

28 September 2020

Address

PT. RGE Indonesia

Jl. MH. Thamrin 31 d/h Jl.Teluk Betung 31

RT.4/RW.1, Kel. Kebon Melati

Kecamatan Tanah Abang

Jakarta Pusat10230

Dear Mr. Sukanto Tanoto,

Re: Opportunity to comment ahead of new Greenpeace [Southeast Asia] publication.

We are writing to offer an opportunity to comment in advance of a [Greenpeace Southeast Asia] publication that profiles fires and areas burned from 2015 to 2019 within the operations corporate groups with palm oil and pulpwood interests associated with high incidences of forest, peatlands and/or other land fires. We also compiled available data on sanctions by the authorities related to fire occurrences and the concerning concessions.

The analysis is based on the following datasets:

- **Concession maps:** Concession boundary data for oil palm and pulp concessions in Indonesia compiled by Greenpeace Southeast Asia from various official or industry sources
- **Burned area:** Government of Indonesia annual burn scar spatial data covering the 2015–2019 period from MoEF–KLHK¹
- **Government sanctions for fire:** Civil/ administrative/ criminal sanctions linked to fire issued between 2015–2019, where data has been made available.
- **Corporate group control:** Corporate group composition based on analysis by Greenpeace International following the Accountability Framework Initiative definition and indicators of a corporate group²

For details of the methodology see Greenpeace International report *Burning Down the House* (2019).³

Group-controlled concessions

Sukanto Tanoto and family control the loosely structured, privately held Royal Golden Eagle group (RGE)⁴ along with other businesses. Its Indonesian pulp operations are run by APRIL.⁵ APRIL distinguishes between pulpwood concessions it owns directly, 'supply partners' and 'open market suppliers'.⁶ The close contractual relationship with 'supply partners' fits the criteria for considering them to be controlled by the group, and registry profiles suggest

¹ <http://geoportal.menlhk.go.id/arcgis/rest/services/KLHK>

² **Accountability Framework Initiative** includes a list of factors to determine the full range of ownership from formal to informal that defines a corporate group.

³ **Burning down the house**

⁴ RGE website: <https://www.rgei.com/>

⁵ APRIL website: <https://www.aprilasia.com/en/>

⁶ APRIL (2020) 'List of APRIL's fiber supply sources'

<https://sustainability.aprilasia.com/en/april-fiber-supply-source/>

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that at least some of the 'open market suppliers' are ultimately controlled by RGE or the Tanoto family. Where such evidence is available, these concessions have been included as part of the group.

RGE also holds palm oil interests via Asian Agri (concessions) and Apical (processing and trading). The Tanoto family may also be linked to other palm oil interests not publicly declared - these are outside the scope of this report.

The findings of this analysis are attached below.

Attachments include a list of the concessions present in our spatial database that have been applied in the analysis and that have been identified as part of your group according to AFI indicators. Please provide boundary maps for any concession linked to your group that is not included in the data table.

Should you dispute the validity of the data on which the analysis is based, please provide documentary evidence to back up your position, such as maps showing recent revisions to concession boundaries and permit numbers, evidence of sale of concessions, or Indonesian Ministry of Forestry (KLHK) correspondence which corrects its official burnscar analysis within the area concerned.

Concerning the data on sanctions, limitations in availability of data means that this is likely an underestimate of the total number of sanctions. We therefore ask, in the interests of transparency, that you provide updates or corrections to these numbers, together with the details of any sanctions received.

You will note that the overall burned area figures are not always consistent with those from previous years. This is due to a number of factors, including the revision of data by KLHK following discussions with companies.

Replies must be received no later than **Monday, October 5th, 2020** to be taken into account.

Best,



Kiki Taufik
Global Head of Indonesia Forest Campaign
Greenpeace South East Asia-Indonesia

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Pulp Concessions

Total burned area 2015 - 2019	62920 ha	
Burned area 2019	10220 ha	
Listed as largest burned area: PT Sumatera Riang Lestari PT Sumatera Sylva Lestari PT Riau Andalan Pulp & Paper PT Adindo Hutani Lestari	Total burned area (2015 - 2019) (ha) 20970 (3 sanctions) 12020 (2 sanctions) 10450 (5 sanctions) 6360 (1 sanction)	
Listed in 2019 as company groups with largest burned area	Yes	
Civil/administrative/criminal sanctions:	21	
Concessions included in analysis	PT Sumatera Riang Lestari(3 sanctions) PT Sumatera Sylva Lestari (2 sanctions) PT Riau Andalan Pulp & Paper (6 sanctions) PT Adindo Hutani Lestari (1 sanction) PT Mitra Kembang Selaras (1 sanction) PT Seraya Sumber Lestari (1 sanction) PT Rimba Mutiara Permai (1 sanction) PT Perkasa Baru PT Bukit Raya Pelalawan (1 sanction) PT Merbau Pelalawan Lestari PT Rimba Peranap Indah (1 sanction) PT Itci Hutani Manunggal (1 Sanction) PT Ekawana Lestari Darma PT Selaras Abadi Utama PT Citra Sumber Sejahtera (1 sanction) PT Toba Pulp Lestari Tbk PT Bukit Batubuh Sei Indah (1 sanction) PT Triomas FDI (Forestry Development Indonesia) PT Mitra Tani Nusa Sejati PT Triomas Forestry Development Indonesia (PO Concession) (1 Sanction)	
PT Sumatera Riang Lestari	Administrative sanctions: 1. Reply letter from KLHK on the list of companies that got administrative sanction 2015-2018. Link: https://drive.google.com/file/d/18KognrM7UNUD_wVvy4OZMZ	
PT Sumatera Sylva Lestari		
PT Riau Andalan Pulp & Paper		

PT Adindo Hutani Lestari	ggkacmD7a5/view 2. Reply letter from KLHK on the list of 115 companies that got warning letter related forest fire cases in 2015-2018. link: https://drive.google.com/file/d/17SlsdwI0Eiu-m8Drhi9Xhi_sEya_3OBQ/view 3. Performance Report of the Directorate of Complaints, Supervision and Administrative Sanctions (PPSA), Gakkum MoEF, 2019. Link: http://gakkum.menlhk.go.id/assets/info-publik/LKJ_Dit_PPSA_2019_compress.pdf
PT Mitra Kembang Selaras	
PT Seraya Sumber Lestari	
PT Rimba Mutiara Permai	
PT Bukit Raya Pelalawan	
PT Rimba Peranap Indah	
PT Itci Hutani Manunggal	
PT Citra Sumber Sejahtera	
PT Bukit Batubuh Sei Indah	
PT Triomas Forestry Development Indonesia (PO Concession)	

Oil Palm Concessions

Total burned area 2015 - 2019	4120 ha
Burned are 2019	190 ha
Concession in analysis:	PT Triomas Forestry Development Indonesia PT Inti Indosawit Subur (Block KTS) PT Inti Indosawit Subur (Block KAN) PT Teguhkarsa Wanalestari PT Delima Makmur (II) PT Delima Makmur (III) PT Rigunas Agri Utama PT Pusaka Megah Bumi Nusantara PT Inti Indosawit Subur PT Mitra Unggul Pusaka PT Inti Indosawit Subur (Block KPT)

Pulp concessions within Greenpeace spatial database.

nama_ht	status_sk	no_sk	stat_milik	PROVINCE	HTI_GRUP
PT MITRA KEMBANG SELARAS	Berlaku	SK.71/Menhut-II/2007	Swasta	Riau	APRIL (RGE)
PT BUKIT RAYA PELALAWAN	Berlaku	SK.70/Menhut-II/2007	Swasta	Riau	APRIL affiliated (RGE)
PT BUKIT BATUBUH SEI INDAH	Berlaku	SK.67/Menhut-II/2007	Swasta	Riau	APRIL affiliated (RGE)
PT CITRA SUMBER SEJAHTERA	Berlaku	SK.68/Menhut-II/2007	Swasta	Riau	APRIL affiliated (RGE)
PT EKAWANA LESTARI DARMA	Berlaku	SK.733/Kpts-II/97	Swasta	Riau	APRIL affiliated (RGE)
PT MITRA TANI NUSA SEJATI	Berlaku	SK.66/Menhut-II/2007	Swasta	Riau	APRIL JV (RGE)
PT RIMBA MUTIARA PERMAI	Berlaku	SK.65/Menhut-II/2007	Swasta	Riau	APRIL affiliated (RGE)
PT TUAH NEGERI	Berlaku	SK.215/Menhut-II/2007	Swasta	Riau	APRIL affiliated (RGE)
PT RIMBA PERANAP INDAH	Berlaku	SK.598/Kpts-II/1996	Swasta	Riau	APRIL affiliated (RGE)
PT SERAYA SUMBER LESTARI	Berlaku	SK.22/Menhut-II/2007	Swasta	Riau	APRIL affiliated (RGE)
KUD BINA JAYA LANGGAM	Berlaku	SK.228/Menhut-II/2007	Swasta	Riau	APRIL JV (RGE)
PT NUSA PRIMA MANUNGGAL	Berlaku	SK.522.1/DISHUT/XI/2002/002	Swasta	Riau	APRIL affiliated (RGE)
PT TRIOMAS FDI	Berlaku	SK.522.21/IUPHHK-HTI//2003/012	Swasta	Riau	APRIL affiliated (RGE)
PT MERBAU PELALAWAN LESTARI	Berlaku	SK.69/Menhut-II/2007	Swasta	Riau	APRIL JV (RGE)
PT WANANUGRAHA BINALESTARI	Berlaku	SK.362/Menhut-II/2007	Swasta	Riau	APRIL affiliated (RGE)
PT RIMBA TIMUR SENTOSA	Berlaku	348/Menhut-II/2006	Swasta	Nanggroe Aceh Darussalam	APRIL affiliated (RGE)
PT SINAR BELANTARA INDAH	Berlaku	194/Kpts-II/1997	Swasta	North Sumatera	APRIL affiliated (RGE)
PT SUMATERA SILVA LESTARI	Berlaku	82/Kpts-II/2001	Swasta	Riau	APRIL affiliated (RGE)
PT RIMBA ROKAN LESTARI	Berlaku	SK.262/Kpts-II/1998	Swasta	Riau	APRIL affiliated (RGE)

PT PERKASA BARU	Berlaku	SK.75/Menhut-II/2007	Swasta	Riau	APRIL affiliated (RGE)
PT SUMATERA RIANG LESTARI	Berlaku	SK.208/Menhut-II/2007	Swasta	Riau	APRIL affiliated (RGE)
PT BINA DAYA BINTARA	Berlaku	SK.64/Menhut-II/2007	Swasta	Riau	APRIL affiliated (RGE)
PT SELARAS ABADI UTAMA	Berlaku	SK.522.21/IUPHHK-HTI/XII/2002/005	Swasta	Riau	APRIL affiliated (RGE)
PT RIAU ANDALAN PULP & PAPER	Berlaku	SK.180/Menhut-II/2013	Swasta	Riau	APRIL (RGE)
PT ITCI HUTANI MANUNGGAL	Berlaku	SK.184/Kpts-II/96	Swasta	East Kalimantan	APRIL (RGE)
PT SUMATERA RIANG LESTARI	Berlaku	SK.208/Menhut-II/2007	Swasta	North Sumatera	APRIL affiliated (RGE)
PT TOBA PULP LESTARI Tbk	Berlaku	SK.923/Menlhk/Setjen/HPL.0/12/2016	Swasta	North Sumatera	Toba Pulp (RGE)
PT ADINDO HUTANI LESTARI	Berlaku	935/KPTS-II/1999	Swasta	North Kalimantan	APRIL affiliated (RGE)
PT RIAU ANDALAN PULP & PAPER	Berlaku	SK.180/Menhut-II/2013	Swasta	Riau	APRIL (RGE)
PT TOBA PULP LESTARI Tbk	Berlaku	SK.923/Menlhk/Setjen/HPL.0/12/2016	Swasta	North Sumatera	Toba Pulp (RGE)
PT ADINDO HUTANI LESTARI	Berlaku	935/KPTS-II/1999	Swasta	North Kalimantan	APRIL affiliated (RGE)

Oil palm concessions within Greenpeace spatial database.

PROVINCE	LEGAL_STAT	HGU	SOURCES	PELEPASAN	IJIN_LOKAS	PO_COM	PO_GRUP	District	IUP	lic_proces
Riau	HGU	63/HGU/BPN/1996	Jikalahari AND updated by Greenpeace 2007			PT Tunggal Yunus	Royal Golden Eagle (RGE)/Asian Agri	Kampar		
Riau	no data		RSPO	no data		PT Inti Indosawit Subur	Royal Golden Eagle (RGE)/Asian Agri	Indragiri Hulu and Pelalawan		
Riau	no data		BPN online map 2019	726/KPT S-II/1989 date 11/27/1989		PT Wanasari Nusantara	Royal Golden Eagle (RGE)/Asian Agri	Kampar		
Riau	HGU	13/HGU/BPN/1995 date 02/28/1995	BPN online map 2019	726/KPT S-II/1989 date 11/27/1989		PT Wanasari Nusantara	Royal Golden Eagle (RGE)/Asian Agri	Kampar		
Riau	HGU	18/HGU/BPN/2000 date 04/27/2000	BPN online map 2019	690/KPT S-II/1992 date 09/07/1992		PT Rigunas Agri Utama	Royal Golden Eagle (RGE)/Asian Agri	Indragiri Hulu		
Riau	no data		RSPO			PT Indo Sawit Subur Buatan	Royal Golden Eagle (RGE)/Asian Agri	Pelalawan and Siak		
Riau	no data		RSPO			PT Indo Sawit Subur Buatan	Royal Golden Eagle (RGE)/Asian Agri	Pelalawan		
Riau	no data		Central Kalimantan Province Plantation Agency 2017			PT Rigunas Agri Utama (Plasma)	Royal Golden Eagle (RGE)/Asian Agri	Indragiri Hulu		
Riau	HGU		BPN online map 2019	267/KPT S-II/1990 date 05/18/1990		PT Mitra Unggul Pusaka	Royal Golden Eagle (RGE)/Asian Agri	Pelalawan		
Riau	no data		Geo RSPO online map 2019	664/KPT S-II/1989 date 10/31/1989		PT Inti Indosawit Subur	Royal Golden Eagle (RGE)/Asian Agri	Indragiri Hulu and Pelalawan		
Riau	no data		Geo RSPO online map 2019	664/KPT S-II/1989 date 10/31/1989		PT Inti Indosawit Subur	Royal Golden Eagle (RGE)/Asian Agri	Pelalawan		
Jambi	HGU	no data	BPN online map 2019	666/KPT S-II/1992		PT Sawit Jambi Lestari	Royal Golden Eagle (RGE)/Asian Agri	Batanghari		
Jambi	no data		MoEF online 2018	666/Kpts-II/1992		PT Sawit Jambi Lestari	Royal Golden Eagle (RGE)/Asian Agri	Batanghari		

Riau	no data		MoEF online map 2019	726/KPT S-II/1989 date 11/27/1989		PT Wanasari Nusantara	Royal Golden Eagle (RGE)/Asian Agri	Kuantan Singingi and Kampar		
Riau	no data		BPN online map 2019	726/KPT S-II/1989 date 11/27/1989		PT Wanasari Nusantara	Royal Golden Eagle (RGE)/Asian Agri	Kuantan Singingi and Kampar		
Jambi	HGU	30/HGU/BPN/93/A/81 date 09/29/1997	BPN online map 2019	266/Kpts-II/1990		PT Dasa Anugrah Sejati	Royal Golden Eagle (RGE)/Asian Agri	Tanjung Jabung Barat	88/Men tanhut-VII/2000 date 10/09/2000	
Jambi	HGU		BPN online map 2019			PT Dasa Anugrah Sejati	Royal Golden Eagle (RGE)/Asian Agri	Tanjung Jabung Barat	88/Men tanhut-VII/2000 date 10/09/2000	
Jambi	HGU	14/HGU/1992 date 09/15/1992	BPN online map 2019			PT Inti Indosawit Subur	Royal Golden Eagle (RGE)/Asian Agri	Batanghari		
Jambi	IUP		BPN online map 2019			PT Inti Indosawit Subur	Royal Golden Eagle (RGE)/Asian Agri	Batanghari	KB.320/859/Mentan/XI/8 date 11/07/1993	
Jambi	HGU	03/HGU/BPN.15/2016 date 08/11/2016	BPN online map 2019	771/Kpts-II/1993		PT Rigunas Agri Utama	Royal Golden Eagle (RGE)/Asian Agri	Tebo	KB.320/185/Mentan//1985	
Jambi	HGU	51/HGU/BPN/1996 date 11/27/1996	BPN online map 2019	771/Kpts-II/1993		PT Rigunas Agri Utama	Royal Golden Eagle (RGE)/Asian Agri	Tebo	KB.320/185/Mentan//1985	
Jambi	IUP		BPN online map 2019			PT Prima Mas Lestari	Royal Golden Eagle (RGE)/Asian Agri	Bungo and Merangin	05/AD M.SDA/2011 date 01/26/2011	HGU Process
Jambi	HGU	87/HGU/KEM-ATR/BPN/2016 date 02/27/2017	BPN online map 2019			PT Prima Mas Lestari	Royal Golden Eagle (RGE)/Asian Agri	Bungo and Merangin	05/AD M.SDA/2011 date 01/26/2011	
Jambi	no data		BPN online map 2019			PT Inti Indosawit Subur	Royal Golden Eagle (RGE)/Asian Agri	Batanghari		
Jambi	HGU		BPN online map 2019			PT Inti Indosawit Subur	Royal Golden Eagle (RGE)/Asian Agri	Batanghari		

North Sumatra	HGU	119/HGU/BPN/2004 date 10/28/2004	Geo RSPO online map 2020 and BPN online map 2019			PT Inti Indosawit Subur (Block KAN)	Royal Golden Eagle (RGE)/Asian Agri	Labuhan Batu		
North Sumatra	HGU	125/HGU/BPN/2004 date 03/13/2004	Geo RSPO online map 2020 and BPN online map 2019			PT Inti Indosawit Subur (Block KPT)	Royal Golden Eagle (RGE)/Asian Agri	Labuhan Batu		
North Sumatra	HGU	03/HGU/BPN.12/XII/2017 date 03/08/2018	Geo RSPO online map 2020 and BPN online map 2019			PT Inti Indosawit Subur (Block KTS)	Royal Golden Eagle (RGE)/Asian Agri	Labuhan Batu		
North Sumatra	HGU		BPN online map 2019			PT Saudara Sedjati Luhur	Royal Golden Eagle (RGE)/Asian Agri	Asahan		
North Sumatra	HGU	131/HGU/BPN/2004 date 10/29/2004	BPN online map 2019			PT Inti Indosawit Subur	Royal Golden Eagle (RGE)/Asian Agri	Batubara		
North Sumatra	HGU	23/HGU/DA/1986 date 05/17/1986	BPN online map 2019			PT Inti Indosawit Subur	Royal Golden Eagle (RGE)/Asian Agri	Serdang Bedagai		
Aceh	HGU	28/HGU/BPN/1998 date 06/12/1998	BPN online map 2019	286/Kpts-II/1997		PT Delima Makmur (II)	Royal Golden Eagle (RGE)/Asian Agri	Aceh Singkil		
Aceh	HGU	15/HGU/BPN/1995 date 03/08/1995	BPN online map 2019	261/Kpts-II/1994		PT Delima Makmur (I)	Royal Golden Eagle (RGE)/Asian Agri	Aceh Singkil		
Aceh	HGU	15/HGU/BPN/1995 date 03/08/1995	BPN online map 2019	262/Kpts-II/1994		PT Delima Makmur (III)	Royal Golden Eagle (RGE)/Asian Agri	Aceh Singkil		
Aceh	HGU	17/HGU/BPN RI/2008 date 06/03/2008	BPN online map 2019			PT Mitra Sejati Sejahtera Bersama	Royal Golden Eagle (RGE)/Asian Agri	Kota Subulussalam		
Riau	no data		MoEF online 2019	690/KPTS-II/1992 date 09/07/1992		PT Rigunas Agri Utama	Royal Golden Eagle (RGE)/Asian Agri	Indragiri Hulu and Kuantan Singingi		
Jambi	no data		Geo RSPO online map 2019			PT Rigunas Agri Utama	Royal Golden Eagle (RGE)/Asian Agri	Tebo		
Jambi	IUP		MoEF online 2018	771/Kpts-II/1993		PT Rigunas Agri Utama (Plasma)	Royal Golden Eagle (RGE)/Asian Agri	Tebo	KB.320/185/Mentan//1985	Righ of Owners hip Proses

Riau	no data		BPN online map 2019	267/KPT S-II/1990 date 05/18/1990		PT Mitra Unggul Pusaka	Royal Golden Eagle (RGE)/Asian Agri	Pelalawan		
Riau	no data		BPN online map 2019	267/KPT S-II/1990		PT Mitra Unggul Pusaka	Royal Golden Eagle (RGE)/Asian Agri	Pelalawan		
Riau	no data		MoEF online map 2019	664/KPT S-II/1989 date 10/31/1989		PT Inti Indosawit Subur	Royal Golden Eagle (RGE)/Asian Agri	Siak		
Riau	HGU		BPN online map 2019	664/KPT S-II/1989 date 10/31/1989		PT Inti Indosawit Subur	Royal Golden Eagle (RGE)/Asian Agri	Pelalawan		
Jambi	no data		Geo RSPO online map 2019			PT Inti Indosawit Subur	Royal Golden Eagle (RGE)/Asian Agri	Batanghari		
Riau	HGU	88/HGU/BPN/1999 date 08/31/2016	BPN online map 2019	791/KPT S-II/1991 date 10/29/1991		PT Rimbun Sawit Sejahtera (formerly PT Pusaka Megah Bumi Nusantara)	Royal Golden Eagle (RGE)/Asian Agri	Kampar		
Riau	HGU	88/HGU/BPN/1999 date 08/31/2016	BPN online map 2019	791/KPT S-II/1991 date 10/29/1991		PT Rimbun Sawit Sejahtera (formerly PT Pusaka Megah Bumi Nusantara)	Royal Golden Eagle (RGE)/Asian Agri	Kampar and Pelalawan		
Riau	HGU	38/HGU/BPN/2000 date 09/20/2000	BPN map online 2019			PT Pusaka Megah Bumi Nusantara	Royal Golden Eagle (RGE)/Asian Agri	Kampar, Pelalawan and Siak		
North Sumatra	no data		Geo RSPO online map 2020			PT Inti Indosawit Subur	Royal Golden Eagle (RGE)/Asian Agri	Serdang Bedagai		
North Sumatra	no data		Geo RSPO online map 2020			PT Inti Indosawit Subur	Royal Golden Eagle (RGE)/Asian Agri	Batubara		
North Sumatra	HGU	20/HGU/BPN/2001 date 08/07/2001	BPN online map 2019			PT Inti Indosawit Subur (Gunung Melayu Plantation)	Royal Golden Eagle (RGE)/Asian Agri	Asahan		
North Sumatra	HGU	20/HGU/BPN/2001 date 08/07/2001	Geo RSPO online map 2020			PT Inti Indosawit Subur (Gunung Melayu Plantation)	Royal Golden Eagle (RGE)/Asian Agri	Asahan		

North Sumatra	HGU	154/HGU/BPN/2004 date 11/11/2004	Geo RSPO online map 2020 and BPN online map 2019			PT Saudara Sejati Luhur	Royal Golden Eagle (RGE)/Asian Agri	Asahan		
North Sumatra	HGU	154/HGU/BPN/2004 date 11/11/2004	Geo RSPO online map 2020 and BPN online map 2019			PT Inti Indosawit Subur (KPM Plantation)	Royal Golden Eagle (RGE)/Asian Agri	Asahan		
North Sumatra	HGU	12/HGU/BPN/1997 date 01/27/1997 and 40/HGU/KEM-ATR/BPN/2017 date 03/21/2017	Geo RSPO online map 2020			PT Inti Indosawit Subur (Block KAK)	Royal Golden Eagle (RGE)/Asian Agri	Labuhan Batu Utara		
North Sumatra	HGU		Geo RSPO online map and BPN online map 2019			PT Inti Indosawit Subur (Block Hari Sawit Jaya/HSJ)	Royal Golden Eagle (RGE)/Asian Agri	Labuhan Batu and Labuhan Batu Utara		
North Sumatra	no data		Geo RSPO online map 2020 and BPN online map 2019			PT Inti Indosawit Subur (Block KTS)	Royal Golden Eagle (RGE)/Asian Agri	Labuhan Batu		
North Sumatra	no data		Geo RSPO online map 2020 and BPN online map 2019			PT Inti Indosawit Subur (Block KPT)	Royal Golden Eagle (RGE)/Asian Agri	Labuhan Batu		
North Sumatra	HGU		Geo RSPO online map 2020 and BPN online map 2019			PT Inti Indosawit Subur (Block KTS)	Royal Golden Eagle (RGE)/Asian Agri	Labuhan Batu and Labuhan Batu Selatan		
North Sumatra	no data		Geo RSPO online map 2020 and BPN online map 2019			PT Inti Indosawit Subur (Block KAN)	Royal Golden Eagle (RGE)/Asian Agri	Labuhan Batu		
North Sumatra	no data		Geo RSPO online map 2020 and BPN online map 2019			PT Inti Indosawit Subur (Block KAN)	Royal Golden Eagle (RGE)/Asian Agri	Labuhan Batu Selatan		
Jambi	HGU	13/HGU/1992 date 09/15/1992	BPN online map 2020	494/KPTS-II/1991 date 08/07/1991		PT Inti Indosawit Subur	Royal Golden Eagle (RGE)/Asian Agri	Tanjung Jabung Barat	187/Mentanhut /VII/2000 date 11/03/2000	
Jambi	no data		Geo RSPO online map 2020	494/KPTS-II/1991 date 08/07/1991		PT Inti Indosawit Subur	Royal Golden Eagle (RGE)/Asian Agri	Tanjung Jabung Barat		

Riau	no data		MoEF online 2019	791/KPTS-II/1991 date 10/29/1991		PT Pusaka Megah Bumi Nusantara	Tanoto	Kampar and Pelalawan		
Riau	HGU	97/HGU/BPN RI/2010 date 12/23/2010	BPN online map 2020	5/MENH UT-II/2006 date 01/40/2006		PT Triomas Forestry Development Indonesia	Tanoto/RGE	Siak		
Riau	HGU		BPN online map 2020	5/MENH UT-II/2006 date 01/40/2006		PT Triomas Forestry Development Indonesia	Tanoto/RGE	Siak		
Riau	HGU	19/HGU/BPN/1998	MoEF online 2018	683/KPTS-II/1995		PT Teguhkarsa Wanalestar i	Tanoto/RGE third party supplier	Siak and Bengkalis		