
AAL - Response to FoE US and WALHI's Allegations

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INTRODUCTION

The following document responds to Friends of the Earth US (FoE US) and WALHI's draft report, which is due to be published in early May, as well as previous allegations raised in earlier reports. It aims to address each allegation with the seriousness and transparency it deserves, reinforcing our commitment to sustainability and ethical practices.

AAL has thoroughly reviewed the claims made and compiled data, expert analyses, and explanations to respond and give further clarity. We are grateful that FoE US allowed AAL to comment on their upcoming report and share this directly with our sustainability team. However, it is important to note that for several items, due to both time and resource constraints (with the designated comment time falling over Eid), the AAL team could not fully investigate or provide information on more complex items. In these instances, we will continue to investigate and welcome further discussions with FoE US and WALHI, providing more evidence or recommending approaches.

RESPONSE TO NEW DEFORESTATION ALLEGATIONS

FOE US and WALHI's most recent draft report contains several serious allegations of deforestation. AAL has investigated these thoroughly, using the map references, geospatial analysis, and methodology provided.

To address concerns, AAL's forestry team first reviewed the methodology and data in Genesis' report, which uses Nusantara Atlas at and a land plot map from ATR-BPN as sources. Genesis also explained that government data regarding Rights to Cultivate (HGU) is not open to the public. These facts show that Genesis does not use PT AAL's HGU data/location permits which are officially issued by the Indonesian Government. HGU data is a very basic material for analyzing the overlap of forest areas versus HGU/oil palm plantation business permits. Without verified HGU/location permit data, research results can be misleading.

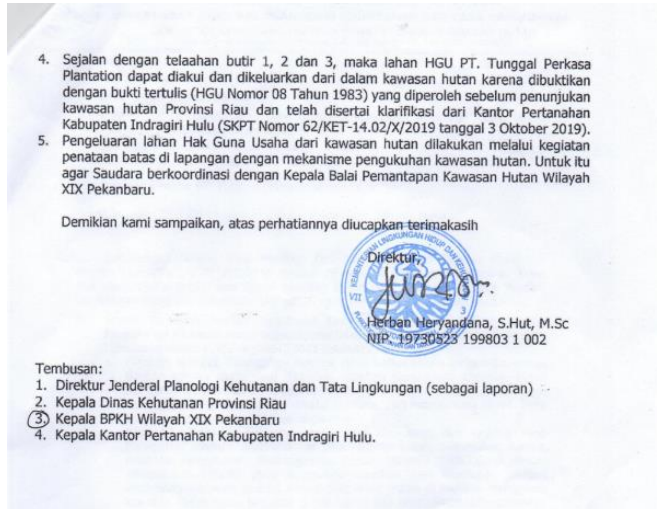

AAL cross-referenced the provided map in its report with AAL's HGU permits. The comparison found significant facts as follows:

- 1) Genesis' reference data shows that the plantation area boundaries differ from the HGU/location permit of PT AAL's subsidiaries.
- 2) Genesis' reference data shows that the plantation area analyzed is located in two different districts from HGU/location permissions of PT AAL subsidiary.
- 3) Genesis' reference data shows larger plantation hectarages than HGU/location permit of PT AAL subsidiaries.

Detail can be seen in Appendix 1.

AAL and its subsidiaries also hold the necessary permits to carry out operations and comply with prevailing laws and regulations. Each company whose permits were indicated in the forest estates had acquired a Forest Release Letter before land clearing.

AAL Forest Release Letters Information		
No.	Subsidiaries	No. of Forest Release Letter
1	PT Tunggal Perkasa Plantations	SK no.157/KPTS-II/1995 (14 Maret 1995) No. S.18/KUH/PKHWI/PLA.2/I/2020 (17 Jan 2020) Surat Ditjen Planologi Kehutanan dan Tata Lingkungan yang menyatakan PT TPP diakui dan dikeluarkan dari Kawasan hutan.

		 <p>4. Sejalan dengan telaahan butir 1, 2 dan 3, maka lahan HGU PT. Tunggal Perkasa Plantation dapat diakui dan dikeluarkan dari dalam kawasan hutan karena dibuktikan dengan bukti tertulis (HGU Nomor 08 Tahun 1983) yang diperoleh sebelum penunjukan kawasan hutan Provinsi Riau dan telah disertai klarifikasi dari Kantor Pertanahan Kabupaten Indragiri Hulu (SKPT Nomor 62/KET-14.02/X/2019 tanggal 3 Oktober 2019).</p> <p>5. Pengeluaran lahan Hak Guna Usaha dari kawasan hutan dilakukan melalui kegiatan penataan batas di lapangan dengan mekanisme pengukuhan kawasan hutan. Untuk itu agar Saudara berkoordinasi dengan Kepala Balai Pemantapan Kawasan Hutan Wilayah XIX Pekanbaru.</p> <p>Demikian kami sampaikan, atas perhatiannya diucapkan terimakasih</p> <p style="text-align: center;">  Herban Meryandana, S.Hut, M.Sc NIP. 19730323 199803 1 002 </p> <p>Tembusan:</p> <ol style="list-style-type: none"> 1. Direktur Jenderal Planologi Kehutanan dan Tata Lingkungan (sebagai laporan) 2. Kepala Dinas Kehutanan Provinsi Riau 3. Kepala BPKH Wilayah XIX Pekanbaru 4. Kepala Kantor Pertanahan Kabupaten Indragiri Hulu.
2	PT Eka Dura Indonesia	SK No. 199/Kpts-VII/1987 (13 Juni 1987)
3	PT Sawit Asahan Indah	SK No. 182/Kpts-5/92 (17 April 1990)
4	PT Pasangkayu	SK No.98/KPTS-II/1996 (19 Maret 1996) SK 1446/Menhut-VII/1996 (11 Oktober 1996)
5	PT Mamuang	SK No.96/Kpts-II/96 (19 Maret 1996)
6	PT Letawa	SK No. 99/Kpts-II/1996 (19 Maret 1996)
7	PT Rimbun Alam Sentosa	Permit given overlapped with other company
8	PT Sawit Jaya Abadi	Land status is Transmigration Land Management Rights (HPL)
9	PT Agro Nusa Abadi	Not in the forest estate so no need to process for Forest Release Letter
10	PT Cipta Agro Nusantara	Has gone through part of the process of obtaining forest release letter but stopped due to acquisitioned by/sold to another company.
11	PT Surya Indah Nusantara Pagi	SK No. 628/Kpts-II/1995 (21 Nopember 1995)
12	PT Persada Bina Nusantara Pagi	SK No. 625/Kpts-II/1995 (21 Nopember 1995)
13	PT Agro Menara Rachmat	SK No.630/KPTS-II/1995 (21 Nopember 1995)

14	PT Gunung Sejahtera Ibu Pertiwi	SK No. 389/Kpts-I/87 (2 Desember 1987)
15	PT Bhadra Cemerlang	SK No.913/KPTS-II/1999 (14 Oktober 1999) SK No.919/KPTS-II/1999 (14 Oktober 1999)
16	PT Subur Agro Makmur	SK No. 453/KPTS-II/1999
17	PT Cakung Permata Nusa	SK No. 437/Mehut-VII/1994 (13 April 1994)
18	PT Borneo Indah Marjaya	Not in the forest estate so no need to process for Forest Release Letter
19	PT Tri Buana Mas	Not in the forest estate so no need to process for Forest Release Letter

Allegations of Concession Overlaps with Forest Estates and Deforestation

AAL has been committed to and upheld its [Sustainability Policy](#) since it launched in 2015. Since then, AAL has had no new land development and has not engaged in any act of deforestation since 2015. However, AAL did carry out replanting activities in several subsidiaries.

Regarding the status of Indonesia Forest estates, it should be noted that regulatory changes always occur over time, especially when the governing regime changes. In several cases in Indonesia, during the regional spatial planning programs, the government repeatedly revised regulations related to spatial planning, resulting in various problems.

Development of regulation changes as follows:

1. Until 1980, based on Forestry Law no. 5 of 1967, forest estates were managed based on registers and partial designation of forest estates.
2. From 1980 to 1992, the spatial planning of forest estates was determined through the Forest Use Agreement (TGHK), which was determined by the Minister of Agriculture with strengthening regulations in Law no. 5 of 1990 concerning Conservation of Biological Natural Resources and Their Ecosystems.
3. From 1992 to 1999, Law no. 24 of 1992 concerning Spatial Planning. The spatial planning of forest estates is based on the results of the integration between RTRWP and TGHK
4. From 1999 to 2005, Law no. 41 of 1999 concerning Forestry, spatial planning of forest estates is based on the designation of forest and water areas determined by the Minister of Forestry.
5. From 2005 to 2007, with the issuance of Law no. 32 of 2004, which replaced Law no. 22 of 1999 concerning regional government, spatial planning of forest estates started to have implications due to several provinces and districts/cities proposing revisions to the Provincial Spatial Planning (RTRWP) and District Spatial Planning (RTRWK) as well as the need to use infrastructure with the expansion of government administrative areas.
6. From 2007 to today, with the issuance of Law no. 26 of 2007 which replaced Law no. 24 of 1992 concerning Spatial Planning, the spatial planning of forest estates is undergoing adjustments in line with the RTRWP revision process.
7. Government Law (PP) No. 26 of 2008 concerning National Regional Spatial Planning (RTRWN), is a guideline for preparing national long-term and national medium-term development plans to realize integration, linkage and balance of development between provincial regions, as well as harmony between sectors,

determining the location and function of space for investment, spatial planning of national strategic areas and spatial planning of provincial and district/city areas.

8. In 2010, the issuance of PP no. 10/2010 concerning Procedures for Changing the Use and Function of Forest Estates as well as PP 24/2010 concerning the Use of Forest estates, in accordance with the dynamics of national development and community aspirations, in principle forest estates can change their use or function.

Based on the above regulations, the Ministry of Forestry and Environment has been redesignating forest estates in stages, which has resulted in numerous cases where parts of the HGU areas were returned to Forest estates, despite the fact that the HGU was secured long before the Decree on the Determination of Forest Estates was published. In AAL's case, the following are a few instances of HGU issuance that predate the forest estate designation.

No.	Subsidiaries	Year of Permit Issuance	Year of Decree of Forest Area Designation (SK Penetapan Kawasan Hutan)
1	PT Tunggal Perkasa Plantations	1995	903/MENLHK/SETJEN/PLA.2/12/2016
2	PT Eka Dura Indonesia	1988	903/MENLHK/SETJEN/PLA.2/12/2016
3	PT Sawit Asahan Indah	1990	903/MENLHK/SETJEN/PLA.2/12/2016
4	PT Pasangkayu	1997	862/MENHUT-11/2014
5	PT Mamuang	1997	862/MENHUT-11/2014
6	PT Letawa	1994	862/MENHUT-11/2014
7	PT Rimbun Alam Sentosa	2011	869/MENHUT-11/2014
8	PT Sawit Jaya Abadi	2010	869/MENHUT-11/2014
9	PT Agro Nusa Abadi	Not in forest estate	
10	PT Cipta Agro Nusantara	2016	869/MENHUT-11/2014
11	PT Surya Indah Nusantara Pagi	2004	529/MENHUT-II/2012
12	PT Persada Bina Nusantara Pagi	2004	529/MENHUT-II/2012

13	PT Agro Menara Rachmat	1997	529/MENHUT-II/2012
14	PT Gunung Sejahtera Ibu Pertiwi	1997	529/MENHUT-II/2012
15	PT Bhadra Cemerlang	2004	529/MENHUT-II/2012
16	PT Subur Agro Makmur	2009	435/MENHUT-II/2009
17	PT Cakung Permata Nusa	2001	435/MENHUT-II/2009
18	PT Borneo Indah Marjaya	Not in forest estate	
19	PT Tri Buana Mas	Not in forest estate	

As seen in the table above, several of AAL's subsidiaries have secured their HGU permit prior to the designation of forest estates within their area. These subsidiaries have undergone the relevant legalization and administrative procedures to resolve the outstanding issues about concession overlaps with forest estates, in line with the Omnibus Law/Job Creation Law.

FURTHER INFORMATION ON PREVIOUS ALLEGATIONS

AAL acknowledges that several allegations regarding AAL's three subsidiaries were not addressed publicly in EcoNusantara's (ENS) report. In the spirit of pursuing a more transparent approach and opening constructive dialogue, we have provided further information on the gaps that FoE US and WALHI have raised previously.

In some instances, we are progressing actions internally, intending to update stakeholders following further clarity on plans for implementation or a more thorough investigation. In other instances, insufficient evidence was found after ENS's thorough investigation. In these instances, both AAL and ENS welcome a discussion on these elements and are open to receiving further information.

Previous FoE US & WALHI Allegations	AAL Comment
AAL and its subsidiaries PT ANA, PT LTT and PT Mamuang never sought or received the Free, Prior and Informed Consent of Communities to operate on their lands	When the plantations in question were established, AAL adhered to best practices as defined in Indonesia at the time. This included community consultation and engagement processes closely aligned with current FPIC principles. Adherence to these practices is fully documented and was a

	<p>condition for the issuance of HGUs. Please refer to the ENS verification report, page 60, to see the flow of obtaining HGUs.</p> <p>We are aligned on the assertion that FPIC is an ongoing process, particularly when considering any form of grievance or remediation. AAL has an FPIC SOP in place and continues to improve its implementation in its operations.</p> <p>However, we recognise that it is important to continue investigating how FPIC principles should be meaningfully used, monitored, evaluated, and retroactively implemented in AAL’s operations. After introductory discussions with credible FPIC advisors, we seek external expert advice on the matter, particularly when considering any grievance or remediation.</p> <p>AAL welcomes a discussion with FoE US and WALHI to share what AAL completed, when and how, and establish if improvements should be made, whether going forward or retrospective. We are willing to adopt improved systems where these can be shown to be an improvement on what is already in place.</p>
<p>There is no evidence in the public domain that PT LTT ever secured location, environmental, or timber utilization permits, raising questions about whether these permits were ever acquired.</p>	<p>PT LTT has all the licenses necessary to conduct its operations (Location Permit, Environmental Permit, Plantation Business permit, State Forest Release Letter, and HGU).</p>
<p>When PT LTT began clearing land in Rio Pakava District in 1993, both PT LTT and PT Mamuang are suspected of taking over 182 hectares of transmigration land in Polanto Jaya Village.</p>	<p>PT LTT’s HGU permits are state documents, and the HGUs referred to by FoE US/WALHI do not match these permits.</p>
<p>In 2004, PT LTT, assisted by the Mobile Brigade Corps (BRIMOB), a paramilitary unit of the Indonesian National Police, seized community land in the villages of Towiora, Minti Makmur, Tinauka, and Rio Mukti. Rightsholders allege that the land-grabbing was carried out with violence, intimidation, indiscriminate shooting, and kidnapping. Three residents were criminalized and sentenced to four months in prison.</p>	<p>ENS and AAL are not qualified to investigate this issue. Resolving any outstanding or past matters of criminalisation will require independent third-party legal advice. AAL welcomes a discussion with FoE US and WALHI on defining an appropriate approach/party to address this issue.</p>
<p>PT LTT cleared land and planted oil palm trees on the banks of the Lariang River, widening the river and increasing the threat of flooding. Lands on the outskirts of the Lariang River are slowly eroding, and every year, flooding inundates settlements, according to residents. In May 2019, approximately 40 houses were flooded.</p>	<p>Lariang’s watershed is over 250 km long, and over the years, it has experienced significant meander changes and abrasion. Due to the river’s length and the fact that many villages and third parties use the river’s delta</p>

	<p>upstream, the investigation of the issue is difficult as there are many factors and variables.</p> <p>AAL is keen to investigate further and mitigate any direct impacts it may have; therefore, it considers collaboration with the broader set of stakeholders involved along the river to better understand flooding and required management. AAL welcomes discussion with FoE US and WALHI to discuss this.</p>
PT Mamuang illegally occupies 255 hectares of Indonesia's protected Forest Zone.	<p>PT Mamuang operates based on the HGU issued by the Indonesian government with authority and legal protection. PT Mamuang has never committed any illegal activity, especially in protected areas.</p> <p>PT Mamuang has complete licenses to conduct its operations (Location Permit, Environmental Permit, Plantation Business permit, State Forest Release Letter and HGU).</p>
There is no evidence in the public domain that PT Mamuang ever secured location, environmental, or timber utilization permits, raising questions about whether these permits were ever acquired.	PT Mamuang has complete licenses to conduct its operations (Location Permit, Environmental Permit, Plantation Business permit, State Forest Release Letter and HGU).
PT Mamuang's concession appears to overlap with the neighbouring PT LTT concession.	ENS investigation has found that a patch of PT LTT's land had been returned to PT MMG
Land conflicts between PT Mamuang and farming communities in Rio Pakava subdistrict are common. In one instance, 68 farmers from Rio Mukti village claim that PT Mamuang seized 128 hectares of land.	AAL is committed to resolving the dispute with KT-SRJ in Rio Mukti village. This issue will be included in the Action Plan
Beginning in 2017, four farmers from Polanto Jaya village—Jufri Alias Upong Bin H. Laujung, Suparto Alias Baris, Mulyadi, and Sikusman—were criminalized for harvesting palm oil fruit bunches from their own lands, for which they held legal Land Registration Certificates (SKPT) and Freehold Certificates (SHM) demonstrating their ownership. After several court hearings, each side in the dispute was ordered to show documentation of their rights to the land. PT Mamuang failed to provide documentation of its legal rights to the land; nevertheless, the Pasangkayu District Court sentenced the four Polanto Jaya residents to prison for four to seven months.	ENS and AAL are not qualified to investigate this issue. Resolving any outstanding or past matters of criminalisation will require independent third-party legal advice. AAL welcomes a discussion with FoE US and WALHI on defining an appropriate approach/party to address this issue.

<p>A permit provided to PT ANA was reissued in 2014 to an area of land only one-third of its original concession size, calling into question the legality of ongoing operations.</p>	<p>It is not unusual that the concession size shrinks during HGU application process. There have several exercises by the verification and validation (Verval) team dispatched by the local governments to measure the concession boundary, each time yielding different results due to the complexity of the issue and numerous overlapping claims.</p>
<p>PT ANA's Plantation Business Permit was illegally awarded in 2007, one year ahead of its Environment Permit (issued in 2008).</p>	<p>As previously detailed in the ENS report, the business permit was awarded one year ahead of its environmental permit. However, the investigation did not find evidence of illegality. AAL is open to further discussion with FoE US and WALHI to explore a mutually acceptable resolution.</p>
<p>PT ANA has reportedly built embankments along the Mintai River resulting in high water levels in community plantations, preventing farmers from harvesting their crops.</p>	<p>To our knowledge, there is no river by the name of Mintai around PT ANA. In fact, PT ANA itself is passed by four rivers namely Sungai Laa, Sungai Lomoito/Lampi, Sungai Lomobonga and Sungai Tambalako. On the other hand, it is true that PT ANA built an embankment in 3 rivers that cross the HGU (embankment in HGU) in the Laa, Lampi and Tambalako rivers. The concept of development that has followed the rules (a certain distance from the river's edge), this is described in our SOP. If FoE US and WALHI wish to clarify the location of the river or discuss this further, AAL would be open to exploring a mutually acceptable resolution to the issue.</p>
<p>Agrochemical contamination from fertilizers that may be linked to company operations has caused the failure of seaweed crops around the mouth of the Mohoni River.</p>	<p>There is no river named Mohoni around PT ANA. Mohoni is the name of the village around PT ANA. Regarding the allegations, Dinas Lingkungan Hidup (Environmental Agency) of North Morowali Regency conducted a field inspection on April 26th, 2019. Based on the results of the administrative evaluation of water pollution control, the company has complied with the provisions of permits, points of compliance, fulfilment of quality standards and has met quality standard parameters, reporting and technical provisions in accordance with regulations and applicable environmental legislation. If FoE US and WALHI wish to clarify the location/name of the river or discuss this further, AAL would be open to exploring a mutually acceptable resolution of the issue.</p>

	<p>Separately, PT ANA has developed a community development program that aims to develop seaweed cultivation. If FoE US and WALHI are interested in this AAL would be happy to share more details on this.</p>
<p>Poorly processed palm oil mill waste leaks into the Mintai River estuary and is contaminating community ponds.</p>	<p>As mentioned earlier, there is no river by the name of Mintai around PT ANA. If FoE US and WALHI wish to clarify the location/name of the river or wish to discuss this further, AAL would be open to exploring a mutually acceptable resolution of the issue.</p> <p>For further information, in case helpful, PT ANA has a mill liquid waste treatment SOP as follows:</p> <ol style="list-style-type: none"> 1. Liquid waste treatment <ul style="list-style-type: none"> - Liquid waste (palm oil mill effluent) is treated through the processing stage and used as a liquid fertilizer (land application) on plantation land that meets the rules of Kementrian Lingkungan Hidup dan Kehutanan (Ministry of Environment and Forestry) regulations. Every month laboratory tests are conducted on the quality of waste that is applied in accordance with regulatory provisions. 2. Water Pollution Control <ul style="list-style-type: none"> - Wastewater treatment must meet the quality standards of wastewater which are calculated based on the provisions with reference to the strictest quality standards <ul style="list-style-type: none"> o Control of liquid waste disposal into a water/river body: o Wastewater disposal is only allowed through the drain gate at a compliance point o Providing emergency response facilities and infrastructure o Monitoring pH and daily wastewater discharge o Monitor water quality every month

- e. Liquid Waste Quality Standards to water body Refer to Government Regulation No. 81/2001 concerning Water Quality Management and Water Pollution Control.

APPENDIX 1: HIGH LEVEL MAPPING OF NEW ALLEGATIONS TO RESPONSES

FoE US and WALHI New Allegations	AAL comment
19 AAL subsidiaries' concessions overlap with over 20,500 hectares of Indonesia's forest estate.	15 subsidiaries were checked as provided in the Genesis' report. Details can be seen in Appendix 2.
15 AAL subsidiaries are linked to 12,970 hectares of deforestation that occurred between 2015 and 2023 in Indonesia's forest estate inside their concessions.	No deforestation cases occurred in the 15 concessions except a land clearing in the conservation area due to the actions associated with the involvement of local communities (in PT Agro Menara Rachmat). AAL continues to investigate the cause of this and is working to ensure appropriate plans are in place to prevent future risks. None of the rest is deemed to be a valid deforestation incident (due to the misinterpretation of replanting events and concession boundaries that do not reflect the actual ones). Please refer to the Appendix 2 for more information.
By 2023, AAL subsidiaries had planted 4,907 hectares in Indonesia's forest estate inside their concessions.	The subsidiaries that overlap with forest estates have undergone the relevant procedures as per the Omnibus Law.
At least 1,100 hectares of AAL's palm oil plantations in Indonesia's forest estate appear to be illegal, as these forests are ineligible to be converted into plantations.	The subsidiaries that overlap with forest estates have undergone the relevant procedures as per the Omnibus Law.
AAL is linked to 3,295 hectares of deforestation between 2021 and 2023 in 15 concession areas which would likely place companies sourcing from AAL out of compliance with the European Union Deforestation Regulation (EUDR).	No deforestation cases occurred in the 15 concessions except a land clearing in the conservation area due to the actions associated with the involvement of local communities (in PT Agro Menara Rachmat). AAL continues to investigate the cause of this and is working to ensure appropriate plans are in place to prevent future risks. None of the rest is deemed to be a valid deforestation incident (due to the misinterpretation of replanting events and concession boundaries that do not reflect the actual ones). Please refer to the Appendix 2 for more information.

Lack of HGU/permits for PT Rimbunan Alam Sentosa, PT Cipta Agro Nusantara and PT Sawit Jaya Abadi.

The HGU for PT Cipta Agro Nusantara has been obtained in 2016.

No	PT	Legalitas Lahan				
		Standing	Jumlah SK	No SK	Luas Dokumen	Luas Dokumen Total
			11,00		1.628,31	1.628,31
13	CAN	HGU	1	HGLV00032 (16-08-2016 s/d 11-04-2051)	7,69	1.628,31
13	CAN	HGU	1	HGLV00034 (16-08-2016 s/d 11-04-2051)	185,06	
13	CAN	HGU	1	HGLV00035 (16-08-2016 s/d 11-04-2051)	20,96	
13	CAN	HGU	1	HGLV00036 (16-08-2016 s/d 11-04-2051)	20,80	
13	CAN	HGU	1	HGLV00037 (16-08-2016 s/d 11-04-2051)	22,70	
13	CAN	HGU	1	HGLV00038 (16-08-2016 s/d 11-04-2051)	5,09	
13	CAN	HGU	1	HGLV00039 (16-08-2016 s/d 11-04-2051)	0,20	
13	CAN	HGU	1	HGLV00040 (16-08-2016 s/d 11-04-2051)	120,55	
13	CAN	HGU	1	HGLV00063 (06-12-2016 s/d 15-07-2051)	469,71	
13	CAN	HGU	1	HGLV00064 (06-12-2016 s/d 15-07-2051)	449,70	
13	CAN	HGU	1	HGLV00065 (06-12-2016 s/d 15-07-2051)	325,85	

PT Sawit Jaya Abadi does not have an HGU due to its location permit under Transmigration Land Management Rights (HPL). However, PT SJA-2 has IUP No. 188.45/0296/2008 and was granted permission to participate in the transmigration program through decrees from the Minister of Manpower and Transmigration and the Minister of Villages, Development of Disadvantaged Regions and Transmigration of the Republic of Indonesia. According to the Indonesian law, HPL permit not allow to be converted to HGU. Instead of allows for added value without changing the function and status of HPL land in the transmigration area.

PT Rimbun Alam Sentosa (PT RAS) holds a plantation business permit (IUP) that was issued in 2007, whereas another company obtained an HGU in the same area. Regarding the overlapping, PT RAS obtained an agreement with the company which allows PT RAS to manage the land for one crop cycle.

APPENDIX 2: AAL CONCESSION MAP OVERLAY ON GENESIS DATA

- This appendix compares concession boundaries between GENESIS data (based on the available map in Genesis' report – 15 PT only)
- GENESIS concession data uses a public domain data/file approach published by Greenpeace and WRI-Indonesia.
- Greenpeace-WRI-Indonesia concession data is the data source used in the Nusantara-Atlas (according to the statement on the website)

No.	Company name	Genesis Report Statement (all data in Ha)	AAL clarification
1	PT Tunggal Perkasa Plantations	<ol style="list-style-type: none"> 1. The PT TPP concession area overlaps with a forest area of 1,869.69 in the Convertible Production Forest (Hutan Produksi Konversi - HPK) of Riau Province according to SK 903/MENLHK/STJEAN/PLA.212/2016. 2. GENESIS stated that there was deforestation during 2015 – 2023, covering an area of 1,054.51 Ha. 	<ol style="list-style-type: none"> 1. In the GENESIS Map, there is a PT TPP concession, with data originating from the Atlas Nusantara platform. However, the website does not explain the source of the concession boundaries for the Sumatra region (invalid). 2. No deforestation was found by PT AAL during 2015-2023 based on the interpretation of satellite imagery and the company's palm oil planting data. 3. The open land cover area is a replanting activity within the HGU.
2	PT Gunung Sejahtera Ibu Pertiwi	<ol style="list-style-type: none"> 1. The PT GSIP concession area overlaps with a forest area of 312.75 located in the Permanent Production Forest (Hutan Produksi Tetap -HP) of Central Kalimantan Province SK 903/Menhut-II/2012. 2. GENESIS stated that there was deforestation during 2015 – 2023, covering an area of 49.50 Ha. 	<ol style="list-style-type: none"> 1. In the GENESIS Map, there is a PT GSIP concession, which data originated from the Atlas Nusantara platform. 2. No deforestation was found by PT AAL during 2015-2023 based on the interpretation of satellite imagery and the company's palm oil planting data. 3. The open land cover area is a replanting activity within the HGU.
3	PT Agro Manara Rachmat	<ol style="list-style-type: none"> 1. The PT AMR concession area overlaps with a forest area of 188.72 Ha within the Permanent Production Forest (HP) of Central Kalimantan Province SK 903/Menhut-II/2012. 2. GENESIS stated that there was deforestation during 2015 – 2023, covering an area of 77.80 Ha. 	<ol style="list-style-type: none"> 1. In the GENESIS Map there is a PT AMR concession which data originated from the Atlas Nusantara platform. 2. It was found that land clearing of 0.19 ha in the conservation area within PT AMR's HGU in 2021-2022 was carried out by the community. The company continues to endeavour to overcome problems by conducting regular reviews, continuous geospatial monitoring, and ongoing collaboration with the community. 3. The current condition of the land is abandoned and has turned into bushland.
4	PT Surya Indah Nusantara Pagi	<ol style="list-style-type: none"> 1. The PT SINP concession area overlaps with a forest area of 237.94 Ha within the Permanent Production Forest (HP) of Central Kalimantan Province SK 903/Menhut-II/2012. 2. GENESIS stated that there was deforestation during 2015 – 2023, covering 	<ol style="list-style-type: none"> 1. In the GENESIS Map there is a PT SINP concession which data originated from the Atlas Nusantara platform. 2. No deforestation was found by PT AAL during 2015-2023 based on interpretation of satellite imagery and the company's palm oil planting data.

		an area of 294.21 Ha.	
5	PT Persada Bina Nusantara Pagi	<ol style="list-style-type: none"> 1. The PT PBNA concession area overlaps with a forest area of 37.84 Ha within the Permanent Production Forest (HP) of Central Kalimantan Province SK 903/Menhut-II/2012. 2. GENESIS stated that there was deforestation during 2015 – 2023, covering an area of 144.06 Ha. 	<ol style="list-style-type: none"> 1. The correct company name is PT Persada Bina Nusantara Abadi (PT PBNA) 2. In the GENESIS Map there is a PT PBNA concession which data originated from the Atlas Nusantara platform. 3. No deforestation was found by PT AAL during 2015-2023 based on satellite image interpretation. 4. The open land cover area is a replanting activity within the HGU.
6	PT Bhadra Cemerlang	<ol style="list-style-type: none"> 1. Genesis states that the location of PT Bhadra Cemerlang is in East Kotawaringin Regency (this data does not match internal data). 2. The concession area of PT Bhadra Cemerlang overlaps with a forest area of 38.64 Ha within the Permanent Production Forest (HP) of Central Kalimantan Province SK 903/Menhut-II/2012. 3. GENESIS stated that there was deforestation during 2015 – 2023, covering an area of 39.58 Ha. 	<ol style="list-style-type: none"> 1. In the GENESIS Map there is a PT Bhadra Cemerlang (PT BCL) concession which data originated from the Atlas Nusantara platform. 2. The location of the PT BCL concession district is different from the GENESIS map. In Genesis' version of PT BCL, the company is located in East Kotawaringin Regency, while AAL's PT BCL is located in East Barito Regency, Central Kalimantan. 3. No further explanation is needed because the reference information is incorrect.
7	PT Subur Agro Makmur	<ol style="list-style-type: none"> 1. The PT SAM concession area overlaps with a forest area of 1,336.18 Ha within the Convertible Production Forest located in South Kalimantan Province SK.435/Menhut-II/2009. 2. GENESIS stated that there was deforestation during 2015 – 2023, covering an area of 4,027.65 Ha. 	<ol style="list-style-type: none"> 1. In the GENESIS Map there is a PT SAM concession originating from the Atlas Nusantara platform. 2. No deforestation was found by PT AAL during 2015-2023 based on the interpretation of satellite imagery and the company's palm oil planting data.
8	PT Cakung Permata Nusa	<ol style="list-style-type: none"> 1. The PT CPN concession area which overlaps with the forest area is 3,396.09 Ha, consisting of Permanent Production Forest and Convertible Production Forest located in the South Kalimantan Province (2,804.2 ha) SK.903/Menhut-II/2012 and Convertible Production Forest located in Central Kalimantan Province (591.89 ha) SK.529/Menhut-II/2012 2. GENESIS stated that there was 	<ol style="list-style-type: none"> 1. In the GENESIS Map there is a PT CPN concession which data originated from the Atlas Nusantara platform. 2. Most of the PT CPN's HGU concession referenced in Genesis' report is no longer part of PT AAL since 2008. Currently, the total area of PT CPN's HGU owned by PT AAL is only 529.67 ha . 3. No deforestation was found by PT AAL during 2015-2023 based on interpretation of satellite imagery and the company's palm oil planting data 4. The open land cover area is a replanting activity within the HGU.

		deforestation during 2015 – 2023, covering an area of 16,208.33 Ha	
9	PT Letawa	<ol style="list-style-type: none"> 1. The PT LTW concession area overlaps with a forest area of 139.47 Ha in the Convertible Production Forest (HPK) of West Sulawesi Province according to SK.862/Menhut-II/2014 2. GENESIS stated that there was deforestation during 2015 – 2023, covering an area of 218.82 Ha. 	<ol style="list-style-type: none"> 1. In the GENESIS Map there is a PT LTW concession originating from the Atlas Nusantara platform. However, the website does not explain the source of the concession boundaries for the Sulawesi region (invalid) 2. No deforestation was found by PT AAL during 2015-2023 based on interpretation of satellite imagery and the company's palm oil planting data 3. The open land cover area is a replanting activity within the HGU.
10	PT Mamuang	<ol style="list-style-type: none"> 1. The PT MMG concession area overlaps with a forest area of 297.02 Ha in the Protected Forest and Convertible Production Forest of West Sulawesi Province according to SK.862/Menhut-II/2014. 2. GENESIS stated that there was deforestation during 2015 – 2023, covering an area of 313.13 Ha. 	<ol style="list-style-type: none"> 1. In the GENESIS Map there is a PT MMG concession which data originated from the Atlas Nusantara platform. However, the website does not explain the source of the concession boundaries for the Sulawesi region (invalid). 2. No deforestation was found by PT AAL during 2015-2023 based on the interpretation of satellite imagery and the company's palm oil planting data. 3. The open land cover area is a replanting activity within the HGU.
11	PT Pasangkayu	<ol style="list-style-type: none"> 1. The PT PSKY concession area overlaps with a forest area of 614.83 Ha in the Protected Forest of West Sulawesi Province according to SK.862/Menhut-II/2014. 2. GENESIS stated that there was deforestation during 2015 – 2023, covering an area of 1,401.72 Ha. 	<ol style="list-style-type: none"> 1. In the GENESIS Map there is a PT PSKY concession which data originated from the Atlas Nusantara platform. However, the website does not explain the source of the concession boundaries for the Sulawesi region (invalid). 2. A field verification was carried out by the Inspectorate General of the Ministry of Forestry on November 2014 and 20 October 2016, with the result that there was no evidence of any criminal acts in the forestry sector committed by PT PSKY and PT MMG regarding the alleged report. The report mentioned that the ones who committed encroachment in the HL were the community around the area for farming and building social and public facilities (mosques, elementary schools, health centres, settlements), and the complainants (MPKS and Walhi Sulawesi) cannot prove the HL complaint/encroachment. 3. No deforestation was found by PT AAL during 2015-2023 based on the interpretation of satellite imagery and the company's palm oil planting data. 4. The open land cover area is a replanting activity within the HGU.
12	PT Rimbun Alam Sentosa	<ol style="list-style-type: none"> 1. The PT RAS concession area overlaps with the forest area of 6,312.61 Ha in Limited Production Forest, Permanent Production 	<ol style="list-style-type: none"> 1. In the GENESIS Map there is a PT RAS concession which data originated from the Atlas Nusantara platform. However, the website does not explain the source of the concession boundaries for the

		<p>Forest and Convertible Production Forest of West Sulawesi Province according to SK.869/Menhut-II/2014.</p> <p>2. GENESIS stated that there was deforestation during 2015 – 2023, covering an area of 14,303.37 Ha.</p>	<p>Sulawesi region (invalid).</p> <p>2. No deforestation was found by PT AAL during 2015-2023 based on interpretation of satellite imagery and the company's palm oil planting data.</p>
13	PT Sawit Jaya Abadi	<p>1. The PT SJA1 concession area overlaps with the 769.02 Ha forest area in the Protected Forest and Permanent Production Forest of Central Sulawesi Province according to SK.869/Menhut-II/2014.</p> <p>2. GENESIS stated that there was deforestation during 2015 – 2023, covering an area of 908.80 Ha.</p>	<p>1. In the GENESIS Map there is a PT SJA1 concession which data originated from the Atlas Nusantara platform. However, the website does not explain the source of the concession boundaries for the Sulawesi region (invalid).</p> <p>2. No deforestation was found by PT AAL during 2015-2023 based on interpretation of satellite imagery and the company's palm oil planting data.</p>
14	PT Cipta Agro Nusantara	<p>1. The PT CAN concession area overlaps with the forest area of 4,709.16 Ha in the Limited Production Forest and Permanent Production Forest of Central Sulawesi Province according to SK.869/Menhut-II/2014.</p> <p>2. GENESIS stated that there was deforestation during 2015 – 2023, covering an area of 9,124.27 Ha.</p>	<p>1. In the GENESIS Map there is a PT CAN concession which data originated from the Atlas Nusantara platform. However, the website does not explain the source of the concession boundaries for the Sulawesi region (invalid).</p> <p>2. The deforestation data stated at 9,124.27 ha far exceeds the HGU area owned by PT CAN, which is only 1,628.31 ha.</p> <p>3. No deforestation was found by PT AAL during 2015-2023 based on interpretation of satellite imagery and the company's palm oil planting data.</p>
15	PT Agro Nusa Abadi	<p>1. The PT ANA concession area overlaps with a forest area of 65.77 Ha in the Protected Forest of Central Sulawesi Province SK.869/Menhut-II/2014.</p> <p>2. GENESIS stated that there was deforestation during 2015 – 2023 covering an area of 45.67 Ha.</p>	<p>1. In the GENESIS Map there are PT ANA concession which data originated from the Atlas Nusantara platform. However, the website does not explain the source of the concession boundaries for the Sulawesi region (invalid).</p> <p>2. Not found deforestation carried out by PT AAL during 2015-2023 based on interpretation of satellite imagery and the Company's oil palm planting data.</p>