



How APP can clear the smoke

FROM
CHRIS CHENG CHIN HSIEN, PEOPLE'S MOVEMENT TO STOP HAZE

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Since coming under investigation by the National Environment Agency, Asia Pulp & Paper Group (APP) has been facing a boycott campaign, with major retailers pulling its products from their shelves (["Asia Pulp & Paper hit by another withdrawal"; Oct 20](#)).

This is despite APP's vigorous response that it has a zero-burning policy. The lesson is clear: It carries little weight when a corporation tries to defend itself against clear, objective evidence.

[Data from Global Forest Watch](#) has shown that APP suppliers make up six of the seven pulpwood companies in Indonesia with the most hot spots on their land this year until Oct 27.

The total number of hot spots on APP supplier concessions has been increasing every year since 2013 ([Supporting Information 1](#)).

To compare with other pulp and paper companies, in Sumatra, there were 18.2 high-confidence hot spots per 100 square kilometres in APP supplier concessions this year, and only 3.1 high-confidence hot spots per 100 sq km on non-APP pulpwood concessions. ([Supporting Information 2](#))

Hence, even if the fires were caused by other parties, as [it claims](#), the data show its inadequate efforts in fire prevention and suppression.

In terms of managing the fire-prone peatland, APP announced this year its restoration project on [7,000 hectares](#) of [its 1.4 million hectares of Sumatra peatland](#). In comparison, hundreds of thousands of hectares of its suppliers' lands have been burnt. ([Supporting Information 3](#))

Its competitor, [Asia Pacific Resources International Holdings, has worked on a project to protect and restore 70,000 hectares of peatland and degraded forest](#) — 10 times the scale of APP's restoration project.

Without objective comparison, APP's advertising of its conservation efforts creates only more smoke during hazy days. To clear it, we would like APP to consider the following requests.

First, it must open itself to a thorough, independent investigation into the reasons for the fire, and post the results and recommendations publicly.

Second, APP must map in detail the burnt areas and restore them to their original conservation or community use. The progress should be audited and published regularly.

Third, there is no point in continuing to build a new mill and develop new plantations until APP proves itself capable of preventing and suppressing fires. If APP is sincere, it should place a moratorium on the development of new mills, plantations and canals until it achieves a low fire outcome, say, fewer than three high-confidence hot spots per 100 sq km per year on its lands. (PM.Haze would like to revise this recommendation to << 1 high-confidence hot spots per 100 sq km per year for non-El Nino years. Please refer to [Supporting Information 4](#) for clarification)

In the long run, obtaining internationally recognised forestry certification, such as the Forest Stewardship Council certification, would provide further evidence that good management practices are being followed.

Supporting Information I:

Number of High-Confidential Hotspot in Sumatra and in APP concessions (highlighted in yellow)

2013		2014		1 Jan – 30 Oct 2015	
Name of Timber Supplier	# Hgih-confident Hotspot	Name of Timber Supplier	# Hgih-confident Hotspot	Name of Timber Supplier	# Hgih-confident Hotspot
APP supplier concession	203	APP supplier concession	1974	APP supplier concession	5428
PT. Sumatera Riang Lestari 3	215	PT. Bumi Mekar Hijau 3	915	PT. Bumi Andalas Permai 1	2382
PT. Rimba Rokan Perkasa	210	PT. Sekato Pratama Makmur 2	312	PT. Sebangun Bumi Andalas Wood Industries	1198
PT. Seraya Sumber Lestari	63	PT. Satria Perkasa Agung 1	245	PT. Bumi Mekar Hijau 5	608
PT. Satria Perkasa Agung 5	60	PT. Satria Perkasa Agung 5	198	PT. Rimba Hutani Mas 5	588
PT. Bina Daya Bentala	57	PT. Bumi Andalas Permai 1	180	PT. Bumi Mekar Hijau 3	294
PT. Arara Abadi 11	55	PT. Sumatera riang lestari 3	166	PT. Bumi Andalas Permai 2	262
PT. Dexter timber perkasa indonesia	55	PT. Riau andalan pulp & paper 3	145	PT. Dyera Hutani Lestari	102
PT. Lestari asri jaya 1	51	PT. Suntara gajapati	128	PT. Bumi Mekar Hijau 4	96
PT. Ruas Utama Jaya 1	31	PT. Sekato Pratama Makmur 1	124	PT. Koperasi Wana Karya Lestari	83
PT. Sumatera riang lestari 2	29	PT. Sumatera riang lestari 4	121		

Supporting Information 2:

Estimation of High-Confidential Hotspot Intensity (number of 1km² resolution high-confident hotspots per 100 km²)

Data sources: Eyes on the Forest [article](#) and [map](#)

Table 1. Number of fire hotspots detected on Sumatra between 1 January and 11 October 2015.

Area	High confidence hotspots		Low confidence hotspots		All hotspots	
	#	% Sumatra	#	% Sumatra	#	% Sumatra
All Sumatra	9,251	100%	25,635	100%	34,886	100%
All Sumatra's peat	6,830	74%	16,137	63%	22,967	66%
All Sumsel	6,220	67%	13,167	51%	19,387	56%
All HTI	4,502	49%	8,519	33%	13,021	37%
All HTI on peat	3,781	41%	6,519	25%	10,300	30%
All SMG/APP	3,644	39%	5,892	23%	9,536	27%
All SMG/APP on peat	3,491	38%	5,339	21%	8,830	25%
PT. Bumi Andalas Permai (all)	1,708	18%	1,630	6%	3,338	10%
PT. Bumi Mekar Hijau (all)	692	7%	1,195	5%	1,887	5%
PT. Rimba Hutani Mas (all)	566	6%	1,198	5%	1,764	5%
PT. Sebangun Bumi Andalas Wood Industries (all)	469	5%	439	2%	908	3%
The above four companies combined	3,435	37%	4,462	17%	7,897	23%

Pulpwood concessions by associated group in Sumatra

Group	Area (ha)	% total
SMG / APP	2,003,513 ha	42 %
RGE / APRIL	1,219,095 ha	26 %
Marubeni	433,105 ha	9 %
Other	1,094,051 ha	23 %
TOTAL	4,749,764 ha	100 %

APP pulp wood concessions (HTI): 3644/200.3513 ~ **18.2 hotspots / 100 km²**

Non APP pulp wood concessions (HTI): (4502-3644)/(474.9764-200.3513) ~ **3.1 hotspots / 100 km²**

Supporting Information 3:

Based on GFW analysis, the estimated area covered with archive NASA active fires (1 Jan 2014 to 23 Oct 2015) is probably larger than **200,000 ha** in just 5 APP suppliers' concessions

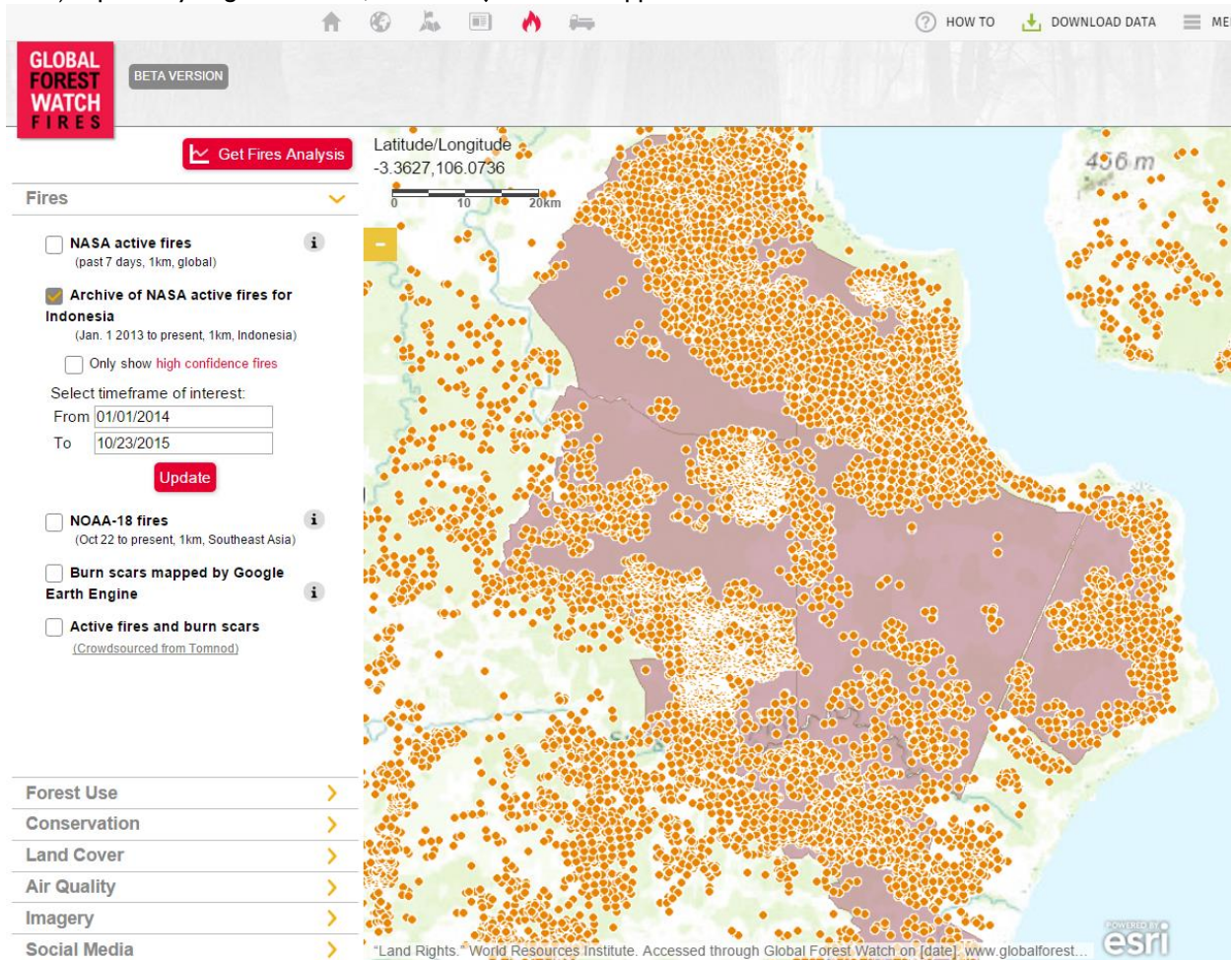


Figure 1. Archive of NASA active fires on APP's 5 concession areas (shaded area, namely PT. Bumi Andalas Permai 1, PT. Bumi Mekar Hijau 3, Sebangun Bumi Andalas Wood Industries, PT. Bumi Andalas Permai 2, PT. Bumi Mekar Hijau 5) in South Sumatra from 1 Jan 2014 to 23 Oct 2015

In addition, due to the fire in 2014, [the Indonesian Ministry has also filed civil lawsuits with the Palembang District Court in South Sumatra against PT Bumi Mekar Hijau \(APP's supplier\) for allegedly causing fires in 20,000 hectares in Ogan Komering Ilir, South Sumatra](#)

Supporting Information 4

The original target for 3 high-confidential hotspots per 100 km² per year is suggested by comparing to non-APP pulp and paper concessions this year (Supporting Information 2).

For APP with over 2 million hectares of lands in Sumatra, this will translate into about 600 high-confidential hotspots per year, which is in fact still higher than the number of high-confidential fires they have in 2013 (Supporting Information 1).

Hence, the 3 high-confidential hotspots (1km² resolution) per 100 km² per year should only be seen as a minimal target for strong El Nino year like this year (2015). During non-El Nino year, APP should not have more fires than it used to have in 2013, which is about 1 high-confidential hotspot per 100 km².

And in fact, with its implementation of [Forest Conservation Policy since Feb 2013](#), we should expect much lower fire intensity than 1 high-confidential hotspot per 100 km².