MIGHTY EARTH

RAPID RESPONSE

PALM OIL SECTOR REPORT 50



Prepared with support from

planet.

August 2025

Supply Chain Information

Supply chain information included in Rapid Response reports is based on the latest public versions of mill disclosures, recent export data, and grievance logs. Mighty Earth encourages companies to send updated versions of mill disclosures as soon as they become available and to share any decision to suspend relations with a given group/company with rapidresponse@mightyearth.org.

Mighty Earth includes biofuel companies in the supply chain tables of Rapid Response reports, as these companies have both direct and indirect trading relationships with groups highlighted in these reports and should be filing grievances on these cases. These biofuel companies are listed in the "Supply Chain Information" tables.

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New Case

Group: KPN Group

PT Graha Agro Nusantara

Concession & Clearance Location: 0.2077, 109.6911 & 0.1993, 109.6868

Deforestation and/or Peatland Development					
Report	Deforestation (ha)	Integrated Deforestation Alerts (ha)	Peatland Forest Clearing (ha)	Tree Cover Loss (ha)	Time Period
50			4.2		October 2023 - June 2024

GIS Imagery (see page 4) shows that between October 2023 and June 2024, there was a total of 4.2 hectares of deforestation on peatland in the PT Graha Agro Nusantara concession.

Ownership

PT Graha Agro Nusantara is part of the KPN Group.

Supply Chain

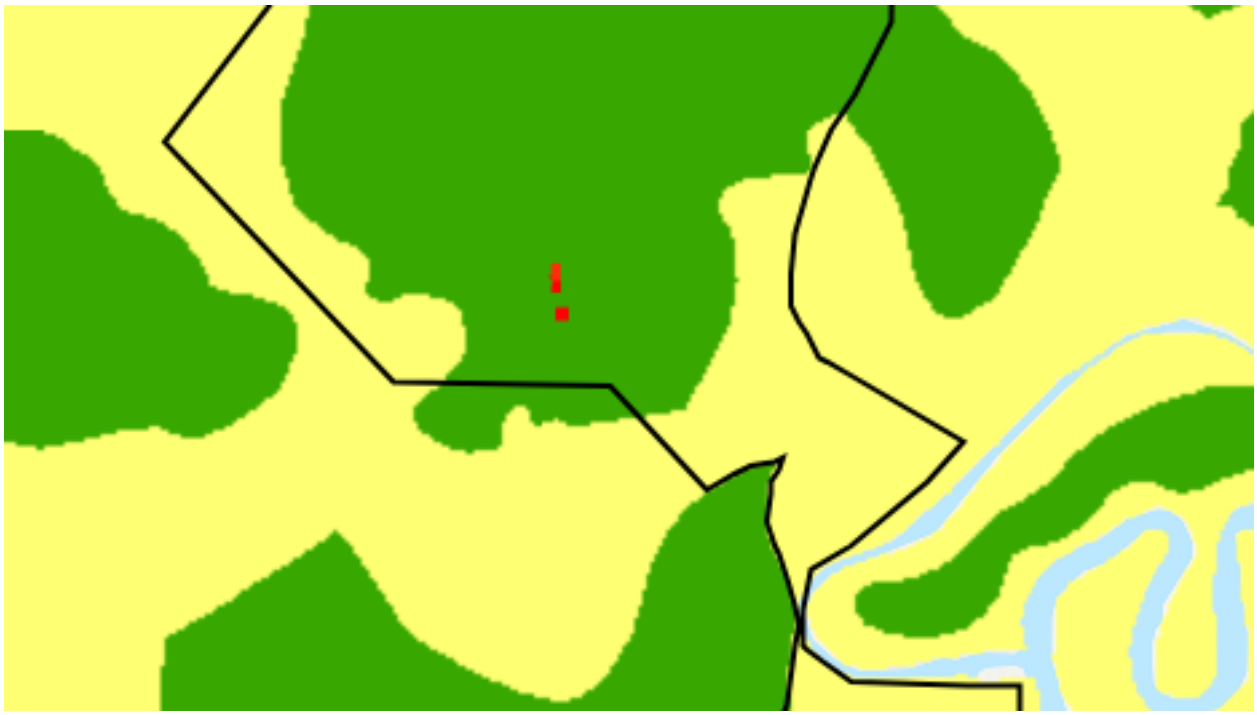
Company/Group/Mill	Traders	Biofuel/Other	Consumer Brands
KPN Group (formerly GAMA)	AAK, ADM, Apical, Astra Agro, Bunge, Cargill, COFCO International, First Resources, Fuji Oil, Musim Mas, Olam Agri, Sime Darby	Avril, Biesterfeld, Galaxy Surfactants, Indorama, Innospec, KAO, Neste, Nisshin Oillio, Oleon, Sakamoto Yakuhin Kogyo, Stearinerie Dubois, Symrise, Zschimmer & Schwarz	Barry Callebaut, Beiersdorf, Colgate Palmolive, Friesland Campina, General Mills, Grupo Bimbo, Hershey, Kellogg, Lion Corporation, Meiji, Mondelēz, Nestle, Pepsi, PZ Cussons, Unilever

Case Notes & Evidence

The PT Graha Agro Nusantara concession is located in West Kalimanatan, Indonesia.

Overlaying the PT Graha Agro Nusantara concession with *'Peatland Ecosystem Function'* maps published online by the Ministry of Environment and Forestry (MoEF) confirms that the entire PT Graha Agro Nusantara concession is located on a 'Peatland Hydrological Unit' (*Kesatuan Hidrologis Gambut).*[1]

The green areas in the MoEF map below are classified as 'Indicative Function - Forest' and the yellow areas are classified as *'Indicative Function - Cultivation.'* The areas of clearing are located in the areas of 'Indicative Function - Forest'



[1] Peatland hydrological units (Kesatuan Hidrologis Gambut, KHG), the term used for peatlands and the surrounding ecosystems, have been the basis for peatland conservation legislation in Indonesia since 2016. It is defined as '*a peat ecosystem located between two rivers, between a river and the sea and/or in a swamp.*'

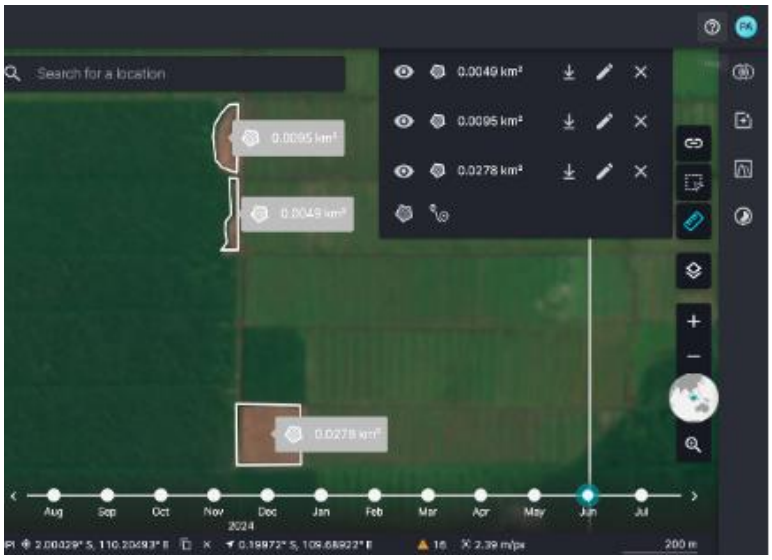
Mapping Analysis

Planet satellite imagery shows that approximately 4 ha of peatland forest was cleared over 3 areas between October 2023 and June 2024. These 3 areas are located in the area demarcated by MoEF as 'Indicative Function - Forest'.

Planet image: October 2023 (coordinates of 3 areas: -0.200201, 109.690049; -0.202473, 109.690126; -0.207571, 109.690966)



Planet image: June 2024 (coordinates of 3 areas: -0.200201, 109.690049; -0.202473, 109.690126; -0.207571, 109.690966)



New Case

Group: Bumitama Agri Group
PT Damai Agro Sejahtera
Concession & Clearance Location: 110.3584, -1.5694

Deforestation and/or Peatland Development					
Report	Deforestation (ha)	Integrated Deforestation Alerts (ha)	Peatland Clearing (ha)	Peatland Forest Development (ha)	Time Period
50			~228 ha		July 2022 - May 2024

GIS Imagery (see page 14) shows that between July 2022 and May 2024, there was a total of approximately 228 hectares of deforestation in the PT Damai Agro Sejahtera concession.

Ownership

PT Damai Agro Sejahtera is part of the Bumitama Gunajaya Agri Group, which has been an RSPO member since 2007.

Supply Chain

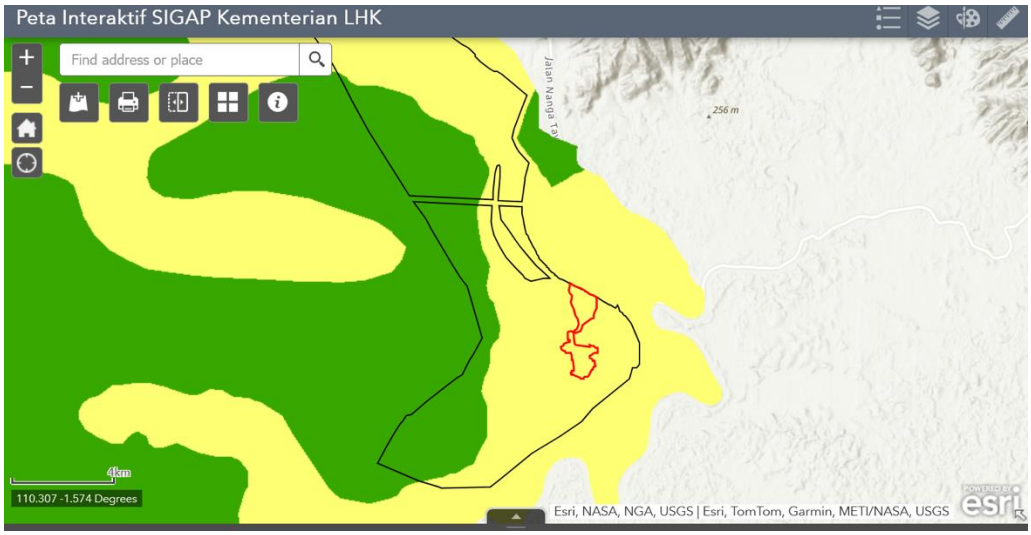
Company/Group/Mill	Traders	Biofuel/Other	Consumer Brands
Bumitama Agri	AAK, ADM, Apical, Astra Agro, Bunge, Cargill, COFCO International, Fuji Oil, GAR, KLK, Louis Dreyfus, Mitsubishi Corporation, Musim Mas, Olam Agri, Sime Darby, Wilmar	Avril, BASF, Biesterfeld, Galaxy Surfactants Ltd, Indorama, Innospec, KAO, Lipsa, Neste, Nikko Chemicals, Nisshin Oillio, Olenex, Oleon, Permata Hijau, Sakamoto Yakuhin Kogyo, Sinarmas Cepsa Pte Ltd, Stearinerie Dubois, Symrise, Zschimmer & Schwarz	Avon, Barry Callebaut, Beiersdorf, Colgate Palmolive, Flora Food Group, General Mills, Grupo Bimbo, Friesland Campina, Hershey, Johnson & Johnson, Kellogg, Lion Corporation, Meiji, Mondelēz, Nestle, Pepsi Co, P&G, PZ Cussons

Case Notes & Evidence

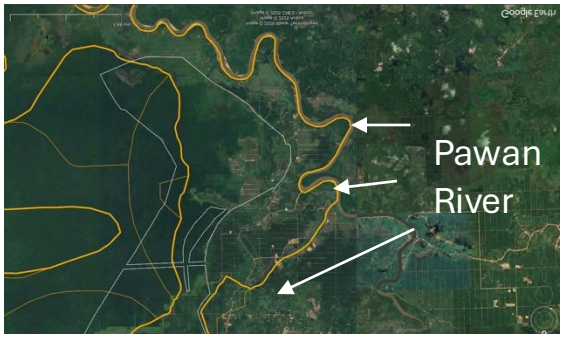
The PT Damai Agro Sejahtera concession is located in West Kalimantan, Indonesia.

Overlaying the PT Damai Agro Sejahtera concession boundary with '*Peatland Ecosystem Function'* maps published online by the Ministry of Environment and Forestry (MoEF) confirms that the entire PT Damai Agro Sejahtera concession is located within a '*Peatland Hydrological Unit'* (*Kesatuan Hidrologis Gambut).*[2]

The green areas in the MoeF map below are classified as Peatland 'Indicative Function – Forest' and the yellow areas are classified as Peatland '*Indicative Function – Cultivation.'* The areas of clearance are located in the '*Indicative Function – Cultivation zone.'*



The same Peatland Hydrological Unit shown on the Google Earth image below indicates that the peatland area (orange outline) goes all the way down to the Pawan River (marked by the white arrows in the image below). Drainage canals can even be seen to the east of the PT Damai Agro Sejahtera concession boundary, indicating that the concession is completely located on peatland.



[2] Peatland hydrological units (Kesatuan Hidrologis Gambut, KHG), the term used for peatlands and the surrounding ecosystems, have been the basis for peatland conservation legislation in Indonesia since 2016. It is defined as '*a peat ecosystem located between two rivers, between a river and the sea and/or in a swamp.*'

Case Notes & Evidence

Bumitama's 2021 report published on the RSPO website – *Assessment Summaries and Management Plans: PT Damai Agro Sejahtera* – is the *'summary of assessment result on Environment Impact Assessment (EIA), Social Impact Assessment (SIA), High Conservation Value (HCV), Land Use Change Analysis (LUCA) and High Carbon Stock (HCS) in PT Damai Agro Sejahtera.'*

Table 3 (below) of Bumitama's report shows that a total of 606.45 ha of the PT Damai Agro Sejahtera concession is proposed for oil palm development (i.e. 241.51 ha + 364.94 ha).

Table 3: The summarized of land use and time-plan for new plantings

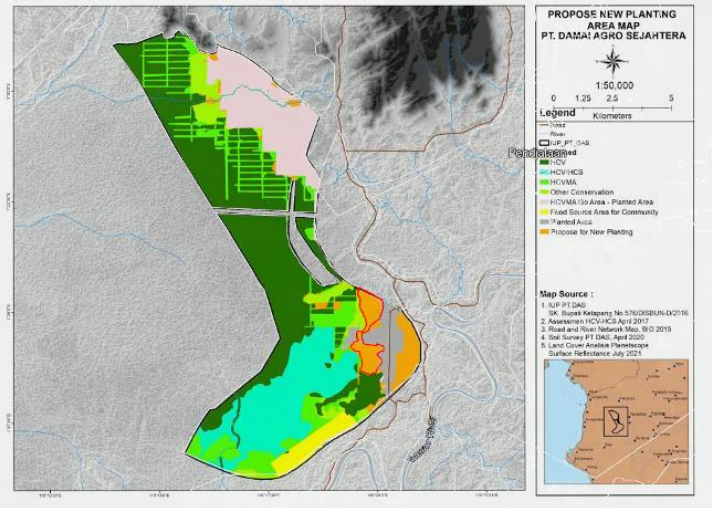
ICLUP Indicative	Land Used Definitive Proposed PT DAS	Width of Area (ha)			
		Ha			%
Planted Area				**372.40**	4
Conservation Area				**8,577.40**	91
HCV			3,642.66		
HCS overlay with HCV area			1,516.14		
HCVMA No Go Area			703.00		
HCVMA Go Area			2,715.60		
	Propose for Development (1)	241.51			
	HCV	11.06			
	HCVMA	491.23			
	HCVMA Planted	1,343.70			
	Other Conservation Area	362.71			
	Food Source	265.38			
Non-Conservation Area				**494.80**	5
	Propose for Development (2)	364.94			
	Area Konservasi lain	113.37			
	Food Source	16.55			
			Total Area	**9,444.60 ***	100

**There is a difference between what is written on the IUP & On the shp file provided by the relevant agencies. This may be due to the digitization process*

The map to the right shows the location of the 606.45 ha proposed for New Planting (areas in orange).

The area of expansion included in this report is marked by a red outline (herein referred to as 'disputed expansion areas').

Map 8: The Area Purpose for New Planting



Case Notes & Evidence

Bumitama report states that 'all shallow peat can be developed.'

Page 46 of the Bumitama report states: '*As a form of caution, all shallow peat areas where most of the land cover has been opened due to very massive logging by the community, are designated as HCVMA GO AREA*.'

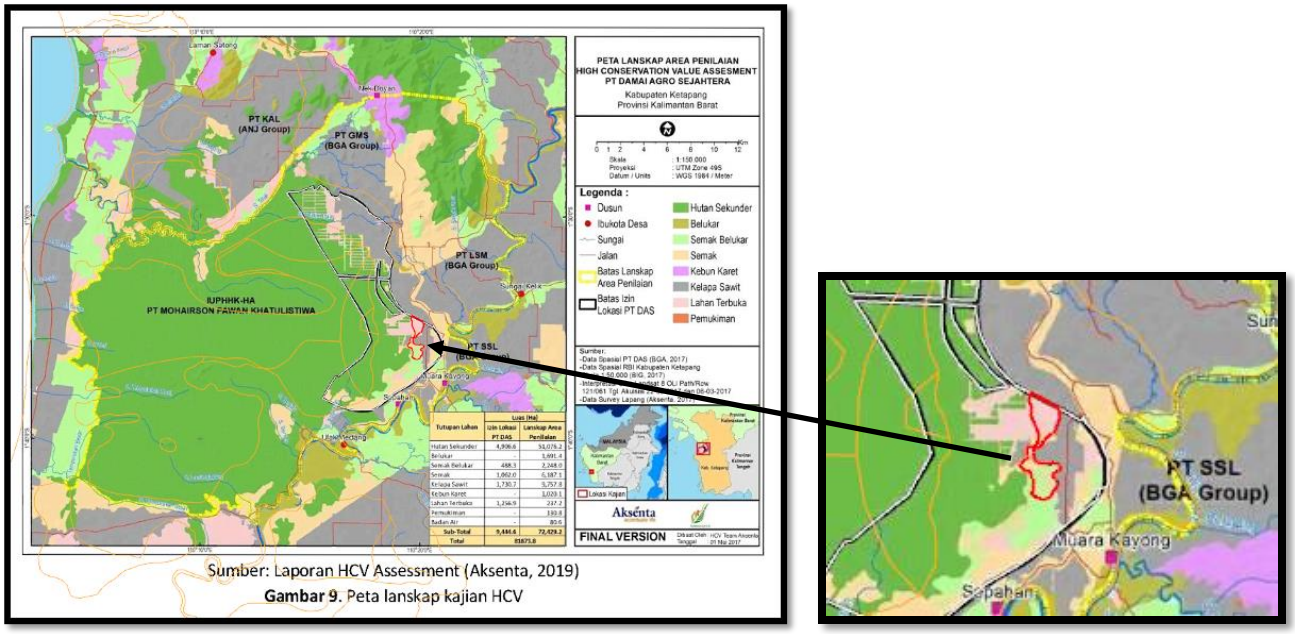
Peatlands that function as protection are very deep peat which can store large amounts of water reserves (thickness more than 3 m). However, HCV 4 valued peatlands in the assessment area are all peatlands (peat depth> 50 cm) that are still forested and have not been disturbed by water management. As a form of caution, all shallow peat areas where most of the land cover has been opened due to very massive logging by the community, are designated as HCVMA GO AREA. The area supports the existence of HCV 4 area by preserving the surface water level, one of which is to protect the soil from heavy metal pollution such as iron (Fahmi at.al., 2012) and aluminium (Fahmi at.al., 2010).

'*Table 32: Description and location of HCV area and HCV Management Area*' of the Bumitama report refers to '*peat areas with a depth of >0.5m* […] *which can be managed for oil palm plantation by managing water management on peatland.*'

			• Riparian zone should be revegetated		
6	HCVMA – Go Area	Orangutan distribution area, peat area with a depth of> 0.5 m, and Sungai Putri KEE area	• Land cover types: oil palm plantation, open land, shrub and bush • This area can be managed for oil palm plantation by managing water management on peatland and managing wildlife species (avoiding human-wildlife conflicts)	Peatlands that are converted to oil palm, open land, shrubs and shrubs	2,715.6
Total Size of HCV and HCVMA (ha)					8,577.4

Case Notes & Evidence

The map below shows the disputed expansion areas (red outline) overlaid with the landcover map on page 24 of the HCS assessment. The disputed expansion areas are classified as *'open land' (lehan Terbuka)* and *'shrub'* (Semak Belukar) – not HCS forest.



Sumber: Laporan HCV Assessment (Aksenta, 2019)
Gambar 9. Peta lanskap kajian HCV

The Bumitama report stating that *'all shallow peat areas […] are designated as HCVMA GO AREA'* – and that the proposed areas for development are not being identified as HCS forests – effectively means that Bumitama has been given the green light to develop and plant these areas with oil palm.

This is despite the RSPO Principles and Criteria (P&C) 2018 requiring '*no new planting on peat (regardless of depth) after 15 November 2018'.*[3]

Further, Bumitama's own 2015 Sustainability Policy requires '*no new planting on peatland, regardless of depth'.*[4]

Many companies' No Deforestation No Peat No Exploitation (NDPE) policies go further than RSPO's and Bumitama's policy limitation to '*no new planting on peat.'* They require '*no peatland development regardless of depth,'* meaning no infrastructure or canals, along with no planting. See Wilmar's and GAR's NDPE policies for examples.

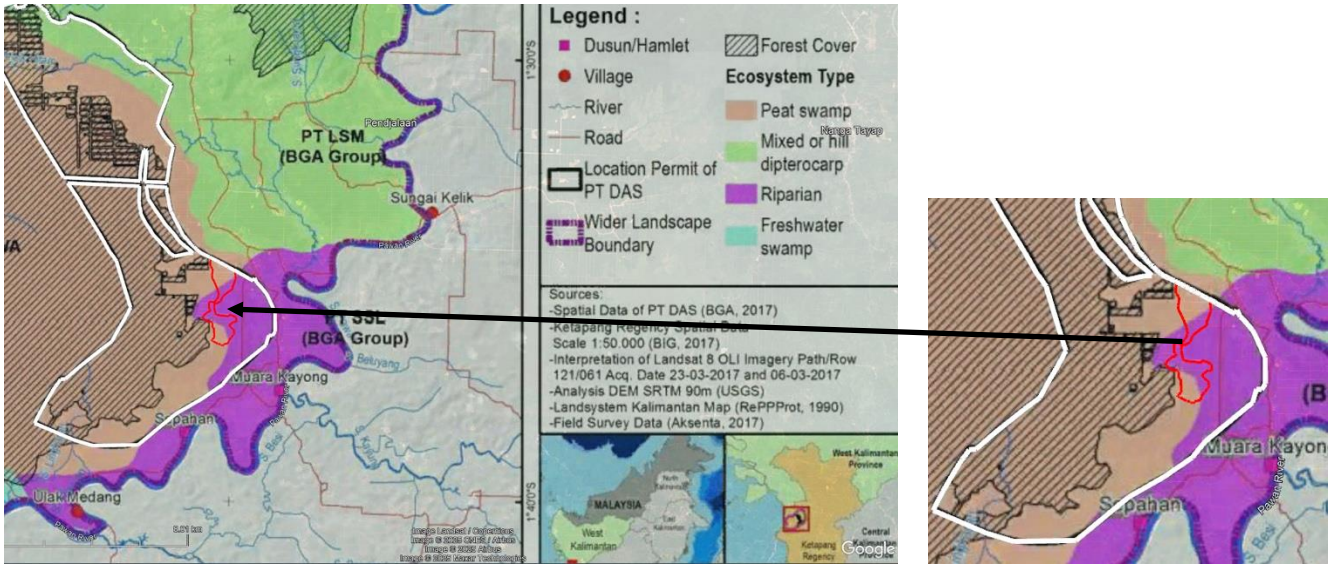
[3] RSPO Organic & Peat Soil Classification document states: '*Indonesia peat soils are defined as: 'Soils with an organic layer of more than 50cm in the top 100cm of soil containing more than 65% of organic matter.'*
[4] Bumitama policy states *'Peatland is defined as soil containing greater than 65% organic matter with depth of more than 50cm.'*

Case Notes & Evidence

Where are the shallow peatland proposed for development?

Map 16 on page 44 of the Bumitama report (*Ecosystem types in PT DAS landscape area (Final Version)* shows that large parts of the disputed expansion areas (red outline) are located within a large area of *'Peat Swamp'* (pale brown) covering the vast majority of the PT Damai Agro Sejahtera concession (boundary highlighted in white outline). The map was created by Askenta Consulting, the company that also conducted the HCS Assessment for PT Damai Agro Sejahtera.

Most of the disputed expansion areas are *'Peat Swamp'* that do not have forest cover. The remaining area is classified as part of a 'Riparian' zones (purple) – it's unclear if this Riparian zone is located on the peat swamp large area.



Case Notes & Evidence

Despite the map above shows the vast majority of the PT Damai Agro Sejahtera concession as being located on peatland, Map 35 on page 73 (below) of the Bumitama report, ('*Distribution of Peat Depth in the area of PT DAS*') claims that all of the disputed expansion areas (red outline) are '*Mineral Soils' (dark green areas*).

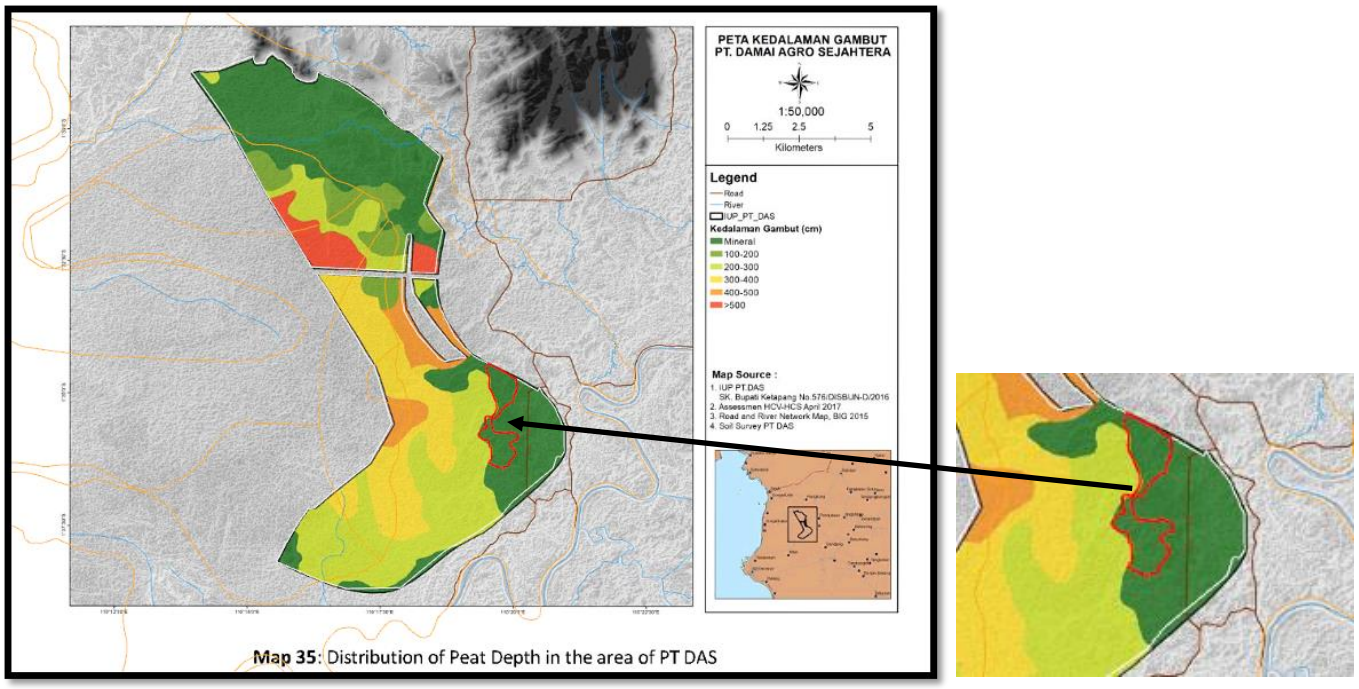


Table 46 (below) on page 73 of the Bumitama report shows that peat depths of between 50-300 cm and greater than 300cm were identified in the PT Damai Agro Sejahtera concession.

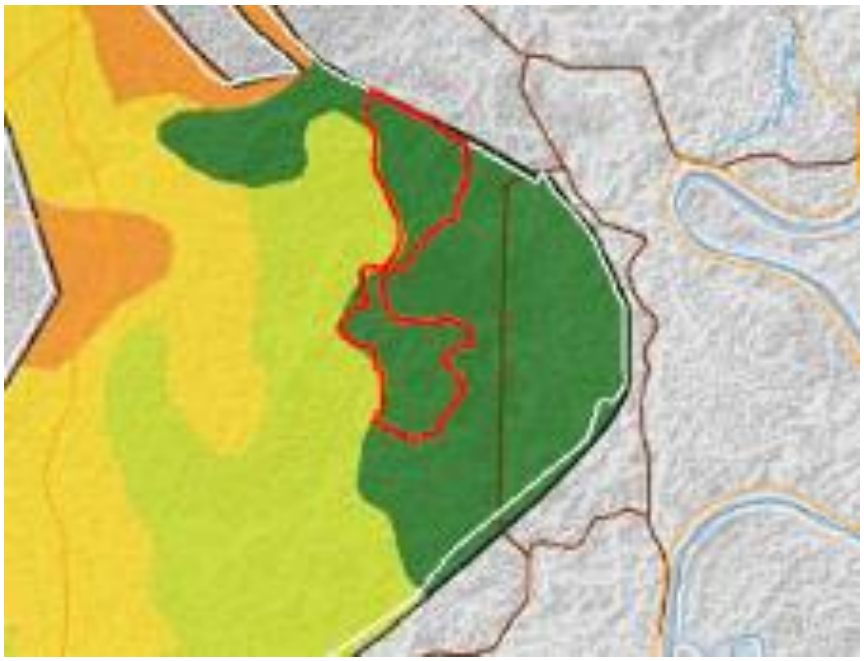
Table 46: Peat area according to thickness level (cm), in the area of PT DAS

No.	Soil type	Peat Depth (cm)	Relief	Area	
				Ha	%
1	Mineral	-	Datar (0-8%)	3,757.2	39.8
2	Organic/ Peat (saprist, hemist)	50 – 300	Datar (0-8%)	3,287.7	34.8
	Organic/ Peat (saprist, hemist)	> 300	Datar (0-8%)	2,399.7	25.4
			Total	**9,444.6**	**100.0**

However, the map above only shows peatland between 100 cm and 500 cm and those over 500 cm. Peat with depth of 50-100 cm are not shown.

Case Notes & Evidence

The area immediately west of the disputed expansion areas (red outline) is identified as peatland with a depth of 200-300cm (pale green). On the map, this peatland area then immediately becomes mineral soils (dark green) in the area where the disputed expansion areas are located.



Peat soils with a depth of 200-300 cm to do not abruptly transition into mineral soils, as illustrated in the map above. There is often a more gradual shift from to peat soils to mineral soil, rather than a clearly defined border.

As the map above from page 73 of the Bumitama report excludes peatland areas with a depth of 50-100cm (shallow peat), it is assumed that the areas within the disputed areas are in fact shallow peatland and not mineral soils. These shallow peatland areas should never have been developed in accordance with RSPO Principles and Criteria (P&C) which requiring '*no new planting on peat (regardless of depth) after 15 November 2018.*'

Mapping Analysis

Based on the satellite imagery below, Bumitama cleared and drained approximately 228 hectares of peatland (white outline) in the PT Damai Agro Sejahtera concession over the period between July 2022 and May 2024. The coordinates are -1.582275, 110.330481 for the northern area and -1.600553, 110.329957 for the southern area.

Planet image: July 2022



Planet image: May 2024



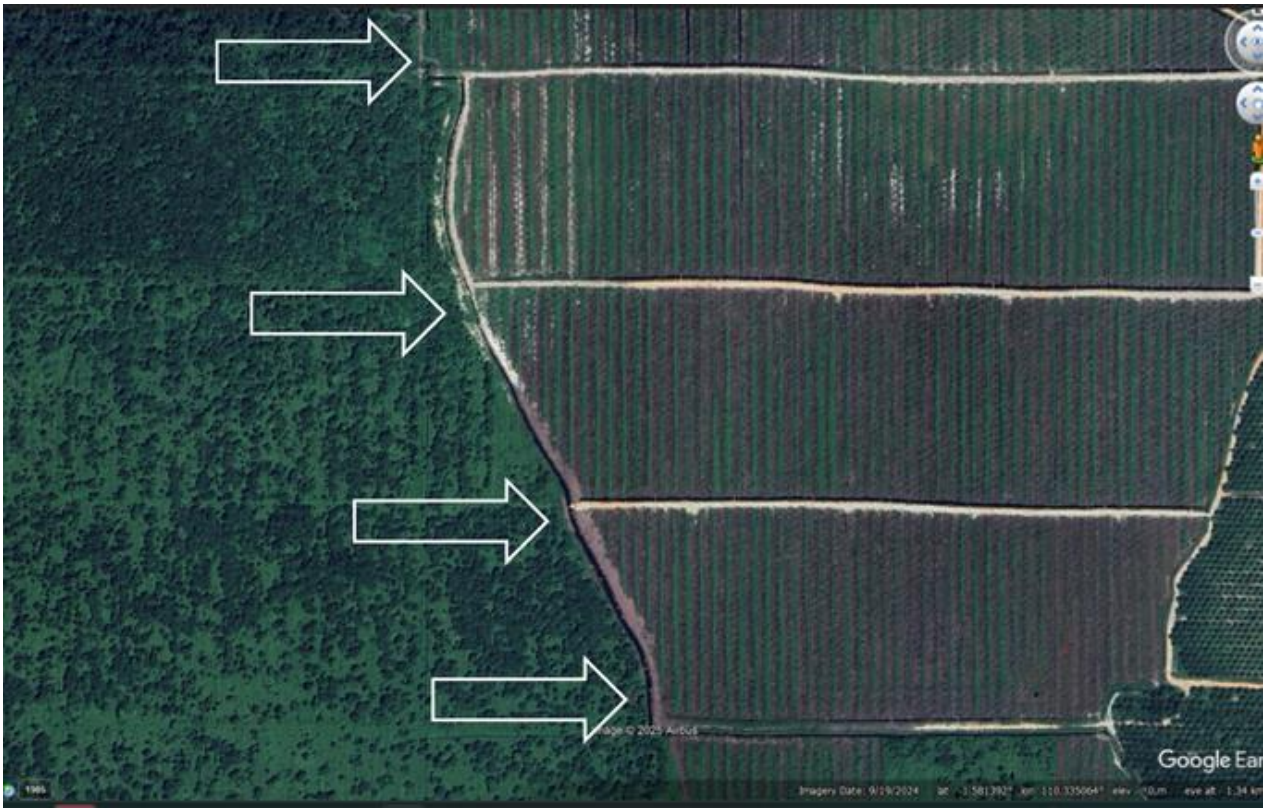
Mapping Analysis

High resolution imagery of the disputed expansion areas

Mighty Earth analyzed high resolution imagery (Airbus imagery hosted by Google Earth and dated September 19, 2024) of the disputed expansion areas. The imagery below shows extensive peatland drainage canals have been constructed as part of the plantation development and infrastructure. Some sections of the drainage canals are up to 6-metres wide.

Perimeter peatland drainage canals have been constructed adjacent to the areas classified as 100-200cm deep peat forest in the map above. An example is provided below – the perimeter canal is marked by the arrows in the satellite image below.

Coordinates: -1.583840, 110.327244



Mapping Analysis

The perimeter canal in the satellite image below is approximately 6 meters wide.
Coordinates: -1.584483, 110.327406



The Google Earth hosted satellite imagery from September 19, 2024 (below) shows an approximately 4 meter wide perimeter drainage canal at the southern end of the disputed expansion area.

Coordinates: -1.584450, 110.327393.



Case Notes & Evidence

The Planet imagery below shows that the perimeter drainage canal, which borders an area of peatland forest to the south, was constructed between May 2024 and June 2024.

Planet imagery: May 2024 (coordinates: -1.60701, 110.32838)



Planet imagery: June 2024 (coordinates: -1.60701, 110.32838)



Case Notes & Evidence

The construction of such a perimeter drainage peatland canal would be in violation of many companies' NDPE policies, which requires '*no peatland development regardless of depth*'. See Wilmar's and GAR's NDPE policies for example.

The planting of oil palm in the areas developed between July 2022 and May 2024 would also be in violation of Bumitama's own 2015 Sustainability Policy which requires '*no new planting on peatland, regardless of depth'.*

It would also be in violation of RSPO Principles and Criteria (P&C, version 2018) which requires '*no new planting on peat (regardless of depth) after 15 November 2018'.* This issue needs to be investigated by the RSPO.

Case Notes & Evidence

Update from September 26, 2025

In response to the above case regarding peatland development in PT Damai Agro Sejahtera, Bumitama issued a press release on August 8, 2025 entitled 'Bumitama clarifies on new planting in PT DAS'.

Please find in the annex (p. 60) Mighty Earth's further mapping analysis regarding peatland development in PT Damai Agro Sejahtera based on the peat soil survey map included in Bumitama's response. This case requires further investigation, as the analysis indicates that PT Damai Agro Sejahtera expanded a 580-metre peatland canal between April and June 2024.

The development or widening of a peatland canal would be in violation of many companies' NDPE policies which requires '*no peatland development regardless of depth*'. See Wilmar and GAR NDPE policies for example.

New Case

Group: CTB Agro Group
PT Bina Agro Berkembang Lestari
Concession & Clearance Location: -0.284857, 109.433209

Deforestation and/or Peatland Development					
Report	Forest Clearance (ha)	Integrated Deforestation Alerts (ha)	Peatland Development (ha)	Tree Cover Loss (ha)	Time Period
50			101		March 2023 – November 2024

GIS Imagery (see page 26) shows that between March 2023 and November 2024, there was a total of 101 ha of peatland development in the PT Bina Agro Berkembang Lestari concession.

Ownership

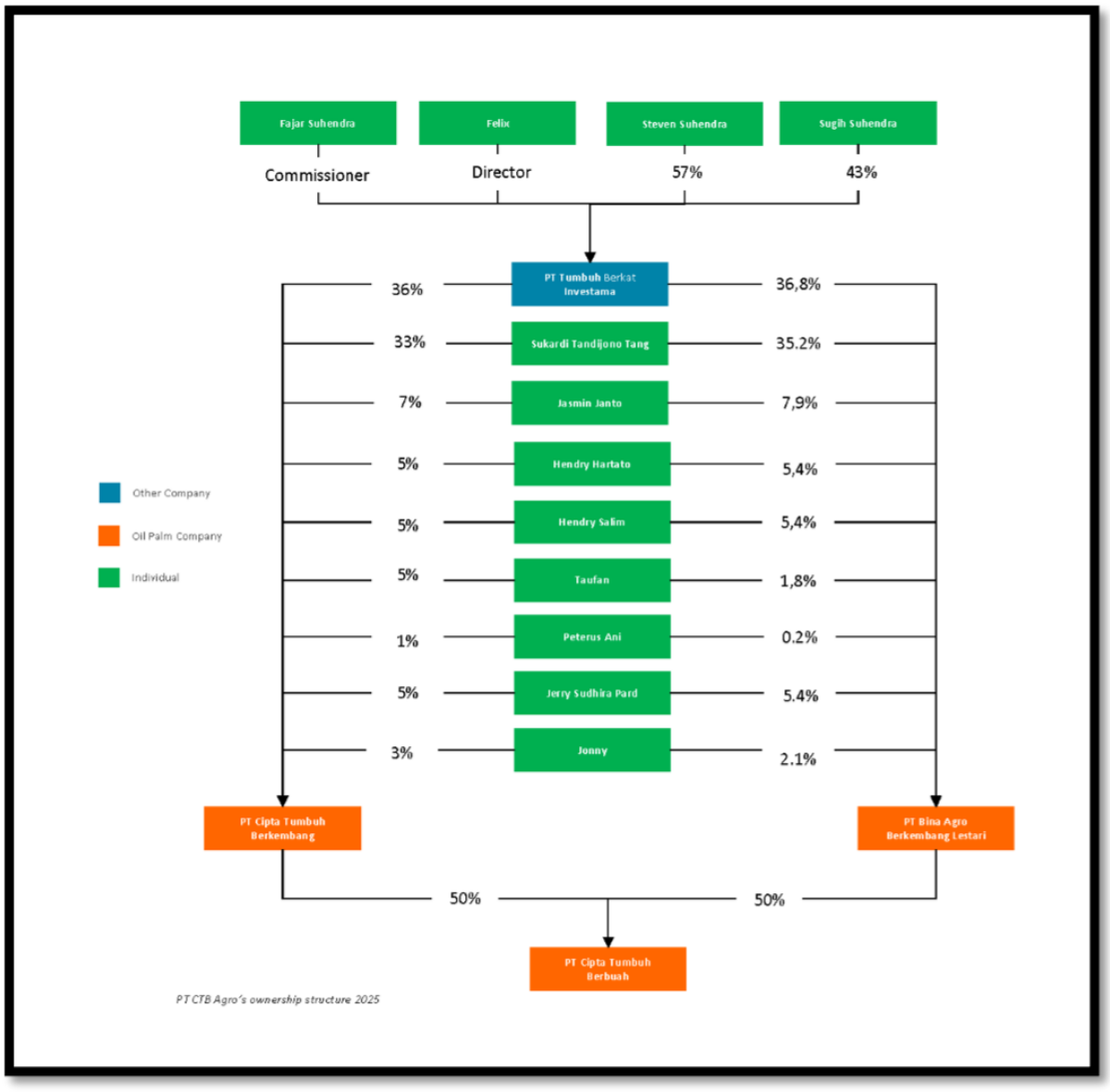
PT Bina Agro Berkembang Lestari is part of the CTB Agro Group (PT Cipta Tumbah Berkembang). The full ownership structure of CTB Agro is shown on page 21.

Supply Chain

Company/Group/Mill	Traders	Biofuel/Other	Consumer Brands
CTB Agro		Avril, Nisshin Oillio, Symrise, Zchimmer & Schwarz	Barry Callebaut, Kellogg, Mondelēz, Nestle, Pepsi

Case Notes and Evidence

The ownership structure of the CTB Agro Group is shown in the diagram below.



PT CTB Agro's ownership structure 2025

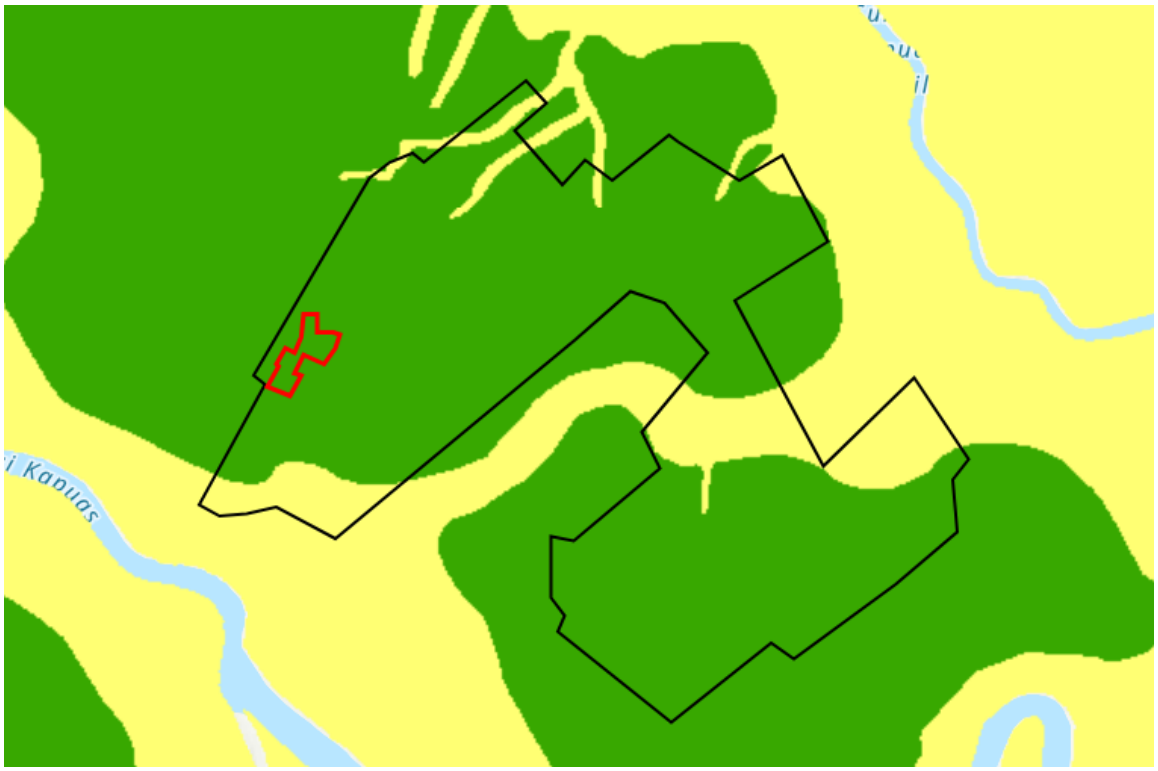
Case Notes & Evidence

The PT Bina Agro Berkembang Lestari concession is located in West Kalimantan, Indonesia.

Overlaying the PT Bina Agro Berkembang Lestari concession with 'Peatland Ecosystem Function' maps published online by the Ministry of Environment and Forestry (MoEF) confirms that the entire PT Bina Agro Berkembang Lestari concession is located on a '*Peatland Hydrological Unit (Kesatuan Hidrologis Gambut, KHG)'.*[5]

The green areas in the MoEF map below are classified as '*Indicative Function Forest*' and yellow as '*Indicative Function Cultivation*.'

The peatland development highlighted in this report (marked with red outline) which is approximately 101 ha is within the '*Indicative Function – Forest* zone of the *Peatland Hydrological Unit (Kesatuan Hidrologis Gambut, KHG).*

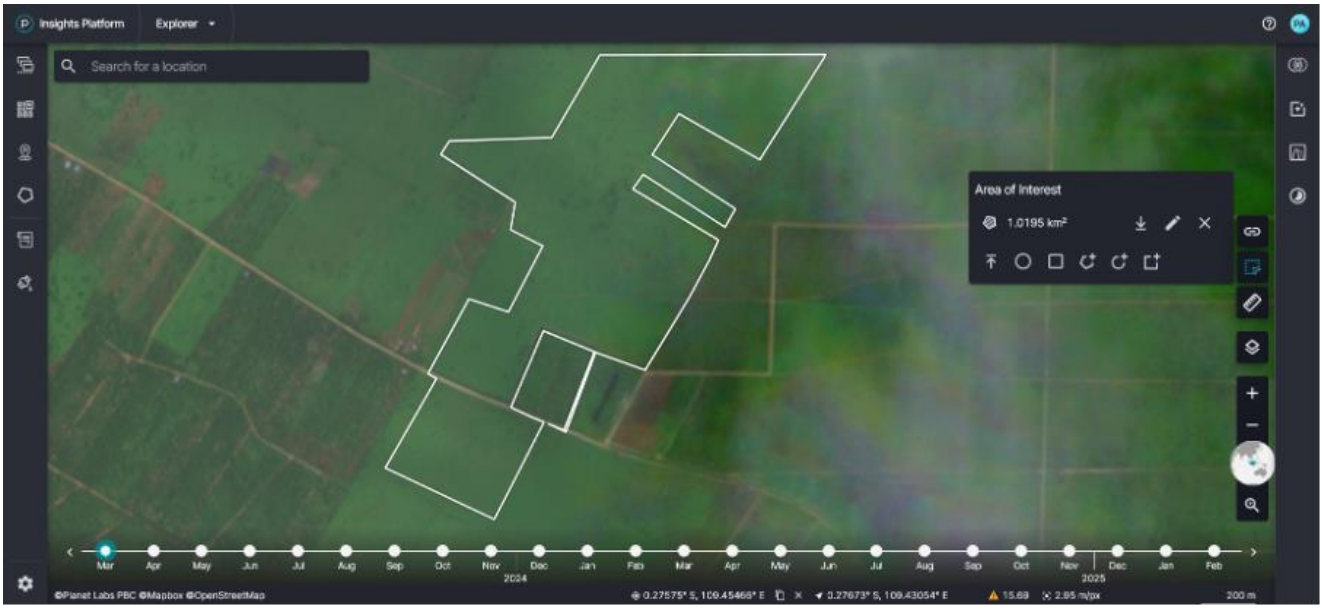


[5] Peatland hydrological units (Kesatuan Hidrologis Gambut, KHG), the term used for peatlands and the surrounding ecosystems, have been the basis for peatland conservation legislation in Indonesia since 2016. It is defined as '*a peat ecosystem located between two rivers, between a river and the sea and/or in a swamp.*'

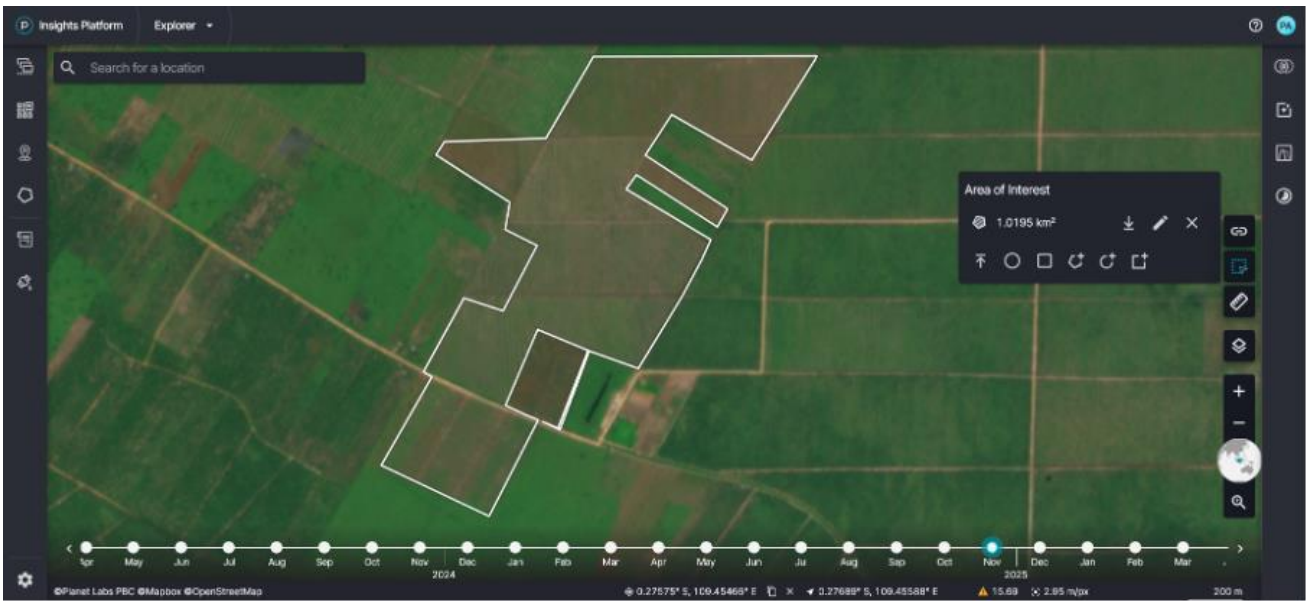
Mapping Analysis

The disputed expansion areas connect with existing developed plantations areas to the southwest and east.

Planet image: March 2023 (coordinates: : -0.284857, 109.433209)



Planet image: November 2024 (coordinates: -0.284857, 109.433209)



New Case

Group: Prima Lestari Investama
PT Sintang Agro Mandiri
Concession & Clearance Location: 0.135695, 111.477353 & 0.136822, 111.484783

Deforestation and/or Peatland Development					
Report	Forest Clearance (ha)	Integrated Deforestation Alerts (ha)	Peatland Development (ha)	Tree Cover Loss (ha)	Time Period
50			44		____

GIS Imagery (see page 27) shows that between February 2022 and November 2023, there was a total of 44 ha of peatland development in the PT Sintang Agro Mandiri concession.

Ownership

PT Sintang Agro Mandiri is ultimately owned and controlled by the Leimang family through the investment holding company PT Prima Lestari Investama. The Leimang family also own mills located in the PT Permata Hijau Sarana and PT Multi Prima Entakai concessions.

Supply Chain

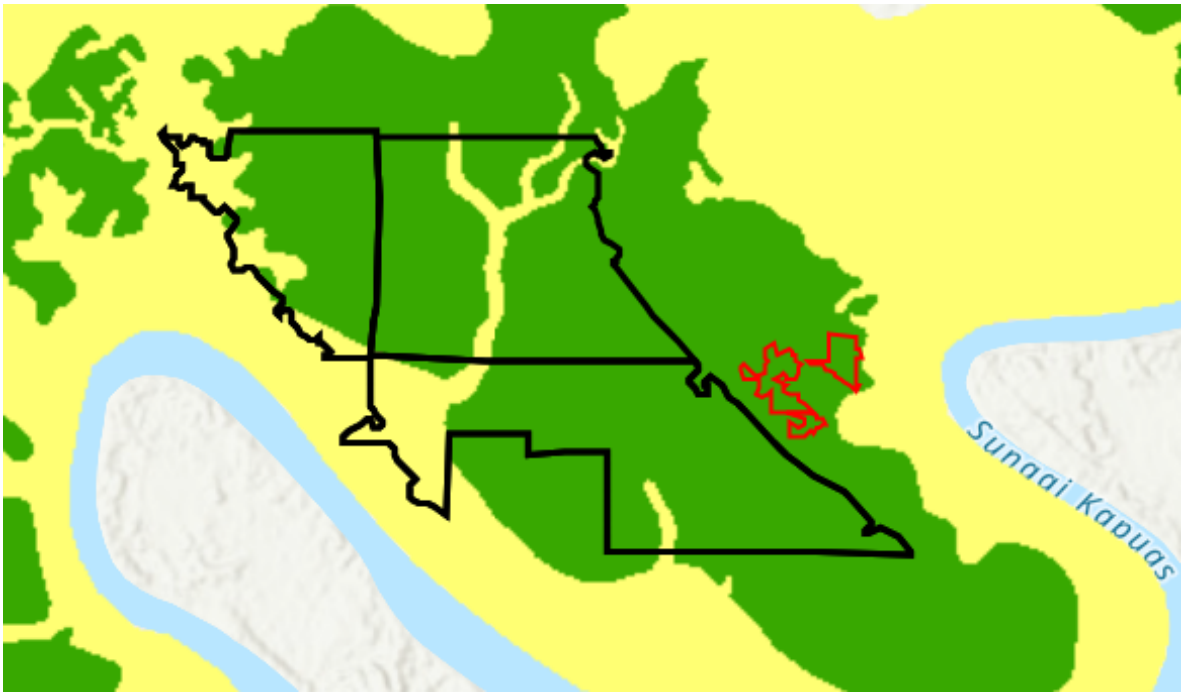
Company/Group/Mill	Traders	Biofuel/Other	Consumer Brands
Sintang Agro Mandiri	AAK, ADM, Bunge, Cargill, COFCO International, Fuji Oil, GAR, Louis Dreyfus, Olam Agri, Wilmar	BASF, Biesterfeld, Galaxy Surfactants, Indorama, Innospec, KAO, Sakamoto Yakuhin Kogyo, Neste, Nikko Chemicals, Stearinerie Dubois, Symrise, Nisshin Oillio, Oleon, Zchimmer & Schwarz	Avon, Beiersdorf, Barry Callebaut, Flora Food Group, Friesland Campina, General Mills, Grupo Bimbo, Hershey, Kellogg, Lion Corporation, Meiji, Mondelēz, Nestle, Pepsi, P&G, PZ Cussons

Case Notes & Evidence

The PT Sintang Agro Mandiri concession is located in West Kalimantan, Indonesia.

Overlaying the PT Sintang Agro Mandiri concession with 'Peatland Ecosystem Function' maps published online by the Ministry of Environment and Forestry (MoEF) confirms that the entire PT Bina Aggro Berkembang Lestari concession is located on a Peatland Hydrological Unit (Kesatuan Hidrologis Gambut, KHG).[6]

The green areas in the MoeF map below are classified as 'Indicative Function Forest' and the yellow areas are classified as 'Indicative Function Cultivation.'



The 44 ha of peatland development highlighted in this report (red outline) are within the '*Indicative Function Forest' area (area A is 33.5 ha; area B is 8.5 ha: area C is 21.7 ha) of the Peatland Hydrological Unit (Kesatuan Hidrologis Gambut, KHG).*

[6] Peatland hydrological units (Kesatuan Hidrologis Gambut, KHG), the term used for peatlands and the surrounding ecosystems, have been the basis for peatland conservation legislation in Indonesia since 2016. It is defined as '*a peat ecosystem located between two rivers, between a river and the sea and/or in a swamp.*'

Case Notes & Evidence

The CNES/AirBus 2025 image below shows the location of the cleared areas (red outline) in relation to plantation development and the PT Sintang Agro Mandiri palm oil mill (blue icon, coords 0.14111, 111.485). It's assumed that the cleared areas are new PT Sintang Agro Mandiri expansion areas.



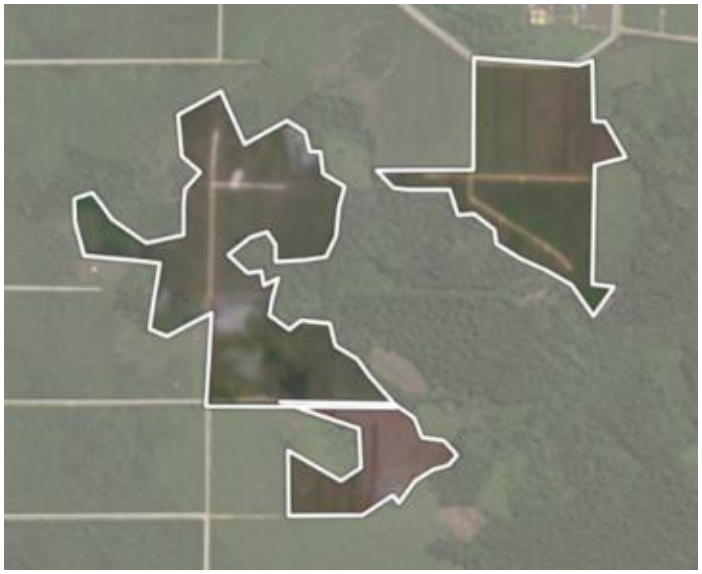
Mapping Analysis

The 3 areas are just south of the PT Sintang Agro Mandiri mill which is located at 111.485, -0.14111.

Planet Image: February 2022 (coordinates of left: 0.135695, 111.477353; right: 0.136822, 111.484783)



Planet image: November 2023 (coordinates of left: 0.135695, 111.477353; right: 0.136822, 111.484783)



New Case

Group: Djohan Brothers
PT Kalimantan Agro Pusaka
Concession & Clearance Location: -0.825220, 109.896681

Deforestation and/or Peatland Development					
Report	Forest Clearance (ha)	Integrated Deforestation Alerts (ha)	Peatland Development (ha)	Tree Cover Loss (ha)	Time Period
50			25		August-October 2023

GIS Imagery (see page 32) shows that between August and October of 2023, there was a total of 25 ha of peatland development in the PT Kalimantan Agro Pusaka concession.

Ownership

PT Kalimantan Agro Pusaka is owned by the Djonhan brothers through PT Djohan Brothers Investindo.

Supply Chain

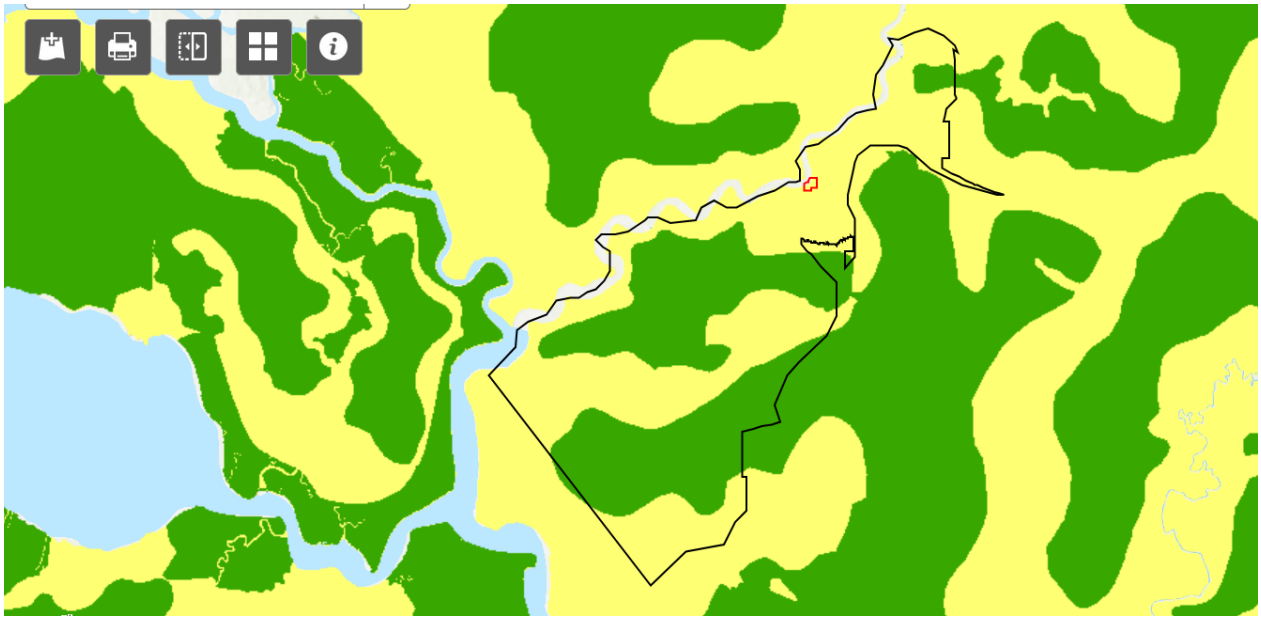
Company/Group/Mill	Traders	Biofuel/Other	Consumer Brands
Kalimantan Agro Pusaka	ADM, Bunge, Cargill, Fuji Oil, GAR, Olam Agri	Avril, BASF, Biesterfeld Spezialchemie, Indorama, Innospec, KAO, Neste, Nikko Chemicals, Nisshin Oillio, Oleon, Symrise	Barry Callebaut, Avon, General Mills, Grupo Bimbo, Hershey, Kellogg, Lion Corporation, Meiji, Mondelēz, Nestle, Pepsi, P&G, PZ Cussons

Case Notes & Evidence

The PT Kalimantan Agro Pusaka concession is located in West Kalimantan, Indonesia.

Overlaying the PT Kalimantan Agro Pusaka concession with *'Peatland Ecosystem Function'* maps published online by the Ministry of Environment and Forestry (MoEF) confirms that the entire PT Kalimantan Agro Pusaka concession is located on a *Peatland Hydrological Unit* (*Kesatuan Hidrologis Gambut, KHG*).[7]

The green areas in the MoeF map below are classified as '*Indicative Function Forest*' and the yellow areas are classified as '*Indicative Function Cultivation*.'



The 25ha of peatland development highlighted in this report (red outline_ is within the 'Indicative Function Forest') of the *Peatland Hydrological Unit (Kesatuan Hidrologis Gambut, KHG*). See area marked with coords -0.825220, 109.896681 .

[7] Peatland hydrological units (Kesatuan Hidrologis Gambut, KHG), the term used for peatlands and the surrounding ecosystems, have been the basis for peatland conservation legislation in Indonesia since 2016. It is defined as '*a peat ecosystem located between two rivers, between a river and the sea and/or in a swamp.*'

Mapping Analysis

Planet image: August 2023 (coordinates: -0.825220, 109.896681)



Planet image: October 2023 (coordinates: -0.825220, 109.896681)



Case Notes & Evidence

The Google Earth/Maxar Technologies image below shows part of the peatland drainage canal network in the PT Kalimantan Agro Pusaka concession, with some parts of the canal measuring 6m wide (coordinates: -0.826695, 109.899216).



New Case

Group: Meadows Capital Ltd
PT Lahan Agro Inti Ketapang
General Concession & Clearance Location: 1.621405, 109.381970

Deforestation and/or Peatland Development					
Report	Forest Clearance (ha)	Integrated Deforestation Alerts (ha)	Peatland Forest Development (ha)	Tree Cover Loss (ha)	Time Period
50			128		December 2023 - June 2025

GIS Imagery (see page 39) shows that between December 2023 and June 2025, there was a total of 128 ha of peatland forest development in the PT Lahan Agro Inti Ketapang concession.

Ownership

PT Lahan Agro Inti Ketapang is part of the Meadows Capital Ltd (a sub-group held offshore). See Case Notes and Evidence for further details.

Supply Chain

Company/Group/Mill	Traders	Biofuel/Other	Consumer Brands
Apical/RGE Group/ Tanoto family	Apical, Mitsubishi Corporation, Sime Darby, Wilmar	Biesterfeld Spezialchemie, Indorama, Stearinerie Dubois, Symrise, Zchimmer & Schwarz	Avon, Johnson & Johnson, Kellogg, Pepsi, Mondelēz
FFB supply from PT Lahan Agro Inti Ketapang to PT Mitra Abadimas Sejahtera	ADM, Bunge, COFCO International, Louis Dreyfus, Fuji Oil, Olam Agri, Wilmar	Avril, BASF, Biesterfeld Spezialchemie, Galaxy Surfactants, Indorama, Innospec, KAO, Nikko Chemicals, Nisshin Oillio, Sakamoto Yakuhin Kogyo, Stearinerie Dubois, Symrise, Zchimmer & Schwarz	Avon, Barry Callebaut, Beiersdorf, Colgate Palmolive, Flora Food Group, Grupo Bimbo, Kellogg, Lion Corporation, Meiji, Mondelēz, Nestle, Pepsi, P&G, PZ Cussons
FFB supply from PT Lahan Agro Inti Ketapang to PT Fajar Saudara Kusuma	ADM, Bunge, Fuji Oil, Olam Agri, Wilmar	Avril, BASF, Biesterfeld Spezialchemie, Galaxy Surfactants, Innospec, Indorama, KAO, Nikko Chemicals, Nisshin Oillio, Symrise	Avon, Barry Callebaut, Beiersdorf, Grupo Bimbo, Kellogg, Lion Corporation, Meiji, Mondelēz, Nestle, Pepsi, P&G, PZ Cussons

Supply Chains to PT Lahan Agro Inti Ketapang/Meadows Capital

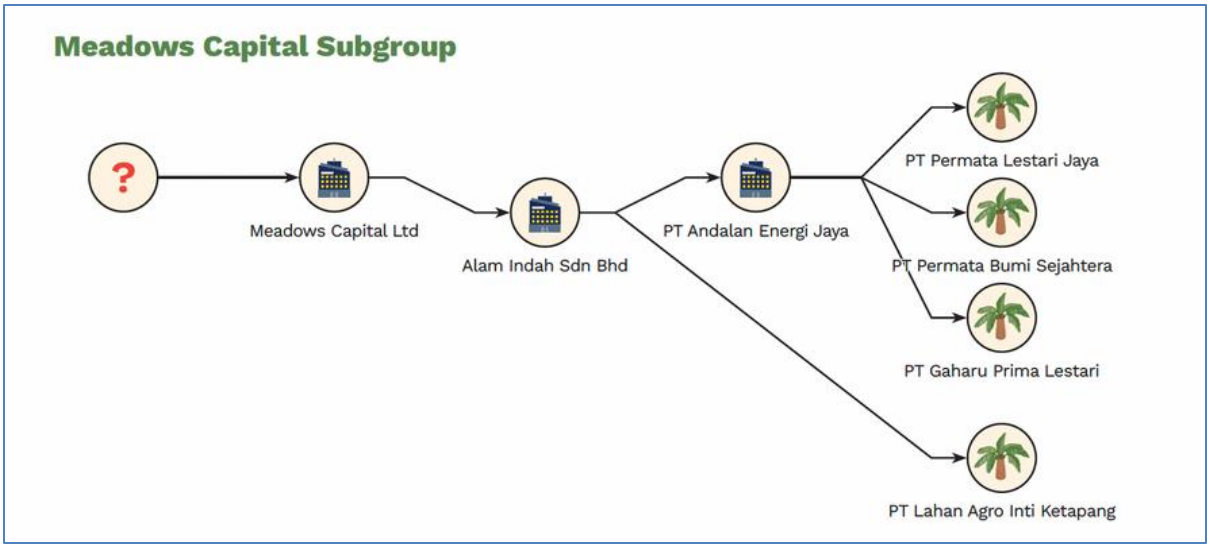
Regarding supply chains, a Greenpeace International report states: *'PT Lahan Agro Inti Ketapang does not have its own mill, so the palm fruit that is harvested is sold to other mills. On their research visit, Greenpeace Indonesia researchers were told that most fruit was sold to two mills: PT Mitra Abadimas Sejahtera and PT Fajar Saudara Kusuma. They were shown receipts to prove the link to PT Mitra Abadimas Sejahtera. Neither of these mill companies is believed to be linked to the companies under investigation or RGE/Tanoto. PT Fajar Saudara Kusuma has told Greenpeace that it stopped sourcing from PT Lahan Agro Inti Ketapang in 2023.'* Mighty Earth has included these two mills in the supply chain table above related to this case as the connections should be investigated as part of a grievance for this case.

Case Notes & Evidence

The PT Lahan Agro Inti Ketapang concession is located in West Kalimantan, Indonesia.

In May of 2025, Greenpeace International published a 406- page report called '[Under the Eagle's Shadow: Investigating the RGE/Tanoto Shadow Empire.](#)' The report, which includes a case study on PT Lahan Agro Inti Ketapang states that the '*Ownership of PT Lahan Agro Inti Ketapang moved to Meadows Capital Sdn Bhd (now renamed Alam Indah Sdn Bhd) from DTK Opportunity in August 2018 after NGO reports highlighted deforestation in its concession. In 2021 and 2022, three other former DTK Opportunity concession companies were also moved to this holding structure*.'

The Greenpeace International report includes an ownership diagram (below) of the Meadows Capital sub-group.



As the Greenpeace International report notes, '*The Royal Golden Eagle group (RGE Group') is the wider name for the group of businesses founded by Indonesian businessman Sukanto Tanoto and still controlled by him and his family. Sukanto Tanoto's children are also involved in the running of RGE companies and the Tanoto Foundation, a charitable body linked with the group. Official businesses (described by RGE as 'business groups') are in the pulp and paper, palm oil and energy sectors, and are based in Indonesia, China, Brazil and Canada*.'

As such, Apical (palm oil) and Asian Agri (palm oil) are just '*members of the RGE group.'*

Case Notes & Evidence

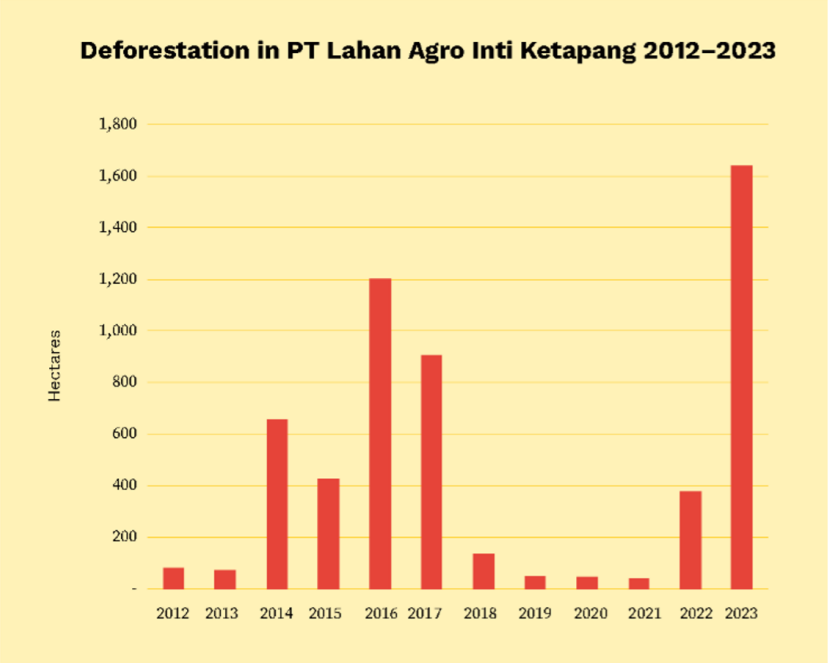
On May 20, 2025, RGE Group issued a statement in response to the Greenpeace International report claim, stating that, '*RGE Refutes Greenpeace Allegations, Reaffirms Commitment to Zero-Deforestation and FSC Engagement Process.*'

The statement only makes selective claims regarding the case studies of companies included in the report. For examples, the RGE statement claims: '*PT Phoenix Resources International is not under direct or indirect ownership or control of RGE or its shareholders*.' PT Phoenix Resources International is the company behind a new pulp mill in Kalimantan.

However, with regards to PT Lahan Agro Inti Ketapang, the RGE statement only claims that '*PT Lahan Agro Inti Ketapang (PT LAIK) has never been a supplier to Apical and is not part of RGE's supply chain*'. It does not declare that PT Lahan Agro Inti Ketapang and or Meadows Capital (and its sub-group of companies as shown in the diagram above) are '*not under direct or indirect ownership or control of RGE or its shareholders*:'

Deforestation and Peatland Development Analysis

The aforementioned Greenpeace International report provides an analysis of deforestation in the PT Agro Inti Ketapang concession for the period between 2012 and 2023 in the graph to the right.



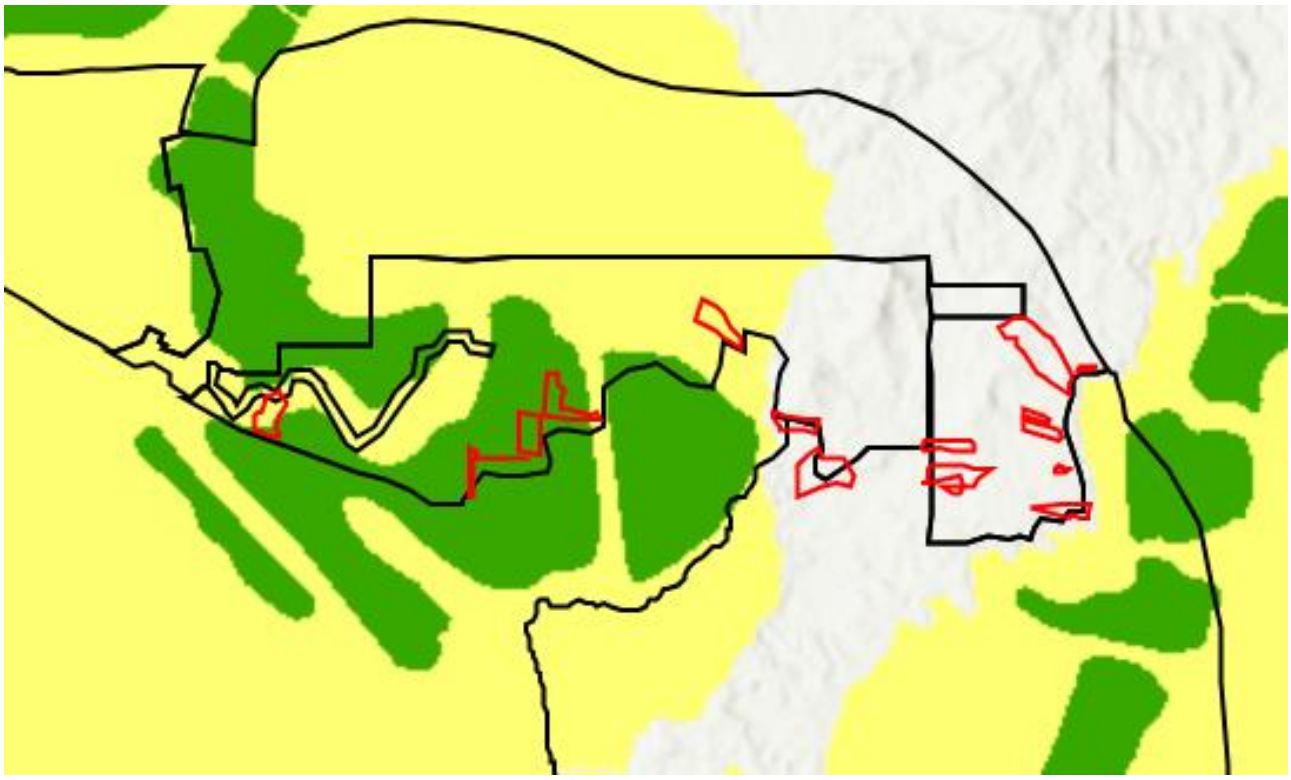
Case Notes & Evidence

The Lahan Agro Inti Ketapang concession is located in West Kalimantan, Indonesia.

Overlaying the Lahan Agro Inti Ketapang concession with '*Peatland Ecosystem Function*' maps published online by the Ministry of Environment and Forestry (MoEF) confirms that the majority of the PT Lahan Agro Inti Ketapang concession is located on a '*Peatland Hydrological Unit (Kesatuan Hidrologis Gambut, KHG).*'[8]

The green areas in the MoeF map below are classified as '*Indicative Function Forest'* and the yellow areas are classified as '*Indicative Function Cultivation*.'

The areas of clearing (red outline) are located on both *Indicative Function Forest'* and '*Indicative Function Cultivation.'*



[8] Peatland hydrological units (Kesatuan Hidrologis Gambut, KHG), the term used for peatlands and the surrounding ecosystems, have been the basis for peatland conservation legislation in Indonesia since 2016. It is defined as '*a peat ecosystem located between two rivers, between a river and the sea and/or in a swamp.*'

Mapping Analysis

Mighty Earth estimates that there were approximately 128 ha of peatland forest development in 15 different areas of the PT Lahan Agro Inti Ketapang concession between December 2023 and June 2025, as shown on the maps below.

Planet image: December 2023 (general location coordinates: 1.621405, 109.381970)



Planet image: June 2025 (general location coordinates: 1.621405, 109.381970)



New Case

Group: Pasifik Agro Sentosa

PT Jalin Vaneo

Concession & Clearance Location: -0.935494, 110.083257

Deforestation and/or Peatland Development					
Report	Forest Clearance (ha)	Integrated Deforestation Alerts (ha)	Peatland Development (ha)	Tree Cover Loss (ha)	Time Period
50			14		October 2022 - November 2023

GIS Imagery (see page 43) shows that between October 2022 and November 2023, there was a total of 14 ha of peatland development in the PT Jalin Vaneo concession.

Ownership

PT Jalin Vaneo is part of Pasifik Agro Sentosa.

Supply Chain

Company/Group /Mill	Traders	Biofuel/Other	Consumer Brands
Pasifik Agro Sentosa	AAK, ADM, Astra Agro, Bunge, COFCO International, Fuji Oil, KLK, Louis Dreyfus, Mitsui, Musim Mas, Olam Agri, Pacific Inter Link, Sime Darby, Wilmar	Avril, BASF, Biesterfeld, Galaxy Surfactants, Indorama, KAO, Lipsa, Neste, Nisshin Oillio, Olenex Rotterdam, Oleon, Permata Hijau, Sakamoto Yakuhin Kogyo, Sinarmas Cepsa, Stearinerie Dubois, Symrise, Zschimmer & Schwarz	Barry Callebaut, Colgate Palmolive, Flora Food Group, Friesland Campina, General Mills, Hershey, Johnson & Johnson, Kellogg, Lion Corporation, Meiji, Nestle, Pepsi, Vandemoortele, P&G, PZ Cussons

Case Notes & Evidence

The PT Jalin Vaneo concession is located in West Kalimantan, Indonesia.

Overlaying the PT Jalin Vaneo HGU concession boundary with '*Peatland Ecosystem Function'* maps published online by the Ministry of Environment and Forestry (MoEF) confirm that the majority of the PT Jalin Vaneo concession is located on a '*Peatland Hydrological Unit (Kesatuan Hidrologis Gambut, KHG).*'[9] The green areas in the MoeF map below are classified as '*Indicative Function Forest'* and the yellow areas are classified as '*Indicative Function Cultivation.'*

The red area is the area of peatland development highlighted in this report (coordinates: -0.935494, 110.083257).



[9] Peatland hydrological units (Kesatuan Hidrologis Gambut, KHG), the term used for peatlands and the surrounding ecosystems, have been the basis for peatland conservation legislation in Indonesia since 2016. It is defined as '*a peat ecosystem located between two rivers, between a river and the sea and/or in a swamp.*'

Mapping Analysis

Planet satellite imagery shows that around 14ha were cleared between October 2022 and November 2023, most of it within the HGU boundary (marked in blue).

Planet image: October 2022 (coordinates: -0.935494, 110.083257)



Planet image: November 2023 (coordinates: -0.935494, 110.083257)



New Case

Group: Unknown
PT Prana Indah Gemilang
Concession & Clearance Location: 110.20493, -2.00429

Deforestation and/or Peatland Development					
Report	Forest Clearance (ha)	Integrated Deforestation Alerts (ha)	Peatland Development (ha)	Tree Cover Loss (ha)	Time Period
50			48		August 2021 - August 2022

GIS Imagery (see page 47) shows that between August 2021 and August 2022, there was a total of 48 ha of peatland development in the PT Prana Indah Gemilang concession.

Ownership

The ownership of PT Prana Indah Gemilang is still under investigation. While the ownership profile is listed on the AHU database, the actual document is unavailable at the time of this report's production.

PT Prana Indah Gemilang is listed on the ICIJ database of offshore companies.

Supply Chain

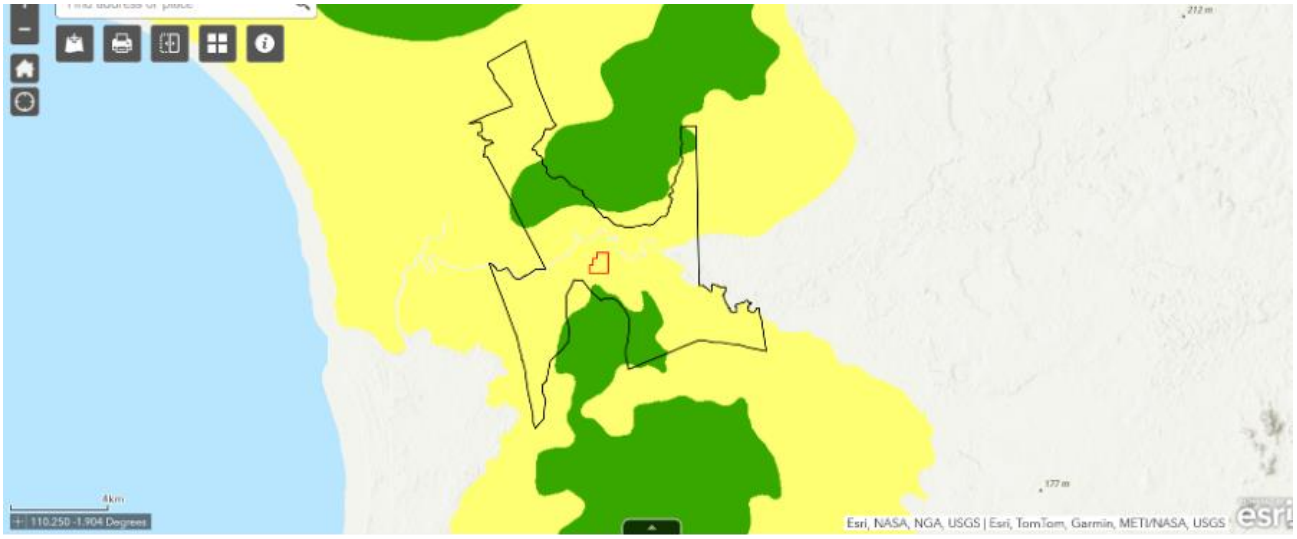
Company/Group/Mill	Traders	Biofuel/Other	Consumer Brands
Prana Indah Gemilang	TBD	TBD	TBD

Case Notes & Evidence

The PT Prana Indah Gemilang concession is located in West Kalimantan, Indonesia.

Overlaying the PT Prana Indah Gemilang concession boundary with '*Peatland Ecosystem Function'* maps published online by the Ministry of Environment and Forestry (MoEF) confirm that the vast majority of the PT Prana Indah Gemilang is located on a '*Peatland Hydrological Unit (Kesatuan Hidrologis Gambut, KHG).'*[10]

The green areas in the MoEF map below are classified as *'Indicative Function Forest'* and the yellow areas are classified as '*Indicative Function – Cultivation.'*



[10] Peatland hydrological units (Kesatuan Hidrologis Gambut, KHG), the term used for peatlands and the surrounding ecosystems, have been the basis for peatland conservation legislation in Indonesia since 2016. It is defined as '*a peat ecosystem located between two rivers, between a river and the sea and/or in a swamp*'

Mapping Analysis

Planet satellite imagery shows that around 48 hectares were cleared between August 2021 and August 2022.

Planet image: August 2021
(coordinates: -2.004483, 110.203850)



Planet image: November 2021
(coordinates: -2.004483, 110.203850)



Planet image: May 2022
(coordinates: -2.004483, 110.203850)



Planet image: August 2022
(coordinates: -2.004483, 110.203850)



New Case

Group: Global Palm Resources Group

PT Cemaru Lestari

Concession & Clearance Location: 0.269257, 109.953882 & 0.259620, 109.959295

Deforestation and/or Peatland Development					
Report	Forest Clearance (ha)	Integrated Deforestation Alerts (ha)	Peatland Forest Development (ha)	Tree Cover Loss (ha)	Time Period
50	33				January - April 2024

GIS Imagery (see page 51) shows that between January and April of 2024, there was a total of 33 ha of deforestation in the PT Cemaru Lestari concession.

Ownership

PT Cemaru Lestari is part of the Global Palm Resources Group, owned since 2023 by ATH Holdings (Singapore) which is owned by the Adijanto family.

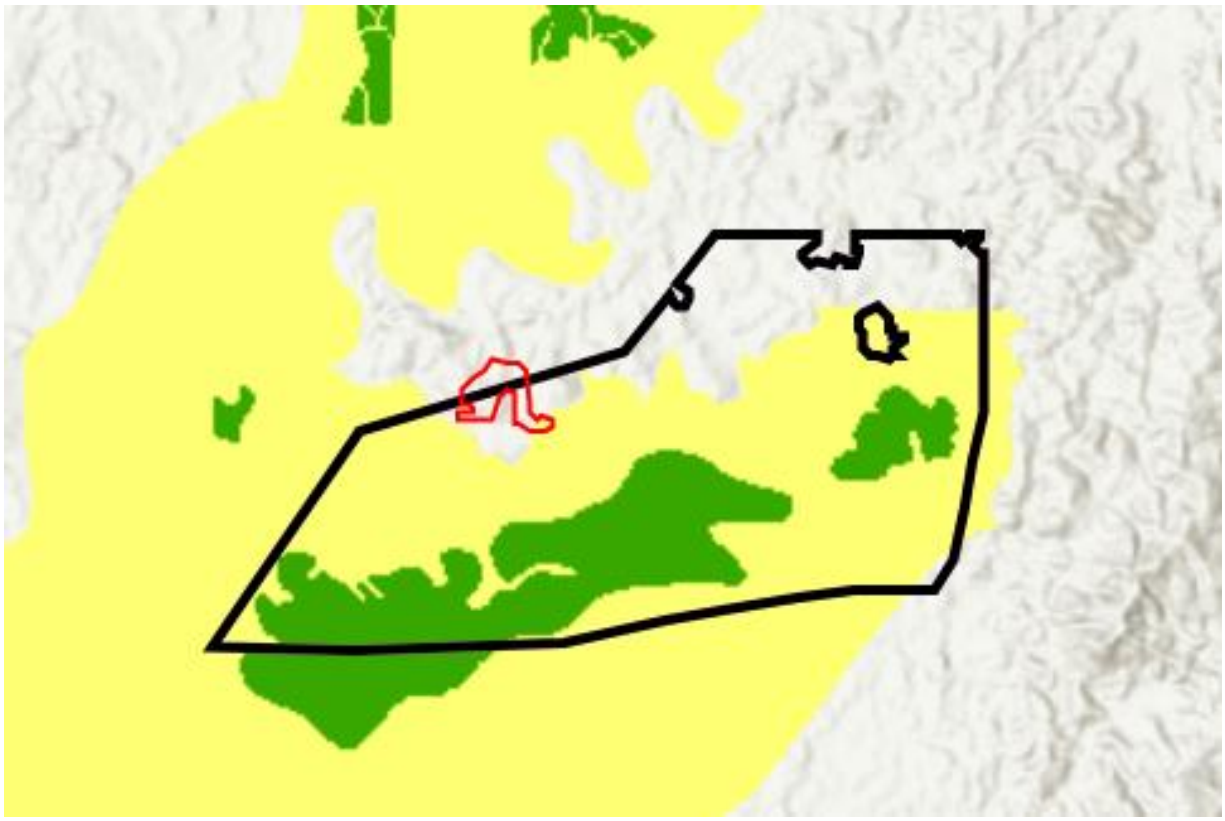
Supply Chain

Company/Group	Traders	Biofuel/Other	Consumer Brands
Global Palm Resources Group	AAK, ADM, Bunge, First Resources, Fuji Oil, GAR, Wilmar	Biesterfeld, Indorama, Innospec, KAO, Oleon, Stearinerie Dubois	Avon, Barry Callebaut, Colgate Palmolive, Flora Food Group, Grupo Bimbo, Hershey, Kellogg, Mondelēz, Nestle, Pepsi, PZ Cussons

Case Notes & Evidence

The PT Cemaru Lestari concession is located in West Kalimantan, Indonesia.

The MoEF map below shows that the area of deforestation highlighted in this case (red outline) is not located on a '*Peatland Hydrological Unit'(Kesatuan Hidrologis Gambut, KHG*).'



Mapping Analysis

Planet image: January 2024
(coordinates: 0.269257, 109.953882)



Planet image: April 2024
(coordinates: 0.269257, 109.953882)



New Case

Group: TSH Resources
PT Munte Waniq Jaya Perkasa
Concession & Clearance Location: -0.653015, 115.991617

Deforestation and/or Peatland Development					
Report	Forest Clearance (ha)	Integrated Deforestation Alerts (ha)	Peatland Development (ha)	Tree Cover Loss (ha)	Time Period
50	10 ha				June 2025 – July 2025

GIS Imagery (see page 52) shows that between June 30, 2025 and July 18, 2025, there was a total of 10 ha of deforestation in the PT Munte Waniq Jaya Perkasa concession.

Ownership

PT Munte Waniq Jaya Perkasa is part of TSH Resources Bhd.

Supply Chain

Company/Group/Mill	Traders	Biofuel/Other	Consumer Brands
TSH Resources	AAK, ADM, Apical, Bunge, Cargill, COFCO International, Fuji Oil, GAR, KLK, Mitsubishi Corporation, Pacific Inter Link, Sime Darby, Wilmar	Avril, BASF, Biesterfeld, Galaxy Surfactants, Indorama, Innospec, KAO, Lipsa, Neste, Nikko Chemicals, Nisshin Oillio, Olenex, Oleon, Sakamoto Yakuhin Kogyo, Stearinerie Dubois, Symrise, Zschimmer & Schwarz	Avon, Beiersdorf, Barry Callebaut, Colgate Palmolive, Flora Food Group, Friesland Campina, General Mills, Grupo Bimbo, Hershey, Johnson & Johnson, Kellogg, Lion Corporation, Meiji, Mondelēz, Nestle, Pepsi, P&G, PZ Cussons, Vandemoortele

Case Notes & Evidence

PT Munte Waniq Jaya Perkasa concession is located in North Kalimantan, Indonesia.

PT Munte Waniq Jaya Perkasa is owned by TSH Resources which terminated its RSPO membership in 2024.

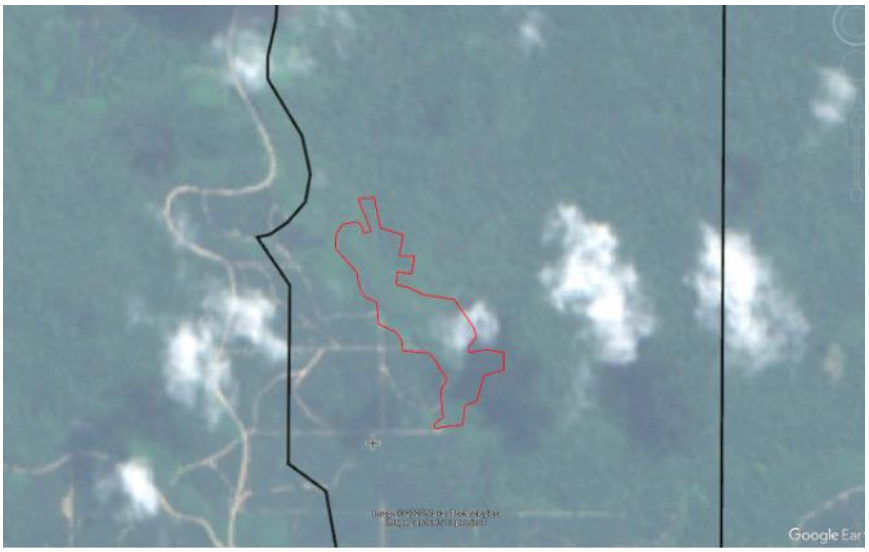
The company's website does not disclose a public NDPE policy, but does state that: '*Through comprehensive High Conservation Value (HCV) and Biodiversity assessments, we identify and preserve critical ecosystems, including areas with endangered species and high biodiversity [and] By adopting the High Carbon Stock (HCS) approach in our development decision-making, we refine our conservation strategies, striking a balance between our operations and the surrounding ecosystems for sustainable coexistence.*'

No HCV assessments for PT Munte Waniq Jaya Perkasa were found on the HCVRN website. No HCS assessments for PT Munte Waniq Jaya Perkasa were found on the High Carbon Stock website.

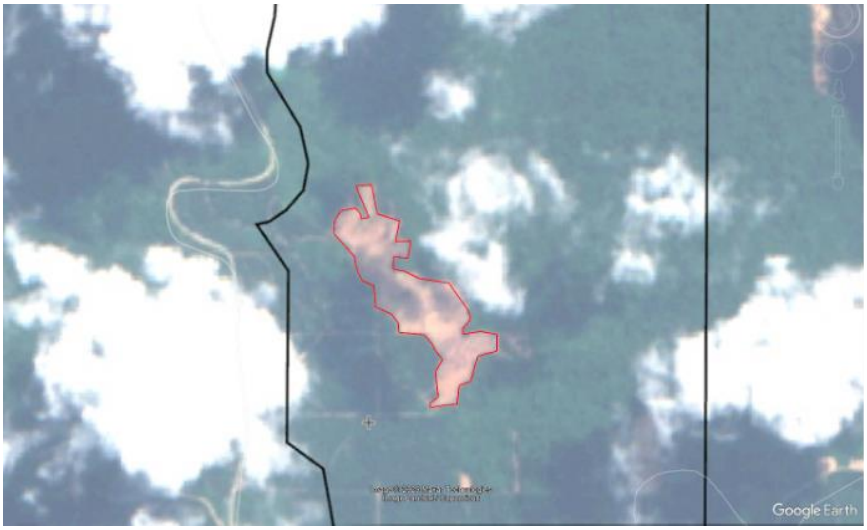
Mapping Analysis

Sentinal imagery shows around 10ha of land clearing between Jun 30, 2025 and July 18, 2025 in the eastern section of PT Munte Waniq Jaya Perkasa's HGU permit area. See imagery below.

Sentinel image: June 30, 2025 (coordinates: -0.653015, 115.991617)



Sentinel image: July 18, 2025 (coordinates: -0.653015, 115.991617)



Case Notes & Evidence

Mighty Earth is aware of conflicts between local communities related to land clearing in the PT Munte Waniq Jaya Perkasa concession.

On July 16, 2025, there was a protest in the area being cleared by several community members. The translation of the message on the board in the photo below reads: 'St*op clearing and planting oil palms in the Muara Tae customary area*.'



Given the above, this Rapid Response case highlights the need for this grievance to investigate the claims by the local communities affected by the oil palm development in the Munte Waniq Jaya Perkasa concession.

Annex: PT Damai Agro Sejahtera

In addition to September 22, 2025 updates to the Bumitama case introduced on p.18, Mighty Earth has conducted a mapping analysis (below and on subsequent pages) regarding peatland development in PT Damai Agro Sejahtera based on the peat soil survey map included in Bumitama's response.

September 3, 2025

In response to a Rapid Response report 50 case regarding peatland development in PT Damai Agro Sejahtera, Bumitama issued a press release on August 8, 2025 entitled 'Bumitama clarifies on new planting in PT DAS'.

The press release states: 'Mighty Earth's Rapid Response Report 50 includes claims that PT Damai Agro Sejahtera (PT DAS), a Bumitama subsidiary, carried out oil palm expansion on peatlands between 2022 and 2024. These claims are drawn from satellite imagery and national- scale indicative peat maps (Peta Kawasan Hidrologi Gambut). Field assessments and the RSPO NPP process undertaken for the area provide additional context to the on-the-ground conditions and development approach.' The press release reveals that: 'A full peat survey was conducted across the PT DAS concession in December 2021 by a certified team using standard methodologies, including auguring to a depth of 300 cm. The results (displayed in the map on page 1) confirmed that no peat, regardless of depth, was present within the proposed new planting blocks. Soils were identified as mineral, predominantly sandy and clay types.'

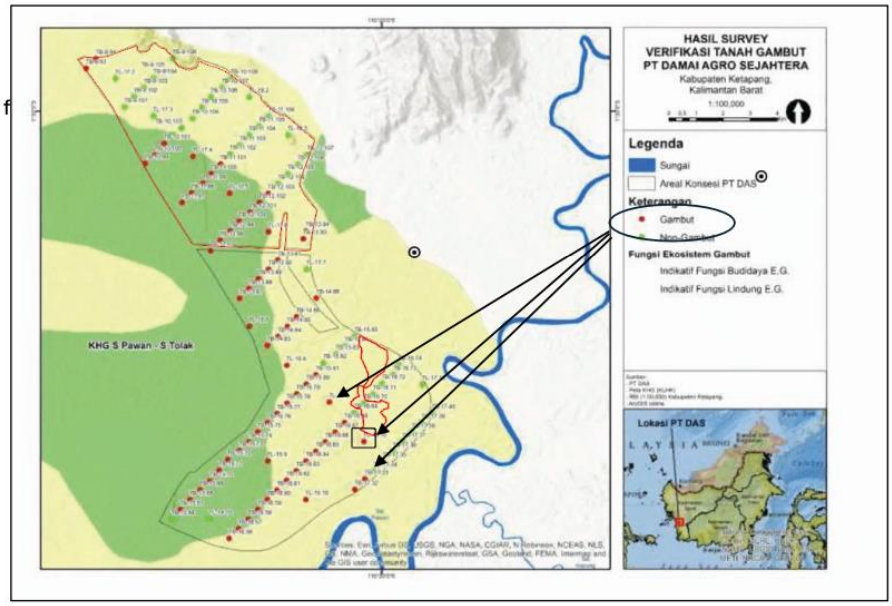
Mighty Earth understands that the 2021 'full peat survey' was conducted by EcoTrop (PT Aihika Sawala Ekotropiak). Page 1 of the Bumitama's press release includes a map showing areas identified as peat soils and non-peat soils in PT Damai Agro Sejahtera.

Mighty Earth's mapping analysis concludes that between April and June 2024, PT Damai Agro Sejahtera expanded an existing 580m canal located adjacent to an area identified as peatland by the EcoTrop peat survey. Such expansion or development in an area of peatland would be in violation of many companies' NDPE policies, which require 'no peatland development regardless of depth'. See Wilmar and GAR NDPE policies for example. This case therefore requires investigation.

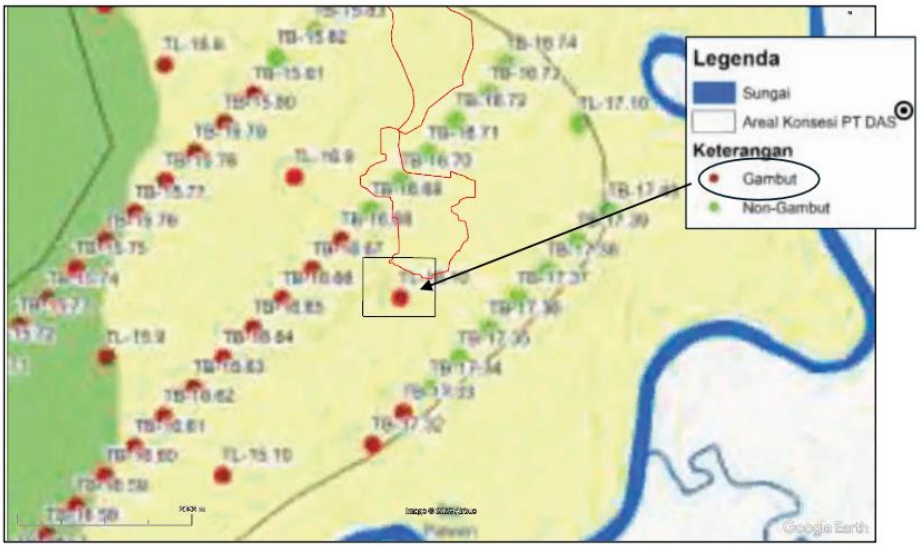
Annex: PT Damai Agro Sejahtera

Mapping analysis and supporting evidence

Page 1 of Bumitama's press release includes a map showing areas of identified peat soils and non-peat soils in the PT Damai Agro Sejahtera concession. The red dots show the locations of peatland (Gambut) identified in the 2021 EcoTrop peat survey.

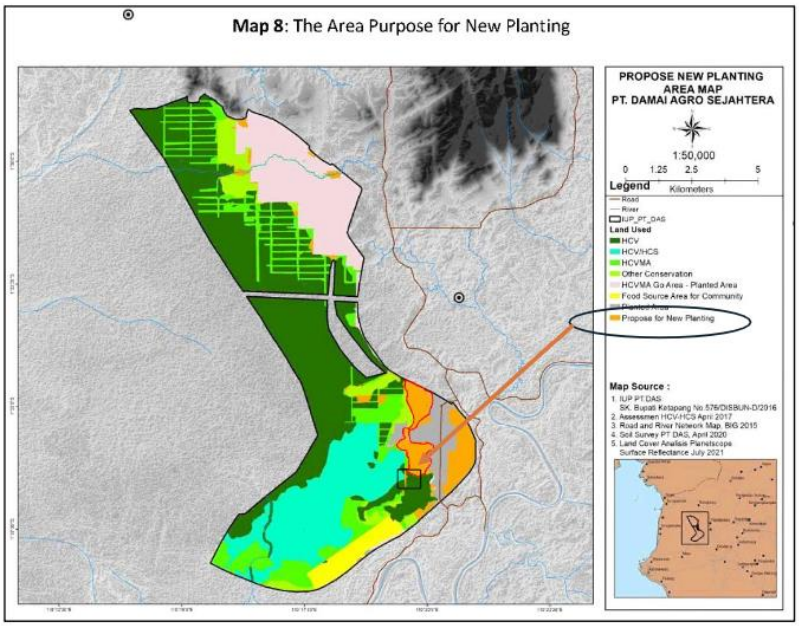


The map below is a zoomed in view of the map above. It shows peat soils (Gambut) were identified to the immediate south of the developed area highlighted in Rapid Response report 50 – i.e. the sample plot (red dot) shown inside the black square in the graphic below.

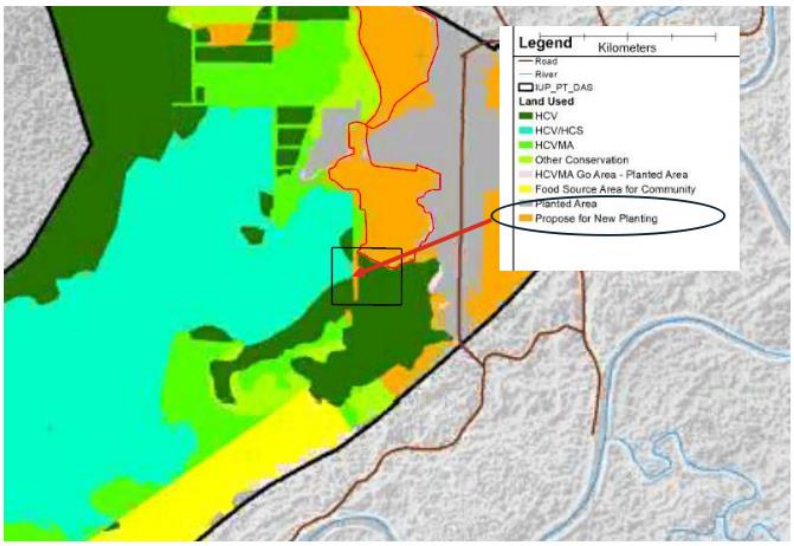


Annex: PT Damai Agro Sejahtera

Map 8 of the 2021 '*Summary of Assessments and Management Plans Damai Agro Sejahtera*' report shows areas with the 'Purpose of Planting' (orange areas). Inside the black box is a vertical strip (orange) that cuts through an HCV area (dark green)

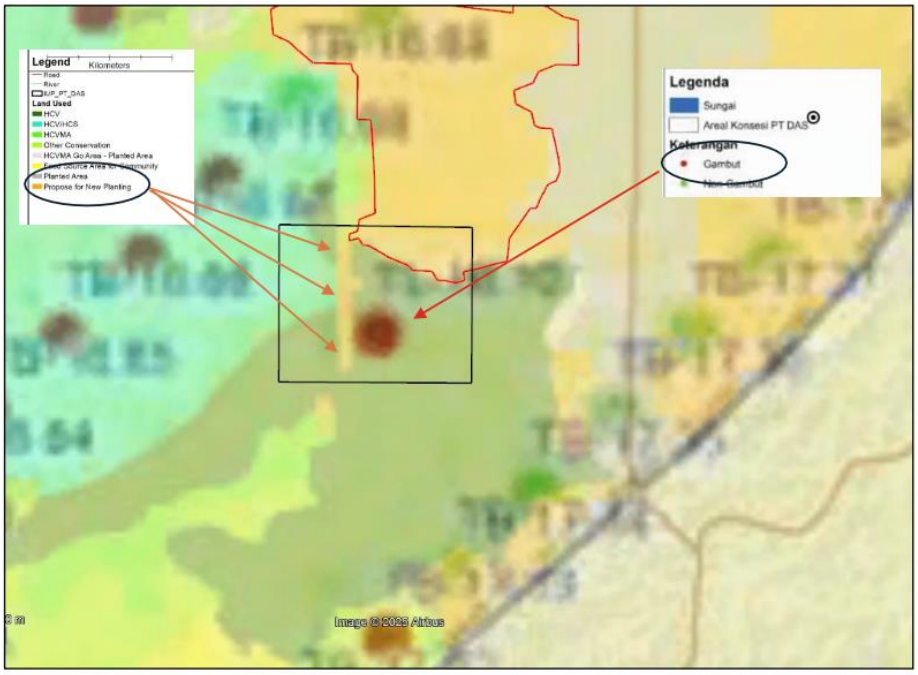


The map below shows a zoomed in view of the map above. It shows an orange vertical strip of the southwestern section of alleged peatland development included in Rapid Response report 50 (red outline). The area marked in the legend as '*Propose for New Planting*' cuts through an HCV area (dark green).



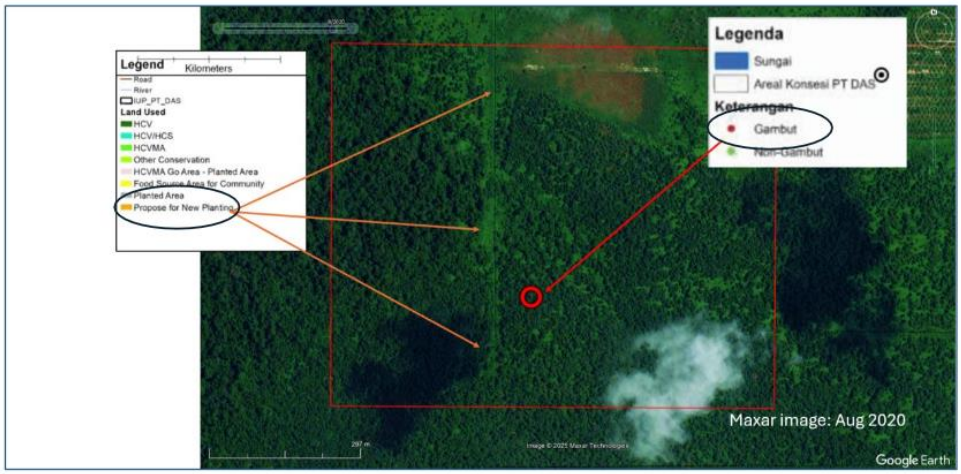
Annex: PT Damai Agro Sejahtera

The map below overlays the EcoTrop peat soil sample plots (red) with the map above showing areas with the 'Purpose of Planting' (orange areas). It shows that the area to the immediate east of the orange strip is peatland (Gambut), marked by the red dot.



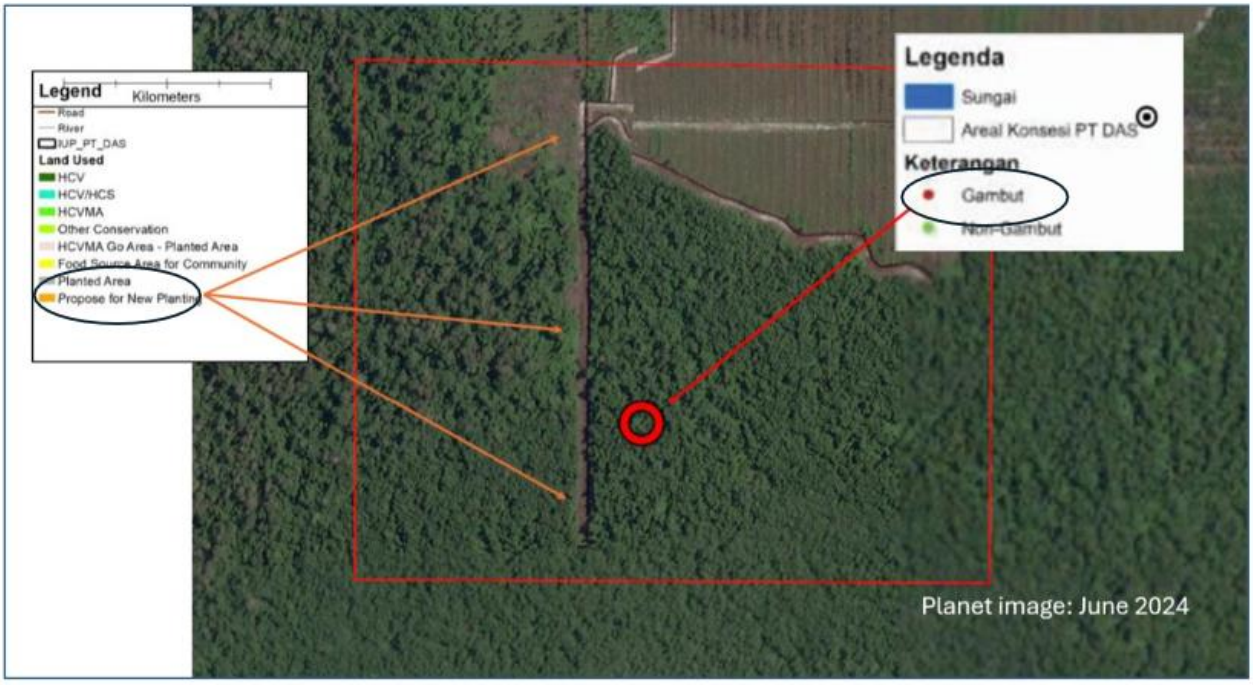
The Maxar satellite image below is dated August 2020 and shows a narrow canal. Planet imagery shows that the initial narrow canal development took place between October 2016 and December 2016. See Planet time series imagery here.

The map below shows the location of identified peatland (red circle) adjacent to a narrow canal development marked on the maps above as '*Propose for New Planting*'.



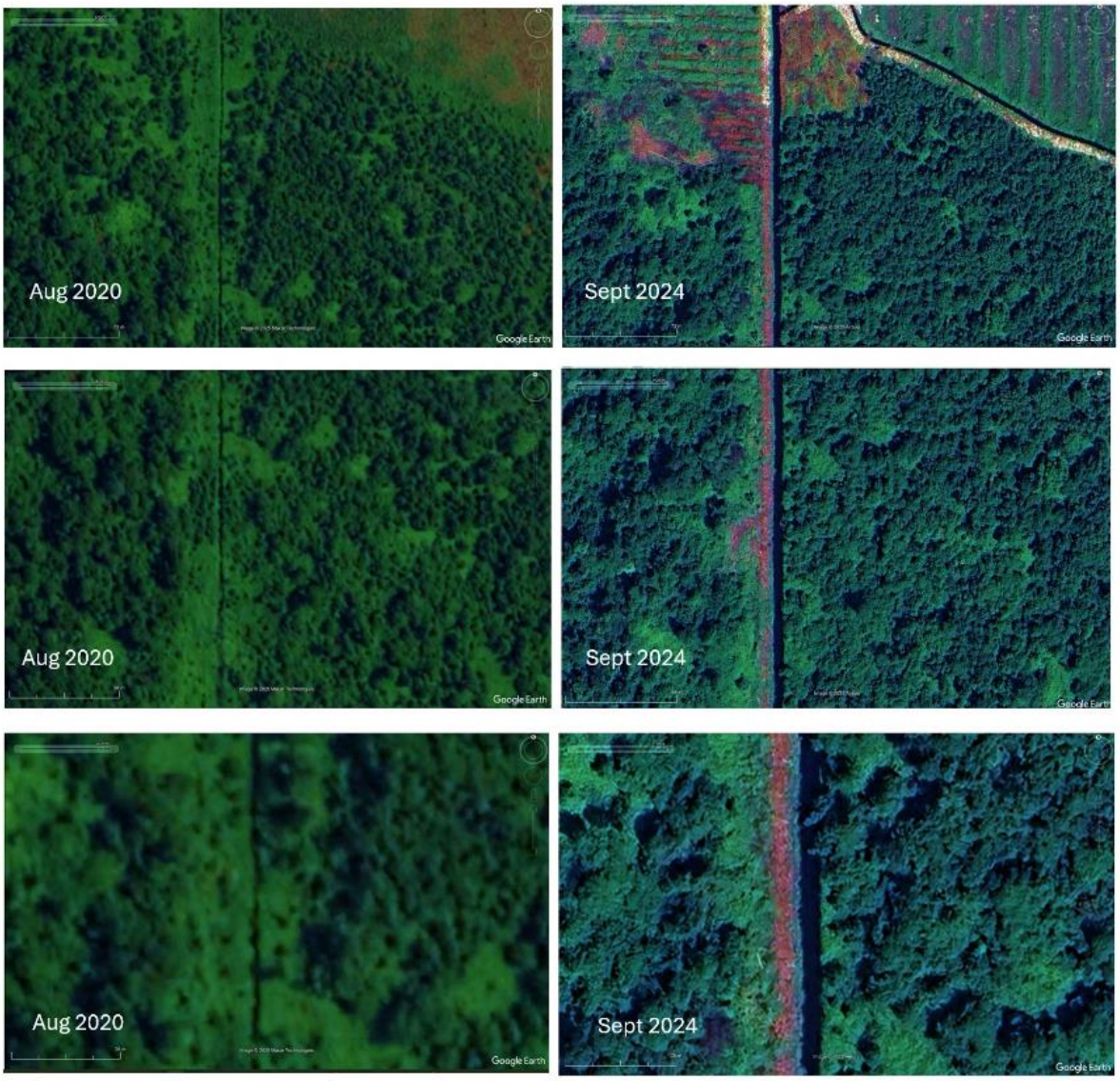
Annex: PT Damai Agro Sejahtera

The map below shows the location of identified peatland (red circle) adjacent to the canal expansion marked as '*Propose for New Planting*'. The high-resolution Planet satellite image below dated June 2024 shows that the 580m narrow canal had been expanded to around 4m wide, together with a cleared area to the left of the canal.



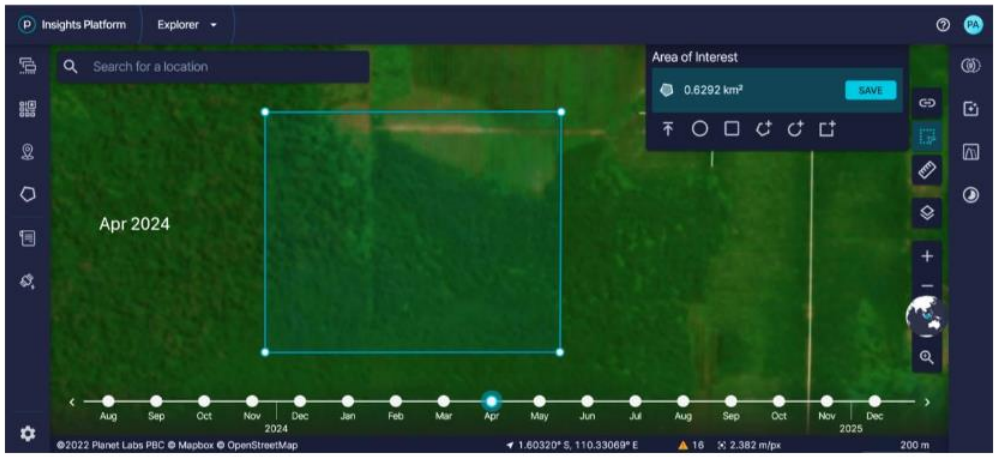
Annex: PT Damai Agro Sejahtera

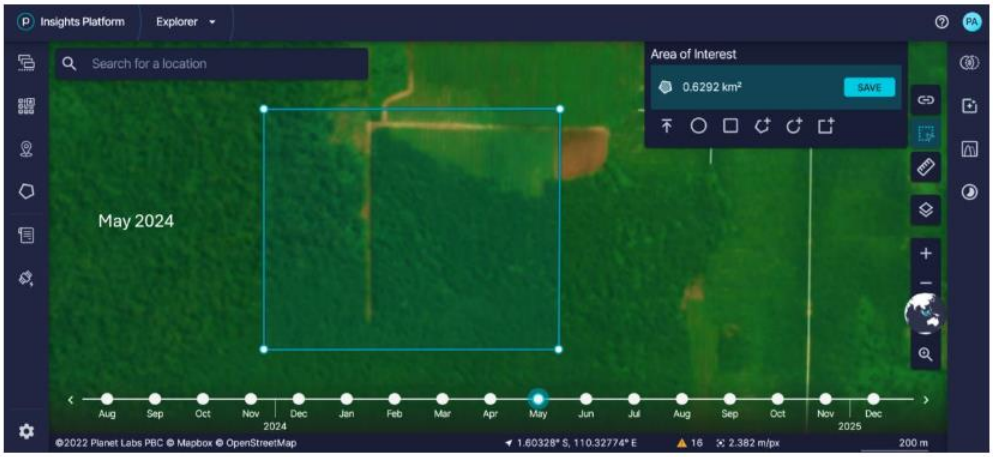
The satellite imagery below shows sections of the 580m canal development as of August of 2020 compared to imagery from September of 2024 after the expansion of the canal to around 4m wide.

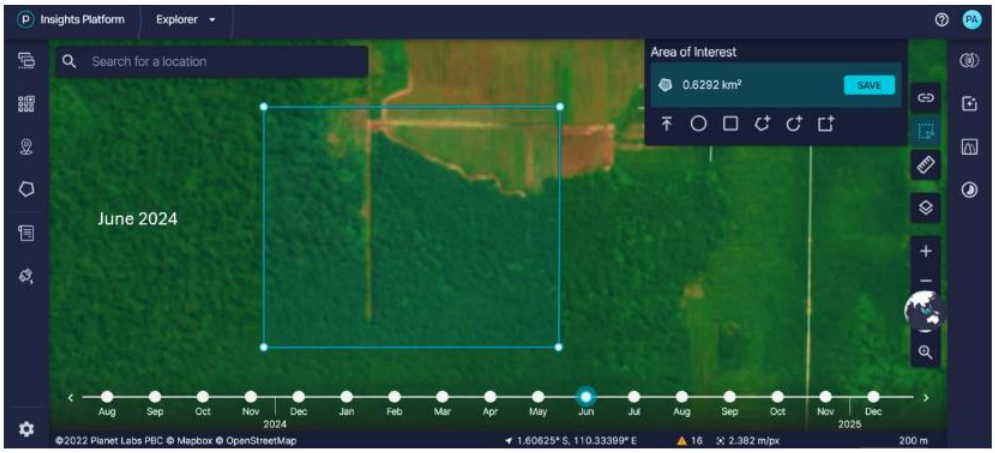


Annex: PT Damai Agro Sejahtera

Planet imagery also shows that the expansion of the peatland canal, together with a cleared area to the left of the canal, took place between April and June of 2024. See imagery below.









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