

FOREST FRONTLINES

Exposing Royal Golden Eagle Group's Sprawling Empire of Destruction

PT. Toba Pulp Lestari: A Corporate Culprit Repeat Offender

[PT. Toba Pulp Lestari Tbk](#) (IDX:INRU), is over 90% owned and controlled by the Tanoto family through a complex series of offshore companies (outlined [p63-71](#)).

RAN commissioned satellite analysis of forest loss in PT. Toba Pulp Lestari's industrial tree plantation (HTI) concessions in Indonesia from 2015-2023. Our analysis of satellite imagery found that PT. TPL concessions lost 1,390 ha (3,434 acres) of natural forest after the introduction of RGE's '[no deforestation](#)' policy in 2015. At least 390 hectares (963 acres) of this forest loss occurred after December 2020, the cut-off date for FSC Full Forest Management certification. The documented deforestation since December 2020 should not only prohibit APRIL's and PT. TPL's association with FSC, it should also preclude PT. TPL products from being imported into the EU market under new [European Union Deforestation Free Regulation](#) (EUDR), which aims to prevent import of commodities that resulted in deforestation after December 2020.

This document presents the full collection of data and satellite maps showing the extent of deforestation within PT. Toba Pulp Lestari's concessions between 2015 and 2023. We put our findings to Royal Golden Eagle and have summarized their responses at the end of this briefing.

Source and methodology

RAN's analysis utilized Planet satellite imagery, deforestation data by Forest Loss Hansen, the peatland map and land cover data from the Indonesian Ministry and Forestry/ KLHK, GLAD Alerts and burned area data from MODIS -GFW and MODIS USGS NASA and an internal database on palm oil concessions. The 2000 KLHK map is used as a baseline to determine the forest area. Deforestation is defined as forest loss within an area classified as forest area based on that map. 2014-2021 KLHK's land cover maps are used to analyze land use change to determine total peat conversion area (2014 and 2015 land cover maps are used to analyze peat conversion in 2015, 2015 and 2016 maps are used to analyze peat conversion in 2016 and so on).

Table 1: Deforestation in PT. TOBA PULP LESTARI Tbk concessions in North Sumatra

All concessions are licensed to PT.TOBA PULP LESTARI Tbk in Sumatera Utara (North Sumatra) Province deforestation took place in 9 of 12 districts highlighted in orange, and corresponding maps are detailed below.

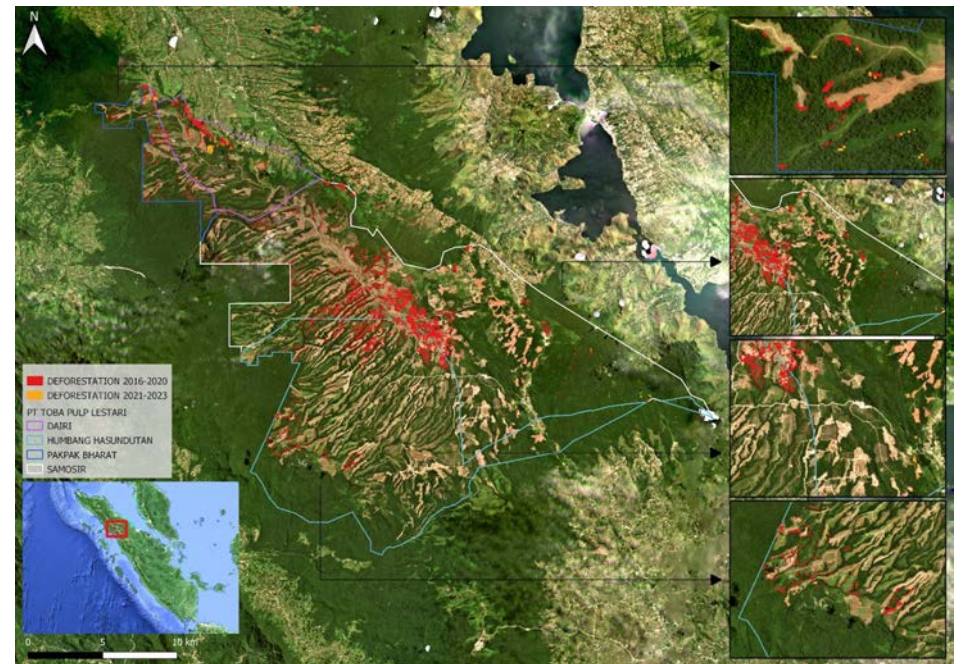
DISTRICT	DEFORESTATION (ha)											
	2015	2016	2017	2018	2019	2020	2021	2022	2023	Subtotal	>FSC/EUDR Cut-off (>2020)	> RGE Forest Policy (>2015)
Asahan	4.22	2.81	0.08	0.32	0.00	4.77	0.32	0.19	0.00	12.69	0.5	8.5
Dairi	33.76	10.34	17.80	22.32	12.75	48.07	23.46	29.02	8.09	205.61	60.6	171.8
Humbang Hasundutan	1.30	1.87	0.00	0.00	0.82	0.31	0.00	1.05	0.68	6.02	1.7	4.7
Kota Padang Sidempuan	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0	0.0
Padang Lawas Utara	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0	0.0
Pakpak Bharat	3.26	0.76	5.44	6.02	0.84	1.04	1.88	1.37	0.23	20.85	3.5	17.6
Samosir	177.33	256.50	82.75	35.17	56.89	10.65	11.09	9.72	10.81	650.91	31.6	473.6
Simalungun	13.88	20.38	33.98	20.67	10.60	8.95	8.94	4.75	1.75	123.88	15.4	110.0
Tapanuli Selatan	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.0	0.0
Tapanuli Tengah	0.04	0.00	0.00	0.87	0.15	0.00	0.43	0.37	0.00	1.85	0.8	1.8
Tapanuli Utara	25.34	26.75	56.65	72.33	48.51	58.72	125.99	107.75	44.39	566.43	278.1	541.1
Toba Samosir	7.45	32.71	25.67	0.00	2.01	0.54	0.58	0.00	0.04	69.01	0.6	61.6
Total										<u>1,657.26</u>	<u>392.9</u>	<u>1390.7</u>

Maps of Deforestation

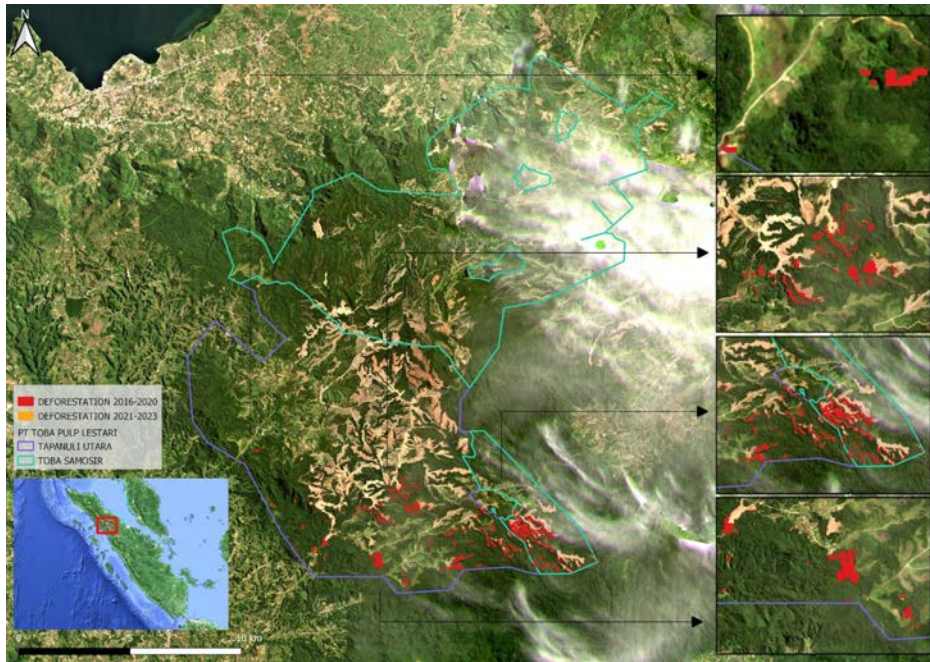
The four maps shown below present the extent of deforestation inside PT. Toba Pulp Lestari's concessions across its operations in North Sumatra after the 2015 and 2020 deforestation cut-off dates.

1. Satellite map showing the extent of deforestation inside PT. Toba Pulp Lestari's concessions in their Aek Nauli Estate between 2015 and 2023 in the districts of Asahan and Simalungun.

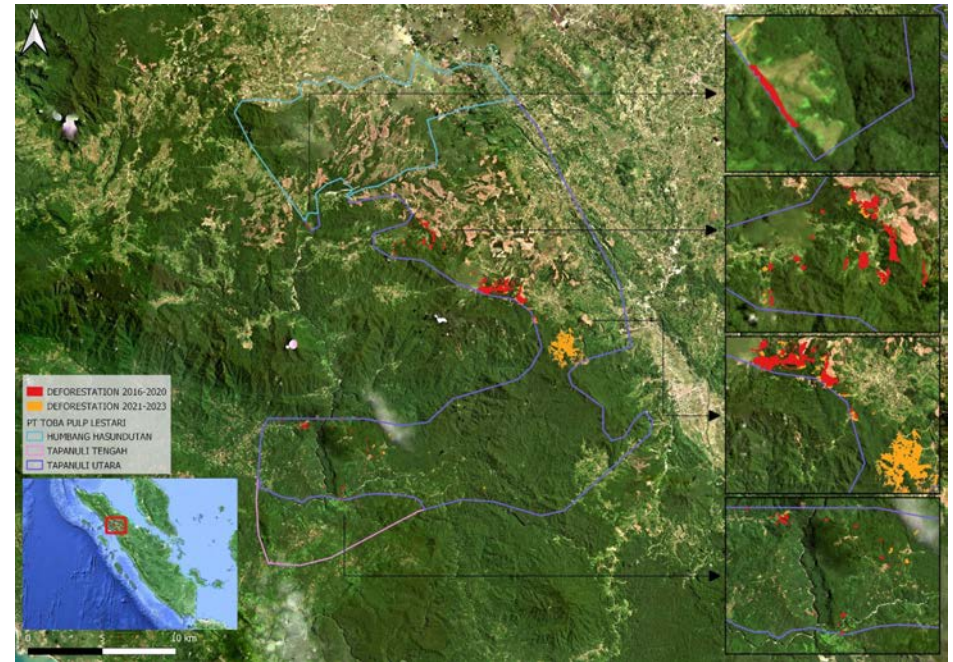
2. Satellite map showing the extent of deforestation inside PT. Toba Pulp Lestari's concessions in their Tele Estate between 2015 and 2023 in the districts of Dairi, Humbang Hasundutan, Pakpak Bharat and Samosir.



3. Satellite map showing the extent of deforestation inside PT. Toba Pulp Lestari's concessions in their Habinsaran Estate between 2015 and 2023 in the districts of Tapanuli Utara and Toba Samosir.



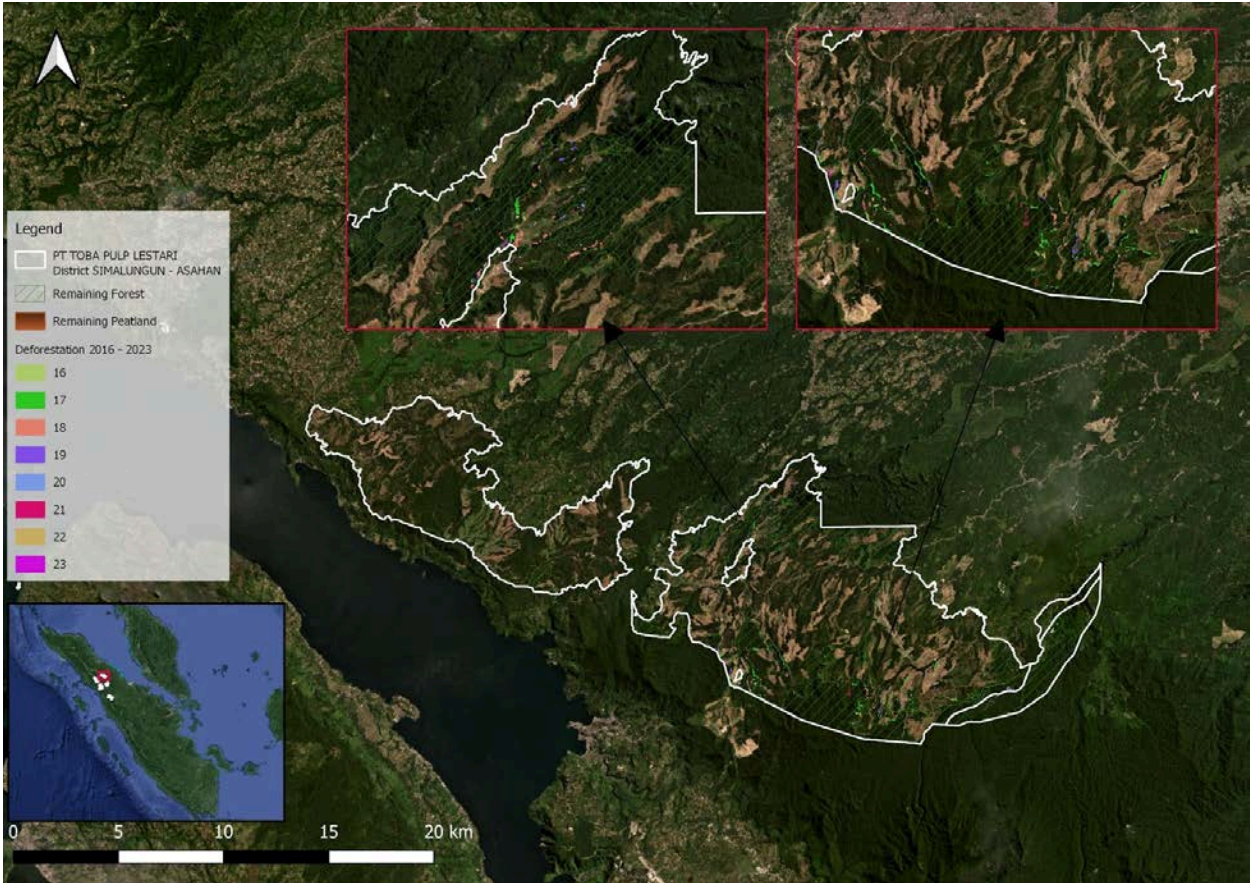
4. Satellite map showing the extent of deforestation inside PT. Toba Pulp Lestari's concessions in their Aek Raja Estate between 2015 and 2023 in the districts of Humbang Hasundutan, Tapanuli Tengah, and Tapanuli Utara.



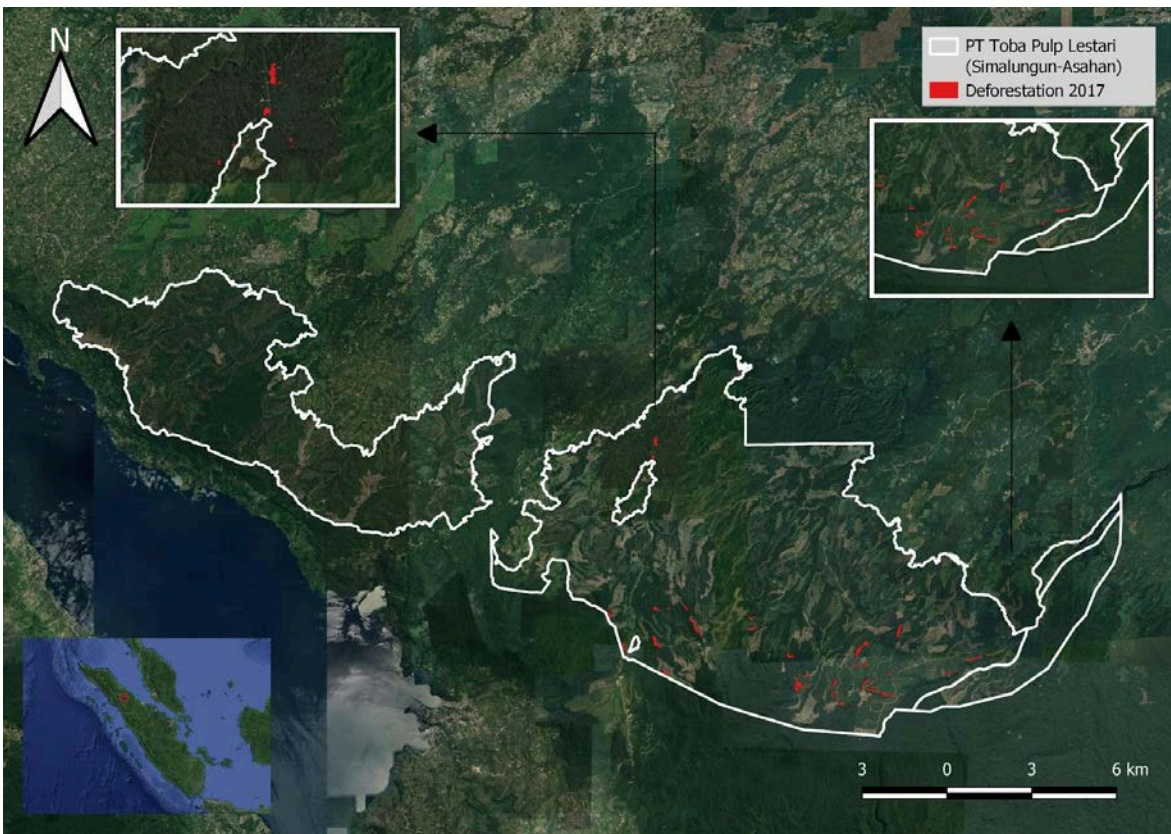
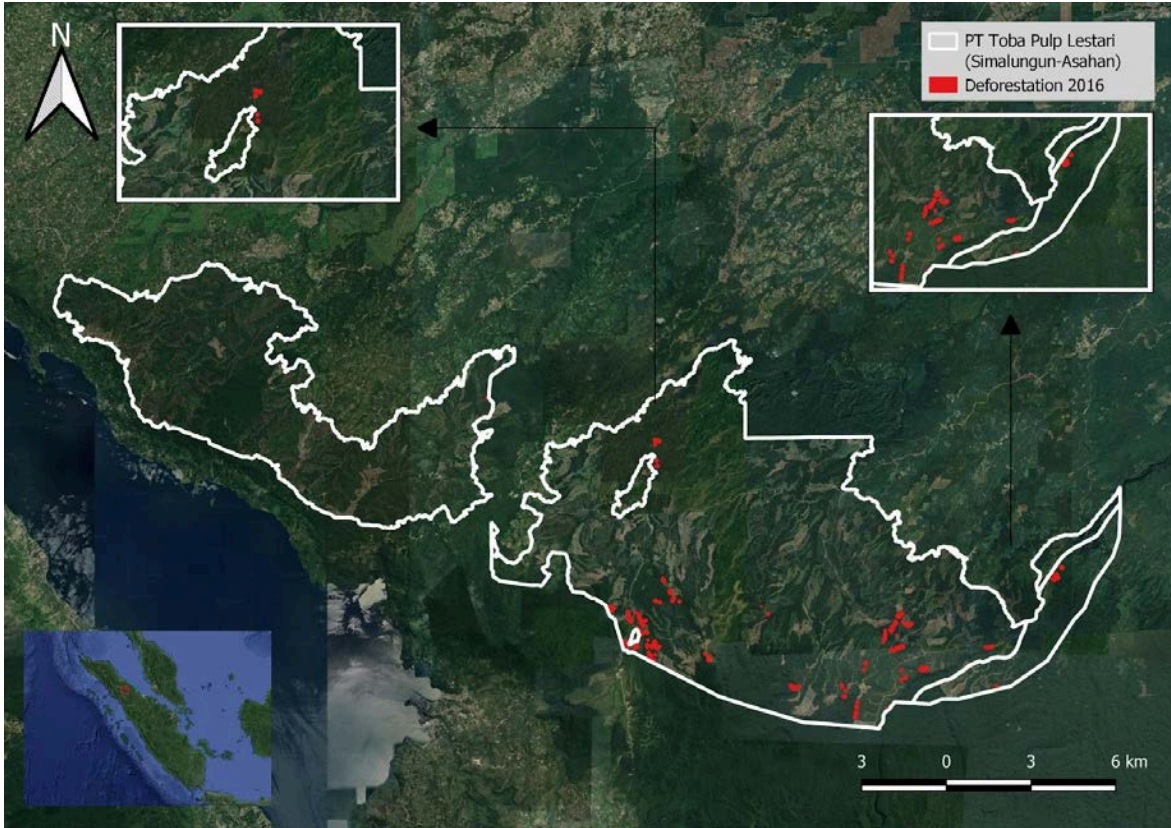
The following section presents the satellite maps broken down by year. The first map in each district shows the extent of clearance between 2016-2023 followed by maps showing deforestation broken down by year.

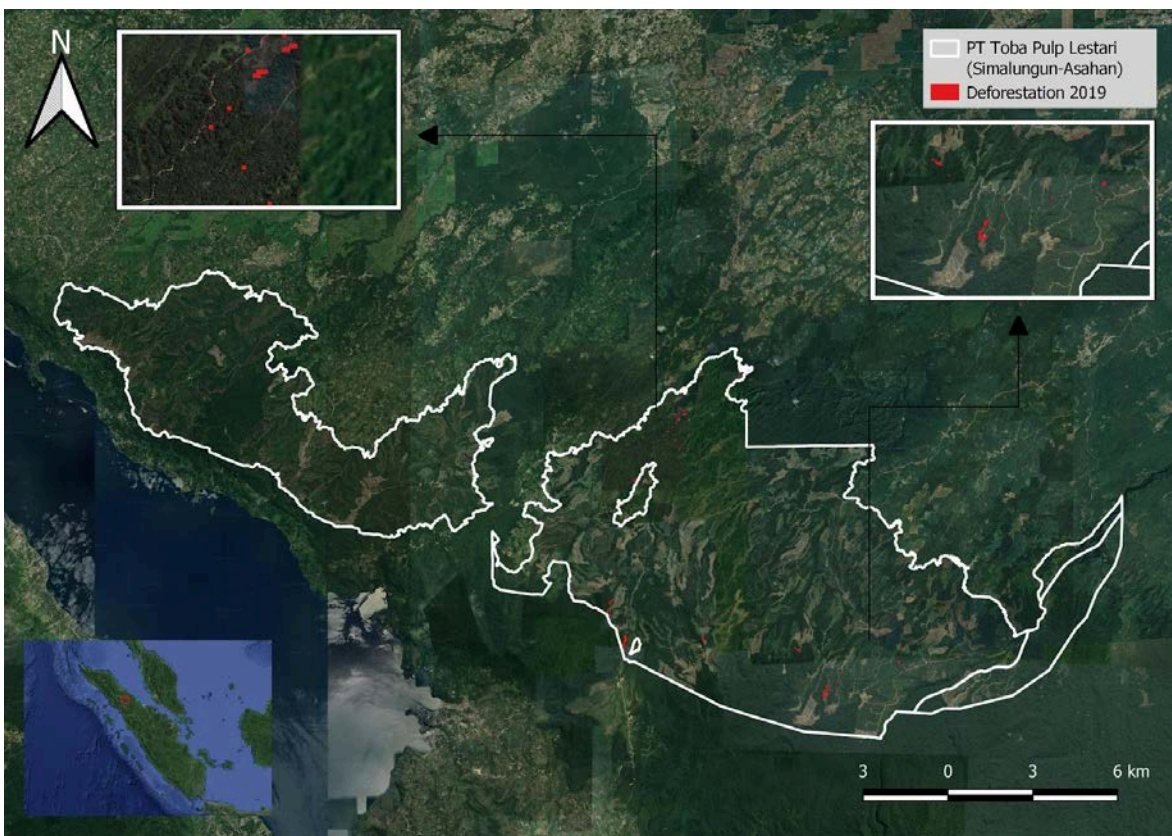
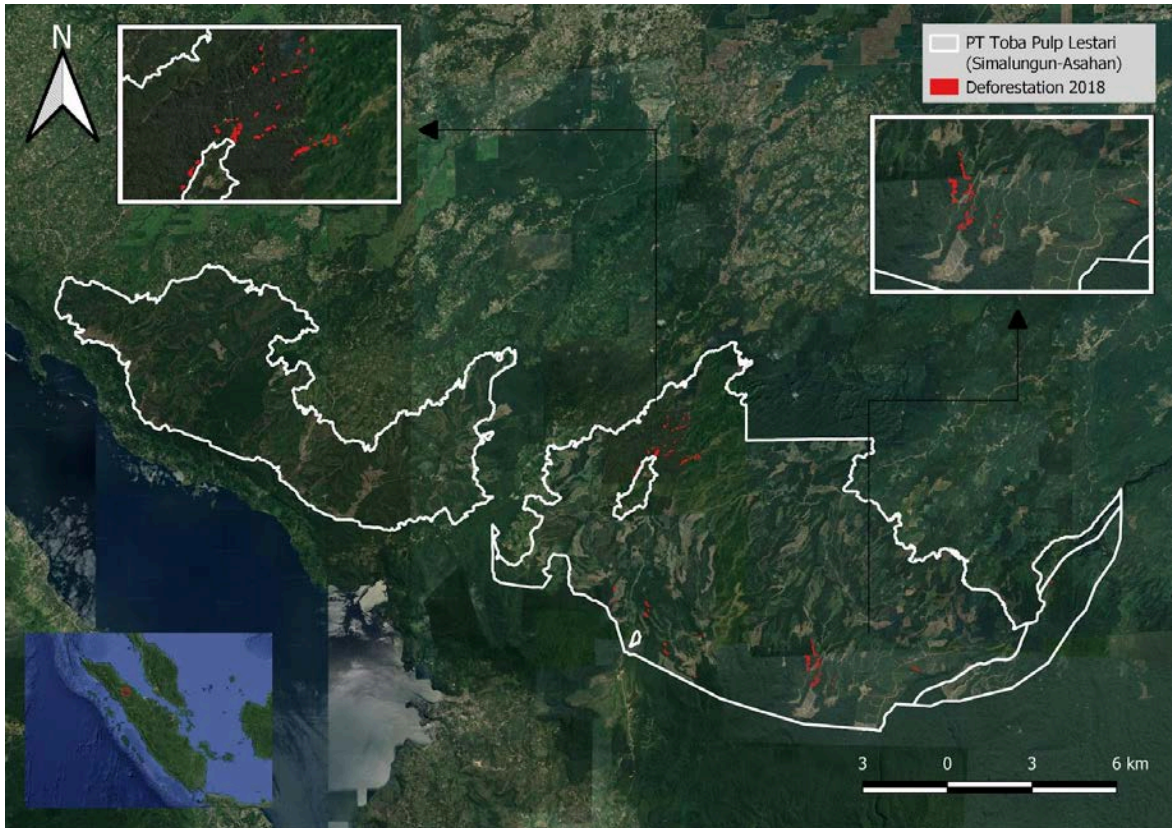
1. Deforestation in PT. Toba Pulp Lestari concessions in the district of Asahan

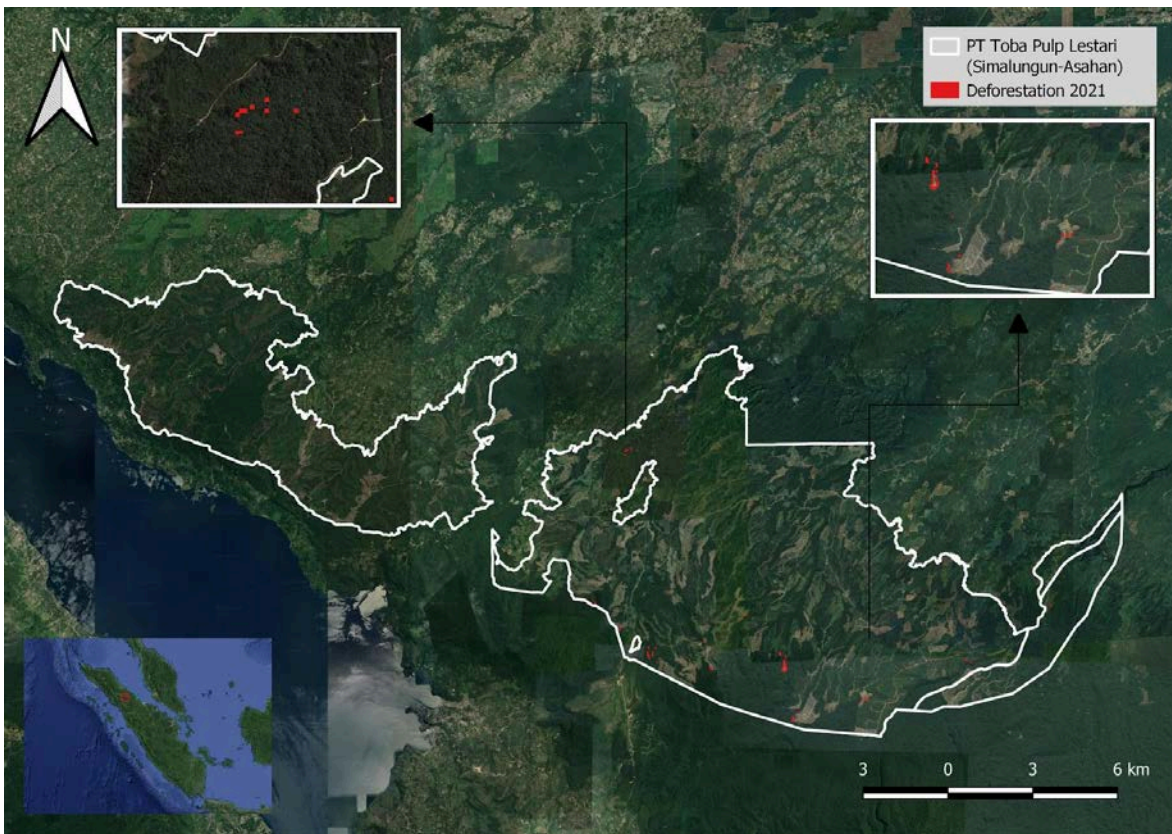
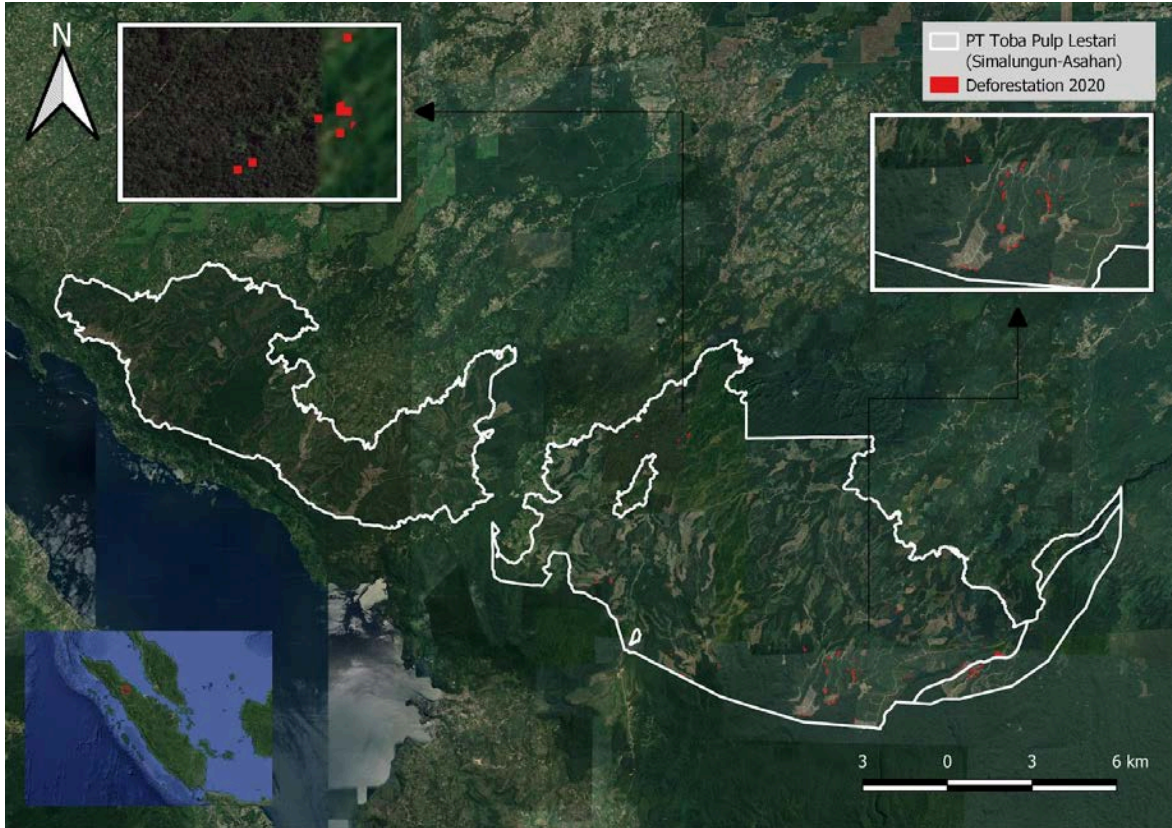
In PT. Toba Pulp Lestari’s concessions in their Aek Nauli Estate in the district of Asahan, over 8.5 ha (21 acres) were cleared between 2016-2023 with 2.8 ha (7 acres) cleared in 2016 and 4.8 ha (12 acres) in 2020. An additional 4.2 ha (10 acres) was also cleared in 2015.

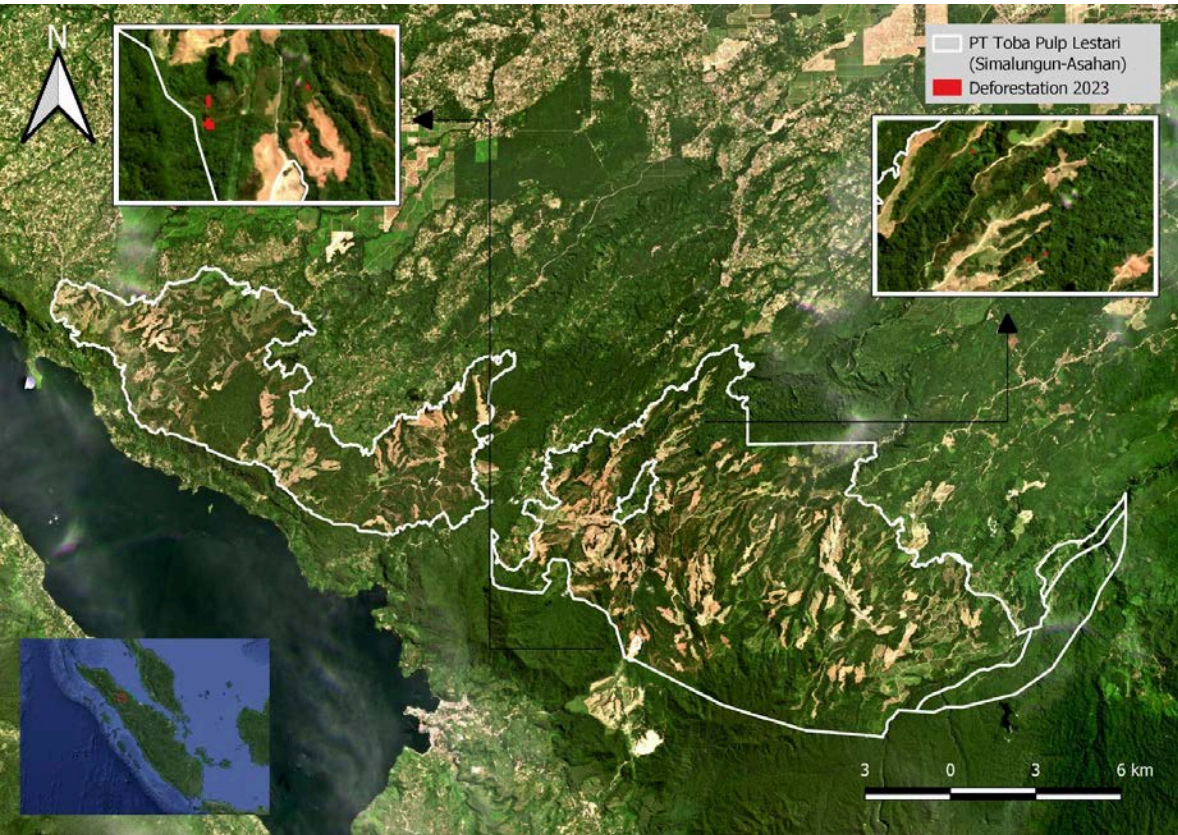
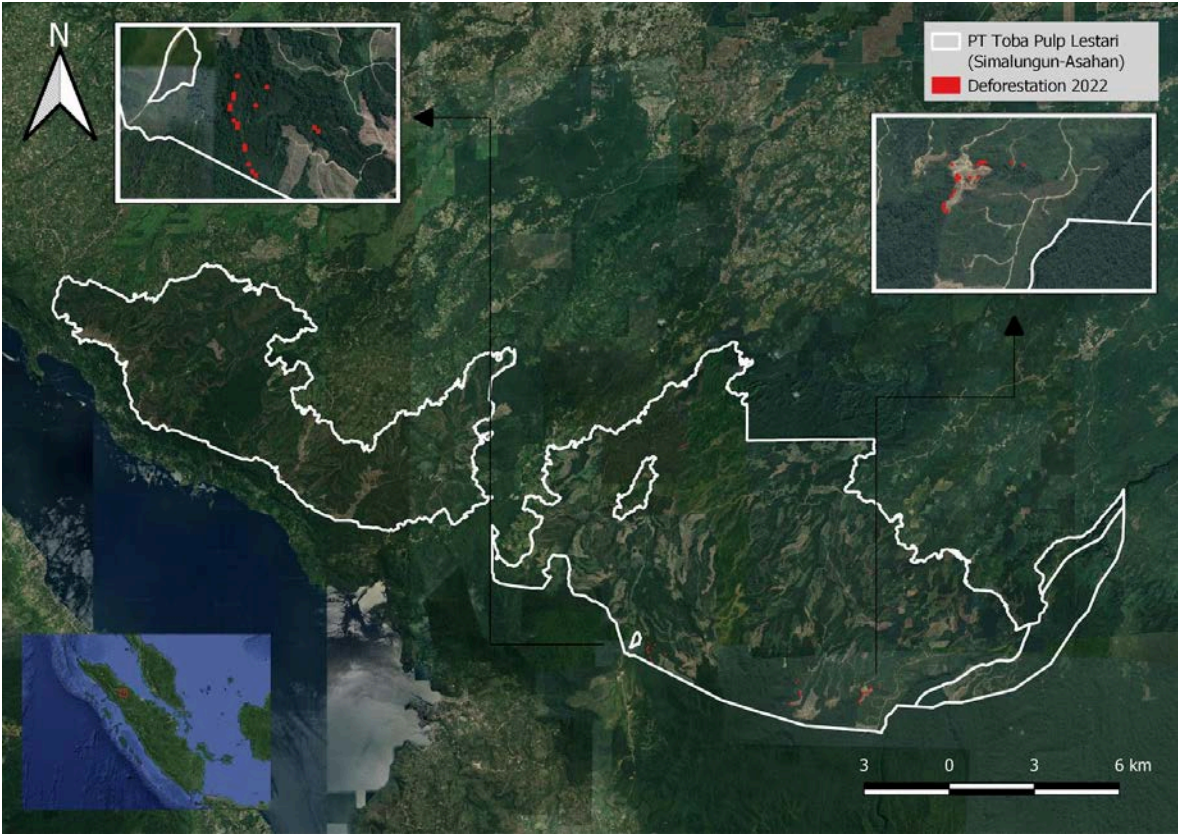


Deforestation in PT. Toba Pulp Lestari concession in Asahan in between 2016-2023.





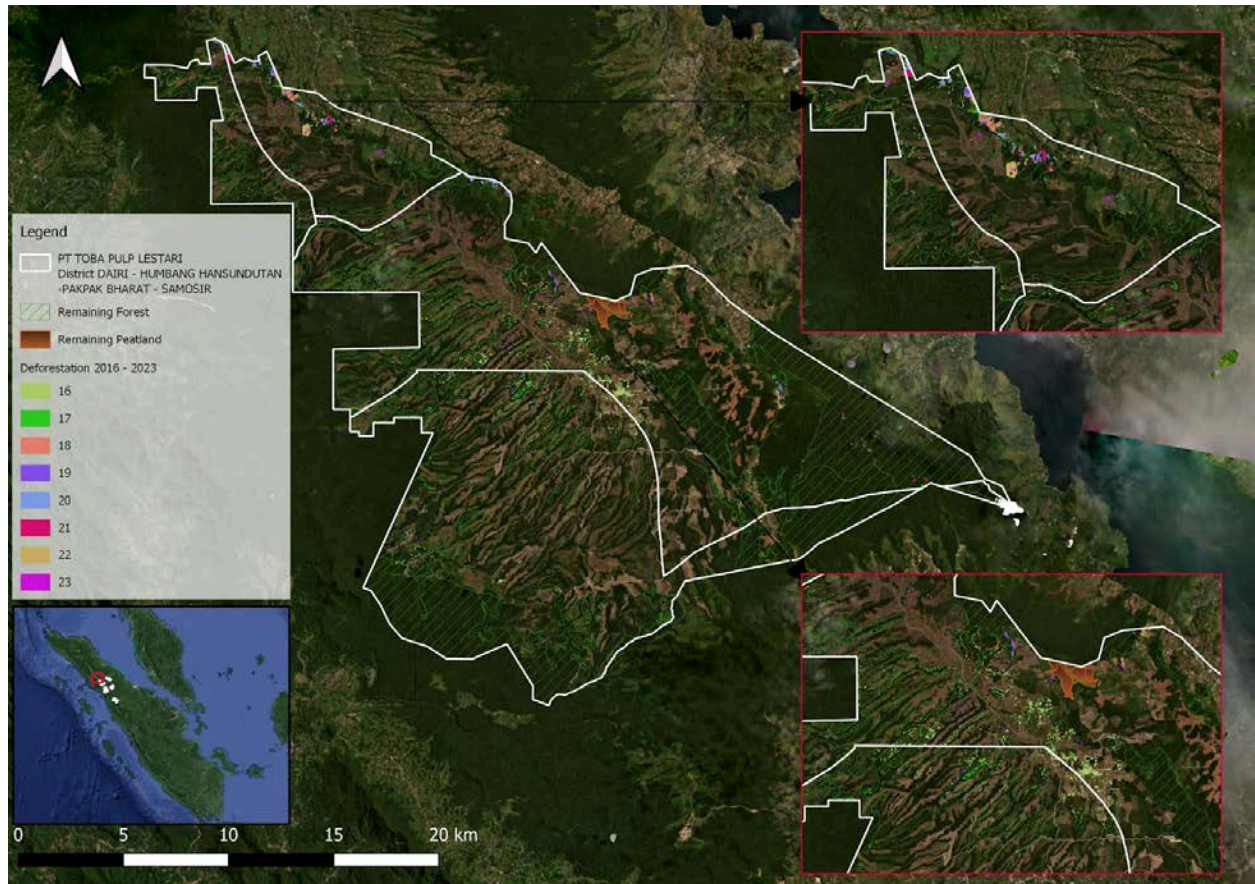




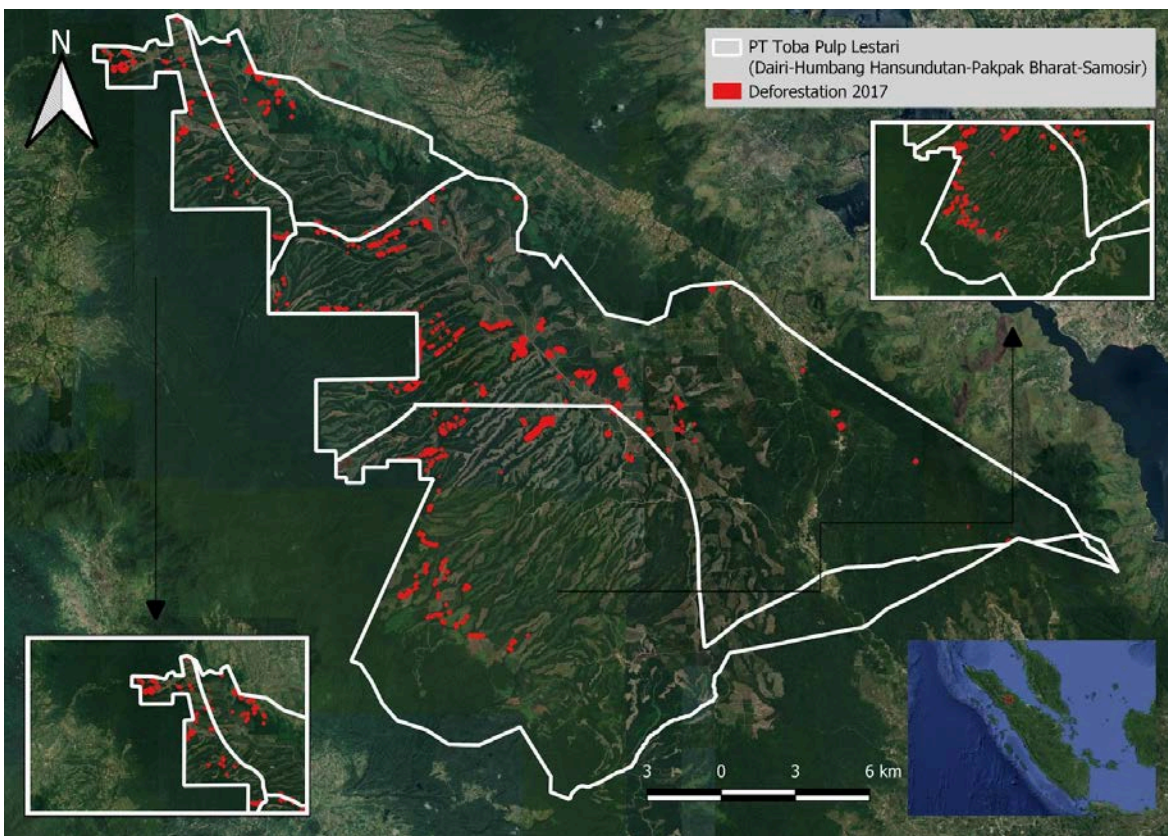
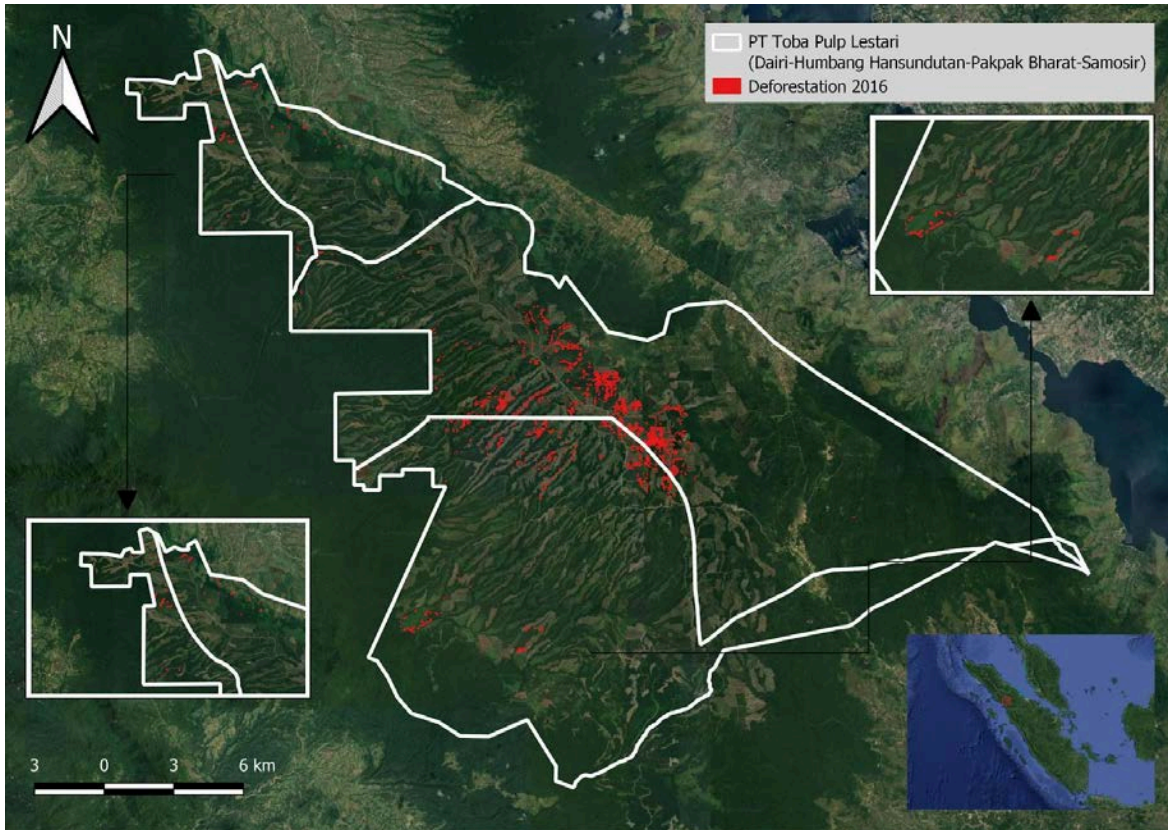
Deforestation in PT. Toba Pulp Lestari concession in Asahan between 2016 - 2023, including after the December 2020 cut-off date.

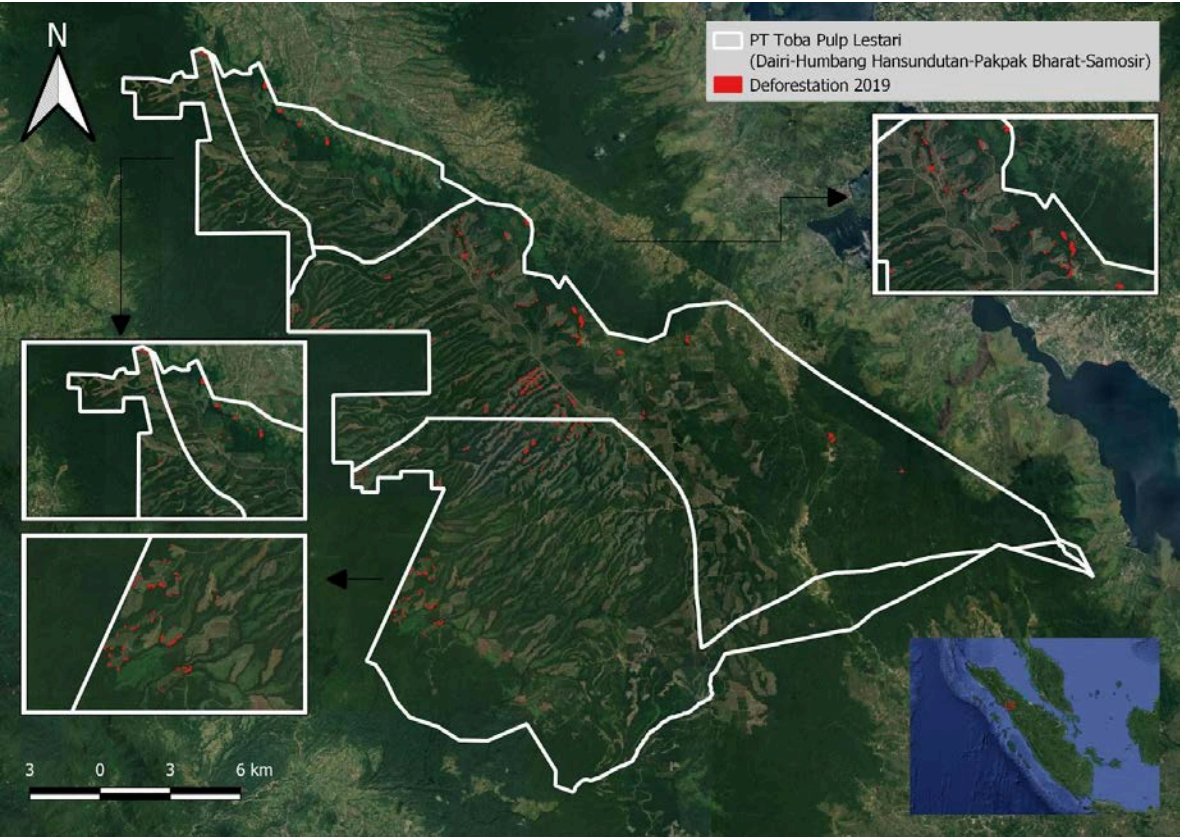
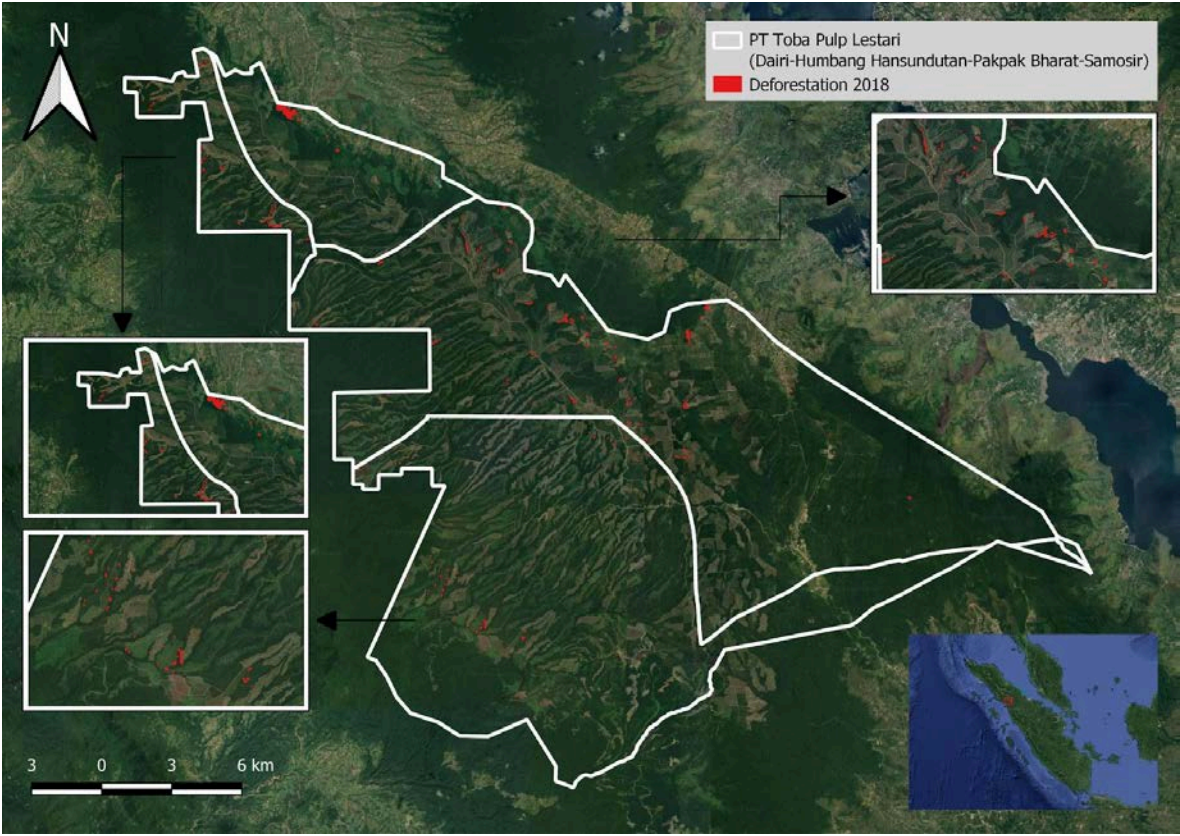
2. Deforestation in PT. Toba Pulp Lestari concessions in the district of Dairi

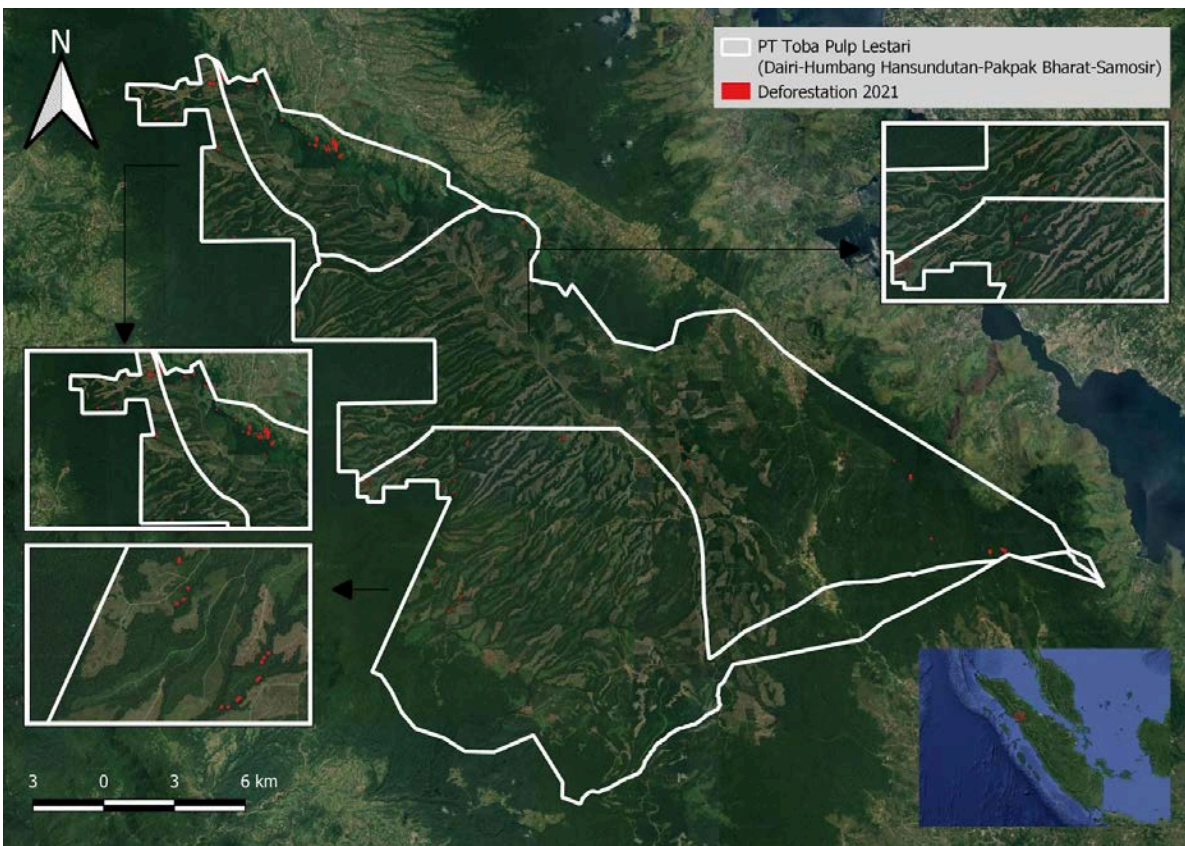
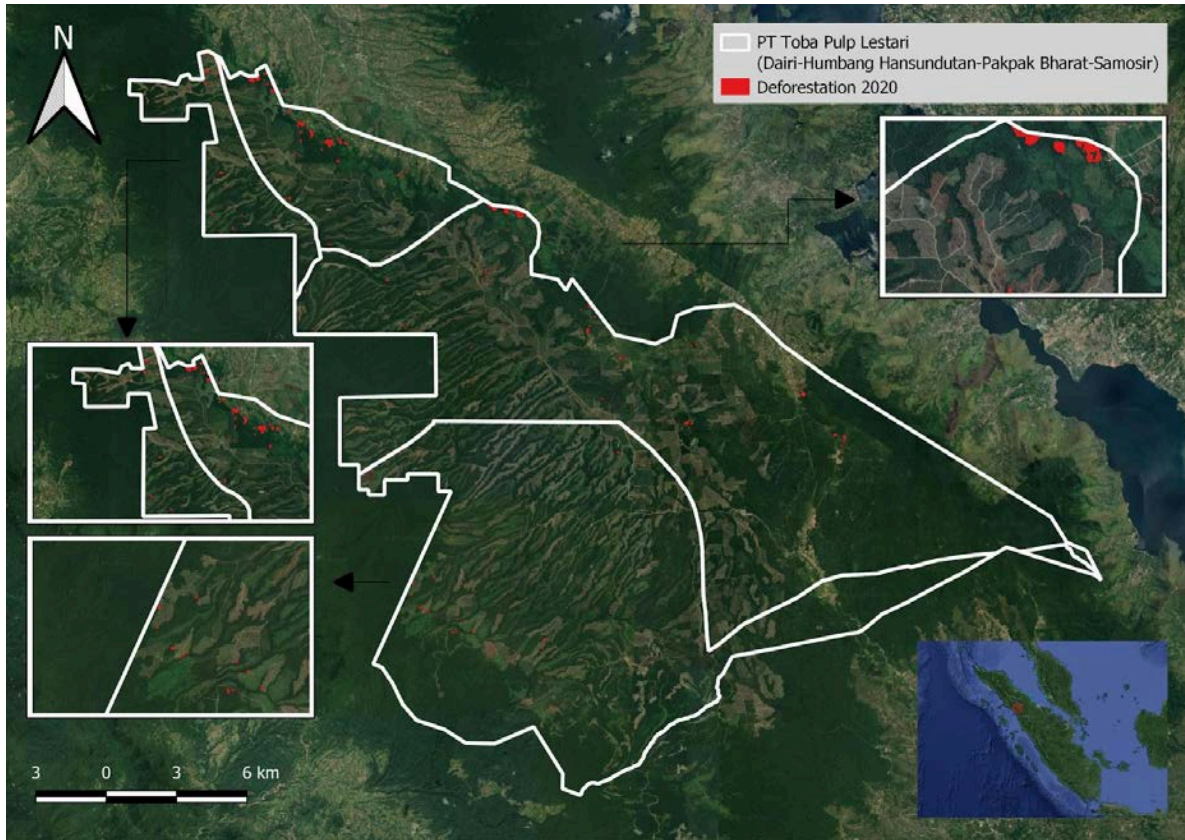
In PT. Toba Pulp Lestari's concessions in their Tele Estate in the district of Dairi, over 171.8 ha (425 acres) were cleared between 2016 -2023 with 10.3 ha (25 acres) cleared in 2016, 17.8 ha (45 acres) in 2017, 22.3 ha (55 acres) in 2018, 12.8 ha (32 acres) in 2019, 48.1 ha (119 acres) in 2020, 23.5 ha (57 acres) in 2021, 29.0 ha (72 acres) in 2022, and 8.1 ha (20 acres) in 2023. An additional 33.8 ha (84 acres) was cleared in 2015.

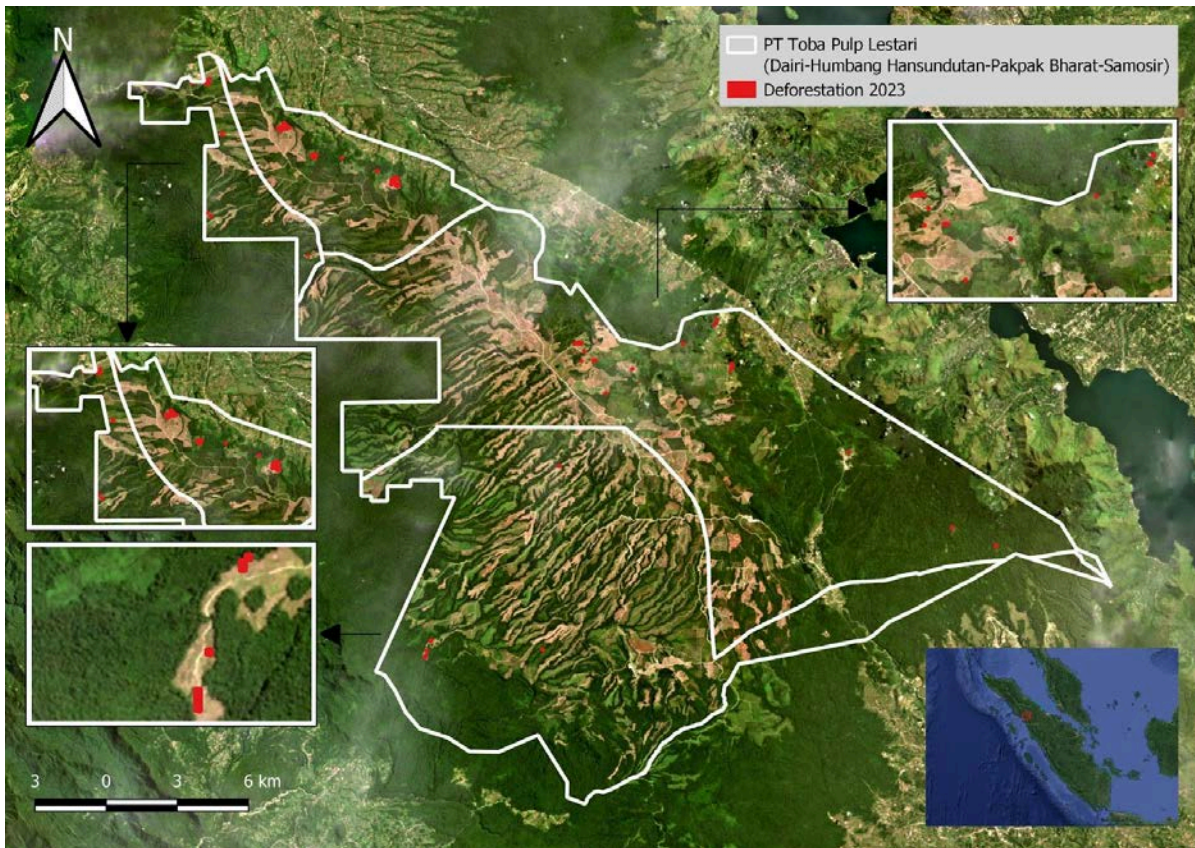
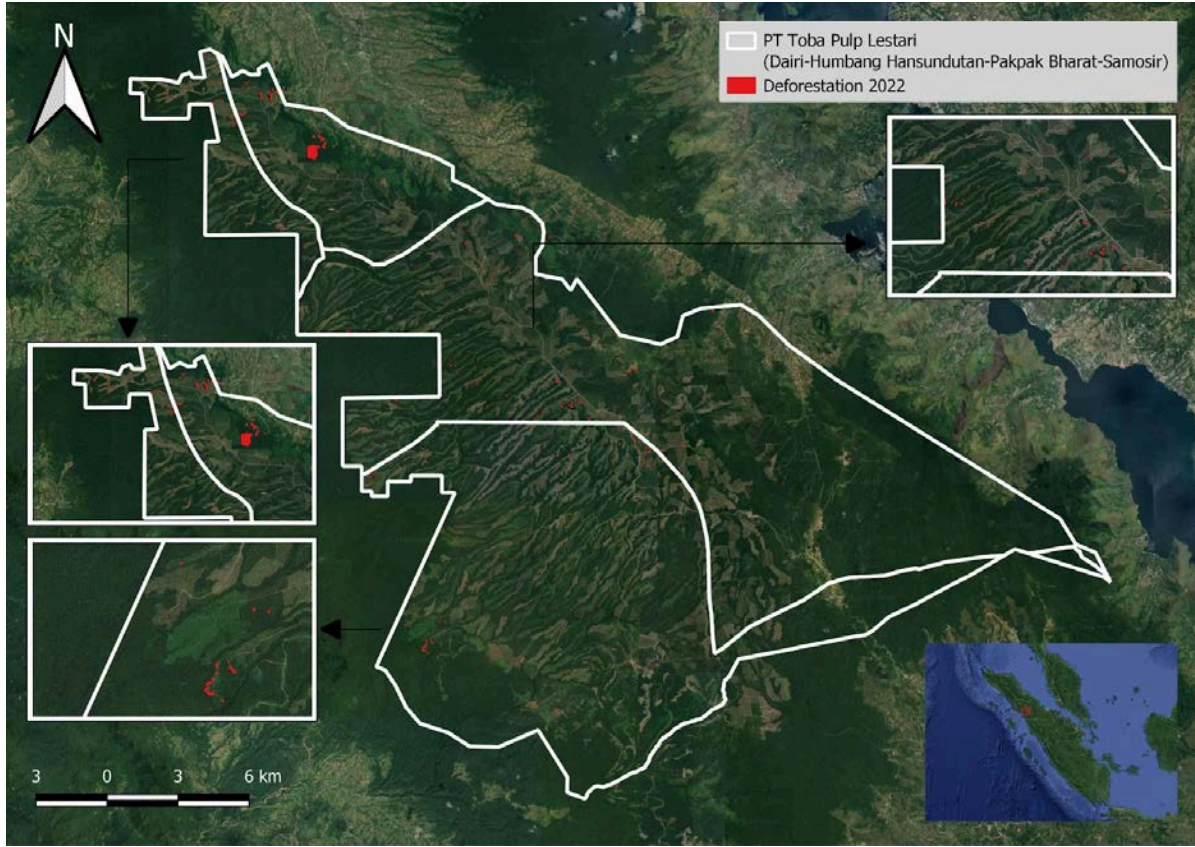


Deforestation in PT. Toba Pulp Lestari concession in Dairi between 2016 - 2023.





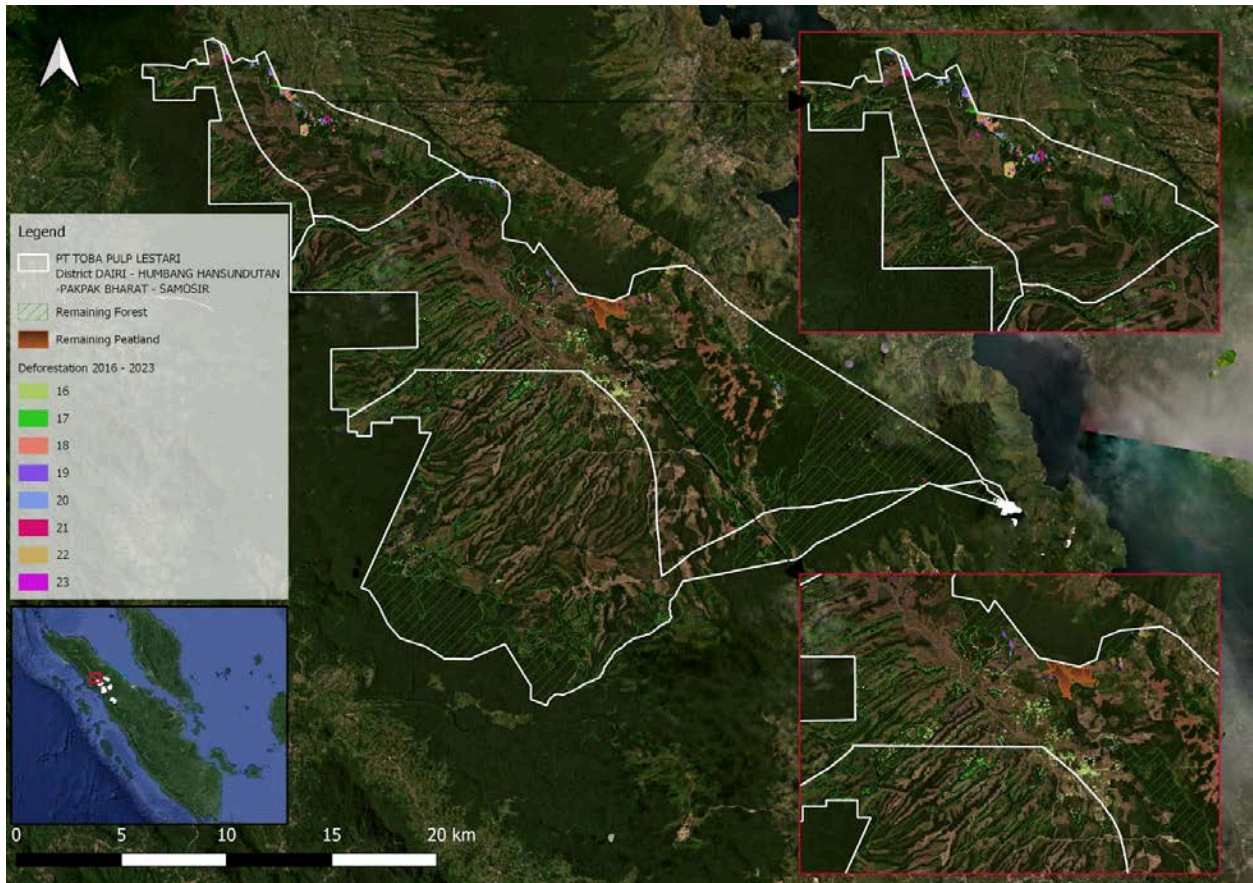




Deforestation in PT. Toba Pulp Lestari concession in Dairi between 2016 - 2023, including after the December 2020 cut-off date.

3. Deforestation in P.T Toba Pulp Lestari concessions in district of Pakpak Bharat

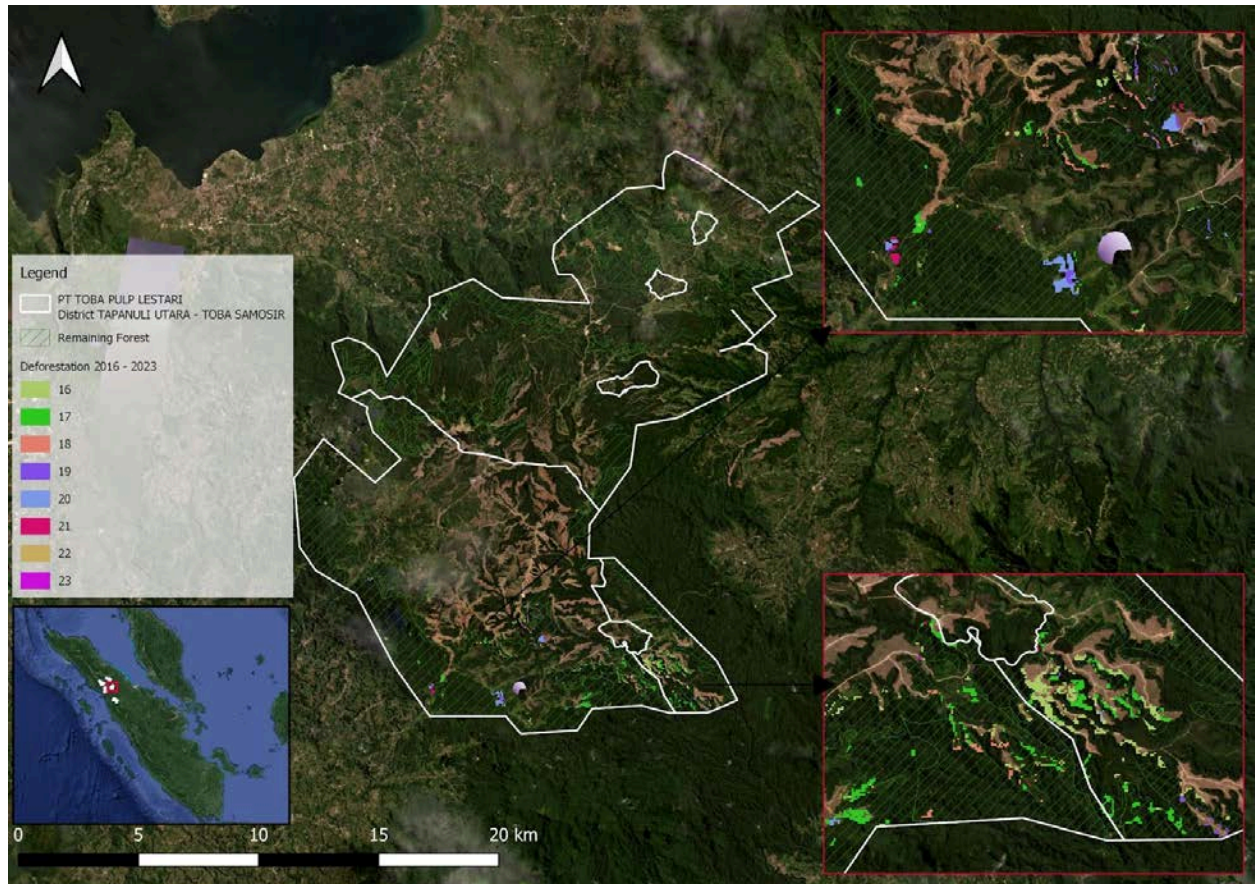
In PT. Toba Pulp Lestari's concessions in their Tele Estate in the district of Pakpak Bharat, over 17.6 ha (43 acres) were cleared between 2016 -2023 with over 5.4 ha (13 acres) cleared in 2017, 6.0 ha (15 acres) in 2018, and small patches cleared from 2019 to 2023. An additional 3.3 ha (8 acres) was cleared in 2015.



Deforestation in PT. Toba Pulp Lestari concession in Pakpak Bharat.

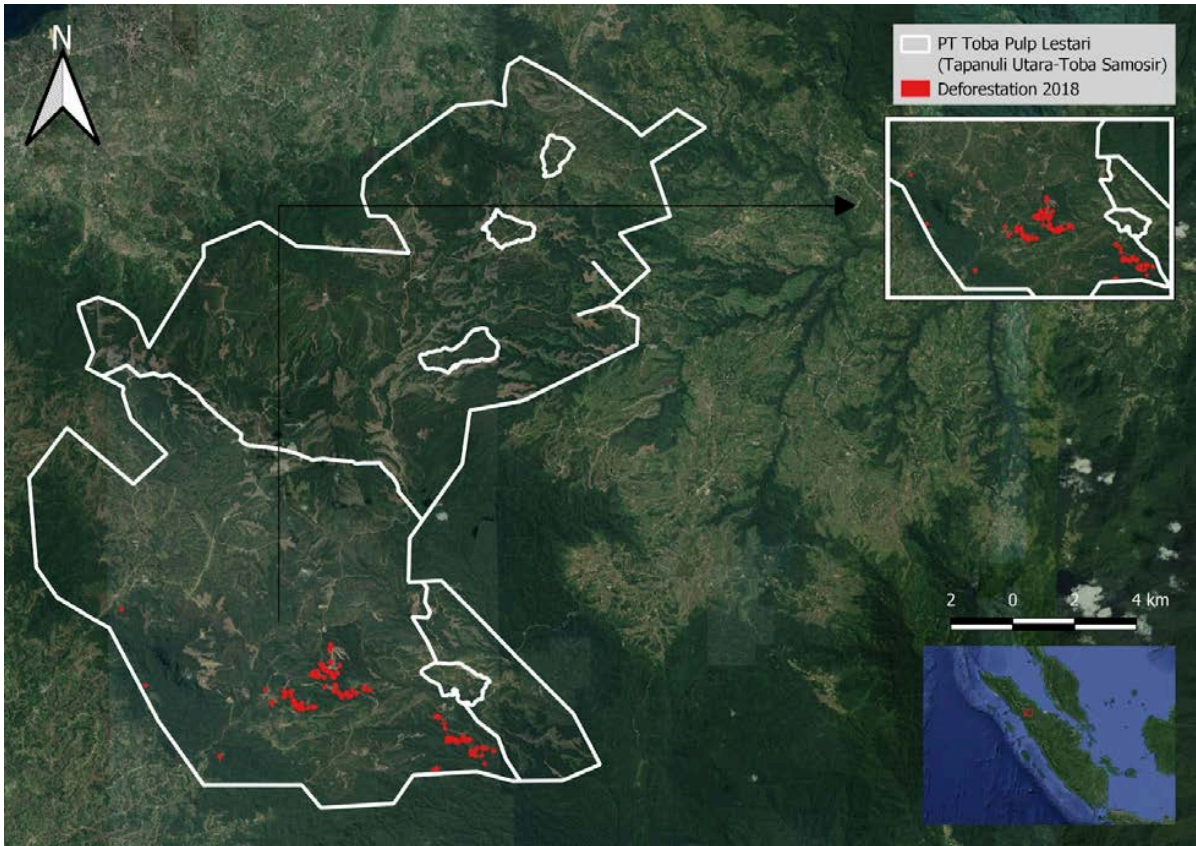
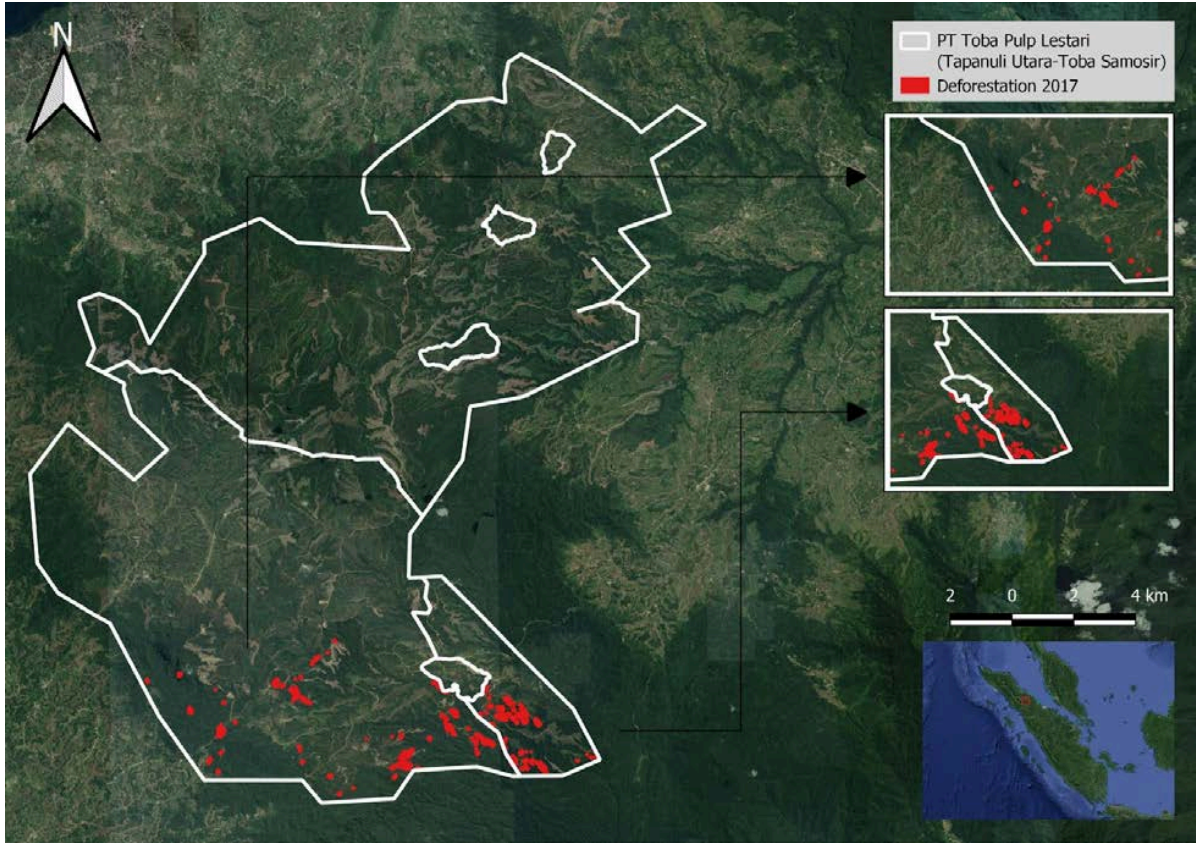
4. Deforestation in PT. Toba Pulp Lestari concessions in district of Samosir

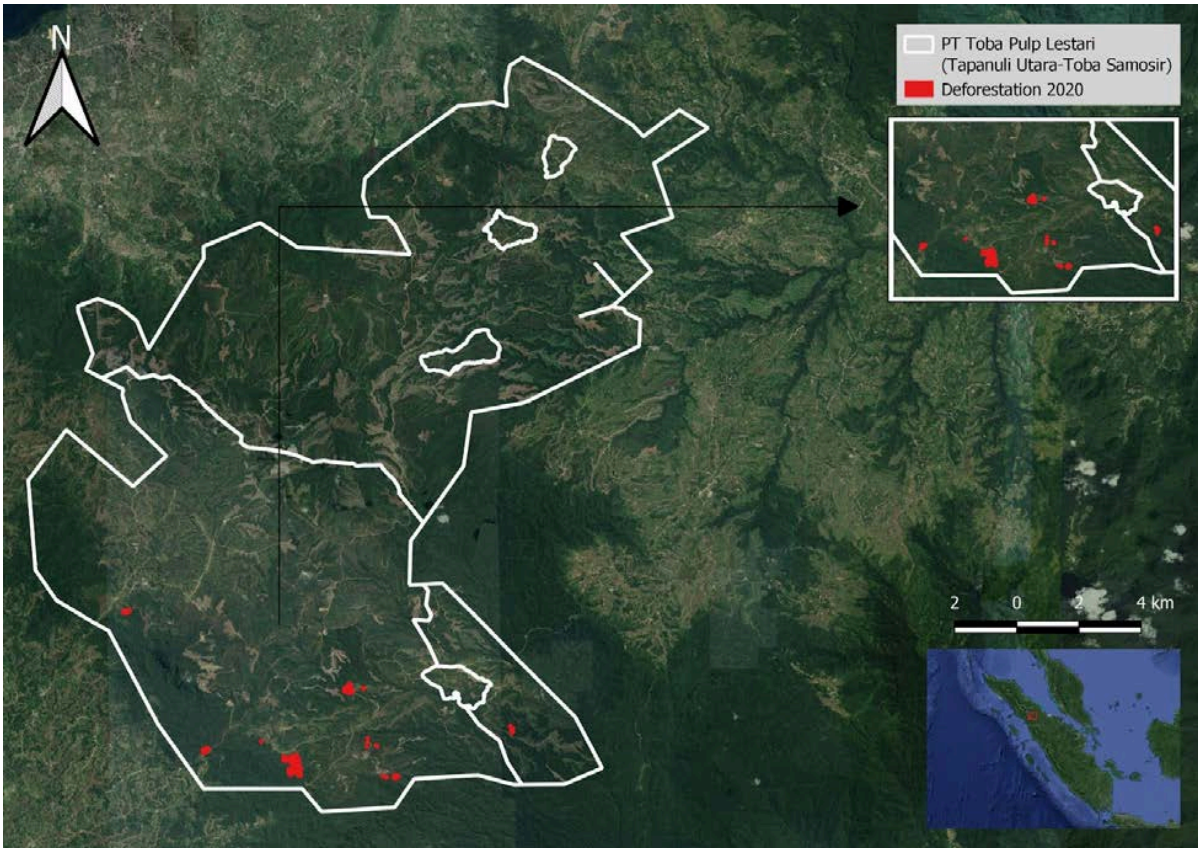
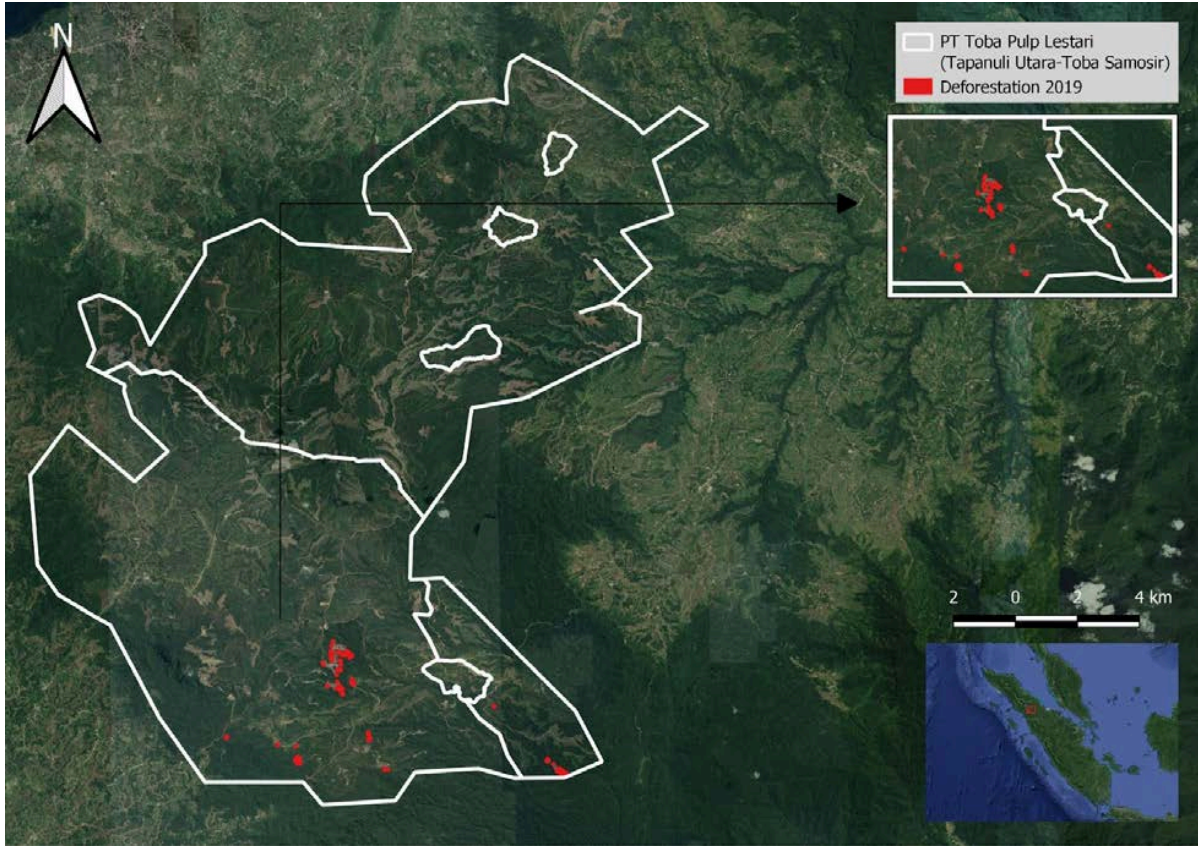
In PT. Toba Pulp Lestari's concessions in their Habinsaran Estate in the district of Samosir, over 466.1 ha (1,152 acres) were cleared between 2016-2023 with over 256.5 ha (633 acres) cleared in 2016, 82.6 ha (205 acres) cleared in 2017, 35.2 ha (86 acres) in 2018, 56.9 ha (141 acres) in 2019, 10.7 ha (27 acres) in 2020, 11.1 ha (28 acres) in 2021, 9.7 ha (24 acres) in 2022 and 10.81 ha (26 acres) in 2023. An additional 177.3 ha (437 acres) was cleared in 2015.

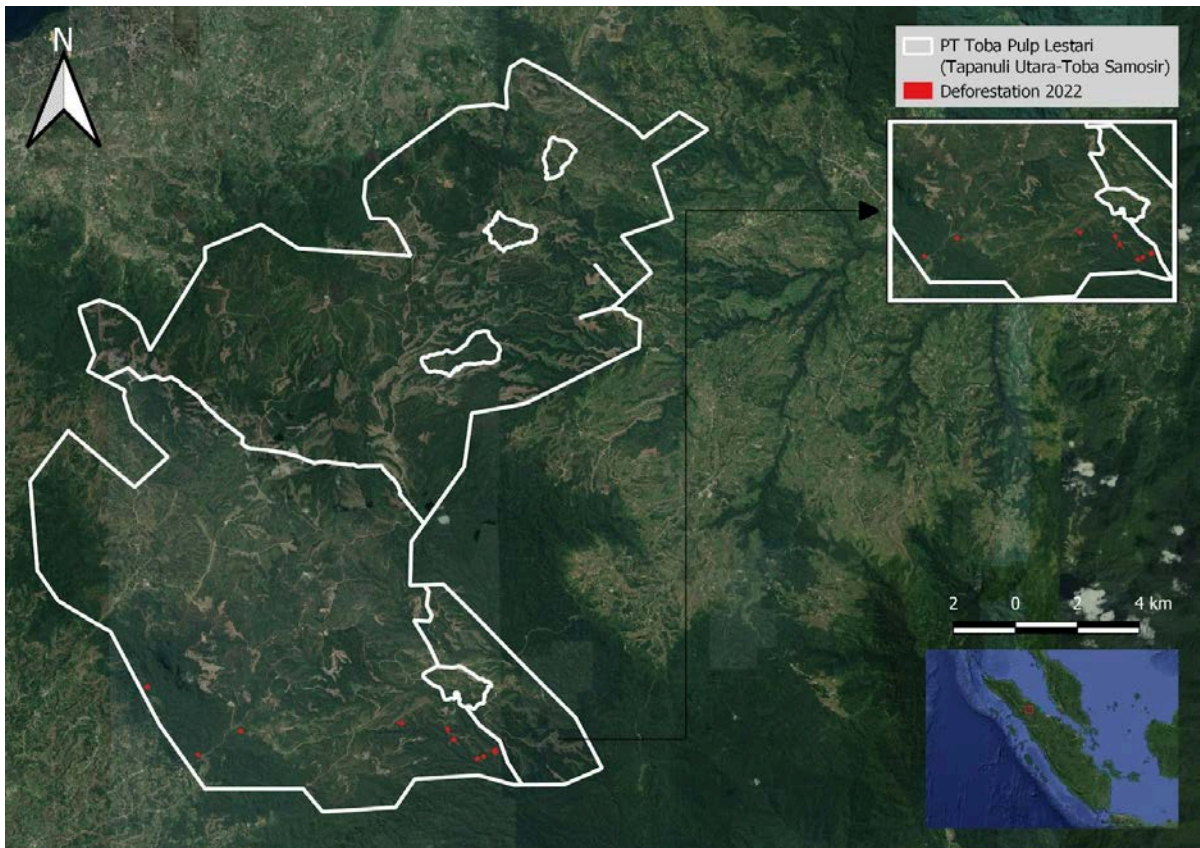
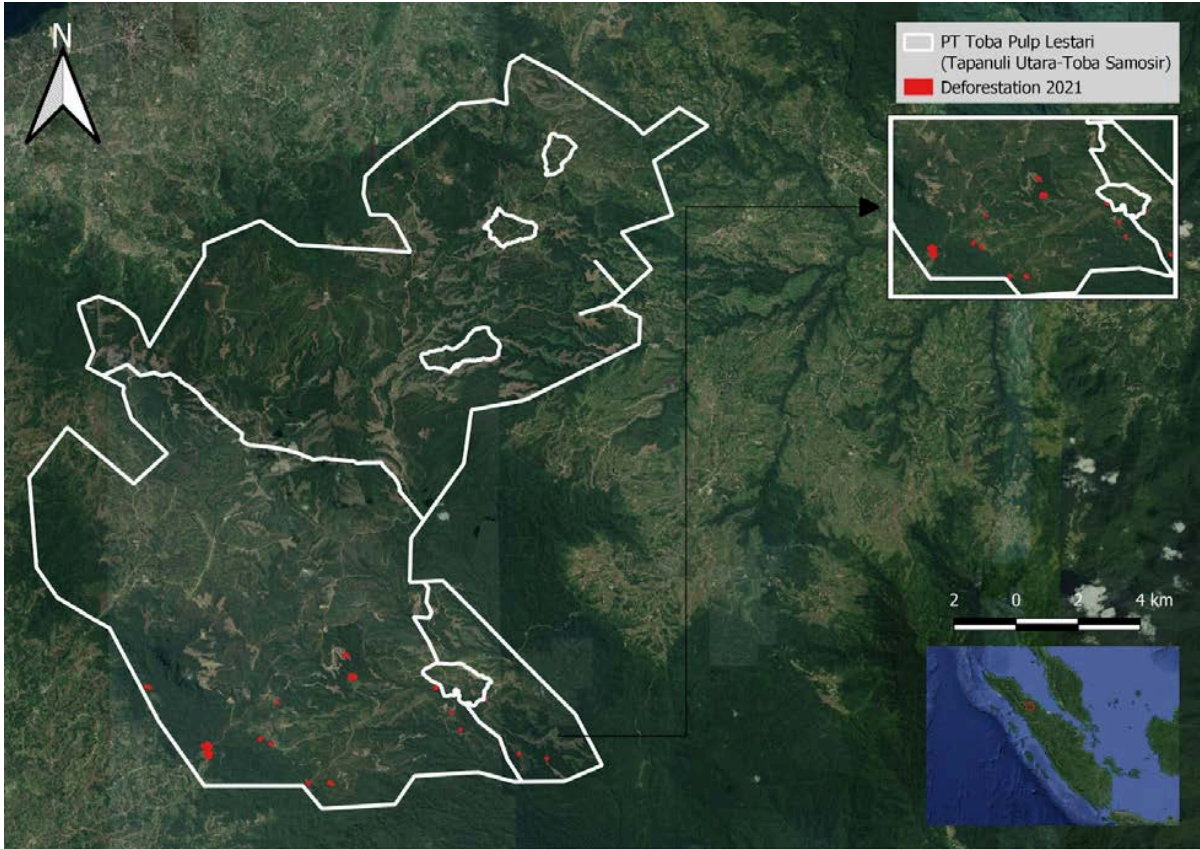


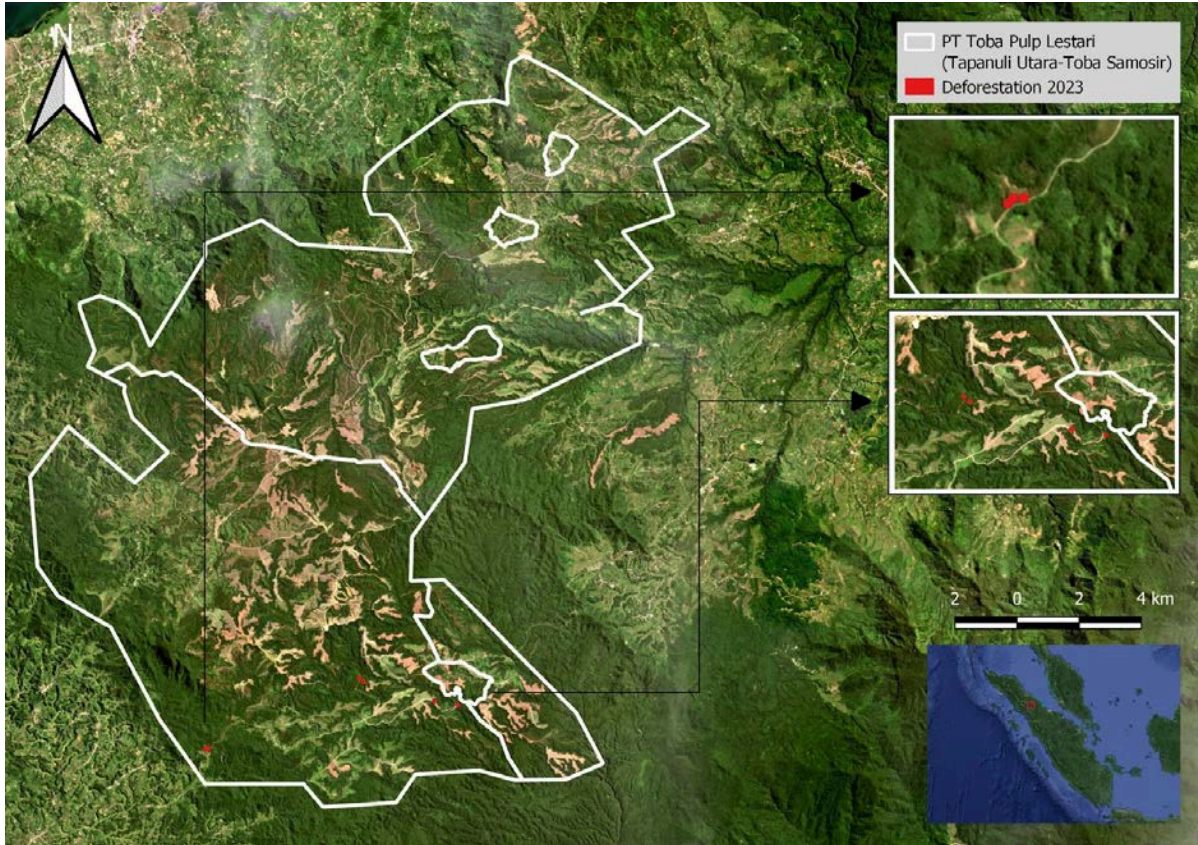
Deforestation in PT. Toba Pulp Lestari concession in Samosir in between 2016-2023.

Note: This map only shows some of the deforestation data for 2023. Please review the map titled “Satellite map showing the extent of deforestation inside PT. Toba Pulp Lestari’s concessions between 2015 and 2023 in Tapanuli Utara and Toba Samosir” to see all locations of forest loss during 2023.







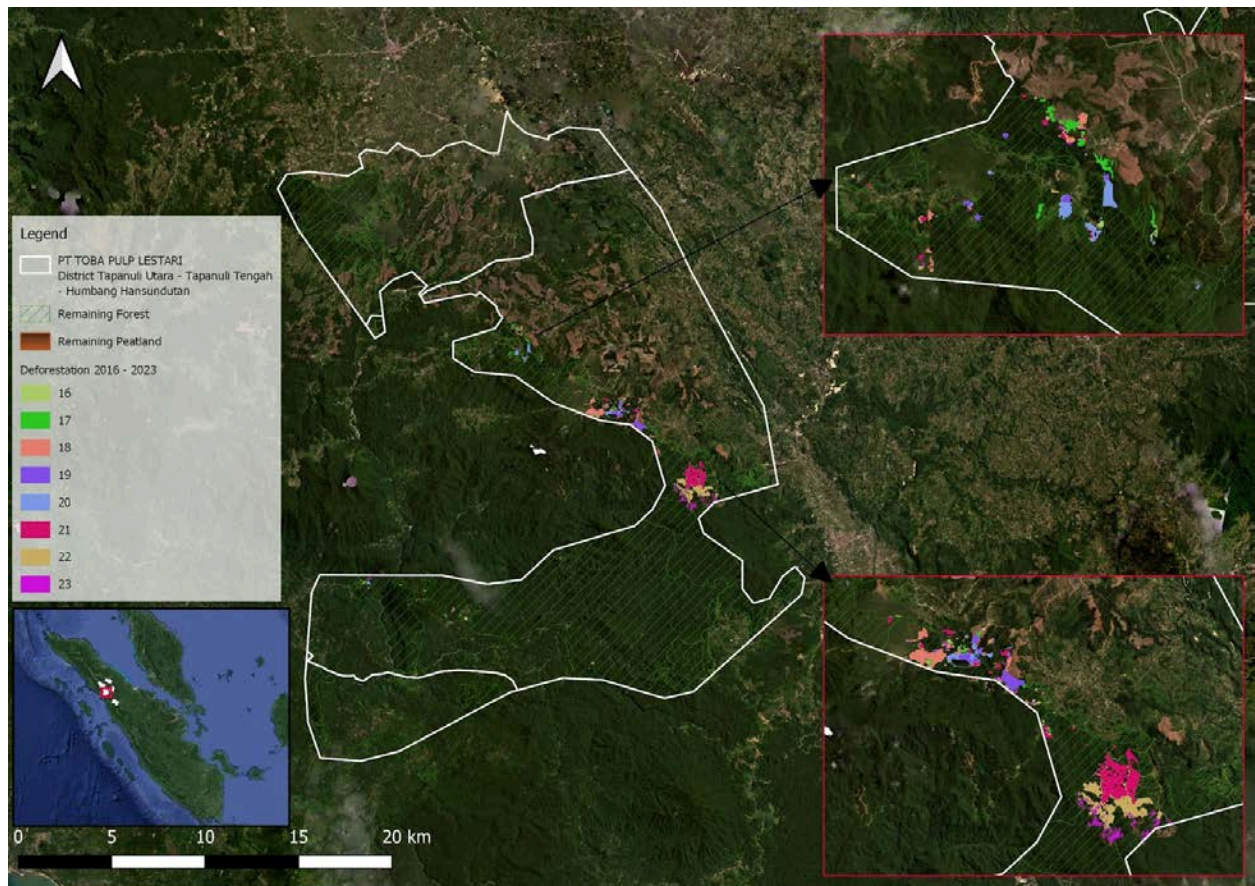


Deforestation in PT. Toba Pulp Lestari concession in Samosir in between 2016-2023, including after the December 2020 cut-off date.

Note: This map only shows some of the deforestation data for 2023. Please review the map titled “Satellite map showing the extent of deforestation inside PT. Toba Pulp Lestari’s concessions between 2015 and 2023 in Tapanuli Utara and Toba Samosir” to see all locations of forest loss during 2023.

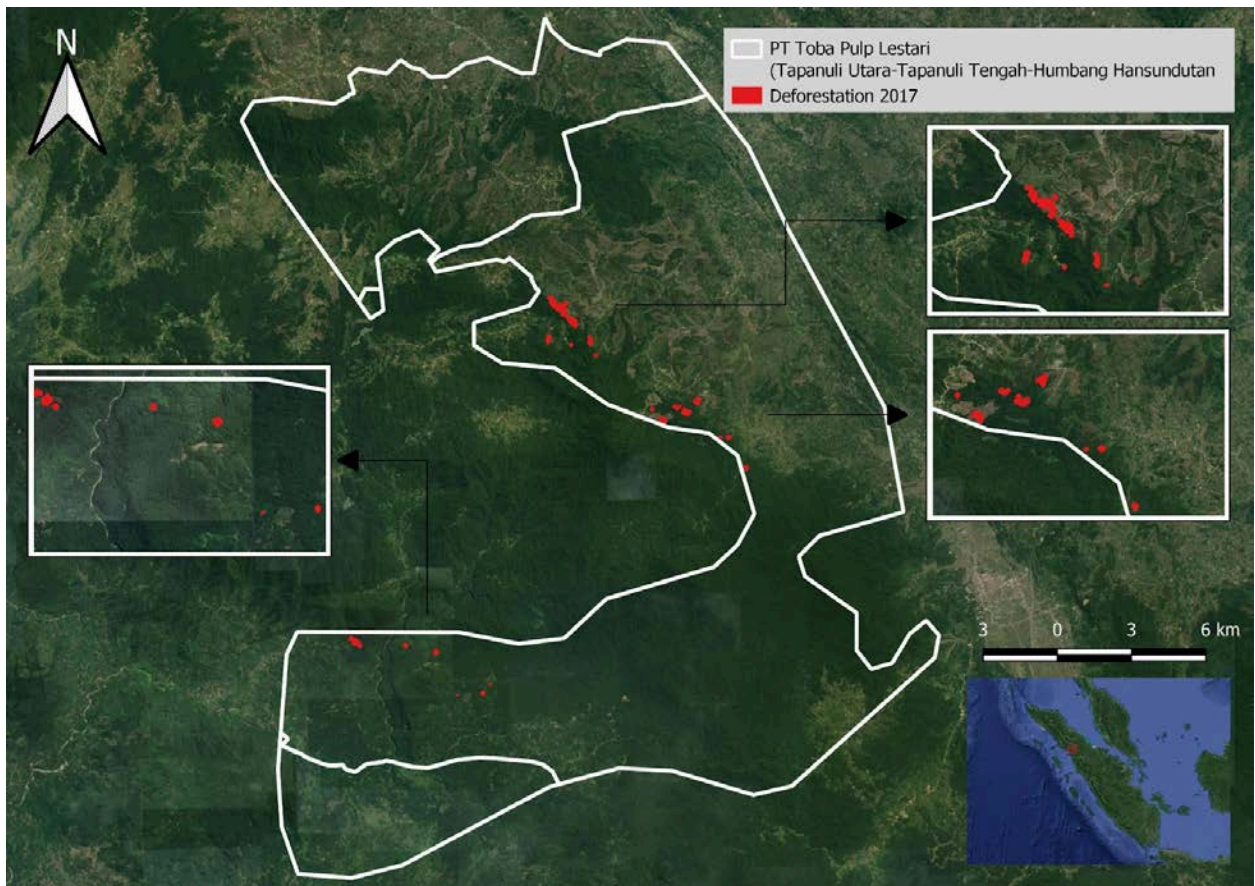
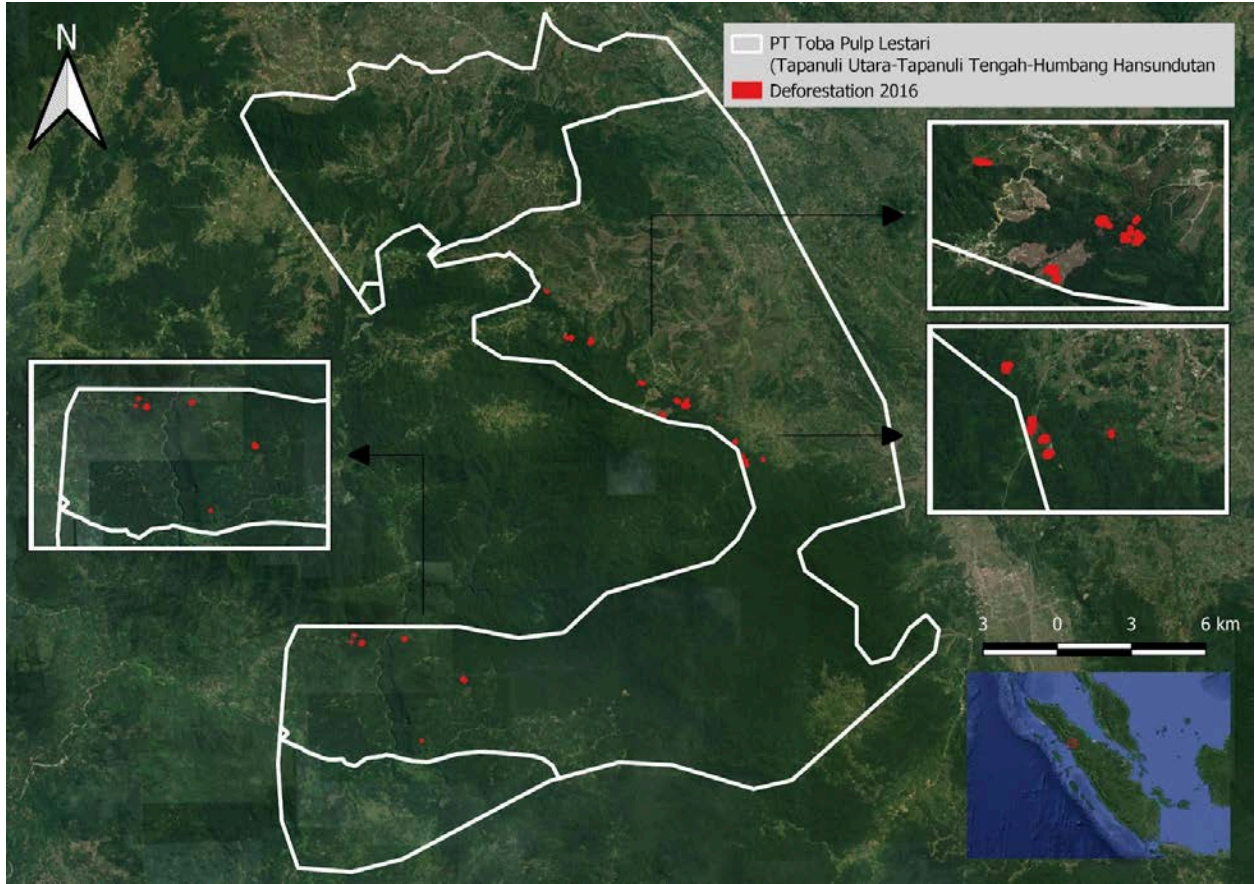
5. Deforestation in PT. Toba Pulp Lestari concessions in district of Tapanuli Utara

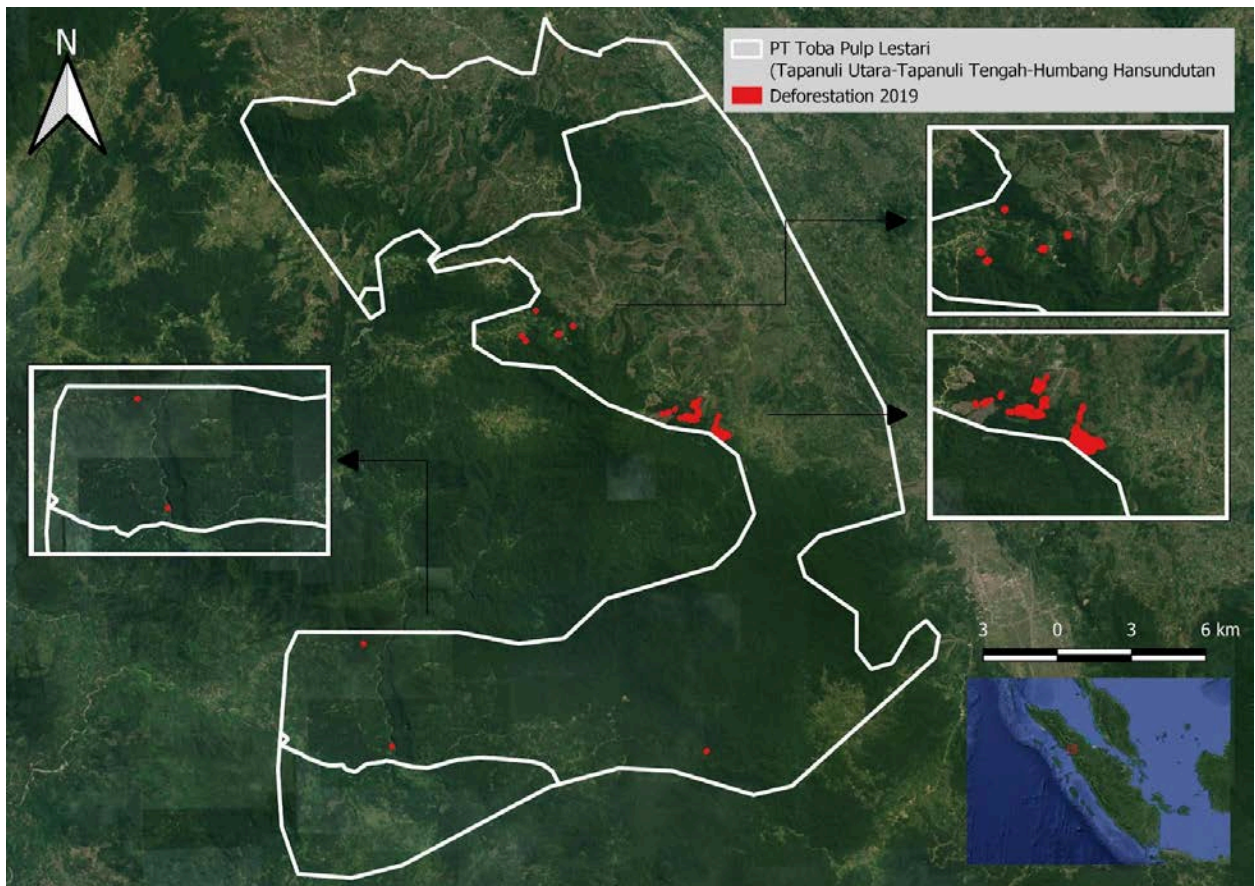
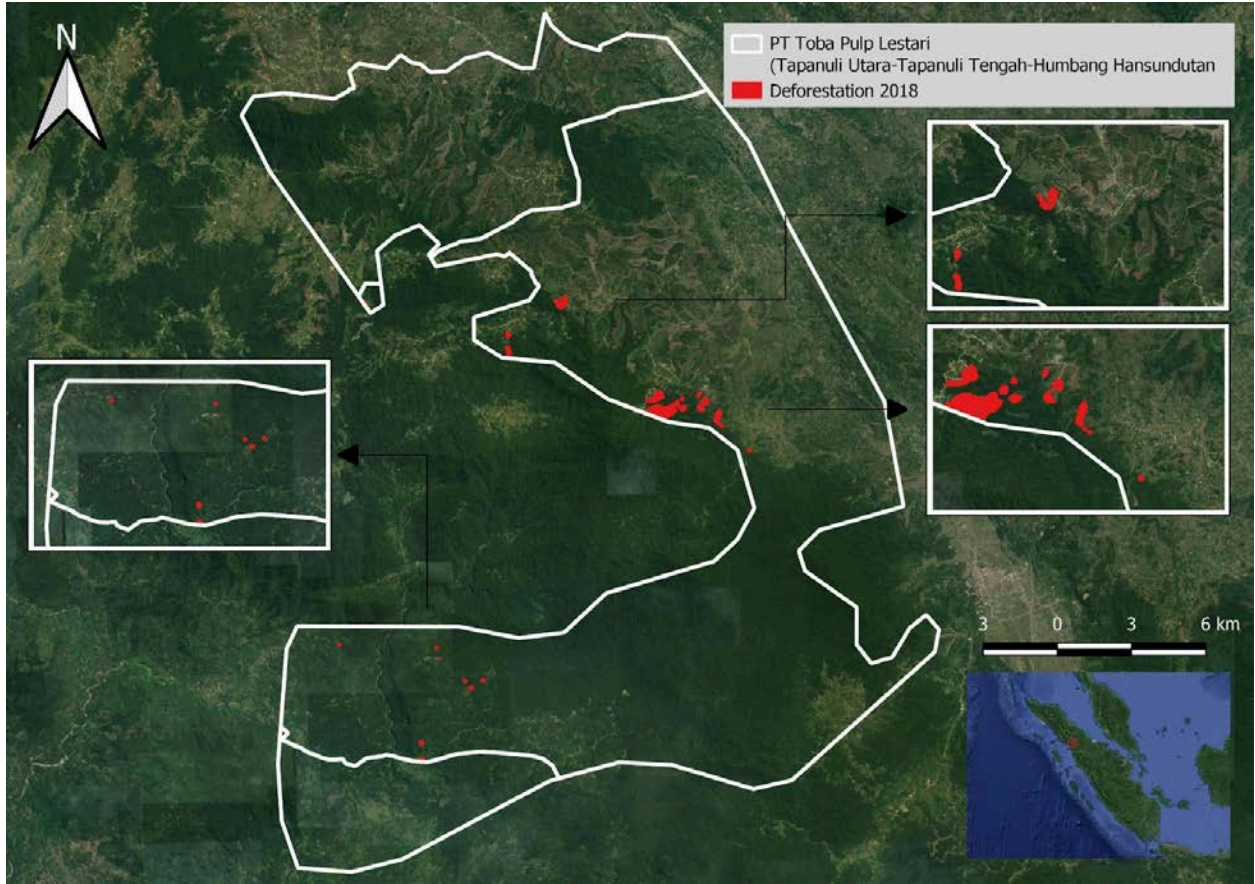
PT. Toba Pulp Lestari's concessions in their Aek Raja Estate in the district of Tapanuli Utara (North Tapanuli) saw the largest levels of deforestation between 2015-2023. Over 541 ha (1,336 acres) were cleared between 2016 -2023 with 26.8 ha (67 acres) cleared in 2016, 56.7 ha (141 acres) cleared in 2017, 72.3 ha (178 acres) in 2018, 48.5 ha (120 acres) in 2019, 58.7 ha (146 acres) in 2020, 126.0 ha (311 acres) in 2021, 107.8 ha (266 acres) in 2022 and at least 44.3 ha (109 acres) in 2023. An additional 25.3 ha (62 acres) was cleared in 2015.

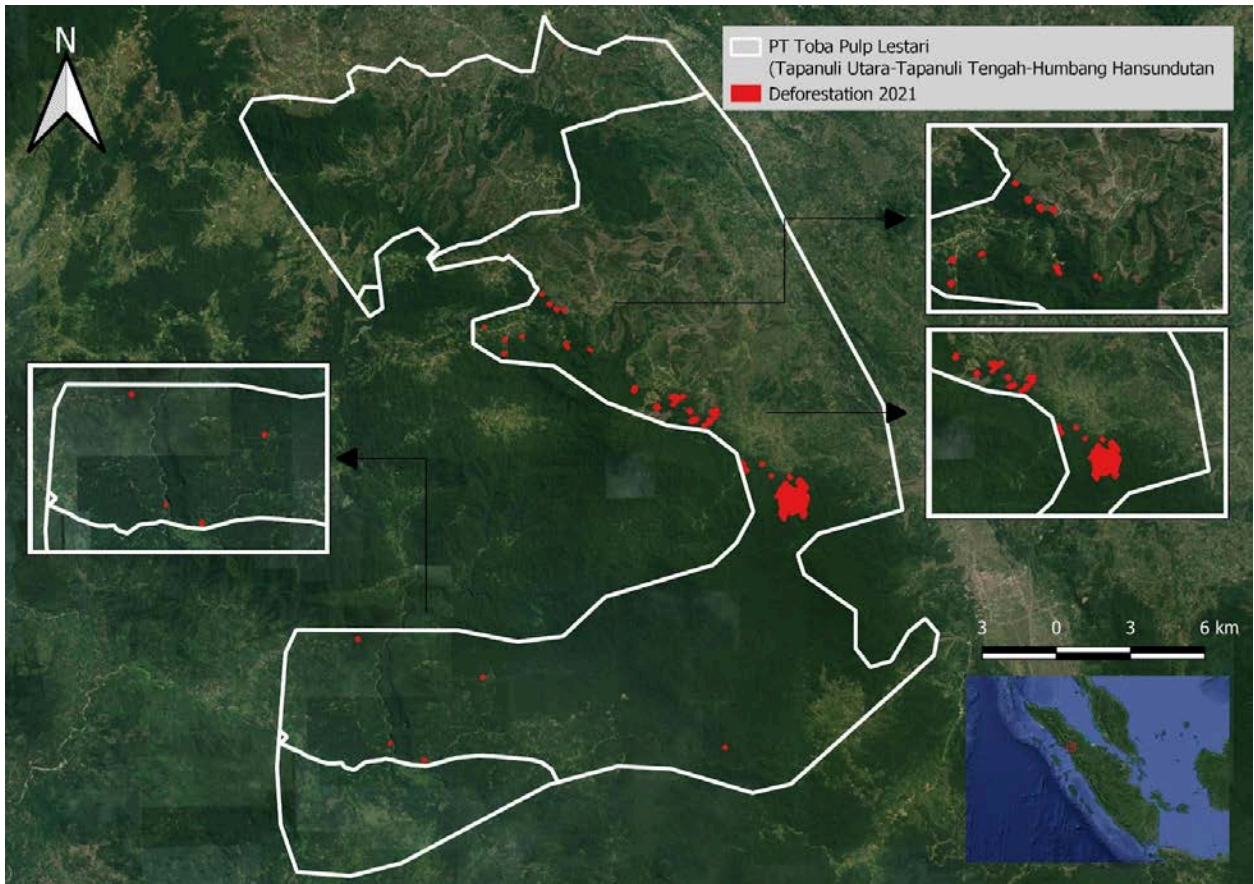
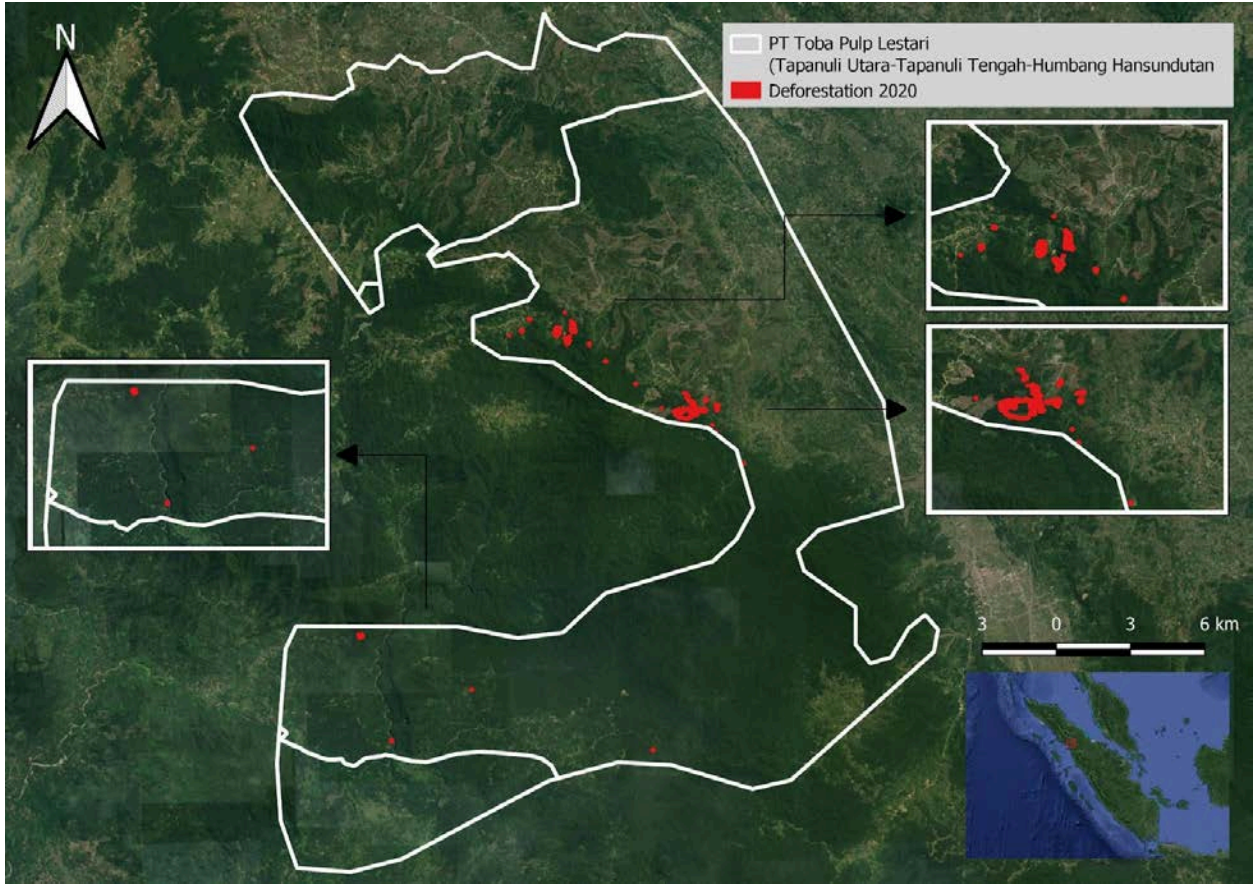


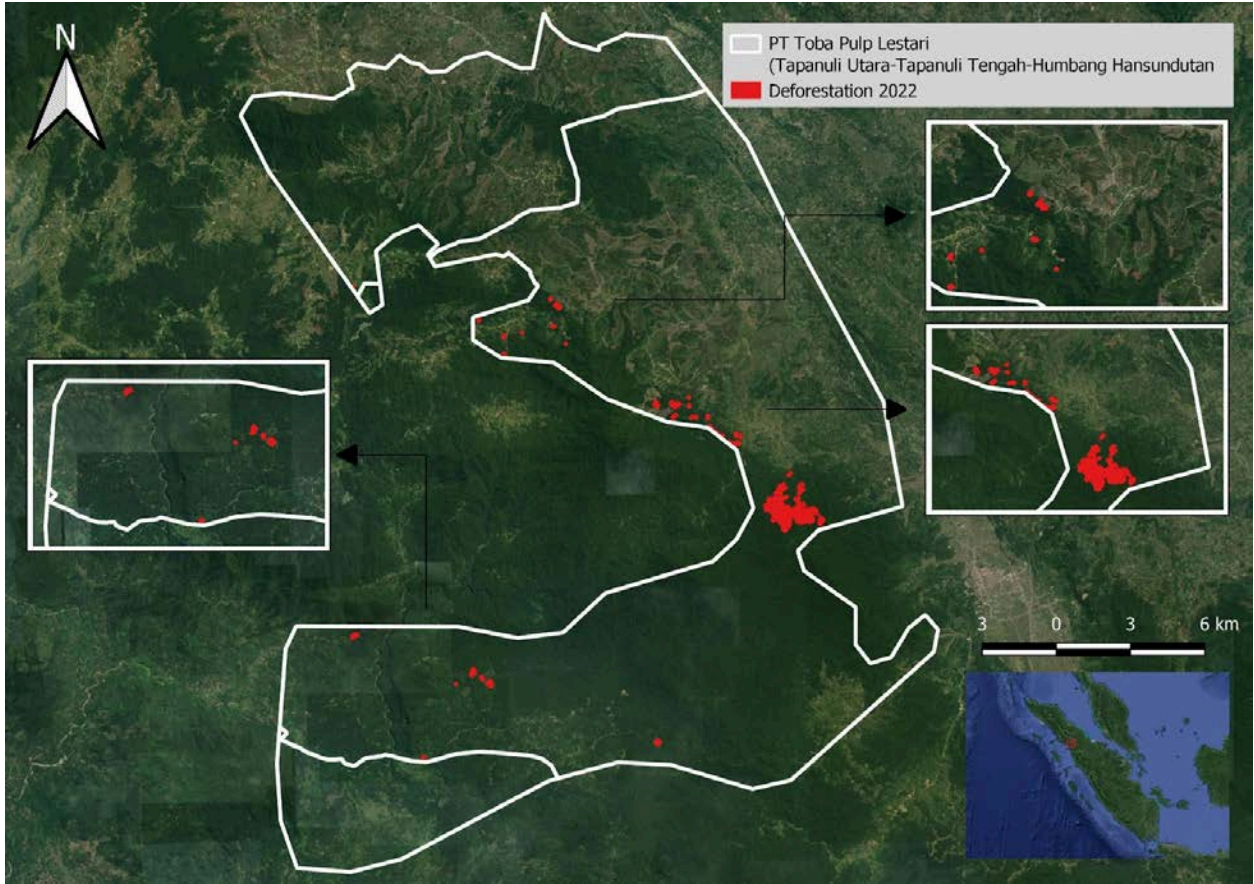
Deforestation in PT. Toba Pulp Lestari concession in Tapanuli Utara between 2016-2023.

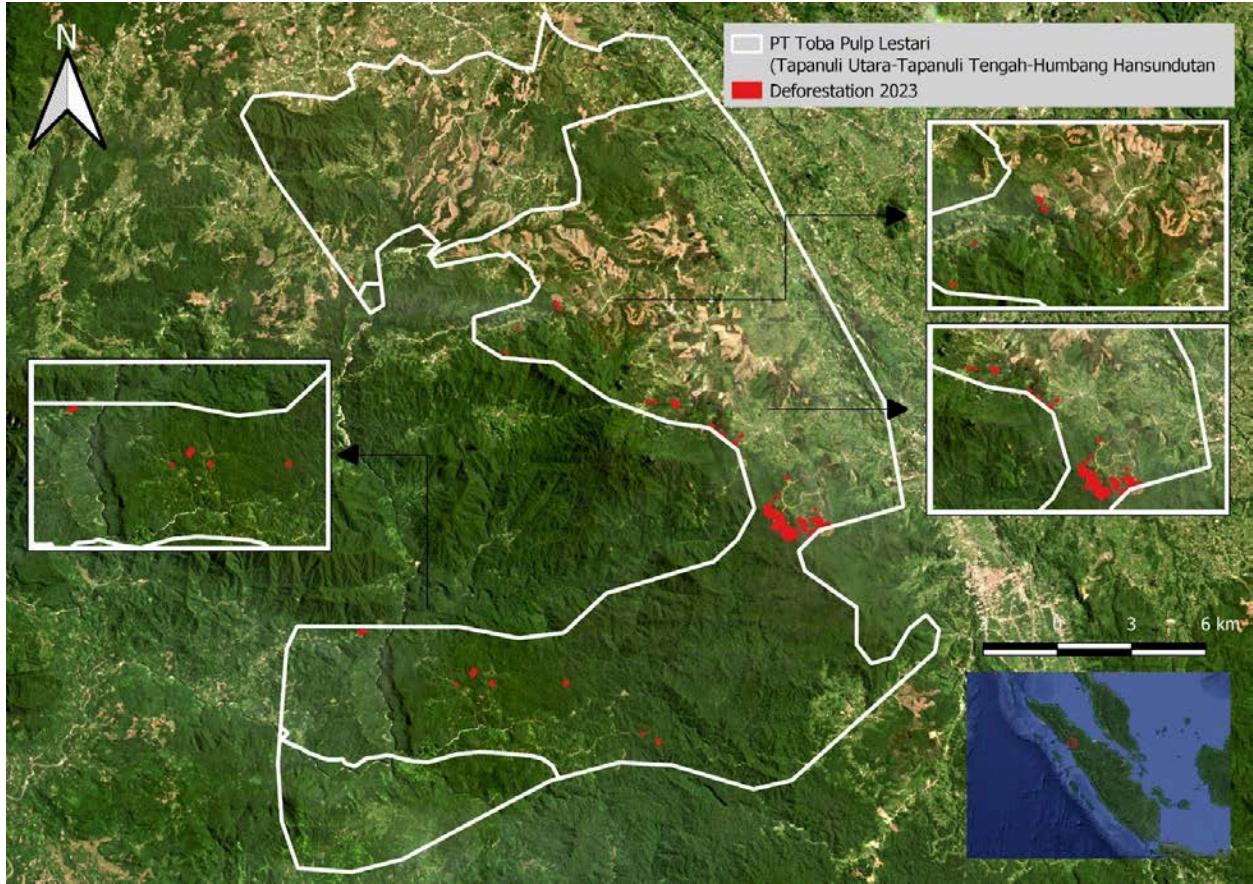
Note: This map only shows some of the deforestation data for 2023. Please review the map titled “Satellite map showing the extent of deforestation inside PT. Toba Pulp Lestari’s concessions between 2015 and 2023 in Humbang Hasundutan, Tapanuli Tengah, and Tapanuli Utara” to review the location of all forest loss during 2023.









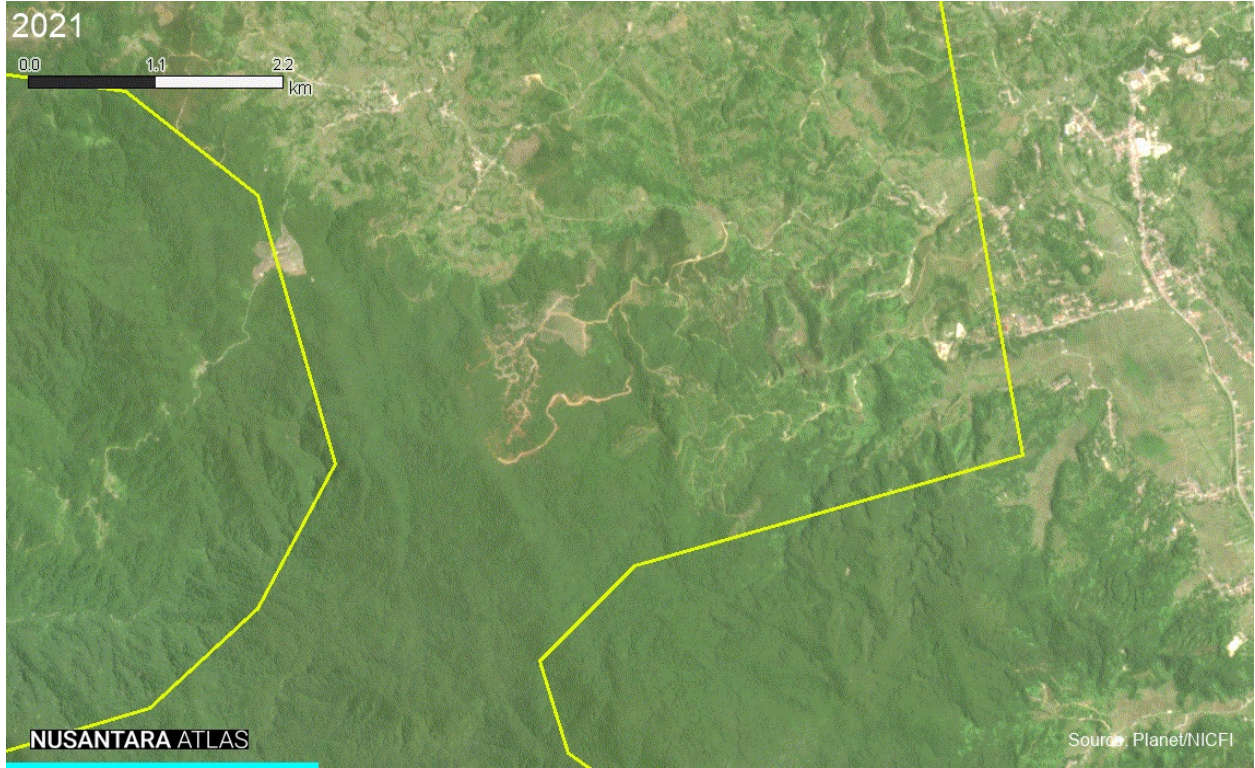


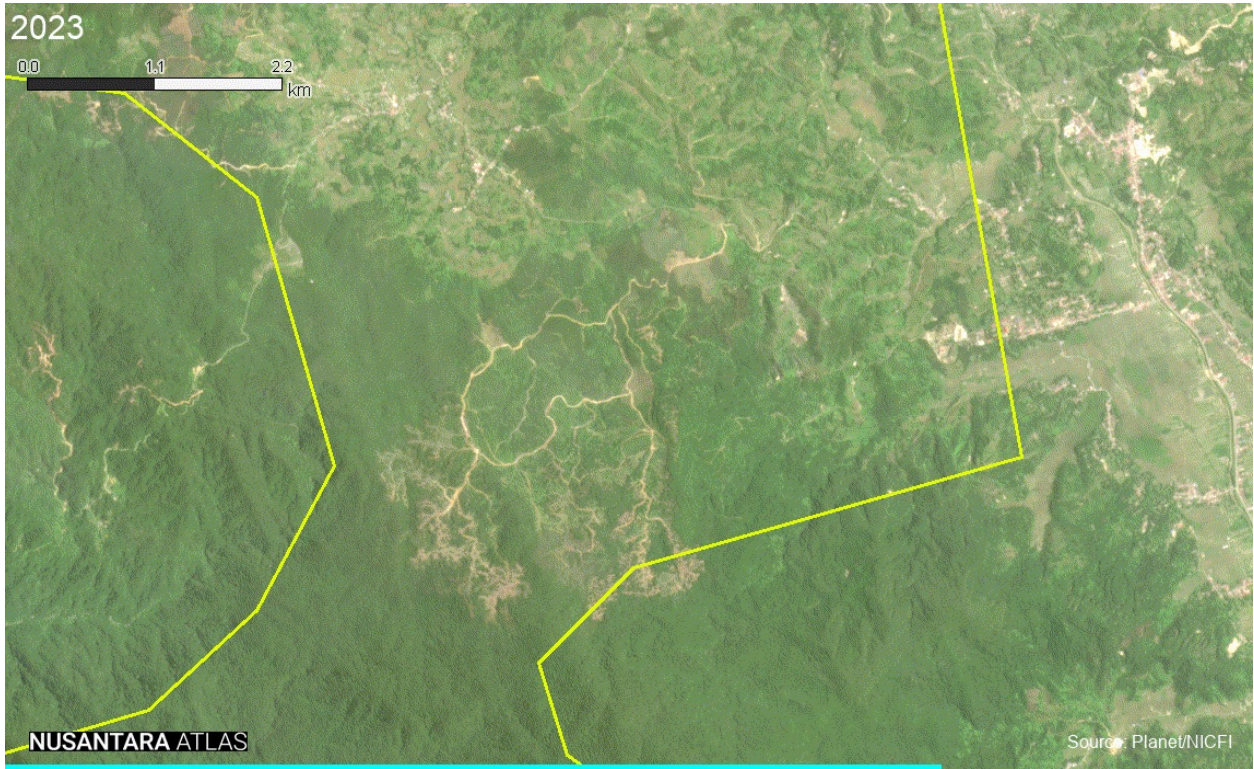
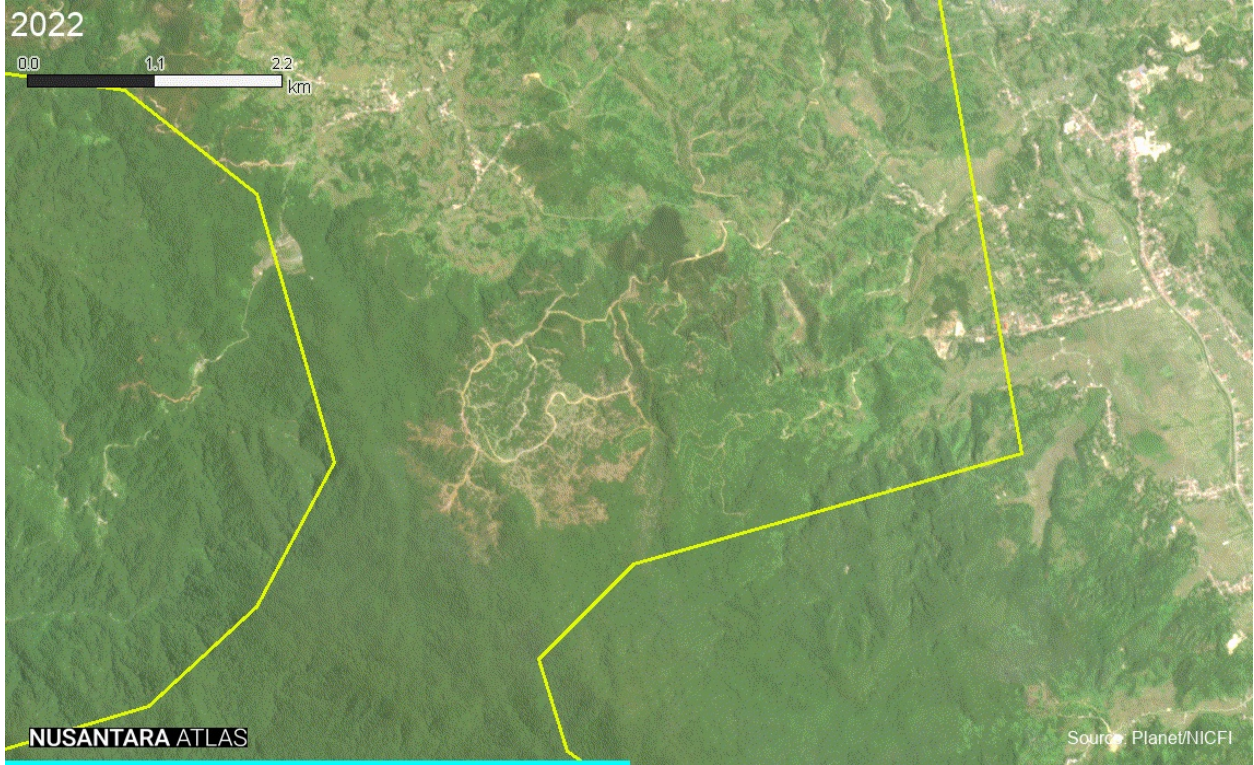
Deforestation in PT. Toba Pulp Lestari concession in Tapanuli Utara between 2016-2023, including after the December 2020 cut-off date.

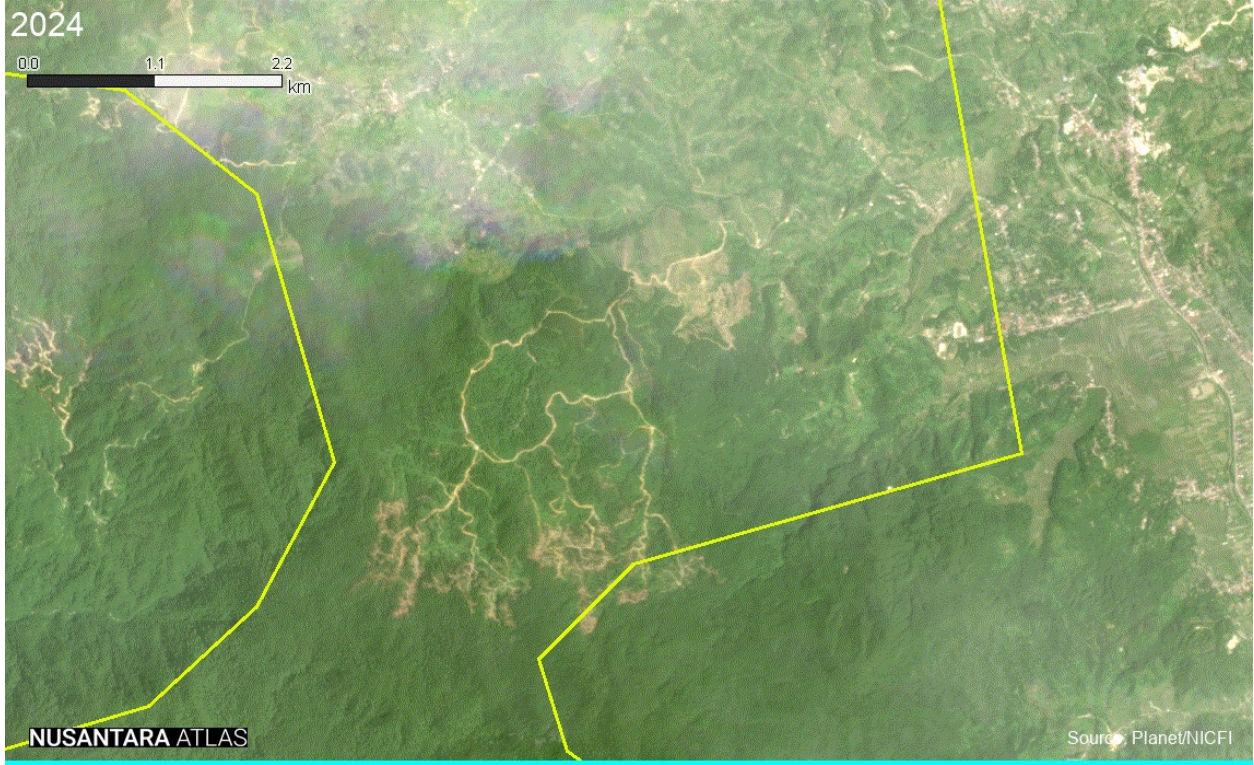
Note: This map only shows some of the deforestation data for 2023. Please review the map titled “Satellite map showing the extent of deforestation inside PT. Toba Pulp Lestari’s concessions between 2015 and 2023 in Humbang Hasundutan, Tapanuli Tengah, and Tapanuli Utara” to review the location of all forest loss during 2023.

Satellite Imagery of Natural Forest Clearance 2021-2024 in Aek Raja Estate, Tapanuli Utara (source: Nusantara Atlas. TheTreeMap)

Images of natural forest clearance in the vicinity of 98.8892487°E 2.0518935°N and 98.8953220°E 2.0549302°N.

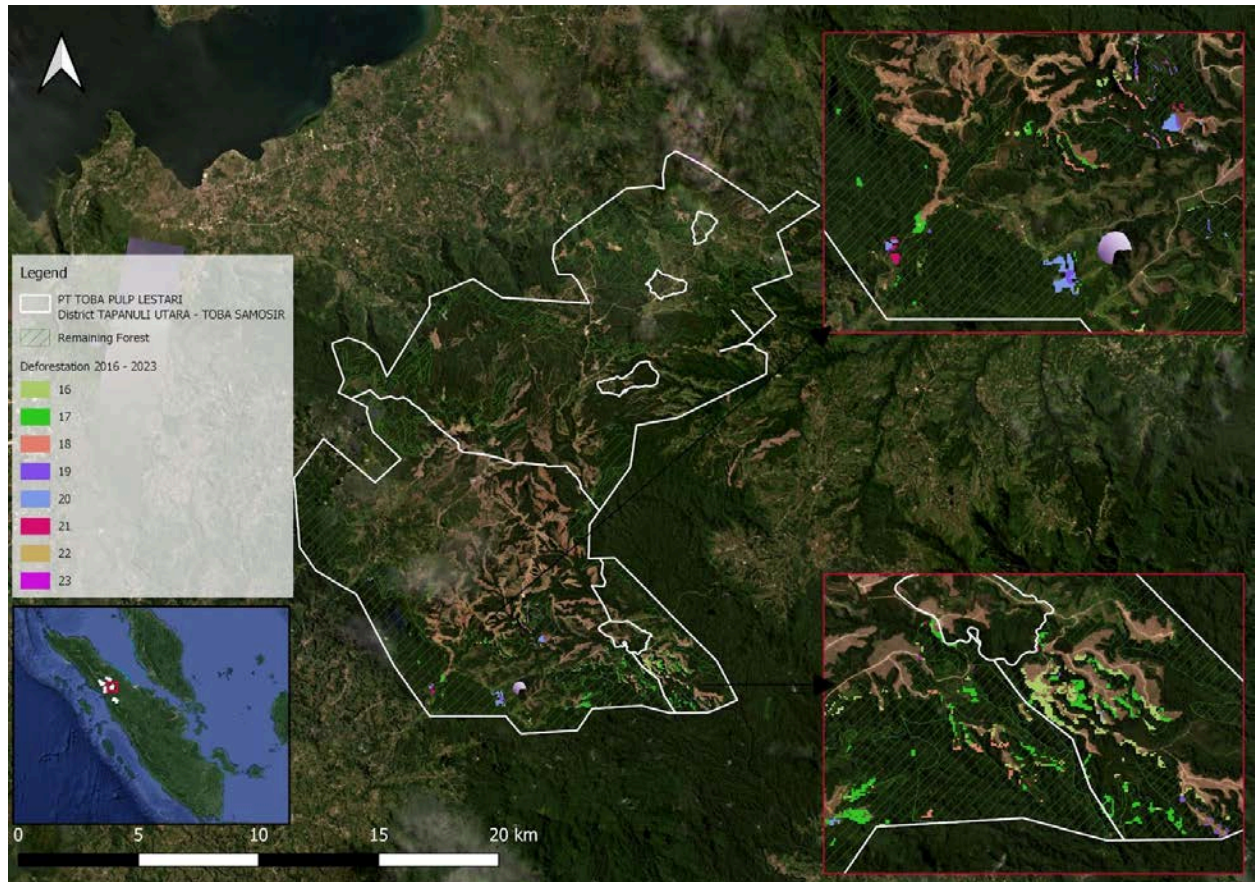




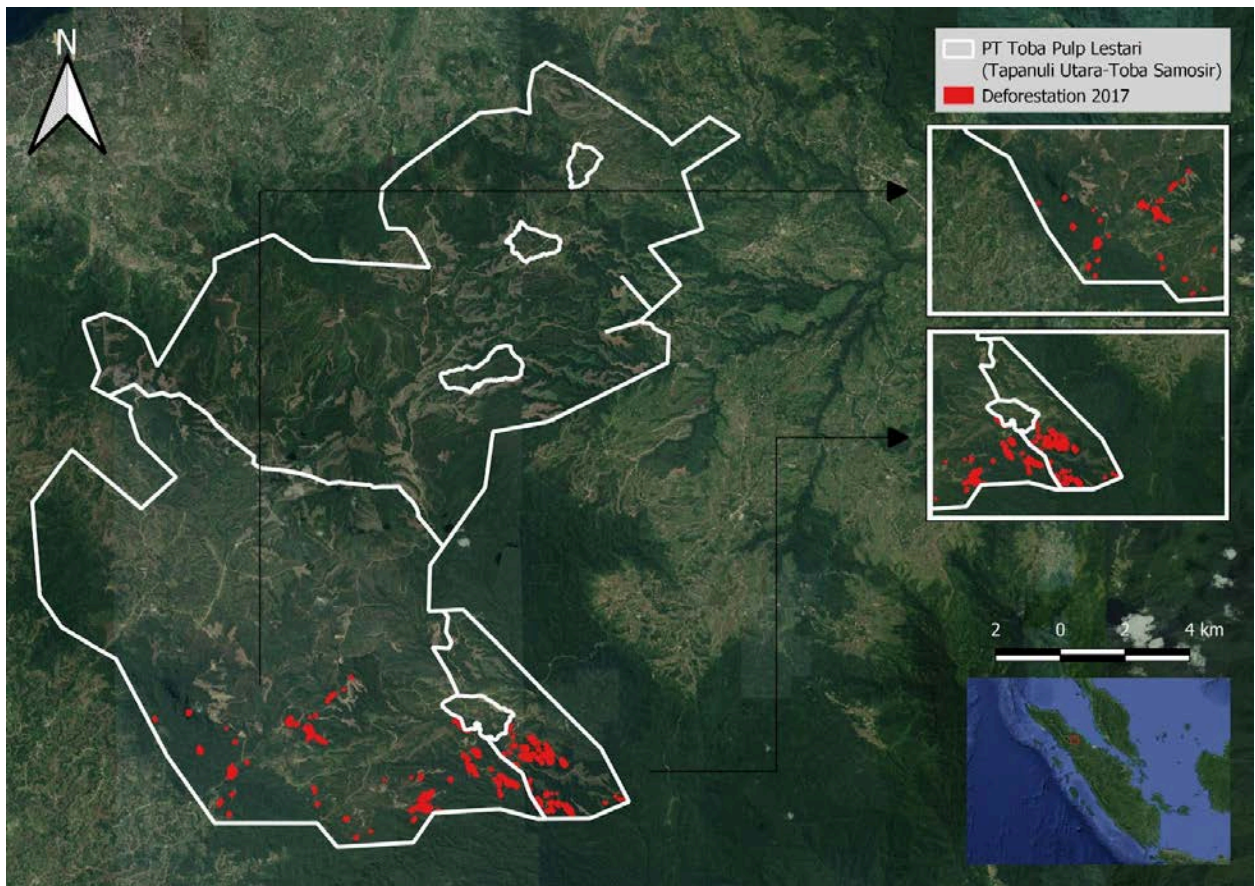
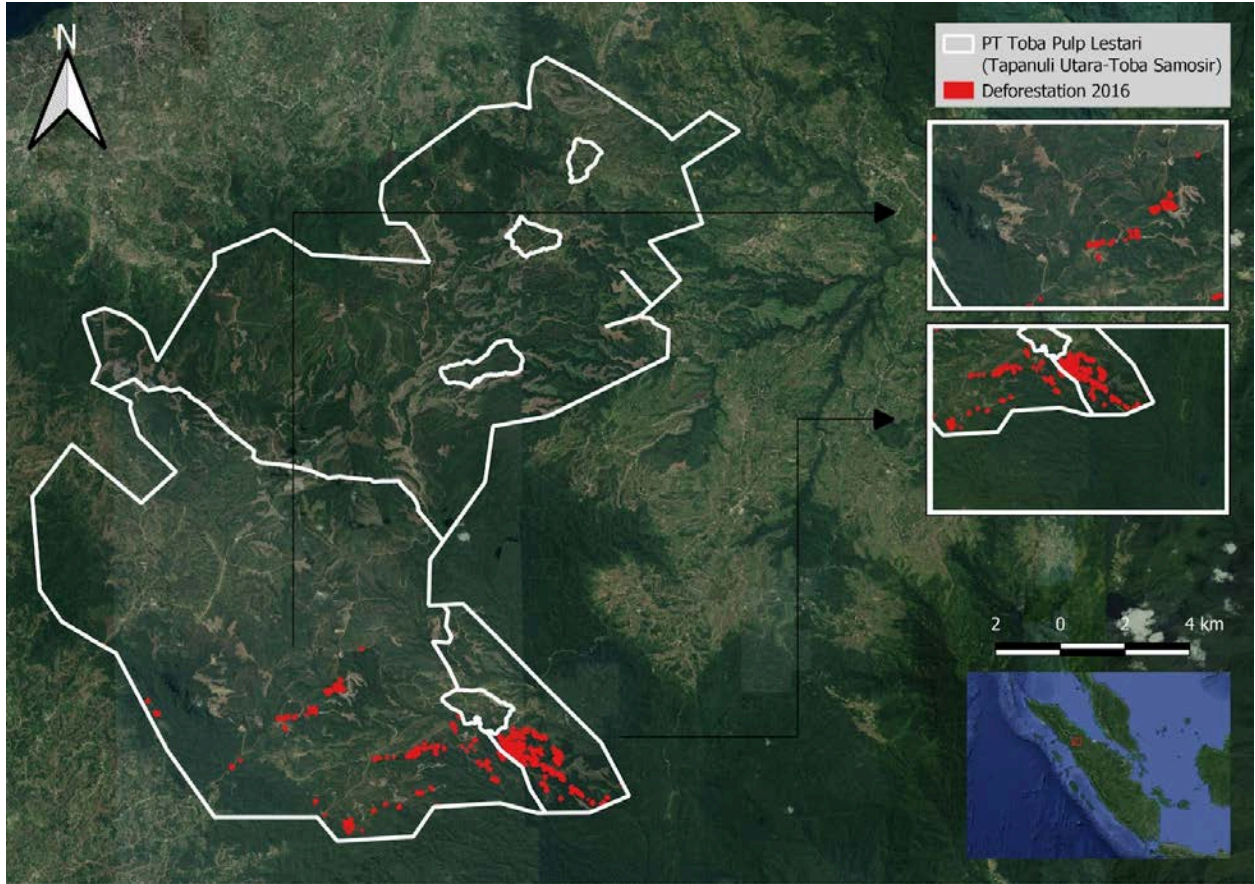


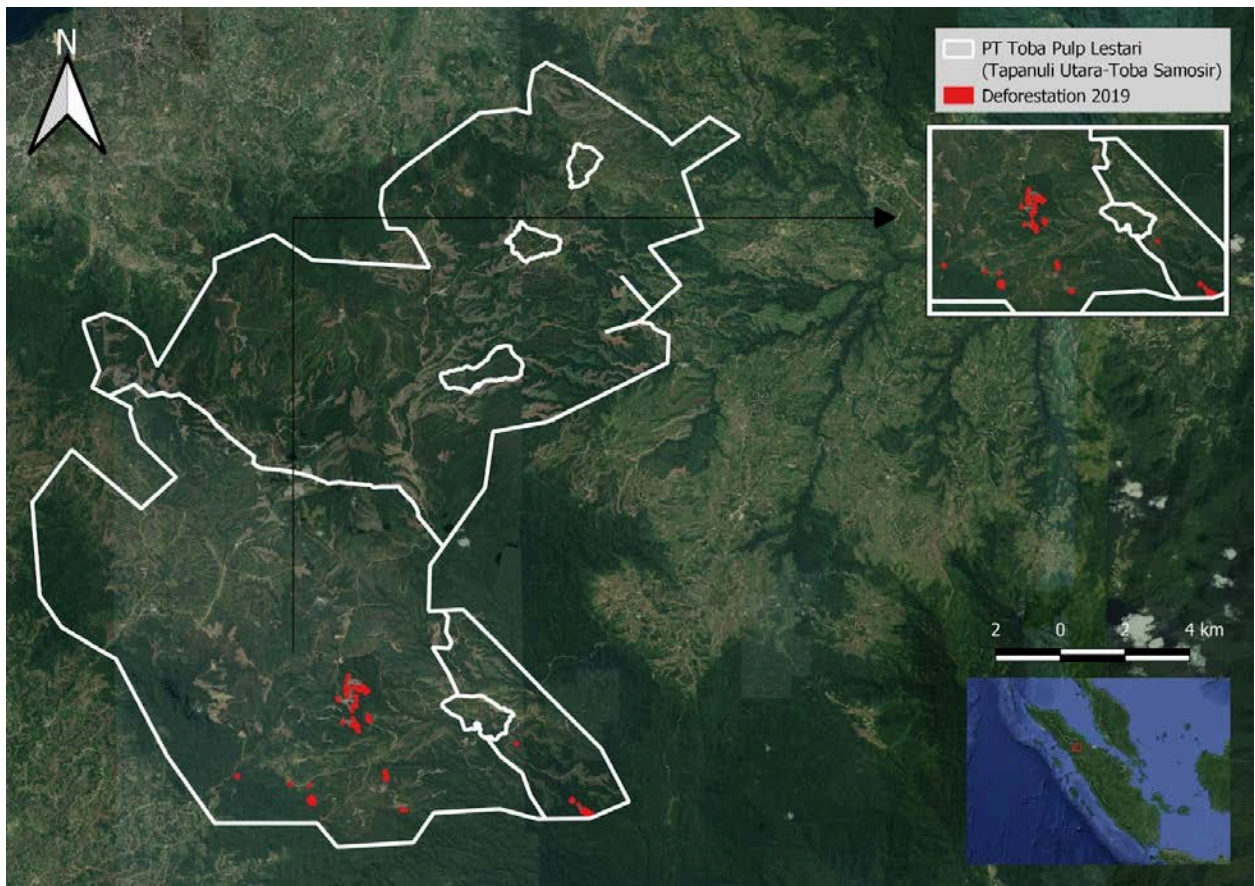
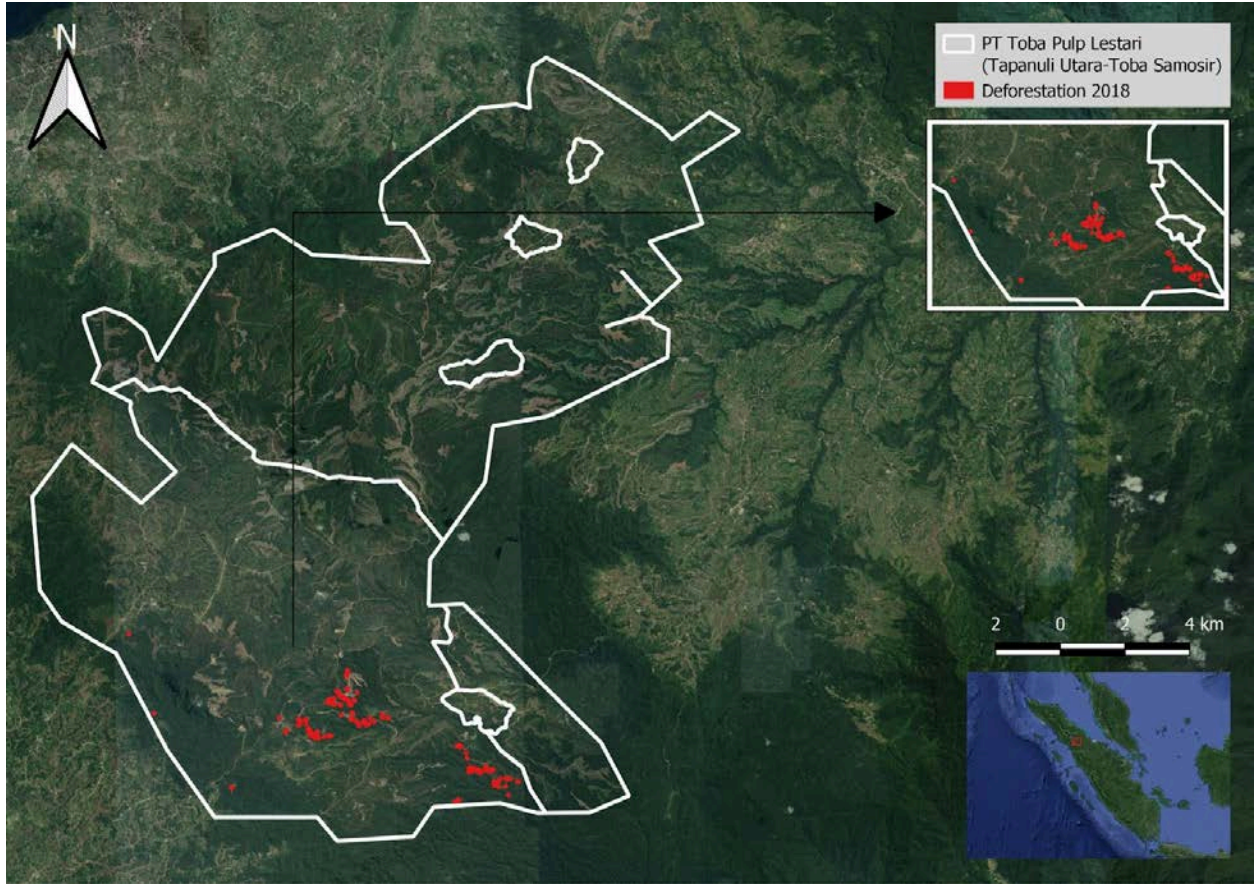
6. Deforestation in PT. Toba Pulp Lestari concessions in the district of Toba Samosir

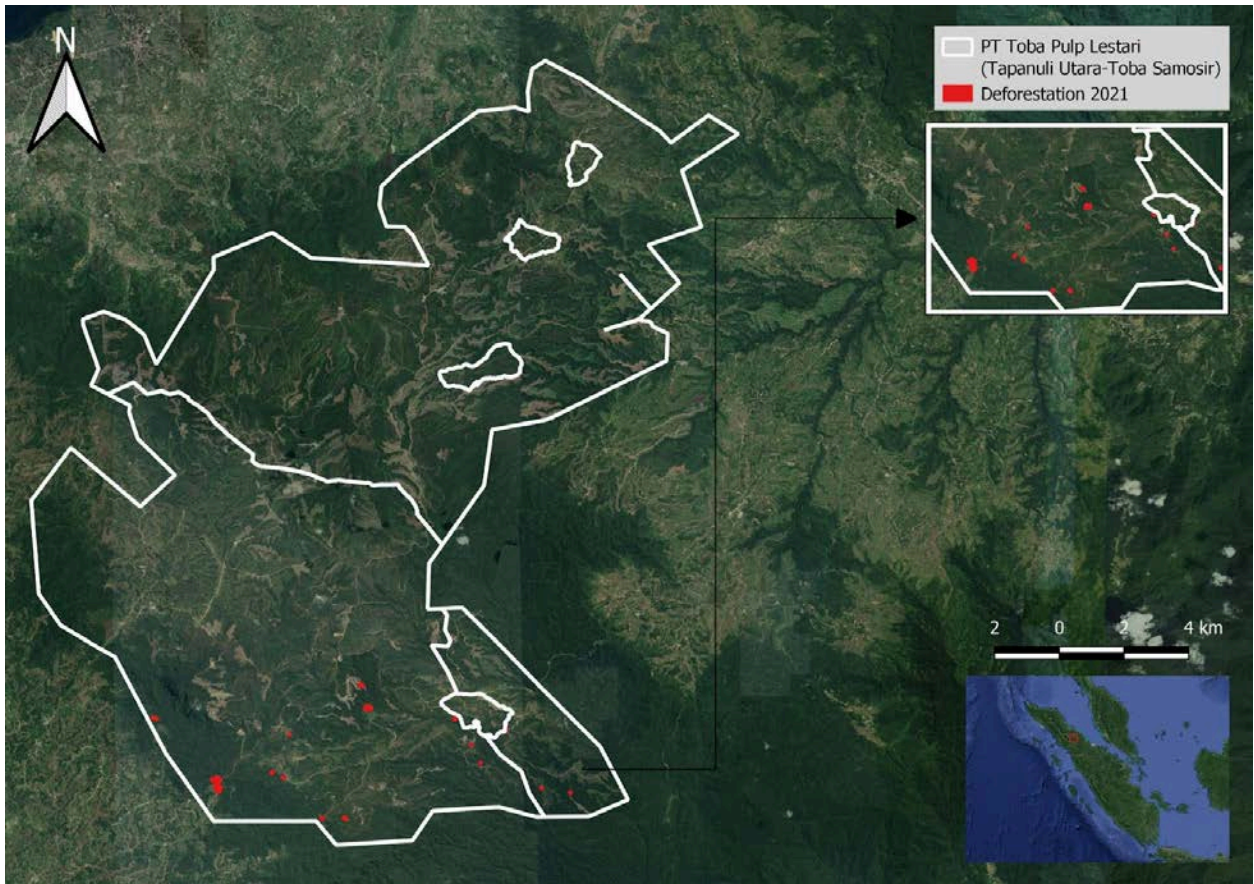
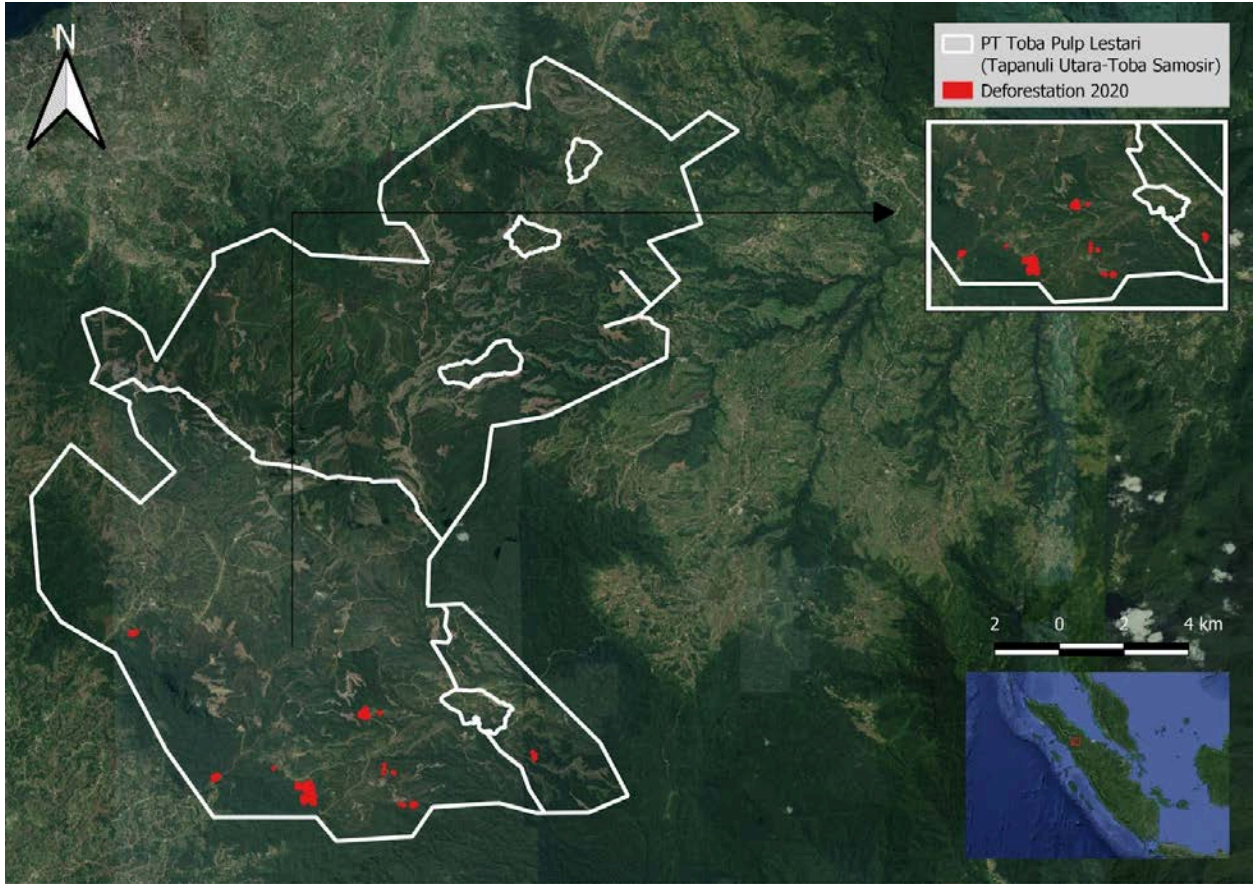
In PT. Toba Pulp Lestari's concessions in their Habinsaran Estate in the district of Toba Samosir, over 57 ha (141 acres) were cleared between 2016-2023 with over 32 ha (79 acres) cleared in 2016, 25 ha (62 acres) cleared in 2017 and small patches in 2019-2021. An additional 7 ha (17 acres) was cleared in 2015.

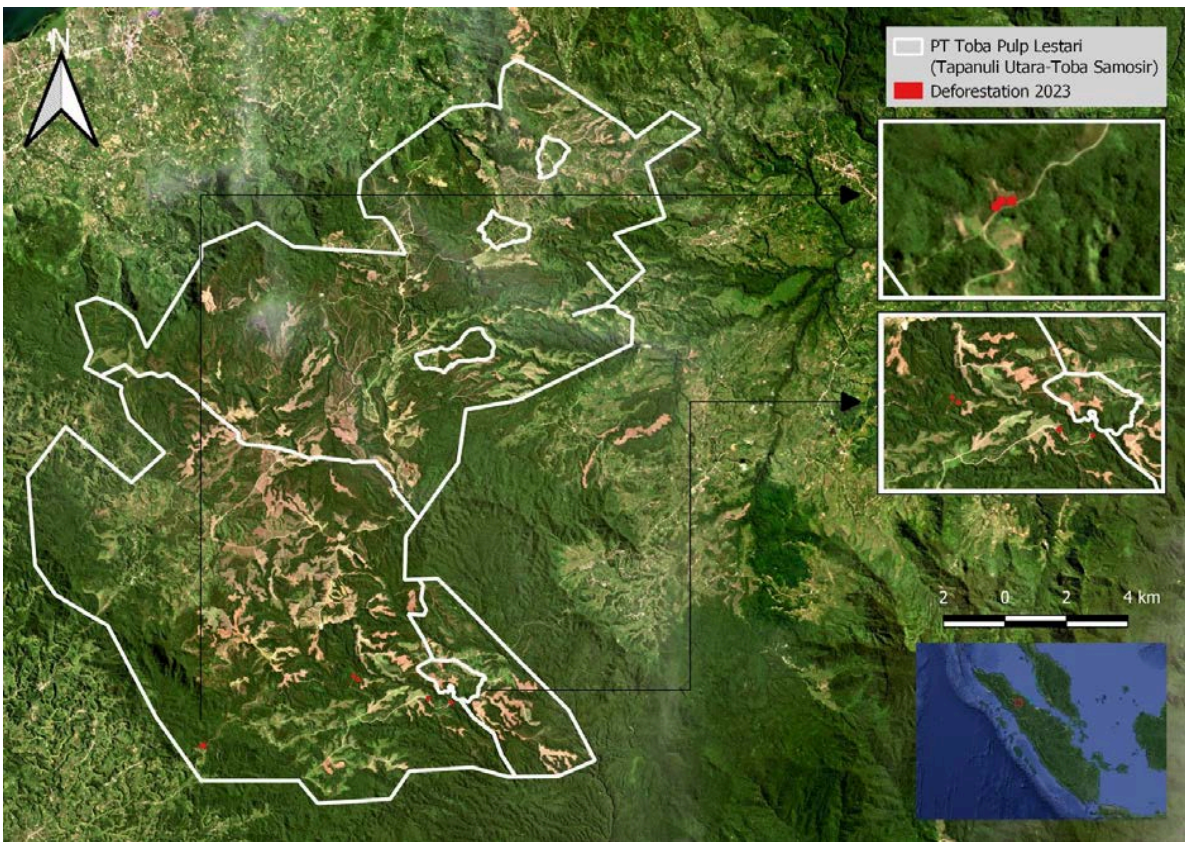
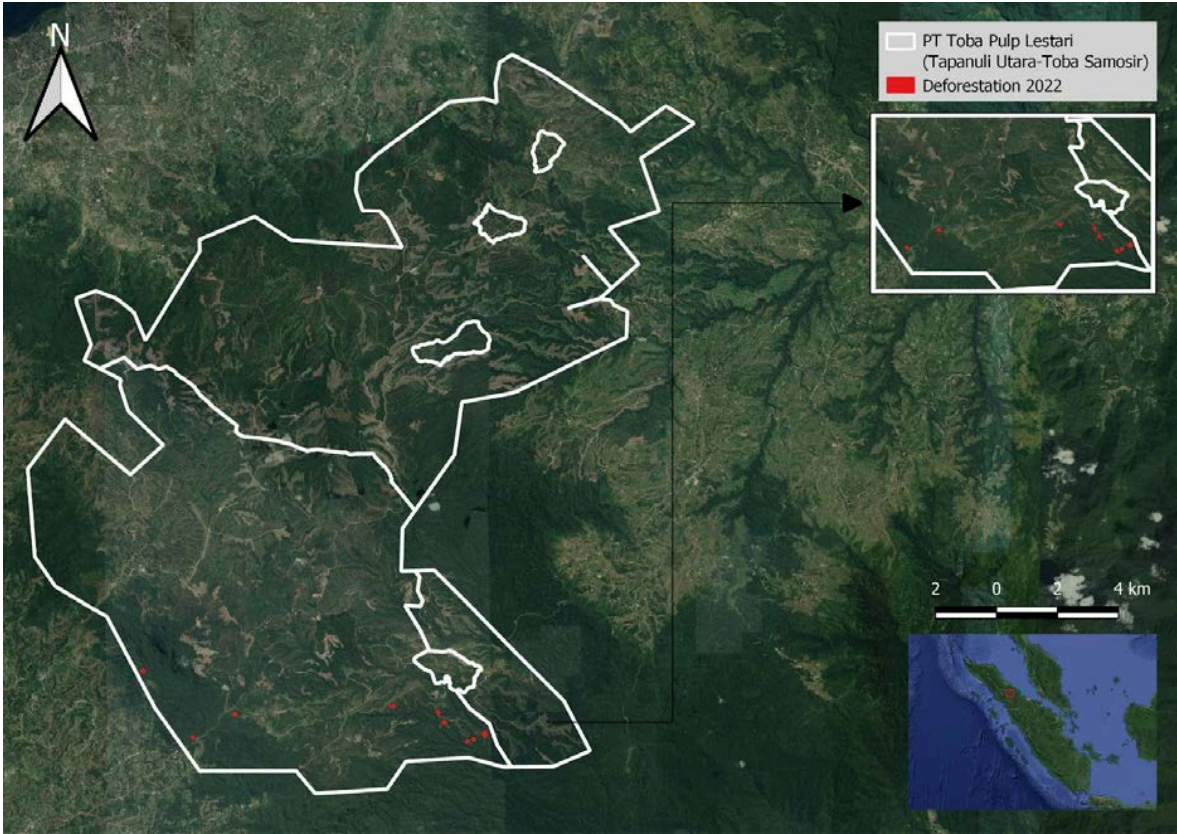


Deforestation in PT. Toba Pulp Lestari concession in Toba Samosir between 2016-2023.







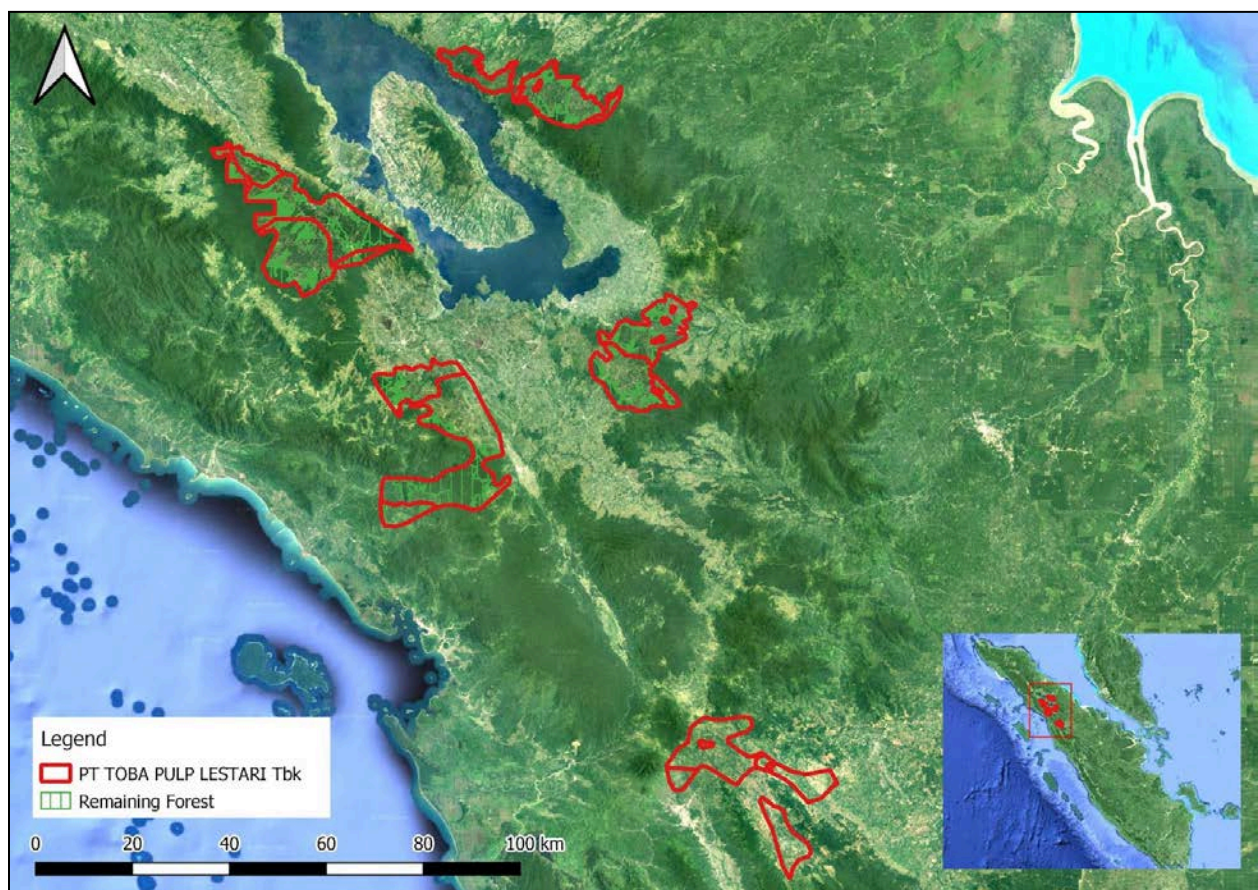


Deforestation in PT. Toba Pulp Lestari concession in Toba Samosir between 2016-2023 including after the December 2020 cut-off date.

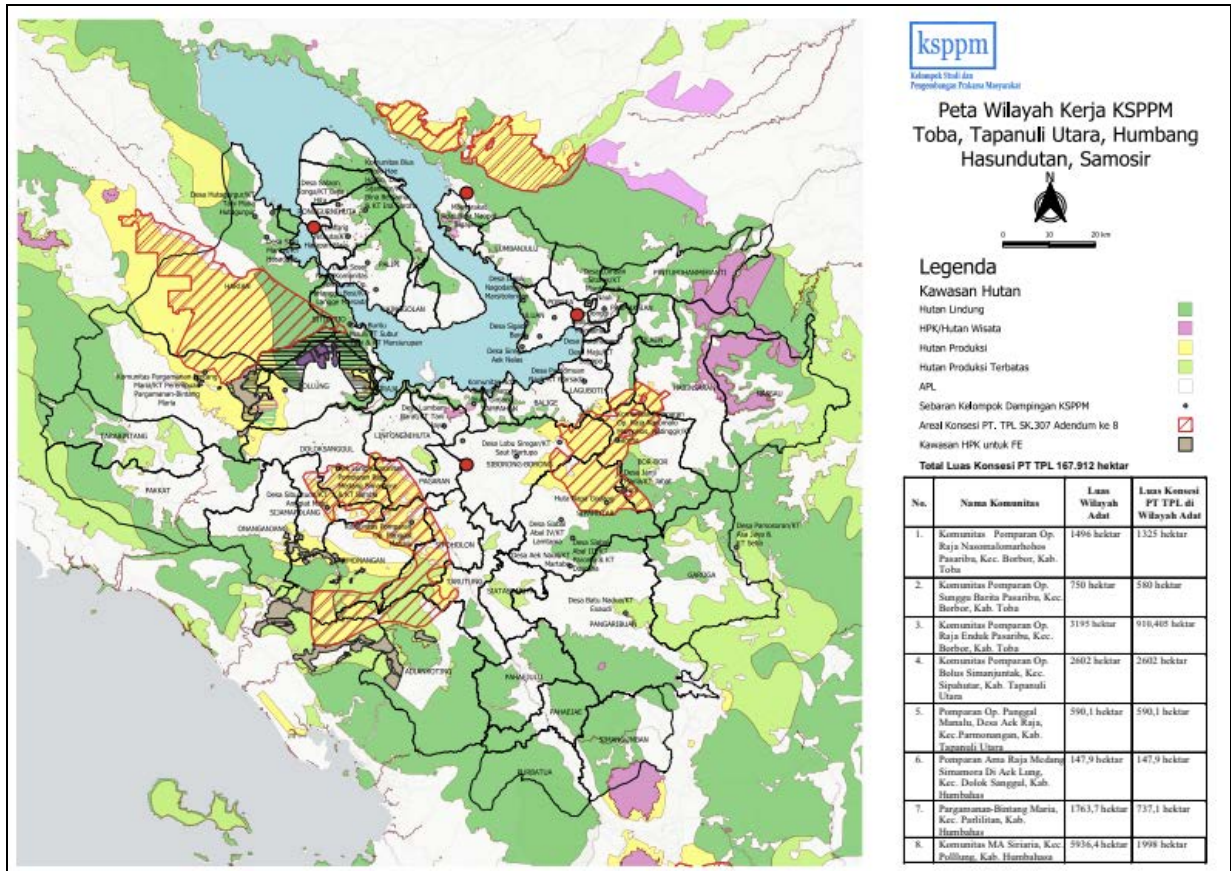
Overlap of customary forests with remaining forests in PT. Toba Pulp Lestari concessions

Significant areas of forests remain inside PT. Toba Pulp Lestari concessions and some of these areas are the customary forests of Indigenous communities that are in conflict with PT. TPL due to its failure to respect their customary land rights. Several communities continue to call on PT. TPL to excise their customary forests and lands from within their concession areas—a critical step in securing legal recognition of their land rights and control over their territories.

The customary forests around the Lake Toba region are central to the culture and livelihood of [Indigenous Batak Toba communities](#) that have depended on the land, forests and the traditional harvesting of native benzoin forests (*kemenyan*) for generations. Their forests and lands are a source of food and tradition and play a critical role in the health of the rivers flowing to downstream communities and provide shelter, medicine, food and livelihoods.



Remaining forests inside PT. Toba Pulp Lestari concessions.



Map showing customary territories in North Sumatra that overlap the concessions of PT. Toba Pulp Lestari.

Royal Golden Eagle Group's response to our findings

The Royal Golden Eagle Group was asked to comment on the findings on the extent of deforestation within PT. Toba Pulp Lestari's operations in Indonesia, as taken from spatial analysis commissioned by RAN. The RGE Group and APRIL did not respond to this request. PT. TPL did respond and in its response denied any deforestation in its operations and violations of the 2015 and 2020 deforestation cut-off dates. Without responding to the full detail of findings concerning satellite analysis of locations of deforestation, they stated that PT. TPL did not clear any natural forests and that any land cover change appears to be related to legal and compliant plantation management activities. In response to the allegations of deforestation in the district of Aek Raja, PT. TPL confirmed clearing of natural forests but stated it was the result of illegal logging and it had reported the incident to the authorities. PT. TPL claims to have updated their [Sustainability Policy](#) in 2023 and this policy continues to reference July 2014 as the end date to the sourcing of natural wood.

PT. TPL stated it is not in a position to excise the area being claimed by some members of the Pargamanan Bintang Maria community from their concession but will abide by the

results of any valid land claim process. Whilst they recognize in their response that 73 families within the Pargamanan Bintang Maria community have opposed a partnership, they claim to be unaware of any formal land claim application made by members of the community to the government. This claim is questionable as there have been [public accounts](#) on the fact that, in March 2022, representatives of the Pargamanan-Bintang Maria community submitted a petition to the local and national government requesting their lands to be recognized as customary forest (hutan adat)--a process that PT. TPL can support through initiating its own formal communication to the government if it were serious about respecting Indigenous rights.

PT. TPL states that FSC includes it in APRIL's Corporate Group based on control but maintains that it is a publicly listed company and not part of the RGE group.

The denial of deforestation by PT. TPL—and the evidence published by RAN—needs to be thoroughly investigated by brands and banks that do business with the RGE Group and the Forestry Stewardship Council. RAN is calling on all actors that finance, do business with, source from, or associate with, the RGE Group to immediately suspend business or associations with the RGE Group, and investigate our findings.