

We refer to the article titled “Paper giant APP evades voluntary forest protection pledges, binding safeguards by banks and buyers needed” published by the Environmental Paper Network.

The article accuses Asia Pulp & Paper of ignoring its forest conservation and human rights pledges. There is no merit to these allegations. These claims are not new and have in fact been asked and answered in the past. The report authors are not entitled to dismiss facts and promote “alternative truths” simply because they don’t like them.

Deforestation Issue

On the issue of deforestation, the report authors continue to advance the disproven narrative that APP is engaging in the practice, citing inaccurate news reports from 2017. APP has previously responded to these allegations. You can find the respond in [here](#) and [here](#)

The fact, APP and its pulpwood suppliers do not engage in deforestation, and no pulpwood from deforested sources have entered the APP supply chain since the implementation of the 2013 Forest Conservation Policy. All our suppliers have undergone a Supplier Evaluation & Risk Assessment (SERA) process to ensure they comply with our sustainability commitments. These suppliers and the SERA reports are made available on our [Sustainability Dashboard](#).

To ensure APP conservation areas remain protected, and are not being illegally encroached upon, ground patrols, in trucks, boats, motorcycles or even on foot, are regularly dispatched to monitor and verify that these areas remain secure. But these conservation areas, spread out across the Indonesian archipelago, are vast and often remote, with little to no infrastructure. Not all areas are accessible by ground patrol.

To overcome this challenge, APP partnered with [MDA](#), a satellite surveillance and intelligence provider, to provide monitoring and alerts through its Forest Alert Service. MDA has delivered world-leading, iconic technologies such as the Canadarm family of space robotics for the International Space Station and three generations of RADARSAT Earth observation satellites.

The Forest Alert Service uses the spaceborne [RADARSAT-2](#) radar imaging sensor to track disturbances in forest cover of conservation areas as they happen over time. The system can penetrate cloud cover and is able to detect even subtle changes in activity, in areas as small as 0.5 hectares. Alerts are delivered to APP within 3 working days after each acquisition to indicate areas where damage to forests may have occurred. This is particularly useful for spotting forest cover changes in hard-to-reach areas that are normally difficult to monitor from the ground, allowing ground teams to respond with more speed and accuracy to the threats to these conservation forests.

This forest monitoring dashboard can be access in <https://sustainability-dashboard.com/in/forest-monitoring>

Wildlife

The report authors also accuse APP of being responsible for the death of an endangered Sumatran tiger in June 2020. The incident happened in May inside a conservation zone, not a production area, and was the result of illegal poaching. Again, this issue has been responded to previously. You can find the respond in [here](#)

APP condemns illegal wildlife poaching in the strongest terms and works closely with the Tiger Forum (Forum Harimau Kita) and the authorities to carry out anti-poaching operations on its conservation areas. APP is also investing in feeding zones and wildlife corridors to prevent human-wildlife conflict and works with SINTAS Foundation to conduct surveys of wildlife populations on its concessions.



Snares that found during the joint operations

We have carried out the joint operation three times in the past year, we determine the location of the joint operation based on the key species distribution mapping. But aside to that, we do continue to sweep for snares across our operations on a monthly basis. These operations succeeded in locating and removing illegal huts which stored traps and snares for birds and large mammals. The team also secured about 70 snares since carrying out these operations and this is the first incident in 10 years. Aside this incident, based on the monitoring using camera traps, there are more than 40 Tiger cubs born in the past 8 years in the APP's concession area.

Community

The report also makes claims regarding community conflicts and alleges that APP has “failed to involve affected communities” and “done poorly in addressing the fundamental causes of conflict”. Specifically, the authors cite two cases which, again, have been answered. In both cases, the narrative presented is incomplete, the impact exaggerated. You can find the respond in [here](#), [here](#) and [here](#).

Free, Prior and Informed Consent continues to be implemented across all developments on APP supplier concessions, and substantial progress has been made in resolving prior conflicts. APP's dispute resolution rate of 51% is acknowledged as one of the highest in Indonesia. APP also engages in multi-stakeholder dispute resolution and complies with all legal requirements, including a community's right to privacy throughout the process.

Furthermore, APP works closely with communities through its flagship program, the Desa Makmur Peduli Api (DMPA), which integrates forestry and farming systems to address one of the root causes of deforestation, fires and conflict; the issue of rural poverty. The DMPA program has been shown to improve livelihood and new targets have been adopted in 2020 to improve the income of participants to at least the regional minimum wage.

EPN mention specific issue where they mention that APP used drones to spray herbicide on community plantations, threatening the community's food safety. They further allege that APP uses such methods to pressure indigenous communities as part of its conflict resolution process. These allegations are gross misrepresentations of the facts on the ground.

APP does use drones to deliver herbicide as part of regular silviculture practice in its own plantations, care is taken to protect health and safety. These include spraying at low altitude (2-3m above ground) and in wind-safe conditions (winds at less than 3m/s). Drones also maintain a buffer zone of 20m from the outer border of the concession, to prevent herbicide from reaching outside the concession boundary.



plants affected by drone activity.

At mediation, all parties, including the community representative, acknowledged that the area affected was outside the agreed boundaries of the area set aside for community livelihood. The community representative also acknowledged that around 10 to 15, one-month-old oil palm plants were affected by drone activity. This is contrary to allegations that up to 2 ha of community plants were affected, directly affecting food security.

You can find the third party statement regarding the community issue from The Indonesian Forest Concessionaires Association (APHI/*Asosiasi Pengusaha Hutan Indonesia*):

<https://www.rimbawan.com/berita/siaran-pers-mengedepankan-dialog-pt-wks-dan-masyarakat-lubuk-mandarsah-bangun/>

Forest Fire

Continuing claims that APP suppliers are “involved in” damaging fires are entirely without merit. While APP is ultimately responsible, as the concession holder, for putting out fires that threaten its concessions, APP maintains a strict No Burn policy. Fires can damage valuable plantation crops and conservation land, so it is in APP’s own best interests to prevent fires, or to contain and extinguish them when they do occur.

Fire is an issue that greatly concerns all parties. APP and its suppliers are also victims of this phenomena as portions of its standing stock have been, and continue to be at risk of being, destroyed by fires.

The causes of forest fires are complex, as are the solutions required to prevent, contain and reduce the threat. APP and its suppliers have had a zero-burn policy for many years and will never use fire to clear land. To simply assume the presence of fires means land clearance by concession holders greatly oversimplifies the situation, mistaking correlation with causality. Plantation crops can take as long as five years to mature, and there is no reason for any company to burn its own crop.

APP invested more than US\$150 million in Integrated Fire Management to build up its surveillance, preparation and firefighting capabilities. This includes investment in equipment - including helicopters, fire engines and support vehicles - so that forces can respond quickly and effectively to outbreaks of fire. Today, APP has one of Indonesia’s largest private fire protection forces with over 3,000 trained firefighters.

This investment is a big part of the reason why the subsequent four years has seen a general reduction in fire incidents, and considerable progress in combating the threat of fires. With the end of the dry season in a few weeks, 2020 will see APP record one of its best years in combating fire, where fire affected areas will be very small, and where the firefighting team contained fires to less than two

APP has never started any of the fires but has a responsibility to put out fires that threaten its supplier concessions. Across 2019 despite fires having occurred on APP supplier concessions, as a result of fire from agricultural activities or encroachment, no sanctions have been issued to APP suppliers. There are no open investigations or outstanding penalties related to fires on any APP supplier concession at this time.

APP is not perfect or without faults. Our sustainability journey, now into its eighth year, is still a work in progress. We are happy to engage constructively with committed stakeholders to evolve and continuously improve. Any concerned stakeholder may also make submissions through our Grievance mechanism, which will then be processed and investigated. The combination of these processes ensures transparency in our compliance process. The result of the Grievance submitted will be published on the dashboard as well.



In addition, since 2008, we have been committed to transparently reporting our sustainability journey through our annual Sustainability Reports, aligned with the Global Reporting Initiative (GRI) standards.

Our Sustainability Report 2019 communicates a summary of our approach and performance against our Sustainability Roadmap: Vision 2020 and, within the roadmap, our Forest Conservation Policy commitments.

We also introduce our Sustainability Roadmap Vision 2030 - an evolution of our Sustainability Roadmap Vision 2020, incorporating an increased range of issues and close alignment with the UN Sustainable Development Goals and the Paris Agreement on Climate Change.

Our Sustainability Report 2019 can be downloaded [here](#)

We appreciate criticism where it is due, so that we can address our failures. But what we cannot do is permit false allegations or ill-informed opinions to distract us from the facts.

We believe the work we do, including our work in innovation, conservation and environmental impact, is critical to our continued survival as a business. Through our FCP and Sustainability Roadmaps, we are demonstrably making progress along a complex and challenging. Continuing the journey of transformation.

We remain firmly committed to our sustainability pledges.