

12th October 2021

Ginger Cassady

Executive Director,
Rainforest Action Network
425 Bush Street, Suite 300 | San Francisco, CA 94108

Asia Pulp & Paper (APP) Responding to the Notification of Publication of Indicative Forest Footprint Evaluation for North and East Kalimantan

Thank you for reaching out regarding your upcoming Indicative Forest Footprint Evaluation.

Regarding the comments you've included in your letter, it should be noted that Asia Pulp & Paper (APP), including its suppliers, has always operated legally, adhering to all necessary requirements and abiding by all relevant regulations of the Government of Indonesia.

In 2013, APP implemented its [Forest Conservation Policy \(FCP\)](#), which, amongst other things, put an end to the practice of natural forest conversion and made forest conservation a key pillar of our business. These commitments to source responsibly under the FCP are also guided by the [Responsible Fiber Procurement and Purchasing Policy \(RFPPP\)](#) and is implemented through the [Supplier Evaluation and Risk Assessment \(SERA\)](#) tool.

Since the implementation of FCP in 2013, no material resulting from deforestation or natural forest conversion has entered the APP supply chain. All suppliers, regardless of whether they are long term partners, or one-off suppliers, undergo the SERA process, which ensures that the fiber supplied is both legal and from certified sources that do not engage in deforestation. The results of the SERA process are made publicly available on our online sustainability dashboard, is open for public consultation before any supplier is approved, and is repeated annually, to ensure all suppliers, and their Government approved work plans, remain in compliance with the RFPPP and our commitments under FCP.

Since 2013, APP has also continued to conserve and protect about 600,000 ha of natural forests within APP and its suppliers' concession. The protected and conserved area is beyond the Government mandate. Where such forested areas have become degraded, APP also commits to restoring these lands through targeted replanting with indigenous tree species. No areas designated as natural or conservation forests have been converted by APP or any of its supply partners since the implementation of FCP.

These facts have been reviewed and affirmed by independent assessments conducted by both Earthworm Foundation and a Big Four auditing firm. For even greater clarity, APP partnered with MDA, a satellite solutions provider, to deliver near real-time forest cover monitoring of all designated conservation areas and made publicly available via [APP's Forest Monitoring Dashboard](#).

These are important steps taken by APP to ensure a sustainable and responsible fiber supply chain that is free from deforestation. APP has established a system to ensure deforestation free supply chain is embedded within its operations along with an integrated monitoring system from engaging a supplier all the way to the pulpwood entering APP mills.

We have also reviewed the list of suppliers presented for comments and we can confirm 10 of the 19 listed suppliers/concession (APPENDIX 1 below) do not supply to APP. The companies listed are neither under APP or the Sinar Mas Forestry Division.

Should you have any questions or concerns about the veracity of these facts, we would be more than willing to sit down with you or your team and walk you through exactly how these measures have helped protect vast tracts of Indonesia's natural forests.

Best regards

A handwritten signature in black ink, appearing to read 'Elim Sritaba', written in a cursive style.

Elim Sritaba

Chief Sustainability Officer
Asia Pulp & Paper

APPENDIX 1

Sinar Mas Forestry	PT. Sumalindo alam lestari i (dh sumalindo lj i)	Berau	East Kalimantan	4235.66	17194.39	21430.05	19.77	80.23
Sinar Mas Forestry	PT. Sumalindo lestari jaya iv	Berau	East Kalimantan	1500.42	64398.65	65899.06	2.28	97.72
Sinar Mas Forestry	PT. Kelawit wana lestari i	Kutai Timur	East Kalimantan	788.68	3945.14	4733.82	16.66	83.34
Sinar Mas Forestry	PT. Sumalindo alam lestari i (dh sumalindo lj i)	Kutai Timur	East Kalimantan	105.09	102.56	207.66	50.61	49.39
Sinar Mas Forestry	PT. Sumalindo alam lestari ii (dh sumalindo lj ii)	Kutai Timur	East Kalimantan	1438.51	20859.16	22297.68	6.45	93.55
Sinar Mas Forestry	PT. Karya wijaya sukses	Mahakam Ulu	East Kalimantan	50.65	20003.03	20053.68	0.25	99.75
Sinar Mas Forestry	PT. Sumalindo lestari jaya ii	Mahakam Ulu	East Kalimantan	1524.04	58996.18	60520.22	2.52	97.48
Sinar Mas Forestry	PT. Sumalindo lestari jaya v	Mahakam Ulu	East Kalimantan	1050.58	55222.30	56272.87	1.87	98.13
Sinar Mas Forestry	PT. Sumalindo lestari jaya (eks PT... giri)	Malinau	North Kalimantan	36.75	69700.04	69736.79	0.05	99.95
Sinar Mas Forestry	PT. Sumalindo lestari jaya ii	Malinau	North Kalimantan	2054.71	185777.83	187832.54	1.09	98.91