

GREENPEACE



Summary dossier

From indiscriminate clearance of Sumatra's peat swamp forests to Asia Pulp & Paper's expanding global empire.

Why CITES must act to prevent the pulp sector in Indonesia driving ramin and Sumatran tigers closer to extinction .

A year-long investigation by Greenpeace International demonstrates that Asia Pulp & Paper (APP) is breaking Indonesian law, driving Sumatran tigers and ramin trees closer to extinction, and undermining CITES – the international conservation agreement governing trade in protected species.

The investigation, at APP's largest pulp mill in Indonesia, Indah Kiat Perawang, exposes how illegal ramin logs are regularly mixed into its supply of logs from natural forest clearance (so-called mixed tropical hardwood or MTH). This trade is banned under Indonesia's ramin laws and its national CITES regulations.

Video footage and forensic evidence obtained during this investigation is being made available to the appropriate domestic and international authorities – the Indonesian Ministry of Forestry and the CITES Secretariat in Geneva.



The dossier of evidence.



Illegal ramin logs mixed in with rainforest species

- **Video footage** documenting numerous illegal ramin logs mixed in with other rainforest species waiting to be pulped inside APP's Indah Kiat Perawang complex.
- **Independent laboratory analysis** of wood samples collected during the investigation at the APP mill confirming that all were ramin.

Rainforest fibres in global paper commodities

- **Trade data** revealing the internal pulp sales from APP's Indah Kiat Perawang pulp mill to APP paper mills in Indonesia and China.
- **Independent laboratory analysis** confirming paper samples linked to these APP mills included rainforest fibre (mixed tropical hardwoods, or MTH).
- **Company documents and trade data** revealing countries that import and corporate consumers that buy from these APP mills.

Increased dependence on rainforest logs

- **Indonesian government maps** revealing extensive clearance of peat swamp forest, a key ramin habitat, in areas now supplying pulpwood to APP.
- **Company and government documents** revealing expansion of pulp production at APP's largest mill in Indonesia, Indah Kiat Perawang, and its increasing dependence on logs from clearance of Sumatra's rainforests.

In brief: key findings

Asia Pulp & Paper (APP), the world's third largest paper company, promotes itself as committed to 'conservation beyond compliance' and having 'zero tolerance for illegal wood'.

Investigation at APP's Indah Kiat Perawang pulp mill reveals illegal ramin logs

Indonesia banned the logging and trade in ramin in 2001 in an effort to stop further loss of the species and degradation of its habitat.

A year-long video investigation inside the compound of Indah Kiat Perawang documents how illegal ramin logs are mixed in with the other mixed tropical hardwood logs waiting to be pulped and exported to other APP paper mills in Indonesia and China. Key findings:

- The logyards within the mill compound were visited on numerous occasions in nine separate months between February 2011 and January 2012. **Illegal ramin logs** were identified and documented on each occasion.
- During the visits, numerous illegal ramin logs could be identified, with up to 17 documented within a few paces of each other. This included large logs of **up to 1 metre in diameter**.
- Of the logs identified as ramin, representative samples were collected and sent to an independent laboratory for verification, where an expert specialising in the identification of internationally protected woods confirmed that 46 samples were ramin.

Ongoing APP expansion is increasing pressure on CITES-protected species

APP is heavily reliant on logs from clearance of Sumatran peat swamp forest, a key habitat for CITES-protected species including ramin and Sumatran tigers.

- Sumatra's peat swamp forests are important habitat for the **Sumatran tiger and ramin tree species**, both CITES-protected species. The logging and trade in ramin has been illegal in Indonesia since 2001. Internationally, the trade in Indonesian ramin is banned under the UN Convention on International Trade in Endangered Species (CITES) – the same treaty that controls or bans international trade in many species including rhino horn and elephant ivory.
- Despite its importance as a habitat for CITES-protected species, Indonesian government maps show that 800,000ha (28%) of Sumatra's peat swamp forest was cleared between 2003 and 2009. **Some 22% of this clearance was in areas currently allocated to APP's log suppliers.**

As part of APP's bid to be the largest paper company in the world, it is in the process of expanding production considerably at Indonesia's largest pulp mill. The expansion at Indah Kiat Perawang is increasing APP's reliance on rainforest logs, including from the indiscriminate clearance of peat swamp forest.

- Indah Kiat Perawang is increasing its reliance on pulpwood from the clearance of Sumatra's rainforest (so-called mixed tropical hardwoods).
- Indah Kiat Perawang is already increasing its pulp production from ~2 million tonnes in 2009 to an estimated

~2.3 million in 2010 and 2011.

- Indonesian government documents show that APP planned to double the volume of MTH use from 20% to **44% of the mill's pulpwood supply** between 2009 and 2011 – meaning that for 2011, APP would need to clear an area of rainforest the size of Jakarta to produce 5 million m3 of logs.
- A 2011 APP report states that Indah Kiat Perawang intends to increase pulp production further by increasing its licensed capacity by an additional 50%, from 2 to 3 million tonnes per year.

International trade is undermining CITES

APP's dependence on rainforest logs including the indiscriminate clearance of ramin habitat is undermining CITES. APP paper products containing rainforest fibre from this clearance enter international trade and are traded to most CITES party countries.

- MTH logs from the clearance of Sumatra's peat swamp forest – a key ramin habitat – are central to pulp production at Indah Kiat Perawang.
- A 2009 Ministry of Forestry document reveals that the mill relies upon MTH log supplies from clearance within concessions located on peatland.
- Indonesian government maps show that in concessions currently controlled by APP suppliers, a total of **180,000ha of peat swamp forest, an area more than twice the size of New York City**, were cleared between 2003 and 2009 – some 40% of the original area (440,000 ha).
- Indah Kiat Perawang is a key supplier of MTH pulp to APP mills in Indonesia and China that export products to most CITES countries.
 - Indah Kiat Perawang trades to 9 APP companies in Indonesia and China; these 9 companies export ~3.1 million tonnes of paper, tissue and packaging products to the global market – over **80% of total exports** from APP Indonesia and China.
 - Fibre tests of consumer products linked to individual APP paper mills owned by those APP companies confirm the presence of MTH (that is, Indonesian rainforest fibre) in the supply chains of 8 out of these 9 APP companies.
 - **136 CITES countries** (78% of all CITES parties) import paper products from APP mills in Indonesia and China with trade links to Indah Kiat Perawang. Key identified markets include North America (USA, Canada), Europe (UK, Spain, Italy, Greece), Asia-Pacific (China, Japan, Australia, New Zealand), South Africa and the Middle East (UAE, Israel).
- Specific products from these APP paper mills – ranging from copy paper to tissue, books and packaging – were confirmed through independent testing to contain MTH fibre. These products were bought in 8 countries and

relate to 12 separate corporate consumers and traders. They include:

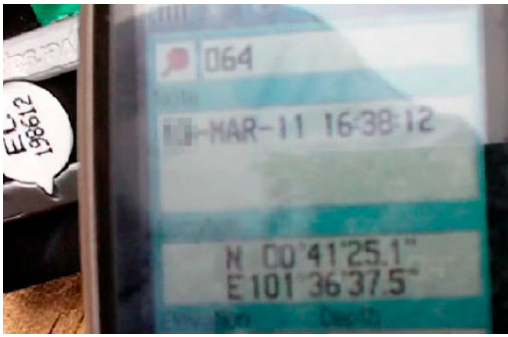
- Xerox (USA): copy paper bought in Greece
- Danone (France): baby milk formula packaging bought in Indonesia in Carrefour
- National Geographic (USA): books bought in the USA through Amazon.com
- Barnes & Noble (USA): books bought in the USA through barnesandnoble.com
- Parragon Publishing (UK): books bought in the UK at a bookshop and in the USA through Amazon.com
- Acer (Taiwan): packaging for a notebook bought in the UK through eBay.co.uk
- Progressive Enterprises (New Zealand): APP-brand tissue bought in New Zealand at Countdown
- Walmart (USA): APP-brand copy paper bought in China at Walmart China
- Collins Debden Ltd (UK) and Collins Debden Pty Ltd (Australia): diaries bought from Collins Debden (UK) through collinsdebden.co.uk and in a shopping centre in Australia
- Mondi Group (UK/South Africa): coated paper sourced from Mondi Hadera in Israel
- Constable & Robinson (UK): books bought in the UK through Amazon.co.uk

Greenpeace calls for illegal ramin logs to be seized and peat swamp forest to be protected.

To protect ramin habitat from indiscriminate clearance and to avoid illegal ramin entering the supply chains of export-oriented paper companies, the following actions are critical:

- **Sinar Mas/ APP:**
A Sinar Mas group-wide policy ending all deforestation, including clearance of peat swamp forest. Golden Agri-Resources, the palm oil division of the group, is already implementing such a policy.
- **Ministry of Forestry:**
The seizure of illegal ramin in APP's pulpwood supply and APP and its 'exclusive' supplier, Sinarmas Forestry, charged, prosecuted and punished in accordance with the law.
- **Ministry of Forestry:**
A ban on all clearance of peat swamp forest, as recommended by a Ministry of Forestry report on ramin.
- **Corporate consumers:**
Immediately cease trade with APP. Companies should implement policies to ensure zero deforestation in their supply chains.





APP is clearing rainforests critical to internationally protected species

Asia Pulp & Paper (APP), part of the Sinar Mas group, claims to be the world's third largest paper company.¹ It aspires to be number one, 2 and is expanding rapidly.³

APP's pulp and paper operations in Indonesia service an export-oriented market. Its largest pulp mill in Indonesia, Indah Kiat Perawang, in Riau, Sumatra, is a primary source of pulp raw materials. APP says its sister company Sinarmas Forestry, whose principal operations are on the island of Sumatra, is its 'exclusive' pulpwood supplier.⁴

APP claims it has 'zero tolerance for illegal wood',⁵ and that its policies ensure so-called 'conservation beyond compliance'.⁶ Specifically, it claims its policies ensure the conservation of protected species – such as those listed by CITES – and any illegal wood will be 'rejected before it enters the mill'.⁷

The United Nations Convention on the International Trade in Endangered Species (CITES) is an international treaty drawn up in 1973. Its objective is to protect wildlife against overexploitation, through regulating international trade of threatened species.⁸ Through it, all international commercial trade in products including rhino horn, ivory, whale meat, tiger skins and 'medicine' is either heavily regulated or banned.⁹

In 2001, Indonesia unilaterally placed its populations of ramin on the CITES¹⁰ list of protected species in order to help enforce a ban on the logging and trade in the species it imposed in the same year.¹¹ Indonesia imposed the ramin ban in an effort to stop further loss of the species and degradation of its habitat.¹²

Ramin is the common name given to ~30 tree species that all belong to the same genus (group of related species) *Gonystylus*.¹³ These are found principally Indonesia and Malaysia.¹⁴ Many of the ramin species are classified as 'vulnerable',¹⁵ meaning that due to habitat loss and overexploitation¹⁶ ramin 'is facing a high risk of extinction in the wild in the medium-term future'.¹⁷

One of ramin's key habitats – Sumatra's peat swamp forest¹⁸ – was heavily targeted by the timber industry.¹⁹

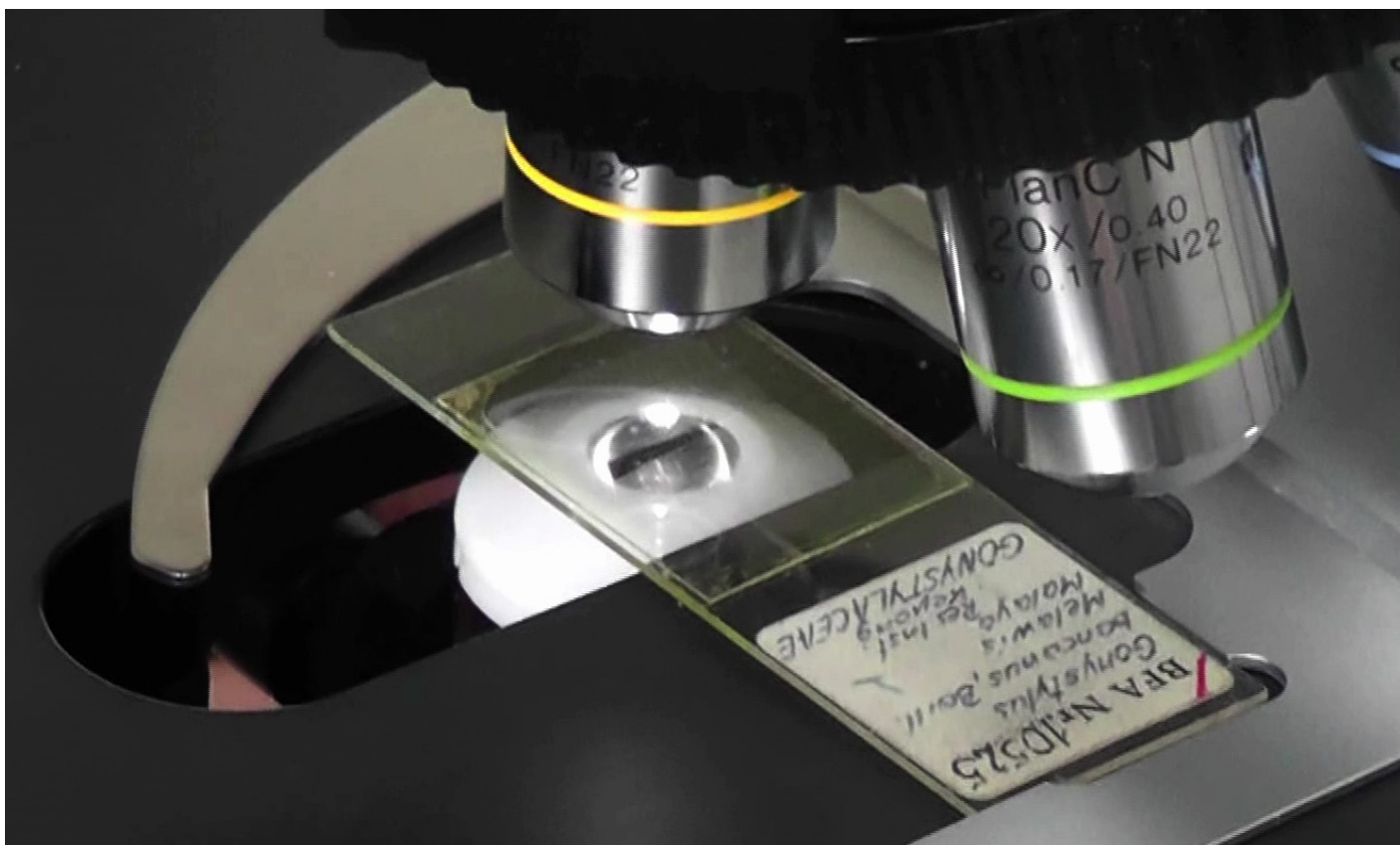
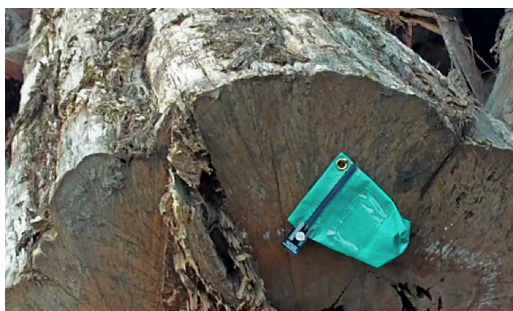
Although ramin trees have been legally protected since 2001 under Indonesian laws and its national CITES regulations, government maps show that some 800,000ha (28%) of Sumatra's peat swamp forest was cleared between 2003 and 2009.²⁰ Much of this peat swamp forest was important habitat for other CITES-protected species, including Sumatran tigers²¹ – only 400 of which remain in the wild.²²

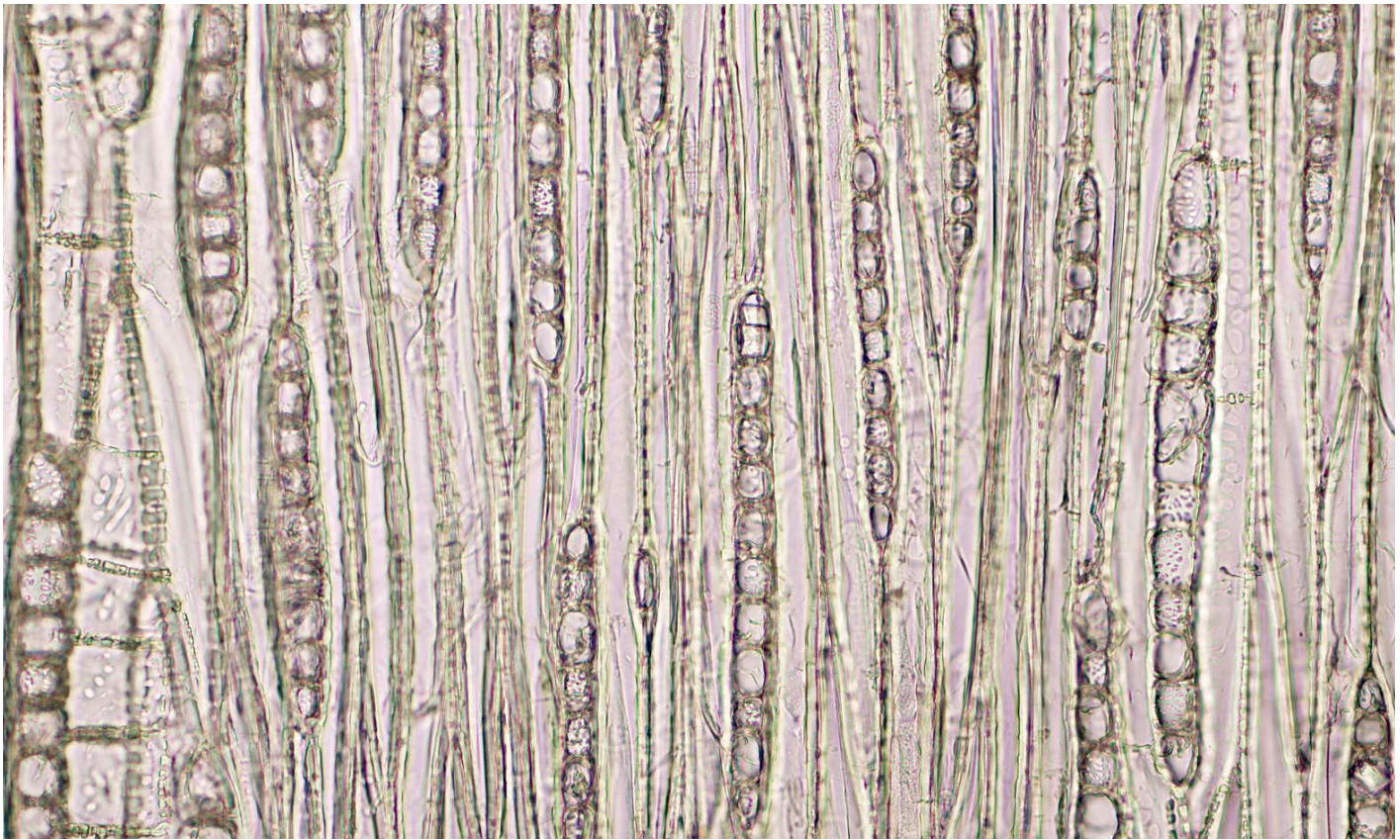
Some 22% of this loss occurred in areas currently allocated to APP's pulpwood suppliers.

The investigation at APP's Indah Kiat Perawang pulp mill.

APP claims that the Indah Kiat Perawang mill has procedures 'to confirm that no illegal or controversial wood enters the mill's pulpwood supply chain',²³ and that all inbound deliveries of logs from its suppliers are inspected to ensure that no ramin or other protected species enter the mill gate.

A year-long video investigation inside the compound of Indah Kiat Perawang documents how illegal ramin logs are regularly mixed in with the other rainforest species (so-called MTH or mixed tropical hardwood species) waiting to be pulped and exported to other APP paper mills in Indonesia and China. Key findings:





- The logyards within the mill compound were visited on numerous occasions in nine separate months between February 2011 and January 2012. Illegal ramin logs were identified and documented on each occasion.
- During the visits, numerous illegal ramin logs could be identified, with up to 17 documented lying within a few paces of each other. This included large logs of up to 1 metre in diameter.
 - Of the logs identified as ramin, representative samples were collected and sent to an independent laboratory for verification, where an expert specialising in the identification of CITES-listed woods confirmed that 46 samples were ramin.

The evidence demonstrates that APP policies and procedures are failing to prevent ramin logs illegally entering any part of its supply chain, be it within the concessions, in transport to mills, or at the mill gate or port.

MTH fibre indicates ramin risk

Indonesian government maps show that in 2003, 440,000 ha of Sumatra's peat swamp forest was held in areas currently controlled by APP suppliers; by 2009, there was just 260,000ha of peat swamp forest in this area, a loss of 180,000ha,²⁴ an area more than twice the size of New York City.²⁵

A 2009 Ministry of Forestry document²⁶ naming the supply areas to Indah Kiat Perawang reveals that much of the MTH wood supply to the mill comes from concessions located on peatland.

An important share of Indah Kiat Perawang's MTH log supply continues to come from the clearance of peat swamp forest,

a key ramin habitat. Therefore, the regular presence of illegal ramin logs mixed in with other rainforest species in the mill's logyards is a strong indication that ramin habitat is being cleared indiscriminately by APP's suppliers to supply Indah Kiat Perawang.

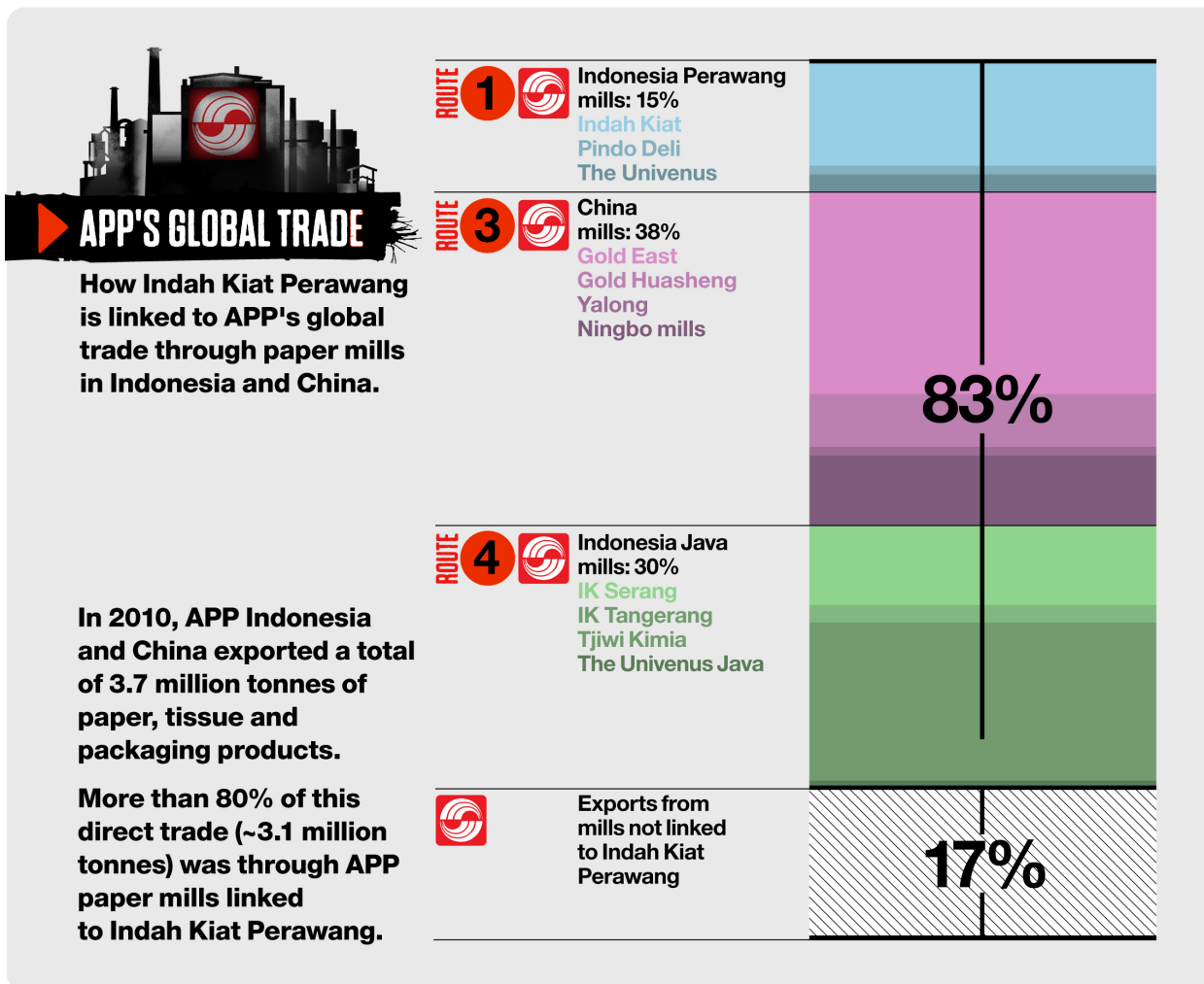
Consequently, the presence of MTH fibres in an end product linked to pulp produced by Indah Kiat Perawang indicates that the product may include fibre from the indiscriminate clearance of ramin habitat; supply from this clearance has been documented to include illegal ramin.

Expansion of APP's Indah Kiat Perawang pulp mill increases pressure on Sumatra's rainforests.

Indah Kiat Perawang produced ~2 million tonnes of pulp in 2009.²⁷ According to Ministry of Forestry data for 2010 and 2011, the mill produced ~2.3 million tonnes of pulp in 2010,²⁸ and had pulpwood supplies predicted to be sufficient to produce over 2.3 million tonnes of pulp in 2011.²⁹ This indicates that the mill is expanding pulp production.

Indonesian government documents show that Indah Kiat Perawang planned to double its use of MTH logs from rainforest clearance from 2.4 million m³ in 2009³⁰ to 5 million m³ in 2011.³¹ This volume equates to some 44% of the mill's total planned pulpwood supply for 2011. 5 million m³ of MTH logs amounts to ~64,000 ha of rainforest clearance in 2011 alone³² – that is the area of Jakarta.³³

A 2011 APP report states that Indah Kiat Perawang intends to increase pulp production further by increasing its licensed capacity by an additional 50%, from 2 to 3 million tonnes per year.³⁴ This will increase pressure on Sumatra's peat swamp forests.



From APP's Indah Kiat Perawang pulp mill to other APP paper mills in Indonesia and China

MTH fibre produced by Indah Kiat Perawang penetrates the international market either directly from the Perawang complex or indirectly, through other APP paper mills in Indonesia and China.

- Using company documents, trade and shipping data, the investigation identified 12 individual APP paper mills run by 9 APP companies in Indonesia and China with trade links to Indah Kiat Perawang.³⁵
- Through fibre testing of products or brands associated with individual APP companies, the investigation established the use of MTH pulp or fibre in the supply chains of 8 of these 9 companies.³⁶
- 2010 trade data show that over 80% of total direct exports by APP Indonesia or China (~3.1 million tonnes) are paper, tissue or packaging products from these 12 APP paper mills.³⁷

From APP paper mills linked to the Indah Kiat Perawang pulp mill to CITES party countries and consumer products.

Some 136 CITES party countries (the vast majority of signatories to the treaty) import products from the 12 APP paper mills linked to Indah Kiat Perawang.³⁸

The investigation has identified specific products linked to these APP paper mills and containing MTH fibre. These products, ranging from copy paper to tissue, books and packaging, were bought in 8 countries and relate to 12 separate corporate consumers and traders. They include Acer (computer packaging), Barnes & Noble (books), Danone (formula milk packaging), Mondi (printing and packaging materials), National Geographic (books), Parragon Publishing (books), Walmart China (APP-brand copy paper), and Xerox (copy paper).

APP undermines CITES by pulping peat swamp forest.

APP's international trade in paper products is driving at least two CITES-protected species (Sumatran tigers and ramin) closer to extinction through the indiscriminate clearance of their Sumatran peat swamp forest habitat. This rainforest clearance, to feed its global paper empire, is clearly undermining the conservation objectives of CITES.

Demands

▶ The Sinar Mas group should ban the clearance of peat swamp forest.

Banning the clearance of peat swamp forest is a key recommendation in an Indonesian Ministry of Forestry report on ramin conservation: 'The practice of peat forest conversion into forest plantation should be prohibited.'³⁹

Such a policy would significantly reduce the risk of any ramin entering any part of APP's supply chain.

APP's sister company within the Sinar Mas group, palm oil producer Golden Agri-Resources, is already implementing a policy ending all peat swamp forest clearance.⁴⁰

- The Sinar Mas group as a whole, including APP and its 'exclusive' supplier Sinarmas Forestry, should implement a policy ending all deforestation, including a ban on the clearance of any peat swamp forest.

▶ Call for international action: 'Let's save ramin, let's save peat swamp forests'

This investigation demonstrates that APP's international trade is adversely affecting ramin species and their habitat in contravention of Indonesia's CITES regulations and its ramin ban.

Evidence including video footage from within the Indah Kiat Perawang compound as well as independent test results is being made available to the two key authorities responsible for ensuring Indonesia's effective compliance with the Convention on the International Trade in Endangered Species: Indonesia's Ministry of Forestry and the CITES Secretariat in Geneva.

Given evidence that the provisions of the Convention are not being effectively

implemented by Indonesia, such as that presented by this investigation, the CITES Secretariat can request that Indonesia's CITES Management Authority – the Ministry of Forestry – propose 'remedial action' to address the problem.⁴¹

▶ Key demands of Indonesia's CITES Management Authority

A key role of Indonesia's CITES Management Authority, the Ministry of Forestry, is to enforce Indonesia's ramin logging and trade ban and to ensure that no ramin enters international trade in violation of CITES regulations.

Enforcement of these regulations by the Ministry of Forestry must include these measures in relation to APP:

- Seizure of all illegal ramin in APP's supply chain – this includes at the Indah Kiat Perawang complex, at any of its suppliers' related forest clearance operations and logyards, in transport to the mill on trucks or barges.
- Ensuring APP and its 'exclusive' supplier, Sinarmas Forestry, are prosecuted and punished in accordance with the law.

▶ Key demands of corporate consumers of APP products

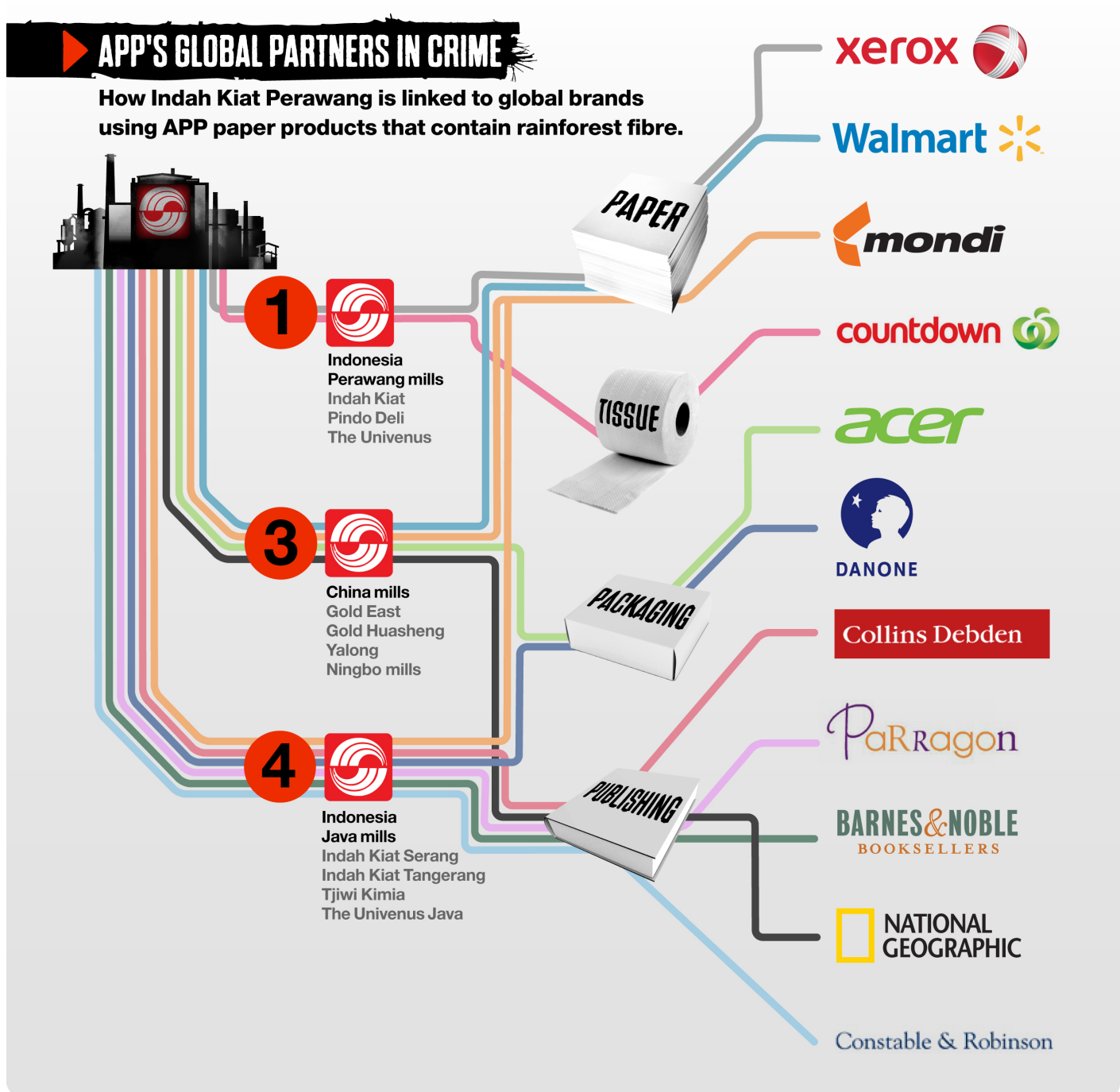
Any company trading with APP is providing financial support to a company that is breaking Indonesian law, driving Sumatran tigers and ramin trees closer to extinction, and undermining CITES – the international conservation agreement governing trade in protected species.

Given the risks associated with APP, a number of companies are removing APP products from their supply chains.

- Companies should immediately cease trade with APP and implement policies to ensure zero deforestation in their supply chains.



Chain of custody links between global brands where MTH has been found in at least one product and APP mills with trade links to Indah Kiat Perawang.



Xerox and Danone products produced by Indah Kiat contain high levels of Indonesian rainforest fibre^A

Xerox copy paper linked to Indah Kiat consists predominantly of Indonesian rainforest fibre.

Trade data showing that Xerox Astro brand copy paper is manufactured by APP's Indah Kiat Perawang facility together with independent fibre analysis of the product reveal that it contains high levels of Indonesian rainforest fibre.

1. Confidential 2010 and 2011 trade data obtained by Greenpeace show that the Xerox Astro brand copy paper sold in Greece is manufactured by Indah Kiat Perawang.
2. Greenpeace sent samples of this copy paper to the Institute for Paper Science and Technology in Germany for fibre analysis. Its full report for one sample taken from this copy paper indicates that 60% of the hardwood vessels counted are what the laboratory categorises as 'unknown hardwood' species. The evaluation was 'a strong indication for mixed tropical hardwoods as 130 unknown vessels have been found, together with acacia'.^B

Below: Fibre analysis report from the Institute for Paper Science and Technology (Germany) shows the breakdown of fibre content within a paper sample from Astro copy paper produced for Xerox.



Fiber analysis of paper

10.01.2012 sf/se

Ordered by: Greenpeace Canonbury Villas London N1 2PN United Kingdom
 Date of order: 2011-12-13
 Your order number:
 Our order number: IPAP-11-320

Institution for
Paper Science and Technology
 IFP-g GMBH
 Alexanderstraße 8
 64283 Darmstadt

Test	Pulp	Sample
		Producer: XEROX Brand name: ASTRO ***Product details on the sample-package: 5033811987913/007R98791 Copy paper Country of delivery: Greece II
Number of test specimen: 5 Estimated number of fibers examined: ca. 2500		
Qualitative identification*	Chemical softwood	Douglas fir identified
	Chemical hardwood	Acacia; 130 unusual vessels of different species were found, but unknown
	Mechanical pulp/rag	Traces
Number of test specimen: 2 Estimated number of fibers examined: ca. 800		
Quantitative determination*	Chemical softwood	ca. 10 %
	Chemical hardwood	ca. 90 % - ca. 30 % Acacia** - ca. 60 % Unknown hardwoods**
Evaluation	There is a strong indication for mixed tropical hardwoods as 130 unknown vessels have been found, accompanied by acacia. There are many destroyed vessels which could neither be identified nor counted.	

**The vessels of all hardwoods were counted together with the number of softwood vessels.

INSTITUTION FOR PAPER SCIENCE AND TECHNOLOGY (IFP-g GmbH)
 PROF. DR.-ING. S. SCHABEL

Ordered by: Greenpeace Canonbury Villas London N1 2PN United Kingdom
 Date of order: 2011-12-13
 Your order number:
 Our order number: IPAP-11-320

Legend
 *applied test methods: ZMIN/74, T 4010m-03
 observation in transmission, magnification 100 times
 Dyeing methods: Herzberg stain, Alexander stain
Weight factors used in quantitative determination
 Softwood pulp: 0,9
 Hardwood pulp: 0,5
 Mechanical pulp: 1,3
Number of test specimen (qualitative identification)

Either the sample or the ply to observe have been
 If no OBA is detected the sample is surely made
 If OBA is detected this will not necessarily mean
 If ink residues are detected on the fibers this will

Qualitative identification:
 This method only gives different wood species

Softwood pulp:
 Softwood pulp can be separated from hardwood
 Different softwoods can only be separated by
 Autumn tracheids of different species often
 other species may not be excluded for sure

Hardwood pulp:
 Hardwood pulps can be separated from softwood
 pulping and paper making process. This is
 Therefore, if a detected vessel is accurately
 To determine a species it is necessary to
 Very low tropical hardwoods have been
 In consequence, for qualitative identification
 But these unknown vessels may derive from
 or from vessels that could not exactly be
 Eucalyptus and Acacia are not regarded

Literature:
 Fiber Atlas, Springer Series in Wood
 Faseratlas, Dr. Marianne Haders-Stie

Danone packaging linked to Indah Kiat consists predominantly of Indonesian rainforest fibre

APP promotional material showing that packaging for Danone Nutricia baby milk is manufactured at APP’s Indah Kiat Serang facility together with independent fibre analysis of the product reveal that it contains high levels of Indonesian rainforest fibre:

1. Packaging for Danone Nutricia baby milk is produced by Indah Kiat Serang, according to APP promotional material. Indah Kiat Perawang supplies virgin pulp to this sister paper mill.^c
2. Greenpeace sent samples of this packaging to IPS in the USA for fibre analysis. Its full report for one sample taken from the glossy printed top sheet of this packaging board (ie paper made from virgin fibre) indicates that 59% of the sample is hardwood, and virtually all (97%) of this is mixed tropical hardwoods from at least 15 different tree types.^p

Below: Fibre analysis report from IPS (USA) shows the breakdown of fibre content within a paper sample from (Danone Nutricia packaging. Microscopic image shows fibres classified as MTH vessels within the Danone Nutricia sample.

(Endnotes)

- A Both laboratories give percentages for the content of different hardwood species found; however, these are not fully comparable due to differences in methodology.
- B IfP-GmbH test results 2010-2012. Copies held by Greenpeace.
- C APP (2010)
- D IPS test results 2010-2012. Copies held by Greenpeace.



Fiber Type	Hardwood	Raw Count	536
Bleaching	Bleached	Weight Factor	0.45
Pulp Process	Kraft	Final Count	241
		% by Weight	59%

<u>Species</u>	<u>Total Vessels Counted</u>	<u>Calculated Percent By Weight</u>
Mixed Tropical Hardwoods*	97	≈97%
Acacia	3	≈3%

Comments: *At least 15 different types were detected, one which resembles species in the Myristicaceae family.



Figure 1. Danone – Nutricia 10x objective Mixed Tropical Hardwoods vessel

sample we received

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to contact us.

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Supplementary data

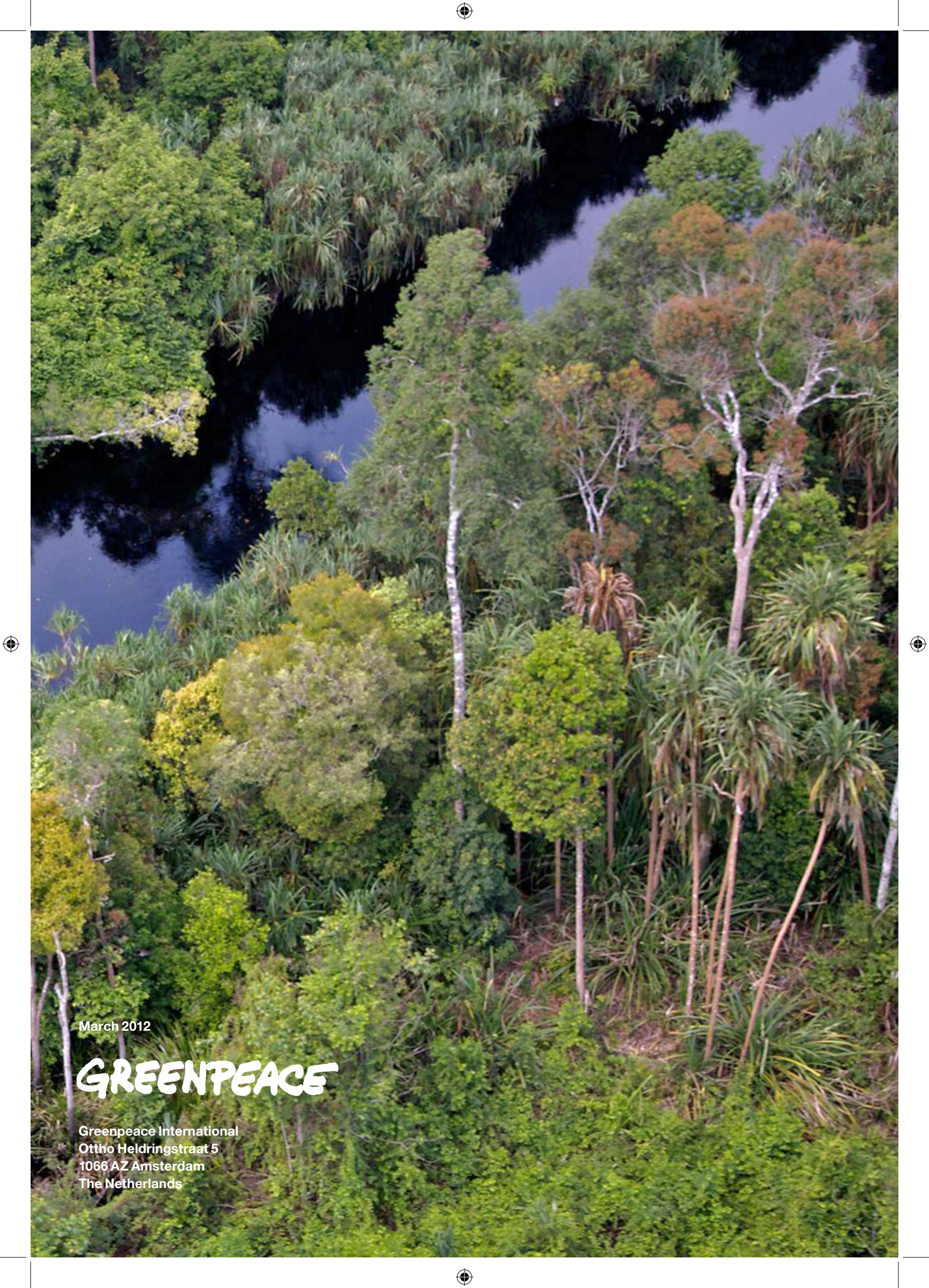
APP market sector	Group	Brand/subsidiary/associate company	Country of sale	APP mill linking the brand and Indah Kiat Perawang	Summary of evidence	Retailed final product	Retailer, location and date of purchase	Testing results showing presence of MTH and/or acacia ⁴²
Copy paper and office supplies	Xerox (USA) ⁴³	Xerox Hellas SA	Greece	Indah Kiat Perawang, Indonesia	APP documents obtained by Greenpeace show 2010–2011 shipping details for Indah Kiat copy paper to Xerox Hellas. Other shipping documentation reveals that Xerox Emirates LLC (UAE) imported copy paper from Pindo Deli (Java) in 2010.	Xerox Astra A4 75gsm (purple) paper and 80gsm (yellow) paper	Astro A4 75gsm: Docusys, Athens (Greece), December 2011 Astro A4 80gsm: Chrysopoulos Theodoros, Athens (Greece)	MTH & acacia
	Walmart (USA)		China	Yalong, China	Greenpeace bought APP own-brand copy paper in various Walmart outlets across China.	Topgun 70gsm A4 copy paper	Walmart, Beijing (China), October 2011	MTH & acacia
	Mondi Group (UK/South Africa)	Paperlink (part of Mondi Group) ⁴⁴	South Africa	Tjiwi Kimia, Indonesia	Shipping documentation obtained by Greenpeace reveals that Paperlink (part of Mondi Group) imported significant volumes of paper from Tjiwi Kimia in 2010. A still active Paperlink website ⁴⁵ indicates that the company has been trading Sinarboard, which is manufactured by Indah Kiat Serang.	Various unidentified art and printing papers	n.a.	
		Hadera Paper Printing (formerly Mondi Hadera Paper) ⁴⁶	Israel	Gold East/Ningbo mills, China Tjiwi Kimia, Indonesia	Mondi Hadera products are sold in Israel under the Mondi brand name. ⁴⁷ In 2006, the company ⁴⁸ signed a rolling contract with APP China to supply coated paper, with 'an obligation on Mondi's part to purchase from suppliers in the APP Group [...] no less than about 15 thousand tons per year' of coated paper. ⁴⁹ As of 2011, the contract remained in force and the company continued to be supplied by APP. ⁵⁰ In 2010, the company imported 40,000 tonnes of paper in total. ⁵¹ Chinese export data indicate that the majority of exports to Israel are from Gold East, although Ningbo Zhonghua also exports coated paper/paperboard. ⁵² Additional information also indicates that Israel imports coated paper from Tjiwi Kimia. ⁵³	Silk APP 157gsm (coated paper) Nevia 90gsm	Sourced from Mondi Hadera (Israel), December 2011	MTH & acacia MTH & acacia
	Nippecraft	Collins Debden Ltd	UK	Tjiwi Kimia, Indonesia	According to its 2010 Annual Report, total sales for the Nippecraft Group were \$80 million. ⁵⁴ Key markets were Australia (42%), North America (28%) and Europe (24%). ⁵⁵ Diaries and other stationery products represented nearly 70% of group sales, ⁵⁶ largely through Nippecraft subsidiaries Collins Debden Pty Ltd (Australia) and Collins Debden Ltd (UK), whose primary business is the distribution of office stationery products such as notepads and account books. ⁵⁷ Nippecraft's various disclosures to shareholders and other financial documents reveal: Nippecraft and its subsidiary Collins Debden are part of the APP Group and Nippecraft buys 'finished products including stationery products' from APP group mills. ⁵⁸ Between 2009 and June 2011, over 70% of Nippecraft purchases from within the APP group ⁵⁹ were from PT Pabrik Kertas Tjiwi Kimia, including TK Import & Export Ltd. ⁶⁰ In 2010, the value of this direct trade with Tjiwi Kimia represented \$18 million. ⁶¹ Unlike Pindo Deli and Indah Kiat, Tjiwi Kimia includes a printing house, TK Printing, and thus is able to supply finished products including stationery products.	Collins Debden Mickey Mouse A5 mid-year diary (Made in Singapore)	www.collinsdebden.co.uk (UK), October 2010	MTH & acacia

		Collins Debben Pty Ltd	Australia	Tjiwi Kimia, Indonesia	See above	Collins 'Week to an opening' A4 2011 diary (blue) (Made in Singapore) Debben Designer 'Week to an opening' pocket 2011 diary (brown) (Made in Singapore)	Broadway Shopping Centre, Kingsgrove (Australia), December 2010	MTH & acacia MTH ⁶² & acacia
Tissue	Progressive Enterprises (New Zealand)	Countdown	New Zealand	Pindo Deli Perawang, Indonesia	Cottonsoft is an APP company manufacturing and distributing tissue products for New Zealand retailers. ⁶³ One of its brands is CottonSofts, which is sold by Progressive Enterprises group retailers including Foodtown and Woolworths, as well as Countdown. A large part of Cottonsoft's 2010 imports to New Zealand from Indonesia were from the Pindo Deli Perawang mill. ⁶⁴	CottonSofts Marine Splash, white unscented two-ply toilet tissue, four-pack	Countdown, Wellington (New Zealand), June 2011	MTH & acacia
Packaging	Acer		UK	Yalong, China	A 2010 online Yalong Paper company brochure ⁶⁵ shows packaging for various Acer laptop models (one netbook and one notebook).	Acer Aspire ONE 532h-2Db (Made in China, 2010)	eBay.co.uk (UK), October 2011	MTH & acacia
	Danone (France)		Indonesia	Indah Kiat Serang, Indonesia	According to an industry source, Danone is an important customer of APP Indonesia. Indah Kiat Serang's website displays a Danone Nutricia product as a reference. ⁶⁶ In Indonesia, Indah Kiat Serang is the only APP mill specialising in the production of coated packaging board, including food-grade materials. It holds FDA (US Food and Drug Administration) certificates for several of its brands. ⁶⁷	Nutricia 'Nutrilon Royal 3' baby milk powder	Carrefour (Indonesia), December 2011	MTH & acacia
Books and printed materials	Parragon Publishing (UK)		USA	Tjiwi Kimia, Indonesia	US customs data for 2011 identify Parragon as an importer of titles from Tjiwi Kimia. Imports include books within the Everyday range, as well as the Mini children's reference slipcase (Parragon Publishing, 2011, ISBN-10 1445442647) US customs data dating back to 2008 also identify Parragon as an importer of various book ranges from Tjiwi Kimia, indicating a long-term relationship with APP.	Everyday baking (Copyright 2010, Printed in Indonesia) ISBN 978-1-1-4075-9447-7	Amazon.com (USA), October 2011	MTH & acacia
	Parragon Publishing (UK)		UK	Tjiwi Kimia, Indonesia	US customs data for 2011 identify Parragon as an importer of titles from Tjiwi Kimia including books within the Everyday range. Parragon also sells the Everyday range in the UK. Books within the Everyday range bought on Amazon.co.uk that are printed in Indonesia include: Everyday Thai (2010), ISBN 978-1-4075-9452-1; Everyday Mediterranean (2010), ISBN 978-1-4075-9450-7; Everyday chocolate (2010), ISBN 978-1-4075-9448-4; and Everyday desserts (2010), ISBN 978-1-4075-9449-1). Similar books in the same range can be bought on Amazon.com.	Energy food ISBN 978-1-4075-7868-2	Bookshop, London (UK), October 2011	MTH & acacia

	Barnes & Noble (USA)		USA	Tjiwi Kimia, Indonesia	US customs data from 2009 identify Barnes & Noble as an importer of various titles from Tjiwi Kimia, including <i>Nursery rhyme treasury</i> (published by Parragon). US customs data from 2009–2011 identify Barnes & Noble as the importer of additional titles from Tjiwi Kimia, including: <i>Horses: their temperament and elegance</i> , ISBN 978-1-4351-1678-8 (2009) <i>A cat's life</i> , ISBN 978-1-4351-1762-4 (2009) <i>A dog's life</i> , ISBN 978-1-4351-1763-1 (2009) <i>Legends of rock</i> , ISBN 978-1-4351-1698-6 (2009) <i>Greatest ever Indian: easy and delicious step-by-step recipes</i> , ISBN 978-0-7607-9046-5 (2009) <i>Illustrated history of weaponry</i> , ISBN 978-0-7607-8444-0 (2011) US customs data from 2008–2009 identify Barnes & Noble as importing several book titles from Tjiwi Kimia, indicating a long-term relationship. Titles included <i>The illustrated history of weaponry</i> , ISBN 978-0-7607-8444-0.	<i>Nursery rhyme treasury</i> ISBN-10 1407528572	Amazon.com (USA), October 2011	MTH & acacia
	Barnes & Noble (USA)		USA	Tjiwi Kimia, Indonesia	See above	<i>The illustrated history of weaponry</i> ISBN 978-0-7607-8444-0	Barnesandnoble.com (USA), October 2011	MTH & acacia
	National Geographic (USA)		USA	Gold East Paper/ Gold Huasheng, China	The Sinar Mas Print Awards, sponsored by 'the Sinar Mas group', is open to printers internationally. At least 70% of the paper used in entries must be from Gold East Paper, Gold Huasheng Paper or Hainan Jinhai Pulp & Paper. ⁶⁸ The 2010 Sinar Mas Print Awards name the National Geographic book <i>Global birding</i> for an award. ⁶⁹	<i>Global birding</i> ISBN-10: 1426206380	Amazon.com (USA), October 2011	MTH & acacia
	National Geographic (USA)		USA	Gold East Paper/ Gold Huasheng, China	See above. The 2010 Sinar Mas Print Awards name the National Geographic book <i>Through the eyes of the Vikings</i> for an award. ⁷⁰	<i>Through the eyes of the Vikings</i> ISBN-10: 1426206402	Amazon.com (USA), December 2011	Pending
	Constable & Robinson (UK)		UK	Indah Kiat Serang, Indonesia	The 2011 PrintWeek India Quality Awards name <i>The sacred India book</i> , printed on 'Sinar Mas Royal matt art paper'. ⁷¹ This is assumed to be Sinar Royal, which is produced by Indah Kiat Serang. A sample of the cover was sent for testing, which confirmed the presence of MTH.	<i>The sacred India book</i> ISBN-10 178033124X	Amazon.co.uk (UK), October 2011	MTH & acacia

Endnotes

- 1 Lifshitz (2010): 4
- 2 APP (2011c): 6
- 3 See eg APP (2010) and APP (2011c)
- 4 APP (2011c): 2
- 5 APP (2004, updated January 2009)
- 6 Eg www.youtube.com/watch?v=rEyduROW8Sk
- 7 APP (2004, updated January 2008)
- 8 CITES website 'What is CITES?' www.cites.org/eng/disc/what.php
- 9 eg CITES (2011c)
- 10 In May 2001, a month after imposing a ban on logging and trade in ramin, Indonesia notified CITES that Indonesia's ramin populations should be listed in Appendix III.
In 2004, given ongoing loss of ramin habitat and illegal logging of ramin, the Ministry of Forestry requested CITES party countries to grant all ramin species the higher Appendix II listing, requiring far greater trade controls, in a bid to achieve improved enforcement of the export ban through increased international scrutiny of potential trade violations under CITES. Source: MoFor (2008)
Virtually all trade in products derived from Indonesian ramin are illegal. The Appendix II CITES listing covers any specimen that may contain Indonesian ramin, its parts or derivatives with a few, very limited exceptions like seeds, seedlings and tissue cultures. Source: Annotation #4 CITES (2011a): 45
Pulp or paper products are not specifically exempted from (thus are covered by) the provisions of the listing. Source: [CITES] AGREES that the term 'readily recognizable part or derivative', as used in the Convention, shall be interpreted to include any specimen which appears from an accompanying document, the packaging or a mark or label, or from any other circumstances, to be a part or derivative of an animal or plant of a species included in the Appendices, unless such part or derivative is specifically exempted from the provisions of the Convention' [emphasis added]. Source: Conf. 9.6 (rev) 'Trade in readily recognizable parts and derivatives' www.cites.org/eng/res/09/09-06R11C15.php
In practice, there is only one legal source of ramin – the FSC-certified PT Diamond Raya selective logging operation and its associated processing companies. Source: CITES (2009)
- 11 MoFor (2001a)
According to MoFor/ITTO (2008b): 'Ministry of Forestry Decree No 127/Kpts-V/2001 regarding the moratorium on the logging and trade in ramin: No logging activity of ramin is allowed in production forest, conversion forest and community forest and no trading activity is allowed both domestic and international.'
The decree was updated in July 2001 with decree 168/2001, which provided limited exemption from the ban for selective logging operations that had been independently certified legal and sustainable. Only one operation has ever been subject to this exemption.
The decree was further updated in October 2001 with decree 1613/2001. This decree is not readily available in the public domain or via requests to the Ministry of Forestry. No subsequent advice was forwarded to the CITES Secretariat. However, it is reported that the decree limits exports of ramin to timber from the Diamond Raya concession that has been worked into dowels, mouldings and other semi-finished wood products.
- 12 Government of Indonesia (2004)
- 13 MoFor/ITTO (2005b): iii. Eighteen *Gonystylus* species have been identified within Indonesia, of which seven are found on the island of Sumatra.
- ITTO-CITES Project/MoFor (2010): 4.
- 14 'The vast majority of species is found on Borneo (27 species), especially in Sarawak. Peninsular Malaysia and Sumatra come second with 7 species each.' Source: Government of Indonesia (2004): 1
- 15 IUCN (International Union for Conservation of Nature) 'Red list of threatened species' www.iucnredlist.org
- 16 Not *G. bancanus*. ITTO-CITES Project/MoFor (2010): ii.
- 17 IUCN (1994)
- 18 South Kalimantan is also said to have some ramin forests. See MoFor/ITTO (2005b): 12, MoFor/ITTO (2008a).
- 19 Government of Indonesia (2004): 5
- 20 Greenpeace mapping analysis 2011
- 21 IUCN Red List 'Panthera tigris ssp sumatrae' www.iucnredlist.org/apps/redlist/details/15966/0 accessed 22/12/2011
- 22 WWF (2011)
- 23 IKPP (2010a): 6
- 24 MoFor (2005), MoFor (2010a), MoFor (2010c)
- 25 Not all this loss necessarily occurred during APP's suppliers' ownership.
NYC = 302 miles² = 78,217ha
Source: US Census Bureau. State & country quick facts <http://quickfacts.census.gov/qfd/states/36/3651000.htm> accessed 5/2/2012
- 26 MoFor (2010h)
- 27 1.98 million tonnes. Source: APP (2011c): 28.
- 28 Estimate based on fibre consumption Jan–Nov 2010; source: MoFor (2010h). See also Tempo Interaktiv (2010).
- 29 2.31 million tonnes. Source: MoFor (2011c).
- 30 MoFor (2010h)
- 31 MoFor (2011c)
- 32 50 tonnes of MTH pulpwood/ha of cleared area. Source: Sinarmas Forestry (2007a): 8. Based on IKPP declared consumption of MTH in 2009, supplied by the company to the Ministry of Forestry in m³ and declared in tonnes in its 2008/2009 corporate sustainability report – 1 green tonne of MTH is equivalent to 1.56m³ (or 0.64t/m³). Sources: MoFor (2010h) and, in tonnes, APP (2011c): 28.
- 33 Jakarta = ~650km² Source: www.jakarta.go.id/english/news/2011/03/jakartas-geography accessed 10/2/2012
- 34 APP (2011c): 27
- 35 The 12 mills are Indah Kiat Perawang, Indah Kiat Tangerang, Indah Kiat Serang, Tjiwi Kimia (counting the paper mill and printing facility as one), Pindo Deli Perawang, Univenus Perawang, Univenus Java, Gold East, Gold Huasheng, Yalong, Ningbo Zhonghua and Ningbo Asia Pulp and Paper.
- 36 The 8 companies for which MTH has been identified via fibre testing are Indah Kiat, Tjiwi Kimia, Pindo Deli, Gold East, Gold Huasheng, Yalong, Ningbo Zhonghua and Ningbo Asia Pulp and Paper. The ninth company for which specific products have not yet been definitively identified is The Univenus.
- 37 Chinese import data (source: CTI (2010)) together with confidential information held by Greenpeace
- 38 Based on trade data and CITES 'List of contracting parties' www.cites.org/eng/disc/parties/alphabet.php accessed 22/12/2011
- 39 MoFor/ITTO (2005b): 39
- 40 GAR (2011): 4
- 41 Under Article XIII. See CITES website 'Text of the Convention on International Trade in Endangered Species of Wild Flora and Fauna' www.cites.org/eng/disc/text.php#XII
- 42 IPS and lFP-GmbH test results 2010–2012. Copies held by Greenpeace.
- 43 Note: Xerox Emirates LLC, also owned by Xerox Corp, imports copy paper from Pindo Deli (Java).
- 44 Throughout the period, the Paperlink paper merchant business has been part of the Mondi Group. In the first half of 2010 Paperlink was part of Mondi Plc (UK) through Mondi Packaging South Africa Ltd. After the Group's restructuring, Paperlink was part of Mondi Ltd (South Africa). Source: Mpact (2011).
- 45 Paperlink website 196.37.199.7/Sinarboard.htm accessed 9/1/2011
- 46 Mondi (2011): 20 shows that Mondi Group held a 50.1% interest in Mondi Hadera Paper Ltd up to 31 December 2010. After this, it held a 25% interest.
- 47 Hadera Paper (2011)
- 48 Under the previous trading name of American Israeli Paper Mills Ltd
- 49 Hadera Paper (2008): 123
- 50 Hadera Paper (2011): 69 and Hadera Paper website 'Printing and writing papers' www.hadera-paper.co.il/en/mondi-hadera-paper accessed 17/1/2012
- 51 Hadera Paper (2011): 69
- 52 CTI (2010)
- 53 Confidential information held by Greenpeace
- 54 Nippecraft (2011a) 2010: 56
- 55 Nippecraft (2011a) 2010: 56
- 56 Nippecraft (2011a) 2010: 56
- 57 Nippecraft (2011b): 5
- 58 Nippecraft (2011c): 5
- 59 Nippecraft transactions with APP related companies ('interested persons') between 2009 and June 2011 detail regular and significant trade by Nippecraft with three APP Group mills – PT Indah Kiat, PT Pindo Deli and PT Pabrik Kertas Tjiwi Kimia. Sources: Nippecraft (2011a): 71, Nippecraft (2011b): 8, Nippecraft (2011c): 3.
- 60 Nippecraft (2011a): 71, Nippecraft (2011b): 8
- 61 Nippecraft (2011a): 71
- 62 Fibre testing results show the presence of MTH together with 23% mangrove species.
- 63 Cottonsoft website 'Who we are' www.cottonsoft.co.nz/who.html accessed 17/1/12
- 64 Confidential information held by Greenpeace
- 65 Yalong Paper (2010): 6
- 66 Indah Kiat Serang website 'Printing products' www.ikserang.com/products_printing.asp accessed 10/1/2012
- 67 Indah Kiat Serang website 'Certificates' www.ikserang.com/products_certificates.asp accessed 10/1/2012
- 68 Sinar Mas Print Awards website 'Application requirement' www.sinarmasprintawards.com/english/sub_bmxx.asp accessed 17/1/12
- 69 Sinar Mas Print Awards website 'Global birding' www.sinarmasprintawards.com/10/sub_main_2.asp?id=577&zplx=%CA%E9%BC%AE%BB%AD%B2%E1%BE%AB%D7%B0&nf=%B5%DA%CB%C4%BD%EC
- 70 Sinar Mas Print Awards website www.sinarmasprintawards.com/10/sub_main_2.asp?id=575&zplx=%CA%E9%BC%AE%BB%AD%B2%E1%BE%AB%D7%B0&nf=%B5%DA%CB%C4%BD%EC&mc=&print=&jx=
- 71 PrintWeek (2011)



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