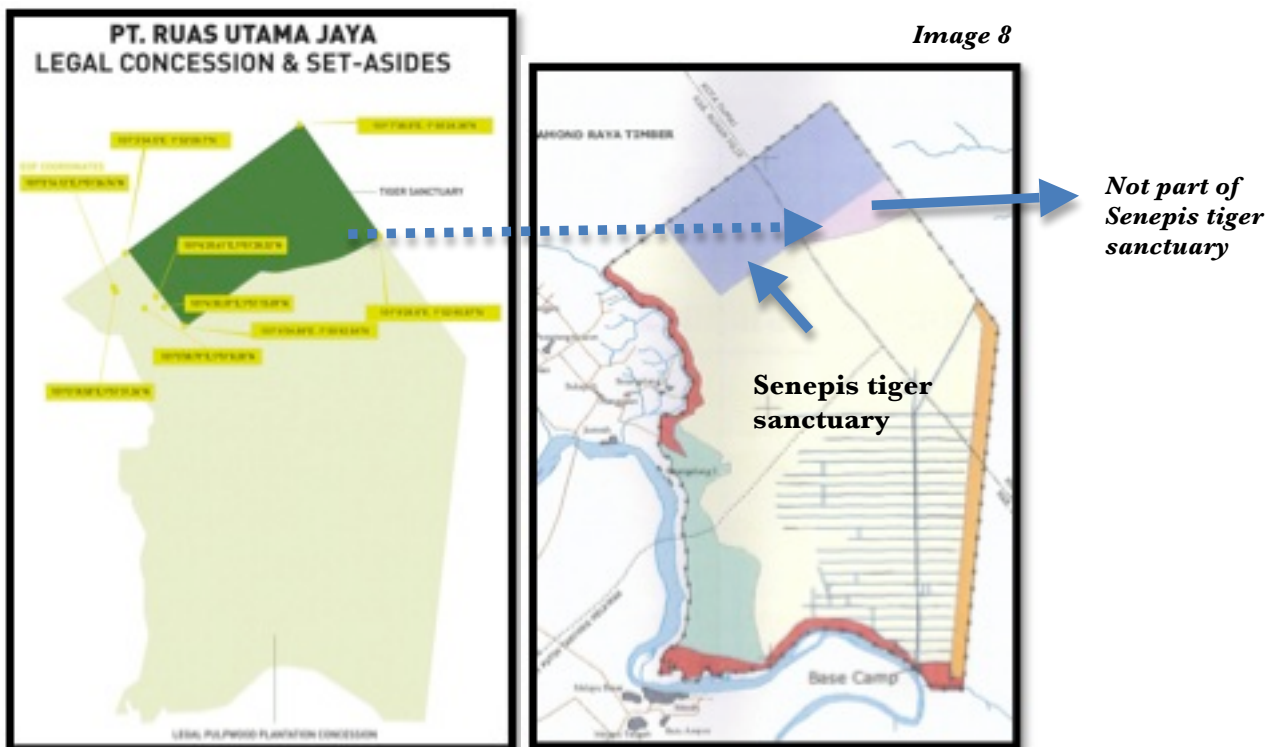
Image 7



However, in the concluding section of the micro-delineation document, it is stated that the area of peatland with a peat depth of more than 3 meters in the RUJ concession extends to only 529 hectares, not 2,860 hectares, as 2,331 hectares of the said peatland is included in the Senepis tiger sanctuary. This means that 70 percent of the Sumatran tiger sanctuary overlaps with RUJ's legal obligations to protect peatland with a peat depth of more than 3 meters (this data on the depth of the peat is based on RUJ's micro-delineation document).

Inexplicably, the Sumatran tiger sanctuary touted by the APP press release is different from that described in the RUJ micro-delineation document and the new RUJ legal concession map prepared in accordance with the micro-delineation document in April 2008. In the area mapped out as the Sumatran tiger sanctuary in the RUJ concession area (green colored area), APP has included an area of 529 hectares of peatland, whereas in reality the said 529 hectares are part of the deep peat area of 2,860 hectares identified in the micro-delineation document.

In other words, the said 529 hectares is not part of the Senepis tiger sanctuary based on the RUJ micro-delineation document. We only need to compare the new RUJ legal concession map and the map stated by APP as a "government map" in its press release to see the difference (see image 8).



If we go by the APP press release, the area of the Sumatran tiger sanctuary has been increased by 592 hectares so as to now extend to almost 4,000 hectares. Of that area, 2,860 hectares, or the equivalent of 71.5%, consists of peatland with a peat depth of more than 3 meters – as identified by the RUJ micro-delineation document, which should in fact already be retained based on the national laws and regulations governing the protection of deep peatland.

This means that the area of peatland with a peat depth of more than 3 meters, as identified by the RUJ micro-delineation document, that has been included in the Sumatran tiger sanctuary on the RUJ concession only extends to an area of 1,076 hectares. In other words, the Sumatran tiger habitat conservation area that is outside the peatland area with a peat depth of more than 3 meters (as identified in the RUJ micro-delineation document) consists of 1,076 hectares, or 3.79% of the total area of RUJ's west block, or 2.43% of the total area of the RUJ concession.

Returning to image 8 above. The map presented in the APP press release is clearly not based on the facts as set out in the RUJ micro-delineation document. APP is thus guilty of misleading the public through the use of this map, and has also tarnished the image of the Government of Indonesia through “guilt by association.”

Driving tigers out of their habitat legally

Based on RUJ's legal documents (in this case the RUJ micro-delineation document of April 2008), the distribution of the Sumatran tiger is clearly shown in image 9, in which the light green-colored area signifies remaining natural forest, the dark green-colored area plantation forests, and the yellow-colored area non-forested areas. The plantation and non-forested areas are the result of the clearing of natural forest prior to March 2007.

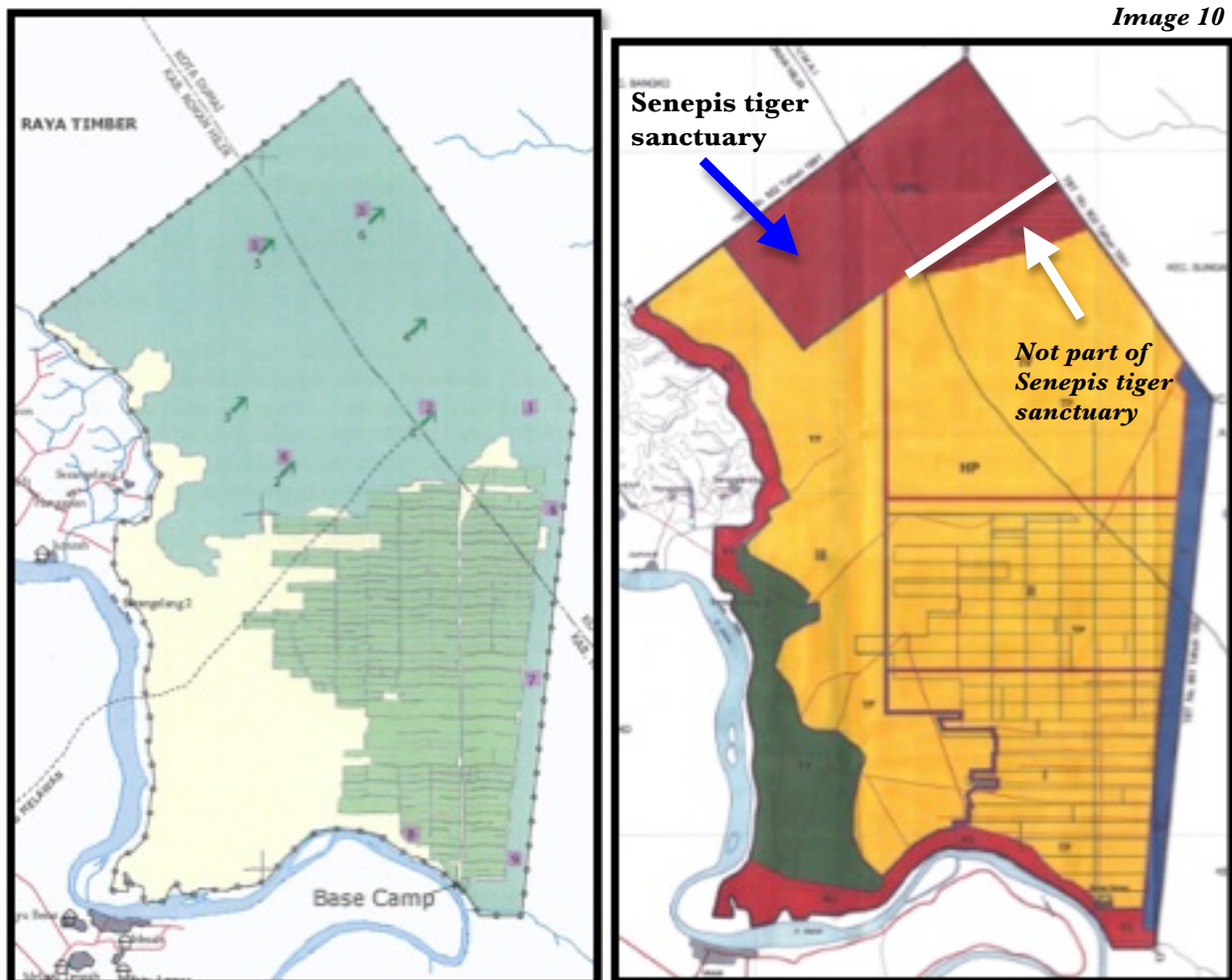


Based on the 6 observations corridors that it was claimed were used out during the process of preparing the micro-delineation document – shown by image 9 – the micro-delineation document makes the following statement:

“The Sumatran tiger (Panthera tigris Sumatrae) is an endemic species of wild animal in the RUJ west block. Traces of this animal have been found along all observation corridors. One trace consisted of claw marks on an 80 cm high branch, while others consisted of new tracks on the ground. The observation findings reveal that the farther we go to the north, the more traces that are found, whether in the form of tracks, claw marks, and droppings. As regards vegetation analysis, the farther north we go, the better the condition of the forest.”

Based on this statement in RUJ’s own document, the company has clearly and legally acknowledged that land clearing in the RUJ concession constitutes clearing in Sumatran tiger habitat, and that any land in the RUJ concession that is not protected by the “Senepis tiger sanctuary” will be cleared. In other words, the Sumatran tiger will be driven out of its habitat.

Image 10 shows a comparison between the area identified as Sumatran tiger habitat (green light-colored area) and the area of natural forest that has been retained as the so-called “Senepis tiger sanctuary” (red-colored area). This image clearly shows the significant area of Sumatran tiger habitat that is being cleared by RUJ (yellow colored area), a wood supplier of APP.



The wood potential in the area identified as Sumatran tiger habitat amounts to 86.87 m³ per hectare, with the volume of wood to be produced by clearing Sumatran tiger habitat being targeted at more than 1.5 million m³, including realization prior to 2007 – as set out in RUJ business plan of June 2008. The wood produced by forest clearance is used as a raw material by PT Indah Kiat Pulp and Paper (IKPP), an APP pulp and paper mill in Riau Province.

Irrespective of whether RUJ is guilty of forest clearance in the “Senepis tiger sanctuary” or not, it is crystal clear that RUJ is guilty of felling forests that provide a habitat for the Sumatran tiger, as revealed by RUJ’s own legal micro-delineation document.

Setting aside of conservation area by APP nothing more than misleading PR stunt

In its presentation on 16 December 2011, Greenomics Indonesia made a slide presentation on the conservation area that APP claims to have set aside in the RUJ concession.

The said presentation was witnessed by both the Secretary General of the Ministry of Forestry and APP representatives (see image 11).



During the presentation, Greenomics Indonesia invited the APP representatives to point out the areas that have been set aside by APP as a conservation area. The Secretary General of the Ministry of Forestry appeared to be paying close attention to what was being discussed as the slides were being shown.

One of the APP representatives pointed to an area of peatland with a peat depth of more than 3 meters, as identified in the RUJ micro-delineation document. Greenomics Indonesia refused to accept this answer to the above question as the area in question was by law already required to be preserved. Once again, Greenomics Indonesia asked the APP representatives to point out what had been set aside as a conservation area on the RUJ concession by APP.

In the end, the APP representatives failed to convincingly respond to Greenomics Indonesia’s question in the presence of the Secretary General of the Ministry of Forestry, who facilitated the Greenomics Indonesia presentation in a fair and objective manner. Indeed, it turned out that no land had been specially set aside by APP as a conservation area on the RUJ concession as, based on RUJ’s own micro-delineation document, the area touted as having been set aside was in fact land that by law already satisfied the criteria for being retained as a conservation area.

The Secretary General asked APP not to repeat its claims about setting aside a special conservation area on RUJ's concession. In fact, the Secretary General as pointed to a specific aspect of APP's overall misleading PR campaign, where the company claimed to have set aside a special conservation area in the form of Giam Siak Kecil Nature Reserve and Kampar Carbon Project (PT Putra Riau Perkasa/PRP).

In response to these comments by the Secretary General, the APP representatives signaled their agreement. Thus, for the future, it needs to be clearly stated by APP if one of its "special conservation areas" is actually already required by law to be conserved. In other words, managed by APP, not set aside by APP.

Based on the foregoing, it is indisputable that the APP press release claiming that "APP suppliers' set-aside area for pure conservation purposes is over 200 thousand hectares in Riau and Jambi" is simply wrong.

If APP complies with the request of the Secretary General of the Ministry of Forestry to no longer use the term "set-aside" in its PR campaign – a campaign that has clearly been designed to mislead the public – then this campaign may be officially declared to have ended on 16 December 2011.

Conclusions

- APP has not right whatsoever to claim that the EoF report is fiction rather than fact, given the changes made by RUJ, a wood supplier of APP, to its legal concession map, as shown in the RUJ micro-delineation document of April 2008. The RUJ concession area that has been cleared, as highlighted in the EoF report, prior to the change in the RUJ legal concession map, did form the “Senepis Tiger Sanctuary” as part of the RUJ concession. At the commitment level, this supplier of APP has clearly breached its commitment by conducting land clearing in an area that had previously been allocated as part of the Senepis Tiger Sanctuary. From the legal perspective, it is true that APP may try to deny that RUJ conducted land clearing in the Senepis Tiger Sanctuary, the changes made to the RUJ legal concession map clearly show that the reality is that APP has no concern whatsoever for the conservation of Sumatran tiger habitat.
- RUJ, a wood supplier of APP, has deliberately mixed up the Sumatran tiger habitat conservation area (Senepis Tiger Sanctuary) on its concession with its obligation to protect those parts of its concession that have peat cover of more than 3 meters. The fact is that 70% of the area of the Sumatran tiger sanctuary on the RUJ concession consists of peatland with a peat depth of more than 3 meters (based on RUJ’s own micro-delineation document), which by law must be retained and protected from land clearing. Inexplicably, of the 2,860 hectares of peatland with a peat depth of more than 3 meters, as stated in the micro-delineation document (which was produced following field surveys and analysis), only 592 hectares are stated to consist of deep peatland that must be retained in the new RUJ legal concession map, meaning that the remaining 2,331 hectares are incorporated into the Senepis Tiger Sanctuary, out of an RUJ concession area of 3,334 hectares.
- Also inexplicably, the map given by APP in its press release denying the EoF report and showing the area of the Sumatran tiger sanctuary on the RUJ concession is identified as a “Government map.” In fact, this map is clearly not based on the maps in the micro-delineation document that was approved by the Government of Indonesia. The map of the Sumatran tiger sanctuary given in the APP press release depicts the area of the Senepis Tiger Sanctuary on the RUJ concession as being larger than the area shown in the micro-delineation document. An area of peatland extending to 592 hectares is identified as being part of the Sumatran tiger sanctuary, whereas in the micro-delineation document, this area is not included in the said sanctuary. As a result of this slight of hand by APP, it appears that the Sumatran tiger sanctuary on the RUJ concession consists of almost 4,000 hectares. This clearly constitutes a blatant attempt by APP to mislead the public.
- Based on the RUJ micro-delineation document, it will be clearly seen that this wood supplier of APP has been legally conducting land clearing on Sumatran tiger habitat, bearing in mind that the observations conducted as part of the preparation of the micro-delineation document found that it was a legal fact that all parts of the RUJ concession constituted Sumatran tiger habitat. Thus, it may be said that RUJ has been legally driving the Sumatran tiger off its habitat through the clearing of tiger habitat, with the wood from such clearing operations being supplied as raw materials to an APP pulp and paper mill in Riau Province. This means that irrespective of whether land clearing operations were carried out in the Sumatran tiger sanctuary or not, the overall land clearing operations conducted by RUJ have, as a legal fact, been conducted on Sumatran tiger habitat. Accordingly, we are entitled to conclude that APP has no concern for the continued existence of Sumatran tiger habitat, as shown by the fact that the land being cleared by RUJ is legally Sumatran tiger habitat.

- It has been proved that the use of the term “set-aside” in respect of APP’s pulpwood suppliers is nothing more than a publicity stunt that has been deliberately calculated to mislead the public. This was clearly demonstrated during the Greenomics Indonesia presentation to the Secretary General of the Ministry of Forestry and APP representatives. In response to this presentation, the Secretary General urged APP to no longer use the term “set-aside” in its PR campaigns, such as in the case of the Giam Siak Nature Reserve and Kampar Carbon Project. The terms “set-aside” should be replaced by “managed by” as the so-called “set-asides” only occurred because the conservation areas allocated by APP’s pulpwood suppliers actually fulfilled the criteria set by the law for mandatory conservation, rather than representing an economic or financial “sacrifice” on the part of APP. APP’s representatives have agreed to abide by the Secretary General’s admonitions.

Recommendations to APP

- APP must withdraw the statement in its press release to the effect that the EoF report was fiction rather than fact. The change in the RUJ legal concession map that excised part of the area of the Sumatran tiger sanctuary provides proof positive that APP has breached its commitment to preserving a Sumatran tiger sanctuary on the RUJ concession. This change in the legal concession map cannot be used to provide a basis for claiming that the EoF report is fiction as the real question that arises is why RUJ made the change to its legal concession map so as to excise part of the Sumatran tiger sanctuary in the first place, including areas that have already been devastated by land clearing on the part of RUJ.
- APP must withdraw the map presented in its press release as part of its effort to undermine the EoF report as the map, which is claimed to be a “government map” is clearly not the same as the legal map contained in the micro-delineation document that was approved by the Minister of Forestry. The map presented in the press release is nothing more than an instrument used by APP as part of its campaign to mislead the public, and has tarnished the good name of the Government of Indonesia through guilt by association.
- APP must no longer use the term “set-aside” in connection with conservation area as part of its PR campaign as the use of this term only serves to mislead the public. APP now needs to comply with the promise it made to the Secretary General of the Ministry of Forestry, namely to drop the term “set-aside” from its PR efforts.

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