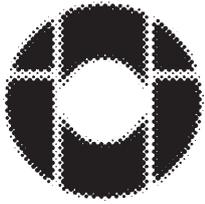


**GREENPEACE**



WHY IOI'S DESTRUCTION  
IN KETAPANG IS A

# **BURNING ISSUE**

FOR THE **RSPO**  
AND THE PALM OIL  
PLANTATION SECTOR



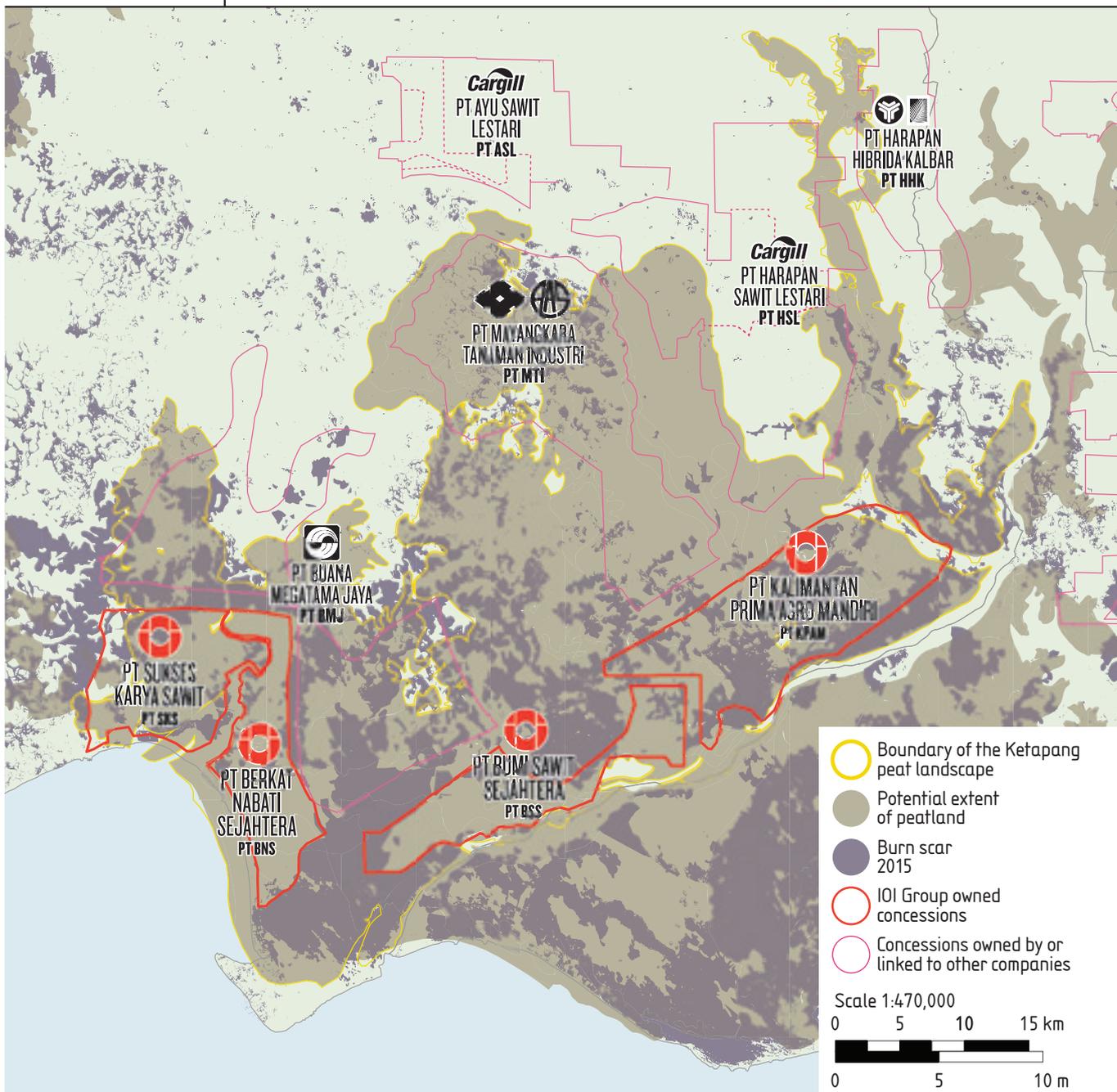
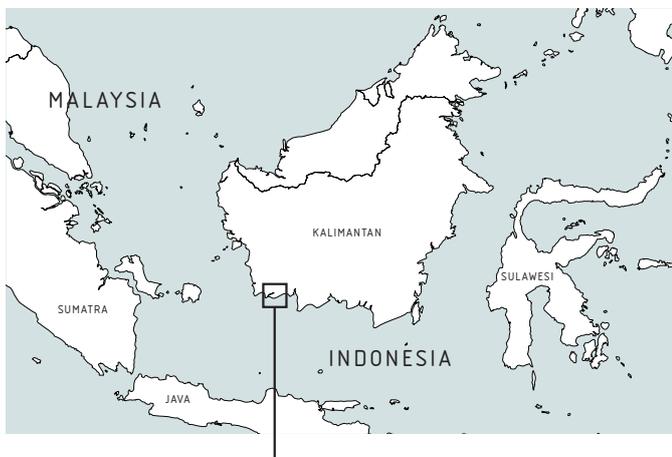
# WHAT IS THE KETAPANG PEAT LANDSCAPE?

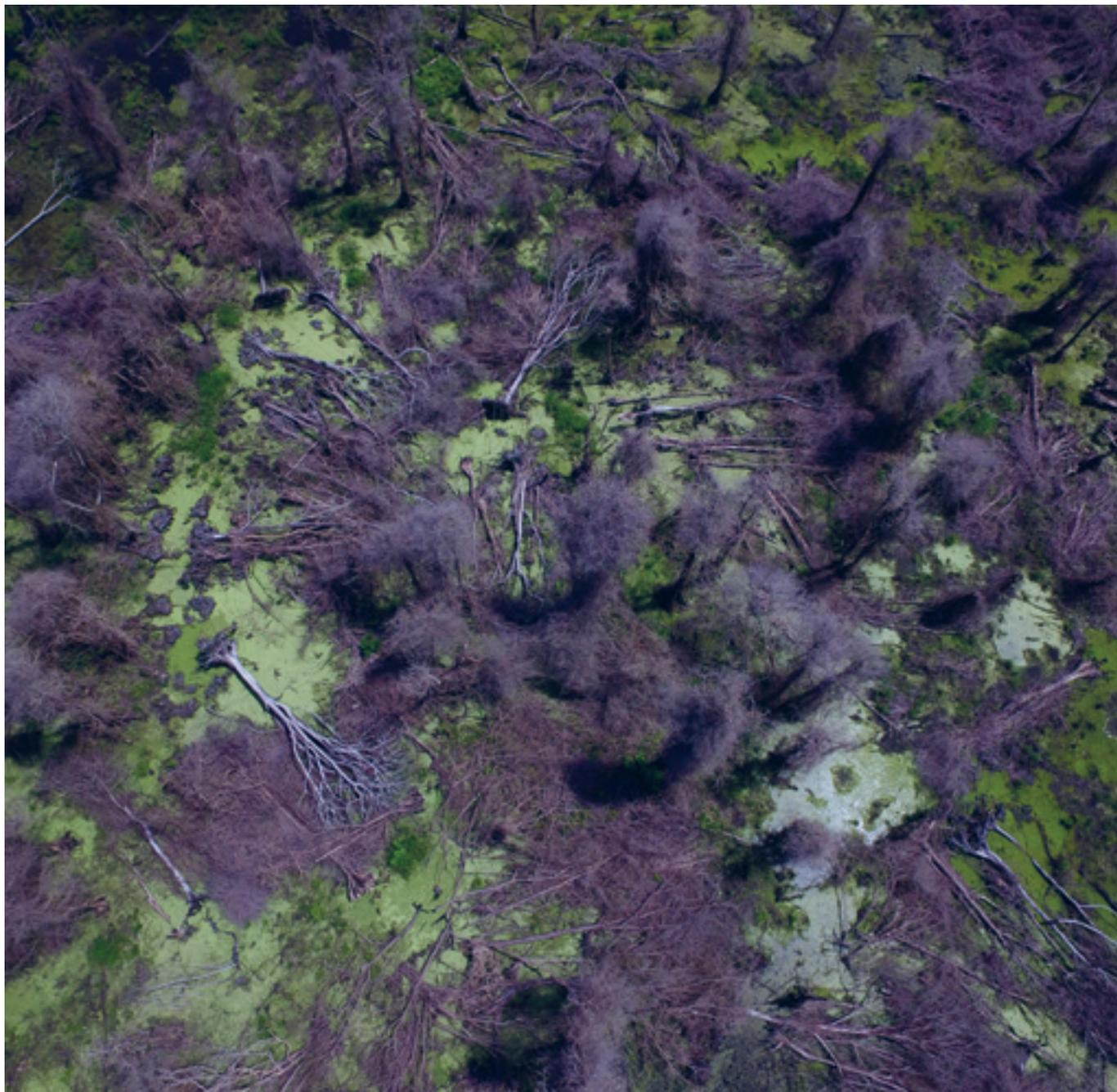
For the purpose of this report, the Ketapang peat landscape is defined as the potentially contiguous area of peat located in the south of the West Kalimantan district of Ketapang, covering an area of around 214,000 hectares.

Indonesia currently still lacks a definitive map of peat areas. Three maps have been produced in the past, all of which have shortcomings.<sup>1</sup>

The Indonesian government has been clear on the need for a new map but this is not scheduled to appear until November 2017.<sup>2</sup>

None of the existing maps covers the full extent of peat in Indonesia and some peatland areas do not appear on any of the maps, so even amalgamating the three maps gives an incomplete picture. The peat map used here is a combination of existing peat maps. The amalgamated map is currently the best method of showing the minimum extent of the area that needs to be properly surveyed when assessing impacts of drainage-based industry as part of a precautionary landscape approach to fire prevention and peatland conservation.





**PT BSS, 16 April 2016,  
2°55'55.686"S 110°44'41.496"E**  
**Drone footage reveals the impact of repeated  
fires on forest near the PT Bumi Sawit Sejahtera  
(IOI) oil palm concession. ©Greenpeace**

## BACKGROUND

Ketapang, West Kalimantan is becoming a test case of corporate commitments to responsible palm oil production. Once a forest home to endangered and vulnerable species including orang-utans, proboscis monkeys and sun bears,<sup>3</sup> the Ketapang peat landscape is now being carved up by the plantation sector with drainage canals; deforested and converted to industrial plantations.<sup>4</sup> This has contributed to regular and severe outbreaks of fires, with analysis of satellite images suggesting nearly a third of the Ketapang landscape burned in 2015.<sup>5</sup> Increasing seawater flooding is also likely over coming decades as burned peat disappears and drained peat degrades and subsides, causing the land surface to slowly sink towards sea level.<sup>6</sup>

Some of the plantation companies in the landscape are strongly associated with players in the pulp sector<sup>7</sup> that have made firm commitments to conservation. Other companies are

directly controlled by large palm oil groups which are members of the Roundtable on Sustainable Palm Oil (RSPO). IOI, for example, controls a third of the land area under concession<sup>8</sup> in the Ketapang peat landscape.<sup>9</sup>

While none of the pulp operations in the Ketapang landscape shows signs of industrial development, IOI and the other palm oil companies that have developed their concessions have contributed to the dire state of this heavily damaged area. Nevertheless, there is still much to fight for. Protecting and restoring the surviving Ketapang peat and forest areas would not only reduce the risk of fires, but would mean serious gains for conservation and biodiversity, and a chance for local communities to benefit. However, without immediate action from IOI and other stakeholders in this landscape, what remains of Ketapang risks going up in smoke.



## IOI GROUP

COMPANY: **IOI GROUP (IOI CORPORATION BERHAD)**<sup>10</sup>

HEADQUARTERS: **MALAYSIA**

STOCKLISTED: **MALAYSIAN STOCK EXCHANGE**<sup>11</sup>

RSPO MEMBER: **YES**

JOINT VENTURES: **IOI HAS THE CONTROLLING STAKE**

(67%) in 4 Indonesian plantation companies (PT Bumi Sawit Sejahtera, PT Berkat Nabati Sejahtera, PT Sukses Karya Sawit, PT Ketapang Sawit Lestari)<sup>12</sup> jointly owned with Bumitama Agri Ltd,<sup>13</sup> which has a 28% stake. IOI also part-owns Bumitama Agri Ltd (31.4%),<sup>14</sup> which is listed on the Singapore stock exchange. In addition, IOI also controls the Indonesian plantation company PT Kalimantan Prima Agro Mandiri.<sup>15</sup>

GROUP GLOBAL MARKET LINKS: **YES**

including refining and manufacturing segment IOI Loders Croklaan<sup>16</sup> and IOI Oleochemicals which sells to over 65 countries,<sup>17</sup> including the USA, the Netherlands and China.

INDONESIAN CONCESSION LOCATIONS:  
**KETAPANG DISTRICT, WEST KALIMANTAN**<sup>18</sup>



# IOI GROUP IN KETAPANG



PT BSS, 16 April 2016, 2°55'13.1"S 110°43'46.9"E

An oil palm sapling brushes against the charred remains of a tree in the PT Bumi Sawit Sejahtera (IOI) oil palm concession. The area, which suffered extensive fires in 2015, was subsequently planted. Landsat analysis shows that the area, which borders a company-identified No Go area of peatland, was cleared after mid-2014.

©Ifansasti/Greenpeace

Greenpeace first raised issues with IOI's plantations in Kalimantan in 2008, highlighting deforestation and drainage of peat and clearance of forested orang-utan habitat.<sup>19</sup>

Investigations by Greenpeace and others continued, and 11 NGOs submitted a complaint to the RSPO in 2010, covering issues in IOI's Ketapang concessions including clearance of peatland since 2009, clearance of high conservation value (HCV) forest areas and illegal encroachment into production forest outside the boundaries of the PT Berkas Nabati Sejahtera (PT BNS) concession. The complaint also covered breaches of community land rights in IOI's Pelita concession in Sarawak, Malaysia. The RSPO grievance panel concluded there was insufficient evidence to prove the sections of the complaint relating to Ketapang,<sup>20</sup> while the Pelita/Long Teran Kanan land dispute is still in a conflict resolution process.<sup>21</sup>

In March 2015 the not-for-profit consultancy AidEnvironment made a new complaint to the RSPO accusing IOI of breaching RSPO standards and its own environmental policies on its concessions in Ketapang.<sup>22</sup> This included specific evidence of:

- the construction of a drainage canal through an area of HCV forest
- clearance of areas of forest on deep peat, continuing after the company had been informed of this breach of standards
- further illegal planting outside the boundaries of PT BNS.

In response to this complaint, on 14 March 2016, the RSPO Complaints Panel decided to suspend IOI Group based on breaches of RSPO principles,<sup>23</sup> with certification suspended for all the company's international operations.<sup>24</sup> The suspension quickly lost IOI major customers, with Unilever, Nestle, Mars, Kellogg<sup>25</sup> and most recently General Mills announcing

moves to other suppliers.<sup>26</sup> IOI has responded by suing the RSPO<sup>27</sup> (and subsequently dropping the case)<sup>28</sup> and engaging Malaysian-based non-profit non-governmental organisation Global Environment Centre (GEC) to recommend actions to demonstrate that IOI complies with the RSPO Principles and Criteria, particularly in relation to peatland, HCV and fire management issues.

The impact of IOI in Ketapang is far greater than is recognised in the specifics of the RSPO complaint. The drainage of peat will contribute to degradation, subsidence and increased fire risk well beyond the boundaries of the concession, with damage to remaining forests and biodiversity. Peat degradation and fires are major contributors to Indonesia's carbon dioxide emissions.

IOI is now in the process of producing yet another new sustainability policy, but this will be of little if any value without comprehensive action on the ground, and IOI has a record of breaching its policies on sustainability (see below). Actions offered so far do not address IOI's destruction, protect what forest and peatland remains or reduce fire risk. The RSPO risks rubber stamping a peat management plan that does not address continued degradation of peatland and fires and emissions on a massive scale, which could irreparably compromise the Ketapang peat landscape.

Indonesian President Joko Widodo gave clear signals about the way ahead for Indonesia and the plantation sectors when he called for an end to new peatland development,<sup>29</sup> blocking of canals, restoration of burnt areas and ban on further palm oil plantations on forest land.<sup>30</sup>

Whereas some plantation companies have commissioned baseline maps,<sup>31</sup> and dammed hundreds of canals around their plantations,<sup>32</sup> much more is needed. IOI, most RSPO companies and the vast majority of plantation companies have so far done nothing to demonstrate that they are serious about taking action to ensure that the fires and emissions that choked Indonesians and the region in 2015 are not repeated.



**IOI GROUP**

# PT BSS: DOCUMENTING IOI'S LEGACY OF DESTRUCTION



**PT BSS, 16 April 2016,  
2°55'25.1"S 110°43'45.2"E**

Oil palm saplings await planting in the PT Bumi Sawit Sejahtera (IOI) oil palm concession. The area suffered extensive fires in 2015. Landsat analysis shows that the area, which borders a company-identified No Go area of peatland, was cleared after mid-2014.

©Ifansasti/Greenpeace



**PT BSS, 16 April 2016,  
2°55'13.1"S 110°43'46.9"E**

An oil palm sapling brushes against the charred remains of a tree in the PT Bumi Sawit Sejahtera (IOI) oil palm concession. The area, which suffered extensive fires in 2015, was subsequently planted. Landsat analysis shows that the area, which borders a company-identified No Go area of peatland, was cleared after mid-2014.

©Ifansasti/Greenpeace



**PT BSS, 16 April 2016,  
2° 55'19.32"S 110°43'39.432"E**

Drone footage documents plantation development on an area that suffered extensive fires in 2015. Landsat analysis shows that the area was cleared after mid-2014.

©Greenpeace



**PT BSS, 17 April 2016,  
2°47'57.5"S 110°54'36.2"E**  
A Greenpeace investigator logs his GPS position beside a canal cutting through a peatland area identified as containing High Carbon Stock (i.e forest).  
©Ifansasti/Greenpeace



**PT BSS, 17 April 2016,  
2°47'57.684"S 110°55'41.76"E**  
Drone footage reveals a swathe of burnt forest between IOI's PT Bumi Sawit Sejahtera and PT Kalimantan Prima Agro Mandiri oil palm concessions. The area within PT BSS was identified as High Conservation Value peat swamp forest including habitat for orangutans, sun bears and other wildlife.  
©Greenpeace

**No Go areas identified as off-limits to development**

**PT BSS concession boundary**



**PT BSS, 17 April 2016,  
2°50'22.284"S 110°54'17.154"E**  
Drone footage documents a primary drainage canal cutting through a company-identified 'No Go' area of buffer forest.  
©Greenpeace



**PT BSS, 16 April 2016,  
2°51'22.9"S 110°52'33.0"E:**  
Newly planted oil palm saplings beside a peatland drainage canal that cuts through an area of identified High Conservation Value. The drained area is an important buffer for the Gelinggang lake as well as habitat for wildlife including orangutans and sun bears.  
©Ifansasti/Greenpeace

---

## 2009

IOI Corporate Responsibility Policy Statement from 2009: 'We strictly avoid encroaching forested or peat land and/or develop new plantation estates that will result in deforestation.'<sup>33</sup>

---

## 2010

PT Bumi Sawit Sejahtera (BSS) HCV survey: According to the company's HCV report,<sup>34</sup> over 90% of the concession area was covered by swamp forest when surveyed in 2010, though much of this was degraded. The report stated that these forests host endangered species including orang-utans, proboscis monkeys and Müller's Bornean gibbon.<sup>35</sup> The report identifies some 711 hectares of peat deeper than 3m.<sup>36</sup> Such areas are legally protected from development under Indonesian law, though enforcement is lax.<sup>37</sup> The map of planned planting and protected areas that appears in the HCV report<sup>38</sup> shows a significantly smaller protected area than that indicated by the consolidated map of peat and HCV and HCS forest areas produced as part of a later survey process,<sup>39</sup> in particular seeming to ignore much of the peat area, including areas identified as deep peat.

---

## JANUARY 6 2014

'Sustainable Palm Oil Manifesto' (SPOM) signed by IOI's CEO, including:

- Protection of peat lands regardless of depth in new developments.
- No deforestation through the conservation of High Carbon Stock (HCS) forests<sup>40</sup>

---

## 2013/BY JAN 2014

Significant development has started in PT BSS concession. By 26 January 2013, the NE area of PT BSS has an almost fully developed road and canal network, with the plantation blocks largely cleared. In the SW area of the concession, roads and canals have been established widely across the area and around 7 plantation blocks (~175ha) cleared.

---

## JANUARY 30 2014

IOI's regional Senior Environment, Health and Safety manager signs up to a peatland restoration plan for 141 hectares of deep peat already cleared in PT BSS.<sup>41</sup>

---

## FEBRUARY 27 2014

IOI submits documents to the RSPO in line with the New Planting Procedures for PT BSS.<sup>42</sup> Any development prior to these being accepted is a breach of RSPO protocol.

---

## JUNE 2014

Greenpeace receives verbal assurance from IOI CEO Dato Lee in a meeting that the commitment to halt all clearance of peatlands and forests applied to BSS and that development would stop while the company understood peatland/ vegetation/ carbon mapping.

Most of PT BSS has canals and access roads, well in advance of the workplan indicated in the NPP.

---

## AUGUST 2014

A letter from Dato Lee confirms Greenpeace's understanding of the June meeting agreement: that 'our commitment to halt clearance of peat land and potential HCS areas applies to all our active concessions' and 'PT BSS is the only concession where IOI is currently clearing land'.<sup>43</sup>

SkyBox satellite image shows further development/ canals in the western area of PT BSS. By 30 August, the concession has a fully developed road and canal network; this network includes areas identified by IOI on maps supplied to Greenpeace as 'No Go' areas. This network includes peat areas in the SW area of the concession that have not subsequently been developed as plantations.

---

## NOVEMBER 2014

Subsidiary IOI Loders Croklaan publishes policy committing to no deforestation of HCS areas as defined in the HCS Approach.<sup>44</sup>

---

## 15 DECEMBER 2014

IOI Group signs sustainability policy commitment to 'no deforestation of HCV areas and HCS areas' and to 'protect peat areas regardless of depth in new developments'.<sup>45</sup>

---

## 12 JANUARY 2015

IOI Corporation and IOI Loders Croklaan sign joint statement to comply with each other's sustainability policies.<sup>50</sup>

---

## NOVEMBER 2015

Greenpeace informs the company of its findings in relation to PT BSS. The company makes no substantial comments on Greenpeace's statements, besides claims to have restored the peat areas that were cleared 'accidentally'.

---

## 2014/2015

Extensive fires<sup>46</sup> burn much of the PT BSS concession, including areas earmarked for protection by the company's HCV/HCS assessment.

A May 2015 report commissioned by IOI from consultants Aksenta found that about half the concession area burned in 2014 alone,<sup>47</sup> including the 141 hectare 'restoration area'.<sup>48</sup>

Landsat analysis and FHS data for 2015 show major fires for a second year running, with nearly 1,700 hectares burned in PT BSS, including most of the 141 hectares 'restoration area'.<sup>49</sup>

---

## OCTOBER 2015

The Indonesian government announces sanctions against PT BSS under the 2009 Environment Act for failing to prevent fires.<sup>51</sup>

---

## 5 NOVEMBER 2015

Ministerial Instruction from the Ministry of Environment and Forestry prohibiting, among other things, new planting on burned areas, and requiring companies to block canals.<sup>52</sup>

---

## APRIL 2016

Field investigation and satellite analysis by Greenpeace documents:

- New planting on burnt areas<sup>53</sup>
- Post-January 2014 drainage and planting on peatland
- Drainage canals in 'No Go' areas as identified for IOI in 2014 on maps consolidating peatland, HCV and HCS (as defined by IOI's own approach) prepared by environmental consultants Aksenta<sup>54</sup>
- Failure to block canals and take other actions in accordance with the Ministerial Instructions issued in November 2015.

---

## 2 JUNE 2016

IOI Group issues 'Update on sustainability': 'As always, IOI Group would like to reiterate that we remain dedicated to all necessary actions (both corrective and forward-looking) to demonstrate our continued commitment to building a world class oil palm business, based on our published sustainability principles of **no deforestation, no planting on peat, zero-burning on all new planting and re-planting of oil palm, and to drive positive socio-economic impact for people and communities.**'<sup>56</sup>

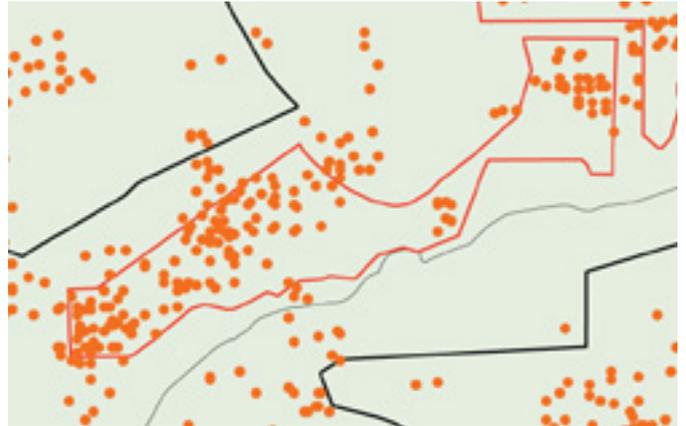
---

## APRIL-MAY 2016

Peer reviews of of the HCV reports for PT BSS, PT BNS and PT SKS carried out after IOI's suspension from the RSPO all find issues the reviewers class as 'major' with most aspects of the original reports. In reference to PT BSS, the criticisms included the lack of consideration of HCVs in the wider landscape, the poor quality of maps presented, the lack of monitoring plans and not identifying the company's operational activities as a threat to HCV 1 (biodiversity).<sup>55</sup>

# PT BUMI SAWIT SEJAHTERA: FIRE HOT SPOTS

2014



**PT BSS, 22 February 2014,**  
**2°48'55.92"S 110°48'21.24"E**  
**Fire burns beside a canal extending**  
**outside the boundary of PT BSS.**  
©AidEnvironment

2015



PT BNS, 3 December 2015,  
2°53'46.23" S 110°40'9.33" E

Fires and haze in forest between two IOI oil palm  
concessions – PT Berkat Nabati Sejahtera and PT Bumi  
Sawit Sejahtera – in the Ketapang peat landscape.

©lfansasti/Greenpeace

# PT BSS: SATELLITE EVIDENCE OF DEFORESTATION, DRAINAGE, PLANTATION DEVELOPMENT AND BURNSCARS

LANDSAT 7:  
24.06.13



LANDSAT 7:  
26.01.14



LANDSAT 7: 27.06.14



LANDSAT 7: 22.02.15



LANDSAT 7:  
05.11.15



LANDSAT 7:  
15.05.16



# CASE STUDY IN DESTRUCTION: CLEARANCE AND PLANTING ON PEAT IN THE NE CORNER OF PT BSS



**PT BSS, 17 April 2016,  
2°48'22.974"S 110° 55'24.966"E**  
Drone footage documents burnt  
forest and drainage canals cutting  
through peatland toward an area of  
identified High Conservation Value  
in the PT Bumi Sawit Sejahtera (IOI)  
oil palm concession.  
©Greenpeace

Peat over three metres deep is protected by Indonesian law.<sup>57</sup> The RSPO Principles include 'Compliance with applicable laws and regulations',<sup>58</sup> and the criteria for new planting direct companies to avoid 'extensive planting on... fragile soils, including peat' in new developments.<sup>59</sup> Nevertheless, IOI cleared important areas of identified deep peat within the PT BSS concession. Despite this, a report commissioned by IOI from consultants Aksenta claimed in May 2015 that the deep peat areas had been cleared because 'severe degradation has decreased their conservation value'; it also confirms important peatland clearance took place following IOI's 6 January 2014 commitment to end peatland clearance:<sup>60</sup>

**'According to the land clearance progress report and stacking map provided by the management unit, the management unit conducted its land clearance on the deep peat area in the northern part of the Permit Area, in the period January-February 2014 (see map on page 22). [...] This land clearance activity was stopped immediately on 14th February.'**

An image from 18 December 2013 – less than three weeks before IOI's 6 January 2014 commitment to avoid all peatland development regardless of depth – shows drainage canals (straight lines) across much of the area, with land cleared and prepared for planting in the southwest and apparent rough vegetation in other areas. Some of what remained of this was later recognised as high carbon stock, by the company's chosen methodology.

By 26 January 2014, Landsat 7 images indicate that all of the 141 hectares deep peat area had been fully developed and most

of it cleared. Additionally, roads and canals to the north of this area, but also cutting into deep peat, were also in place.

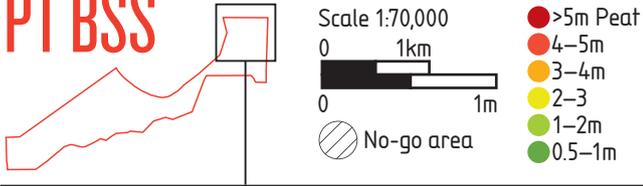
On 30 January 2014, IOI's regional Senior Environment, Health and Safety manager signed up to a peatland restoration plan for 141 hectares of deep peat already cleared in PT BSS.<sup>61</sup>

On 3-4 February 2014, the SAI Global assessors conducting the NPP verification audit for IOI visited the concession. The NPP document reports: 'during field observation we found that peat area of more than 3 meters deep outside of HCV identified has been opened on Block O5a (Longitude: 1100 54,33' East & Latitude: 20 48,95' South) and Block P5a (Longitude: 1100 54,77' East & Latitude: 020 48,96' South) – see appendix 3. The opening of deep peat in the new plantings area was found not in accordance with PT BSS's development and management plan and RSPO Principles and Criteria especially criterion 7.3 indicator major 1 and criterion 7.4 indicator minor 2. SAI Global noted that PT. BSS has established restoration program started in 2014 up to 2016 (Appendix 4).'<sup>62</sup>

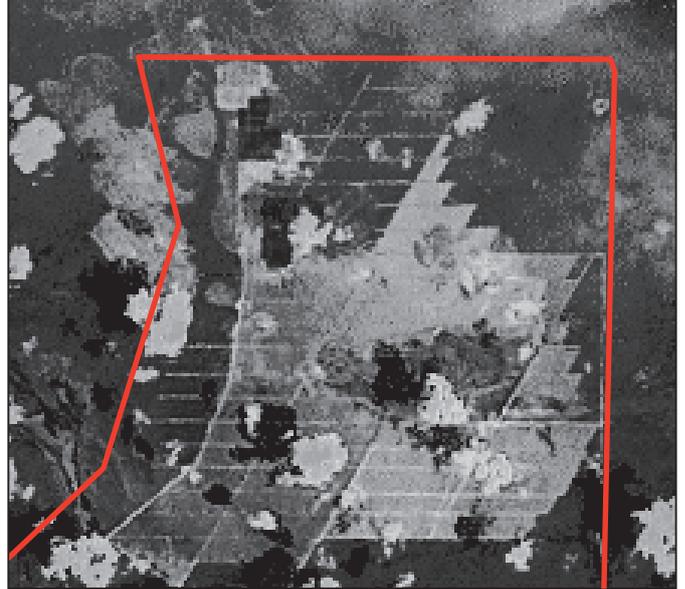
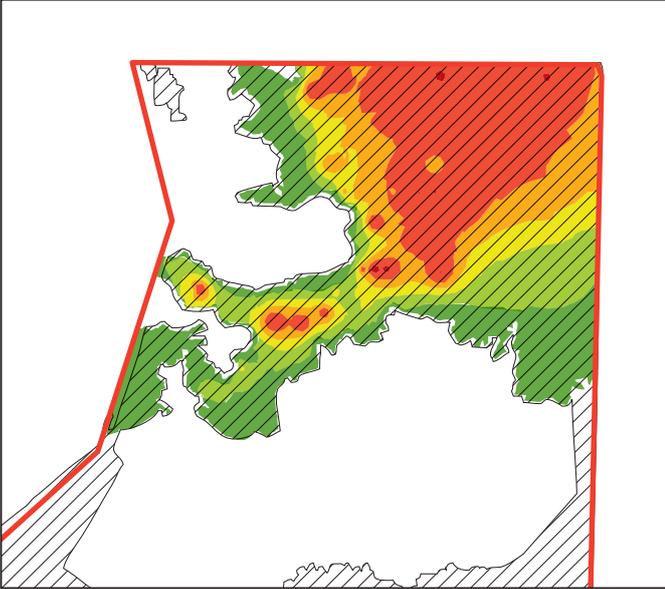
By 11 February 2014, Landsat 7 images show at least one additional road and canal, cutting into deep peat and connecting an identified area of HCV (the so-called HCV 7 area) to a water reservoir at the nursery.

In October 2014, much of the 141 hectares restoration area burned.<sup>63</sup> A high resolution satellite image from 19 December 2015 shows that drainage canals continue to cover the entire area intended to be restored, and reduced vegetation suggests little in the way of serious restoration. Young planting is now visible (narrow parallel lines of green) in the southwestern part of the restoration area.<sup>64</sup> It is also visible on an area of peatland just east of the restoration area, also on peat.

# PT BSS



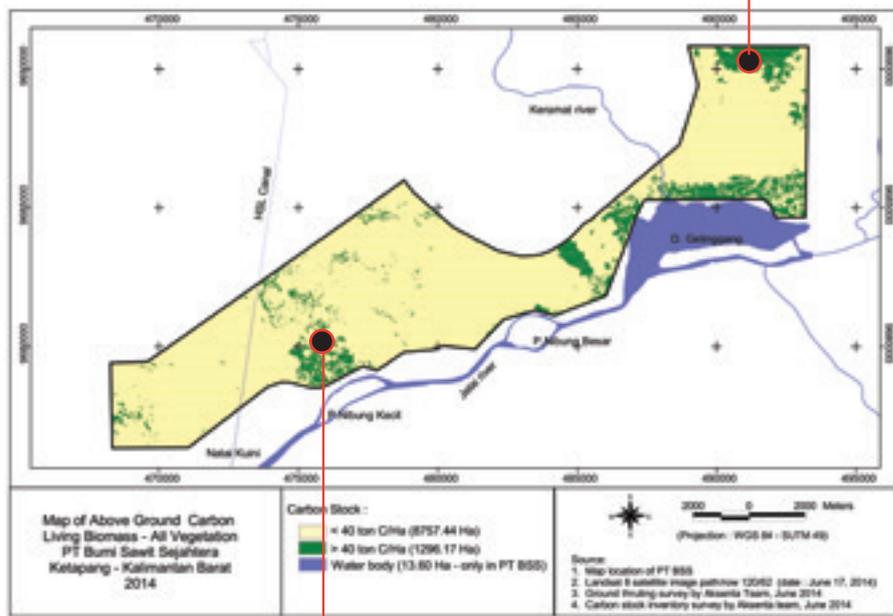
26.01.14



11.02.14



# IOI'S LEGACY OF FOREST DESTRUCTION IN PT BSS

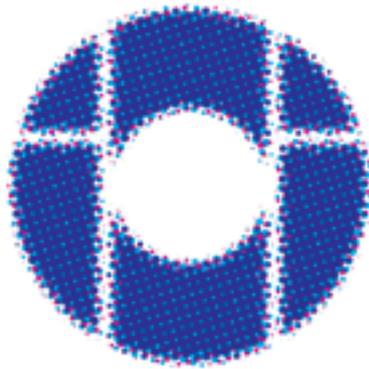


**PT BSS, 7 March 2014, 2°50'38"S 110°54'40"E**  
 Drainage canal cutting into an area later identified as a No Go area of forest containing High Conservation Value.  
 ©Rante/Greenpeace



**PT BSS, 20 February 2015**  
 Clearance of identified High Carbon Stock forest.  
 ©AidEnvironment

# ALL TALK AND NO ACTION



## IOI GROUP

On 27 May 2016, IOI circulated a new draft policy and action plan for consultation.<sup>65</sup> This goes no further than existing IOI policy, and even appears to water down its past commitments.<sup>66</sup> Greenpeace informed the company that the proposal remains weak, with no credible timeline for implementation or measurable milestones. It lacks the following significant commitments:

- **A moratorium on expansion, including in existing concessions:** Although IOI's policy commits the company to no deforestation and HCV clearance, there is no mechanism to ensure that all remaining forest and other socially or ecologically-important areas within the wider landscape are identified and protected. The company should commit to an immediate moratorium on development, including in existing concessions, while the appropriate studies are conducted.
- **A landscape approach to peatland conservation:** IOI should make an explicit commitment to conserve the forest and peatland landscapes impacted by its supply base. This starts by hydrological mapping of the landscapes affected by IOI's supply base using appropriate technology (including LiDAR) to understand the impact of its deforestation and drainage. This baseline data will help to produce integrated management plans that mitigate fire risk and protect all remaining forest and peatland in these landscapes.
- **Timelines and measurable indicators:** The policy lacks measurable objectives, and lacks milestones and timelines to achieve those objectives. For example, it is unclear when the company plans to ensure that the IOI Group is fully compliant with its own policies.
- **Drainage and past damage:** The action plan does not specify ending drainage affecting peat inside and outside this or IOI's other concessions in the area, nor does it specify measures to protect or restore natural vegetation to all peat areas. No mention is made of damage to other HCS and HCV areas or how this would be remediated.
- **Inadequate standards for forest and peat protection:** The IOI Group is backing a high carbon stock study funded by signatories of the Sustainable Palm Oil manifesto,<sup>67</sup> which would permit clearance of forests with up to 75 tonnes of carbon per hectare: given the HCS study is not aiming to achieve 'no deforestation', this does not represent an adequate implementation of the company's commitment. Instead the 'High Carbon Stock Approach' developed and overseen by a group of plantation companies and NGOs, is based on vegetation classes and protects patches of 'young regenerating forest,'<sup>68</sup> HCS forest that generally contains less than 75 tonnes of carbon per hectare. The policy also cites the RSPO Principles and Criteria (P&C) and 'Manual on Best Management Practices for existing oil palm cultivation on peat' as its guides on existing plantations; these are inadequate and fall short of what other players in the plantation sectors are doing. The action plan commits the company to the RSPO Next standards,<sup>69</sup> but these provide no additional protection for peatlands in existing plantings and do not currently set a definition for high carbon stock forest.<sup>70</sup>
- **Transparency and accountability:** the policy omits a measurable commitment to transparency. IOI should publish all concession maps for its own operations through Global Forest Watch's online forest monitoring and alert system and require all suppliers to do likewise.
- **Communities offered fair and equitable opportunities:** the policy should include an explicit commitment to conduct independent assessments of social and labour conditions in palm oil concessions in Malaysia and Indonesia and resolve outstanding grievances including with the Long Teran Kanan community in a transparent manner to the satisfaction of the local people.

# THIRD-PARTY PALM OIL SUPPLIERS



**PT Arrtu Energi Resources,  
20 September 2015,  
1°37'20.1"S 110°3'29.671"E**

**A Greenpeace investigator captures GPS coordinates on the boundary of a PT Arrtu Energi Resources (Eagle High) concession in Ketapang, West Kalimantan.**

©Ifansasti/Greenpeace

Companies including Eagle High supply palm oil to large RSPO members including Cargill and Wilmar, who in turn trade with IOI subsidiaries as well as global brands. Recent investigations by Greenpeace revealed extensive fires and clearance in the peatland area within and beyond concession boundaries of a PT Arrtu Energi Resources (Eagle High) concession in Ketapang, West Kalimantan. The area is identified as orangutan habitat and is covered by the government moratorium on new permits for development on primary forest or peatland. Images such as these demonstrate how the problems in Ketapang go beyond IOI Group.

The web of external suppliers and complex trading makes it essential for the palm oil industry as a whole to clean up its operations and monitor smaller producers, as part of solving the problems of fires and peatland destruction.



**PT Arrtu Energi Resources,  
20 September 2015**

Drone footage on the boundary of an Arrtu Energi Resources (Eagle High) concession in Ketapang, West Kalimantan shows extensive fires and clearance in the area within and beyond concession boundaries.

©Greenpeace



Kalimantan, 3  
December 2015,  
3°3'35.28"S  
113°30'42.072"E  
Peatland forest.  
©Ifansasti/Greenpeace



PT BNS, 3 December  
2015, 2°54'22"S  
110°41'1"E  
Smoke rising from  
peatland at the  
border of the PT  
Berkat Nabati  
Sejahtera (IOI Group)  
oil palm concession  
in Ketapang, West  
Kalimantan.  
©Ifansasti/Greenpeace

# RSPO STANDARDS FAIL TO PROTECT PEAT LANDSCAPES



Whilst the RSPO's standards currently acknowledge much of the damage oil palm plantations do to peat, they fail to incorporate real efforts to prevent this damage, leaving the RSPO lagging behind both progress in the private sector and recent directives from the Indonesian government – notably instructions from the Minister of Environment and Forestry to all plantation companies to dam canals, to halt all development on peat and to restore all burnt areas.<sup>71</sup>

The RSPO 2013 Principles and Criteria (P&C) and 'Manual on best management practices for existing oil palm cultivation on peat' clearly state that subsidence and significant CO<sub>2</sub> emissions are inevitable in palm plantations on peat even in optimum conditions. The best practice manual cites scientific studies showing a 'carbon footprint of about 60 tonnes of CO<sub>2</sub>/hectare/year'<sup>72</sup> under optimal drainage of 40–60cm, and notes that 'implementation of good water management and other BMPs will reduce subsidence but will not stop it'<sup>73</sup> so that 'in the long term, the demise of the drained peat soil layer is inevitable'.<sup>74</sup>

It appears that the RSPO accepts that plantations on peat are a short-term destructive land use with major environmental implications, yet the P&C do not even ban replanting on peat after the current plantation cycle, merely recommending drainability assessments and that companies 'should consider ceasing replanting'.<sup>75</sup>

The P&C direct companies to avoid 'extensive planting on ... fragile soils, including peat' in new developments<sup>76</sup> with accompanying guidance suggesting this should be no more than 100 hectares in a development.<sup>77</sup>

Neither document addresses the damage to peat and forests in the wider landscape caused by drainage for plantations.

The RSPO's failure to protect peatland in its P&C and best practice manual and the failure to effectively enforce existing standards, mean it is falling behind best-practice efforts to prevent fires and degradation.

## ALTERNATIVES – CROSS-SECTOR COLLABORATION ON PEAT PROTECTION

Work to protect and restore Indonesia's peatland has already begun.

Hydrological mapping is essential to assessing priority areas and private-sector work has now developed a cost-effective approach to LiDAR mapping which can be used on major domes and deep coastal peat, which account for the lion's share of Indonesia's peatland. This system has already been used to survey around half of Sumatra's peatland and the data will be made available to the Indonesian government.

Rewetting of dry peat by blocking drainage canals can help prevent fires and reduce peat degradation. Reviews of past canal blocking have shown that community-constructed box dams can be a long-term solution in smaller ditches, but have a limited lifespan in large canals where water flows are higher. An alternative has recently been developed for use at scale, using dams built of compacted peat: tests so far suggest these dams are more robust and cost effective and could provide a long-term solution in primary drainage canals. Thousands of such dams have now been built on perimeter canals in pulp concessions in Sumatra.

Companies that between them control 2 million hectares of peatland are showing some signs of starting to mitigate their impact on peat. Much more is needed including collaboration between actors operating in the same peatland landscapes. These landscapes are often impacted by oil palm company operations.

**It is critical for the plantation sector as a whole – pulp growers, oil palm growers and industry bodies such as the RSPO – to take action.**

Tanjung Puting National Park,  
Central Kalimantan, 31 October 2013,  
2°49'8.38"S 111°46'44.37"E

Leaping proboscis monkey (*Nasalis larvatus*).  
Proboscis monkeys are listed as Endangered  
on the IUCN Red List. The HCV assessment  
for IOI's PT BSS concession identified that it  
included habitat for this species.

©fansasti/Greenpeace



# 6-STEP PLAN TO SAVE PEAT LANDSCAPES

## 1. MORATORIUM

- Immediate moratorium on plantation development and expansion.

## 2. MAPPING

- Conduct HCV and HCS assessments (using the High Carbon Stock Approach methodology) to identify all remaining forest and other socially or ecologically-important areas.
- Map out all peatland landscapes affected by own operations and suppliers using appropriate technology, including LiDAR, to identify priority areas for intervention and those areas most at risk from subsidence. Make this data publicly available.

## 3. COLLABORATION

- Engage with communities living on and around peat domes and incorporate their knowledge and needs in development of management plans.
- Multi-stakeholder partnerships within priority peatland landscapes to collaborate on peatland protection and management.

## 4. PROTECTION

### SHORT-TERM

- Immediate retirement of areas most dramatically degrading peatland forests (eg through dieback) inside or adjacent to the concession areas.
- Raise water levels throughout plantation areas to attempt to reduce subsidence rates and decrease fire risks.
- Introduce buffer zones to protect remaining peatland forests in and adjacent to concessions.
- Permanently protect all remaining forest and other socially or ecologically important areas in concessions.
- Require all third party suppliers to do likewise and develop an ambitious time-bound plan for phasing out non-compliant suppliers.

### MEDIUM-TERM

- Government: Rezoning of peatland areas and revision of peat regulations to protect forest, stop drainage impacts and prevent further peatland degradation and fires.
- RSPO: Revise standards and monitoring/enforcement systems to compel members to protect peat landscapes on and near existing and new plantations.
- Development of non-drainage-based uses of peatland including cultivation of alternative species and provision of economic alternatives for people living in peat landscapes.

## 5. RESTORATION

- Restoration of natural vegetation on the most vulnerable burned or abandoned peat areas.
- Time-bound plan to phase out all existing drainage affecting peat landscapes by 2040 or earlier.

## 6. TRANSPARENCY AND MONITORING

- Publish all concession maps through Global Forest Watch's online forest monitoring and alert system.
- Require all suppliers to publish concession maps covering their entire operations, prioritising high risk areas by end 2016. Commit to insert transparency clauses in new contracts and to start phasing out producers who do not comply.
- Collaborate on ongoing monitoring of forest cover, peatland subsidence, water table depths and emissions at concession and landscape levels.

# MAPPING SOURCES

Burned area analysis by Greenpeace based on Landsat 7 and Landsat 8 images.

Peat area based on amalgamating:

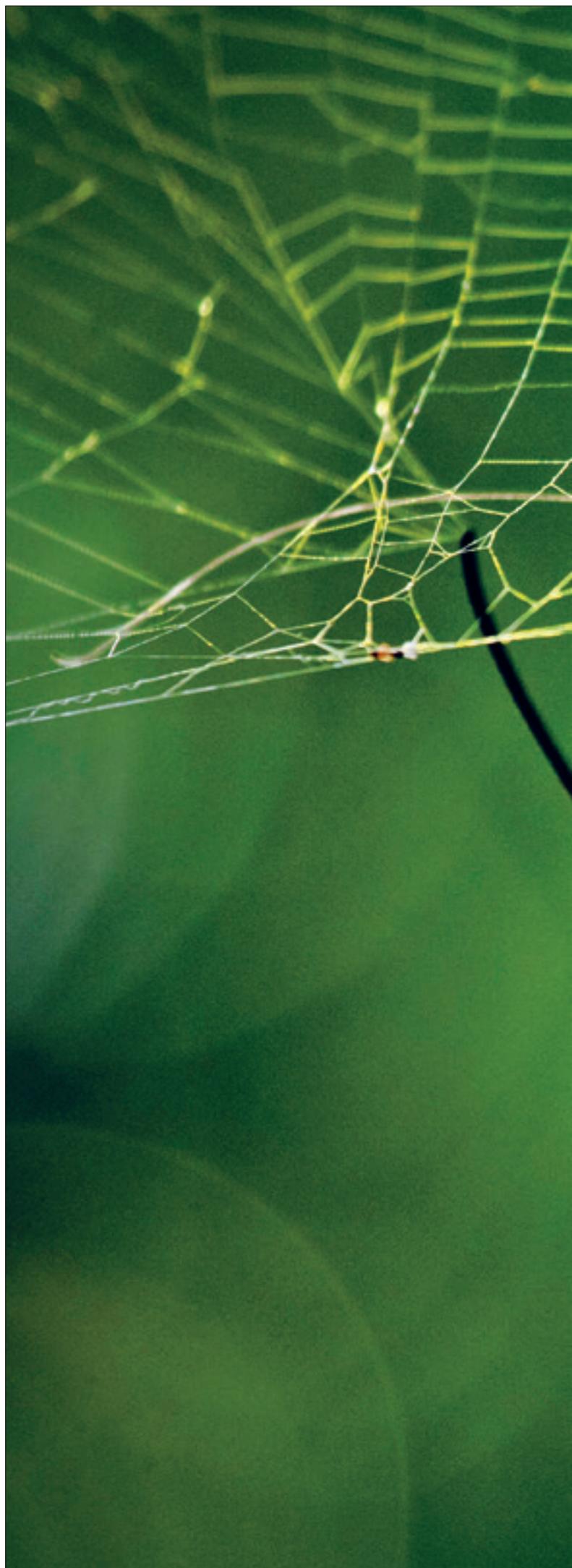
1. RePPProT, 1988–1990. A National Overview from the Regional Physical Planning Programme for Transmigration. UK Overseas Development Administration and Directorate Bina Program, Ministry of Transmigration.
2. Wahyunto S, S Ritung, H Subagjo (2004) Maps of area of peatland distribution and carbon content in Kalimantan, 2000 – 2002. Wetlands International – Indonesia Programme & Wildlife Habitat Canada (WHC)
3. Ritung S, S Wahyunto, K Nugroho, Sukarman, Hikmatullah, Suparto, C Tafakresnanto, 2011. Peta lahan gambut Indonesia. Skala 1:250.000. Balai Besar Penelitian dan Pengembangan Sumberdaya Lahan Pertanian

Oil palm concessions 2015: Greenpeace mapping analysis based on agriculture plantation maps provided by the Planning Department of the Ministry of Forestry, Indonesia, downloaded 29 July 2010 (appgis.dephut.go.id/appgis/kml.aspx), supplemented and updated by Greenpeace with data gathered from provincial planning agencies (BAPEDA) and various plantation companies.

Pulpwood plantation (HTI) concessions 2014: Ministry of Forestry Peta indikatif arahan pemanfaatan hutan pada kawasan hutan produksi yang tidak dibebani Izin untuk usaha pemanfaatan hasil hutan kayu / Industrial forestry concession map, indicating areas for future development, 2014. Badan Penelitian, Pengembangan dan Inovasi / Research, Development and Innovation Agency. <http://www.forda-mof.org/index.php/berita/post/1913>

## Note:

For the purpose of this report, Greenpeace stands for Greenpeace International except where otherwise stated.





10 September 2013  
2°49'46.23"S, 111°48'05.42"E  
A spider in Tanjung Puting National Park,  
Central Kalimantan.  
© Infansasti/Greenpeace

# ENDNOTES

- 1 These are:  
RePPPProT, 1988-1990. A National Overview from the Regional Physical Planning Programme for Transmigration. UK Overseas Development Administration and Directorate Bina Program, Ministry of Transmigration.  
Wahyunto, Ritung S, Subagio H, 2003. Peta Luas Sebaran Lahan Gambut dan Kandungan Karbon di Pulau Sumatera / Map of Area of Peatland Distribution and Carbon Content in Sumatera, 1990-2002. Wetlands International - Indonesia Programme & Wildlife Habitat Canada (WHC), and similar publications for Kalimantan and Papua in 2004 and 2006, collectively referred to as the Wetlands International Peat Atlas.  
Ritung S, Wahyunto, Nugroho K, Sukarman, Hikmatullah, Suparto, Tafakresnanto C, 2011. Peta lahan gambut Indonesia. Skala 1:250.000. Balai Besar Penelitian dan Pengembangan Sumberdaya Lahan Pertanian. The latter two maps were produced on the authority of the Indonesian Ministry of Agriculture. The 2011 map largely derives from the 2003-2006 Peat Atlas with some errors corrected but apparently excluding much shallow peat and not distinguishing among peat depths over 3 metres. See for further discussion section 2 of: BAPPENAS, Ditjen Sumber Daya Air (Directorate of Water Resources), Partners for Water Programme (2013) Quick Assessment and Nationwide Screening (QANS) of peat and lowland resources and action planning for the implementation of a national lowland strategy. Peatland maps for Indonesia, Report on QANS Component 4, February 2013. <https://www.deltares.nl/app/uploads/2015/03/QANS-Peat-mapping-report-final-with-cover.pdf>
- 2 According to the regulation mandating the One Map, Peraturan Presiden Republik Indonesia Nomor 9 Tahun 2016
- 3 IOI Group (2014) RSP0 summary report of SEIA and HCV assessments – PT Bumi Sawit Sejahtera p17 [http://www.rspo.org/file/RSP0-Summary%20Report%20of%20HCV-SIA%20Assessments\\_PT%20BSS.pdf](http://www.rspo.org/file/RSP0-Summary%20Report%20of%20HCV-SIA%20Assessments_PT%20BSS.pdf)
- 4 Greenpeace Indonesia mapping analysis 2016
- 5 Greenpeace mapping analysis 2016. 64,000 hectares of 214,000 hectares based on analysis of images from Landsat 7 and Landsat 8.
- 6 This has been predicted in studies elsewhere in Borneo and in Sumatra. See: Deltares (2015) Drained peatlands in Sarawak, Malaysia will be increasingly flooded due to subsidence. <https://www.deltares.nl/en/news/drained-peatlands-in-sarawak-malaysia-will-be-increasingly-flooded-due-to-subsidence> and Deltares (2015) Assessment of impacts of plantation drainage on the Kampar Peninsula peatland, Riau. <https://www.deltares.nl/en/projects/impact-assessments-for-pulp-and-oil-palm-plantations-in-the-kampar-peninsula-peatlands-riau-indonesia/>
- 7 PT Mayangkara Tanaman Industri is a supplier to APRIL (though not from its Ketapang estate) and PT Buana Megatama Jaya is being assessed as a supply partner by APP. Source: direct communications with Greenpeace.
- 8 Around 49,000 hectares of 153,000 hectares. Greenpeace Indonesia mapping analysis 2016.
- 9 For the purpose of this report, the Ketapang peat landscape is defined as the area of peat located in the south of the West Kalimantan district of Ketapang, covering an area of around 214,000 hectares. The peat map used here is a combination of existing peat maps – see box 'What is the Ketapang peat landscape?'
- 10 IOI Group website, 'Group structure' [http://www.ioigroup.com/Content/CI/Corp\\_Structure](http://www.ioigroup.com/Content/CI/Corp_Structure)
- 11 IOI Group website, 'Group structure' [http://www.ioigroup.com/Content/CI/Corp\\_Structure](http://www.ioigroup.com/Content/CI/Corp_Structure)
- 12 IOI Group (2015) Annual Report 2015 p249 [http://www.ioigroup.com/Content/IR/PDF/AnnualReport/Corp/2015\\_AR.pdf](http://www.ioigroup.com/Content/IR/PDF/AnnualReport/Corp/2015_AR.pdf)
- 13 IOI Group (2015) Annual Report 2015 p249 [http://www.ioigroup.com/Content/IR/PDF/AnnualReport/Corp/2015\\_AR.pdf](http://www.ioigroup.com/Content/IR/PDF/AnnualReport/Corp/2015_AR.pdf) and Bumitama Agri Ltd (2015) Annual Report 2015 p103 <http://ir.bumitama-agri.com/annuals.cfm>
- 14 IOI Group (2015) Annual Report 2015 p254 [http://www.ioigroup.com/Content/IR/PDF/AnnualReport/Corp/2015\\_AR.pdf](http://www.ioigroup.com/Content/IR/PDF/AnnualReport/Corp/2015_AR.pdf)
- 15 IOI (2016) Update on Sustainability 17 April 2016 <http://www.ioigroup.com/Content/NEWS/NewsroomDetails?intNewsID=781>
- 16 IOI Loders Crocklaan website <http://europe.ioiloders.com/>
- 17 IOI Oleochemicals website: Company <http://www.ioioleo.com/company-oleochemical-e.html> viewed 2 June 2016
- 18 IOI Group (2015) Annual Report 2015 p43 [http://www.ioigroup.com/Content/IR/PDF/AnnualReport/Corp/2015\\_AR.pdf](http://www.ioigroup.com/Content/IR/PDF/AnnualReport/Corp/2015_AR.pdf)
- 19 Greenpeace International (2008) 'Burning Borneo' pp 14, 21-25
- 20 RSP0 (2012) Letter from RSP0 to IOI and complainants, 3 May 2012 [www.rspo.org/file/RSP0 letter to IOI LTK sNGO 20120503.pdf](http://www.rspo.org/file/RSP0%20letter%20to%20IOI%20LTK%20SNGO%2020120503.pdf)
- 21 RSP0 website, 'Case Tracker: IOI - IOI Pelita Sdn Bhd' <http://www.rspo.org/members/complaints/status-of-complaints/view/4> viewed 2 June 2016
- 22 Received on 3 April 2015, see RSP0 website 'Case tracker' <http://www.rspo.org/members/complaints/status-of-complaints/view/80>
- 23 RSP0 (2016) Notice to RSP0 Members on the Suspension of IOI Group's certification, 1 April 2016 <http://www.rspo.org/news-and-events/announcements/notice-to-rspo-members-on-the-suspension-of-ioi-groups-certification> Specifically, breach of principle 2, compliance with national laws and regulations, and principle 7, responsible development of new plantings.
- 24 RSP0 (2016) Suspension of IOI Group's Certification 31 March 2016 <http://www.rspo.org/files/download/29e69420862ab64>
- 25 Burrows, D (2016) Major brands dump palm oil supplier IOI following RSP0 suspension [Foodnavigator.com 7 April 2016](http://www.foodnavigator.com/Market-Trends/Major-brands-dump-palm-oil-supplier-IOI-following-RSP0-suspension) <http://www.foodnavigator.com/Market-Trends/Major-brands-dump-palm-oil-supplier-IOI-following-RSP0-suspension>
- 26 GM (2016) General Mills statement on palm oil supplier, News Release, June 3, 2016 <http://www.generalmills.com/en/News/NewsReleases/Library/2016/June/palm-oil-statement63/278f1194-f8f7-448a-bcf9-bbb09cfae997>
- 27 Vaughan, A (2016) Top palm oil producer sues green group over deforestation allegations [The Guardian 9 May 2016](http://www.theguardian.com/environment/2016/may/09/top-palm-oil-producer-sues-green-group-over-deforestation-allegations) <http://www.theguardian.com/environment/2016/may/09/top-palm-oil-producer-sues-green-group-over-deforestation-allegations>
- 28 IOI (2016) IOI withdraws legal challenge against RSP0 Board's decision 6 June 2016 <http://www.ioigroup.com/Content/NEWS/NewsroomDetails?intNewsID=804>
- 29 Jacobson, P (2016) Indonesia's forestry ministry follows through on palm oil permit freeze [Mongabay.com, 23 May 2016](http://news.mongabay.com/2016/05/indonesias-forestry-ministry-follows-palm-oil-permit-freeze/) <https://news.mongabay.com/2016/05/indonesias-forestry-ministry-follows-palm-oil-permit-freeze/>
- 30 Ministerial instructions S.494/MENLHK-PHPL/2015 and S661/MENLHK-SETJEN/ROKUM/2015, see an English translation of the latter here: [http://eyesontheforest.or.id/attach/Minister\\_of\\_E\\_and\\_F\\_Instruction\\_number\\_S.661\\_2015.pdf](http://eyesontheforest.or.id/attach/Minister_of_E_and_F_Instruction_number_S.661_2015.pdf)
- 31 Deltares (2016) Exploration of efficient and cost-effective use of LiDAR data in lowland/peatland landscape mapping and management in Indonesia <https://www.deltares.nl/en/projects/lidar-data-large-scale-peatland-management-flood-risk-assessment/>
- 32 Deltares (2016) Brief guideline for plantation perimeter canal blocking as a rapid fire risk reduction measure in Indonesian peatlands
- 33 IOI Group website 'Environment sustainability - Corporate responsibility - plantation' [www.ioigroup.com/corporateresponsibility/environment\\_plantation.cfm](http://www.ioigroup.com/corporateresponsibility/environment_plantation.cfm) Archived copy via [web.archive.org](http://web.archive.org), dated 31 December 2009
- 34 IOI Group (2014) RSP0 summary report of SEIA and HCV assessments – PT Bumi Sawit Sejahtera p3 [http://www.rspo.org/file/RSP0-Summary%20Report%20of%20HCV-SIA%20Assessments\\_PT%20BSS.pdf](http://www.rspo.org/file/RSP0-Summary%20Report%20of%20HCV-SIA%20Assessments_PT%20BSS.pdf)
- 35 IOI Group (2014) RSP0 summary report of SEIA and HCV assessments – PT Bumi Sawit Sejahtera p17 [http://www.rspo.org/file/RSP0-Summary%20Report%20of%20HCV-SIA%20Assessments\\_PT%20BSS.pdf](http://www.rspo.org/file/RSP0-Summary%20Report%20of%20HCV-SIA%20Assessments_PT%20BSS.pdf)

- 36 IOI Group (2014) RSPo summary report of SEIA and HCV assessments – PT Bumi Sawit Sejahtera p4 [http://www.rsपो.org/file/RSPo-Summary%20Report%20of%20HCV-SIA%20Assessments\\_PT%20BSS.pdf](http://www.rsपो.org/file/RSPo-Summary%20Report%20of%20HCV-SIA%20Assessments_PT%20BSS.pdf)
- 37 Both Presidential Decree 32/1990 <http://www.hukumonline.com/pusatdata/downloadfile/lt4e944f2251dd3/parent/21942> and Government Regulation 26/2008 stipulate that peat >3m deep should be automatically designated as protected areas. Ministry of Agriculture Regulation 14/2009 on Peatland Utilisation for Palm Oil Cultivation provides that peatland may be used for oil palm plantations provided the soils are <3m deep. This replaced the previous Minister of Forestry and Plantation Decree 376/1998 which provided criteria for choosing areas for oil palm plantations and states 'plantation developments on peat soils deeper than two metres are not allowed'. Guidance on peatland development is notable for its absence from the Law of the Republic of Indonesia 39/2014 (Plantation Act). Indonesia Government Peat Regulations 71/2014, currently under revision, allow zoning of peat for protection and cultivation, with peat >3m not already allocated within concessions being earmarked for protection.
- 38 IOI Group (2014) RSPo summary report of SEIA and HCV assessments – PT Bumi Sawit Sejahtera p6 [http://www.rsपो.org/file/RSPo-Summary%20Report%20of%20HCV-SIA%20Assessments\\_PT%20BSS.pdf](http://www.rsपो.org/file/RSPo-Summary%20Report%20of%20HCV-SIA%20Assessments_PT%20BSS.pdf)
- 39 Aksenta (2014) Map of HCV, AGB>40tonC/ha and peat
- 40 IOI website 'Sustainable palm oil manifesto' [http://www.ioigroup.com/Content/S/S\\_PalmOil](http://www.ioigroup.com/Content/S/S_PalmOil) viewed 31 May 2016
- 41 IOI Group (2014) RSPo Notification of ongoing planting 27 February 2014, p24 shows scan of restoration plan. [http://www.rsपो.org/file/Notification\\_ongoing%20NPP\\_PT%20BSS.pdf](http://www.rsपो.org/file/Notification_ongoing%20NPP_PT%20BSS.pdf)
- 42 IOI Group (2014) RSPo Notification of ongoing [sic] planting 27 February 2014 [http://www.rsपो.org/file/Notification\\_ongoing%20NPP\\_PT%20BSS.pdf](http://www.rsपो.org/file/Notification_ongoing%20NPP_PT%20BSS.pdf)
- 43 Letter to Greenpeace South-east Asia from IOI CEO Dato Lee, 26 August 2014
- 44 IOI Loders Croklaan (2014) Sustainable palm oil policy p4 [http://europe.ioiloders.com/images/static\\_pages/150108\\_Brochure\\_Sustainable\\_Palm\\_Oil\\_Policy.pdf](http://europe.ioiloders.com/images/static_pages/150108_Brochure_Sustainable_Palm_Oil_Policy.pdf)
- 45 IOI (2014) Sustainability policy statement revised 15 December 2014 <http://www.ioigroup.com/Content/S/PDF/IOI%20Sustainability%20Policy%20Statement.pdf>
- 46 NASA (2015) Fire Information for Resource Management System (FIRMS) <https://earthdata.nasa.gov/earth-observation-data/near-real-time/firms>
- 47 Aksenta (2015) Talking sustainability: Seeking the truth p4. 'The GIS acreage estimation on the superimposed Landsat satellite imagery of November 18, 2014 and PT. BSS planting block map, revealed that the severe land fires in the period August-November 2014 have burned nearly all areas to the west of PT HSL canal which crosses PT. BSS Permit Area (located in the previously planned '2015 planting block'), covering a total area of about 1,808 hectares. Another significant fire affected area to the east of the PT HSL canal covering a total area of about 3,109 ha of not yet cleared area, and a total area of about 663 ha of newly cleared land in the 2014 planting block.' <http://www.rsपो.org/files/download/a978f9c551ee78d>
- 48 Aksenta (2015) Talking sustainability: Seeking the truth p21 <http://www.rsपो.org/files/download/a978f9c551ee78d>
- 49 1,695 hectares burned. Greenpeace mapping analysis (2016) based on Landsat 7 and Landsat 8 images.
- 50 IOI Corporation and IOI Loders Croklaan (2015) Statement of mutual responsibility between IOI Corporation and IOI Loders Croklaan, 12 January 2015 [http://northamerica.ioiloders.com/images/applications/Mutual\\_responsibility\\_agreement\\_Jan\\_2015.pdf](http://northamerica.ioiloders.com/images/applications/Mutual_responsibility_agreement_Jan_2015.pdf)
- 51 KLHK (2015) Perkembangan Penanganan Penegakan Hukum Kebakaran Lahan dan Hutan [www.menlhk.go.id/berita-16-perkembangan-penanganan-penegakan-hukum-kebakaran-lahan-dan-hutan.html](http://www.menlhk.go.id/berita-16-perkembangan-penanganan-penegakan-hukum-kebakaran-lahan-dan-hutan.html)
- 52 Ministerial instructions S.494/MENLHK-PHPL/2015 and S661/MENLHK-SETJEN/ROKUM/2015
- 53 One example being planting in a development block around the coordinates 2°55'13.462"S/110°43'41.981"E
- 54 Aksenta (2014) Map of HCV, AGB>40tonC/ha and peat
- 55 Daemeter (2016) Review of HCV Report for PT. Bumi Sawit Sejahtera 18 April 2016
- 56 Emphasis in original. IOI (2016) Update on Sustainability 2 June 2016 [www.ioigroup.com/Content/NEWS/NewsroomDetails?intNewsID=801](http://www.ioigroup.com/Content/NEWS/NewsroomDetails?intNewsID=801)
- 57 See above for fuller comment. Legislation includes Presidential Decree 32/1990, Government Regulation 26/2008, MoAg Regulation 14/2009
- 58 RSPo (2013) Principles and Criteria, Principle 2 <http://www.rsपो.org/resources/key-documents/certification/rsपो-principles-and-criteria>
- 59 RSPo (2013) 'Principles and Criteria', clause 7.4 'Extensive' is defined as over 100 hectares. <http://www.rsपो.org/resources/key-documents/certification/rsपो-principles-and-criteria>
- 60 Aksenta (2015) Talking sustainability: Seeking the truth pp20-21 <http://www.rsपो.org/files/download/a978f9c551ee78d>
- 61 IOI Group (2014) RSPo Notification of ongoing planting 27 February 2014, p24 shows scan of restoration plan. [http://www.rsपो.org/file/Notification\\_ongoing%20NPP\\_PT%20BSS.pdf](http://www.rsपो.org/file/Notification_ongoing%20NPP_PT%20BSS.pdf)
- 62 IOI Group (2014) RSPo Notification of ongoing planting 27 February 2014, p19
- 63 See Aksenta (2015) Talking sustainability: Seeking the truth p4 <http://www.rsपो.org/files/download/a978f9c551ee78d>
- 64 Part of the development block around the coordinates 2°49'3.14"S / 110°54'33.92"
- 65 Email from Dr. Surina Ismail, IOI Group Head Of Sustainability, to Greenpeace, received 27 May 2016
- 66 For instance, a weakening on forest protection: the statement moves away from IOI Loders Croklaan's commitment to the High Carbon Stock Approach to the potentially weaker HCS convergence.
- 67 Raison et al (2015) HCS+ Draft extended summary p6 <http://www.carbonstockstudy.com/draft-synthesis-report>
- 68 HCS Approach Steering Group (2015) The HCS Approach toolkit, version 1.0 p7 <http://highcarbonstock.org/the-hcs-approach-toolkit/>
- 69 IOI (2016) IOI withdraws legal challenge against RSPo Board's decision 6 June 2016 <http://www.ioigroup.com/Content/NEWS/NewsroomDetails?intNewsID=804>
- 70 RSPo (2015) RSPo Next Content <http://www.rsपो.org/certification/rsपो-next>
- 71 Ministerial instructions S.494/MENLHK-PHPL/2015 and S661/MENLHK-SETJEN/ROKUM/2015, see an English translation of the latter here: [http://eyesontheforest.or.id/attach/Minister\\_of\\_E\\_and\\_F\\_Instruction\\_number\\_S.661\\_2015.pdf](http://eyesontheforest.or.id/attach/Minister_of_E_and_F_Instruction_number_S.661_2015.pdf)
- 72 RSPo (2013) 'Summary: RSPo manual on best management practices (BMPs) for existing oil palm cultivation on peat' p7 <http://www.rsपो.org/resources/supplementary-materials#>
- 73 RSPo (2013) 'Summary: RSPo manual on best management practices (BMPs) for existing oil palm cultivation on peat' p10 <http://www.rsपो.org/resources/supplementary-materials#>
- 74 RSPo (2013) 'Summary: RSPo manual on best management practices (BMPs) for existing oil palm cultivation on peat' p8 <http://www.rsपो.org/resources/supplementary-materials#>
- 75 RSPo (2013) 'Principles and Criteria', clause 4.3.5 and accompanying guidance <http://www.rsपो.org/resources/key-documents/certification/rsपो-principles-and-criteria>
- 76 RSPo (2013) 'Principles and Criteria', clause 7.4 <http://www.rsपो.org/resources/key-documents/certification/rsपो-principles-and-criteria>
- 77 RSPo (2013) 'Principles and Criteria', p 70 <http://www.rsपो.org/resources/key-documents/certification/rsपो-principles-and-criteria>



**GREENPEACE**

June 2016

Published by Greenpeace International  
Ottho Heldringstraat 5  
1066 AZ Amsterdam  
The Netherlands

[enquiries@greenpeace.org](mailto:enquiries@greenpeace.org)  
[www.greenpeace.org/burningissue](http://www.greenpeace.org/burningissue)

**Front cover:**

PT BSS, 16 April 2016,  
2°55'13.4"S 110°43'40.2"E

A Greenpeace investigator documents the devastation of a company-identified 'No Go' area of peatland in the PT Bumi Sawit Sejahtera (IOI) oil palm concession. This area of the concession suffered extensive fires in 2015.

©Ifansasti/Greenpeace

**Back cover:**

West Kalimantan, 21 September 2015,  
1°52'44.191"S 110°7'33.359"E

A smouldering log on peatland between oil palm concessions in Ketapang, West Kalimantan. The area is covered by the government moratorium on new permits for development on primary forest or peatland.

©Ifansasti/Greenpeace