



Rainforest Action Network
425 Bush Street, Suite 300
San Francisco,
CA 94108, USA

11 October 2021

For the attention of Ms Ginger Cassady, Executive Director

Dear Sirs,

Re: Notification of Publication of Indicative Forest Footprint Evaluation for North and East Kalimantan

We refer to your letter dated 6 October 2021 addressed to Genting Group. Since the issues raised therein were related to Genting Group's plantation business, this matter has been referred to Genting Plantations Berhad ("GENP") to respond accordingly.

We appreciate your effort in seeking our comments to your findings prior to publication of the above. Our responses to your allegations are as below.

- 1. The Genting Group has contributed to the loss of over 700,000 hectares of rainforests inside the concessions of its palm oil suppliers. These rainforests have been logged and/or converted to palm oil and pulp and paper plantations across both provinces from 2009 to 2019.*

The above statement is inaccurate as the Genting Group had only ventured into crude palm oil ("CPO") refining activities in 2017 following the commencement of the Group's sole refinery, namely the Genting MusimMas Refinery ("GMMR") situated in Lahad Datu, Sabah, Malaysia.

In sourcing for crude palm oil ("CPO") for GMMR's operations, GENP requires suppliers to observe the No Deforestation, No Peat and No Exploitation principle. Additionally, other criteria assessed prior to inclusion to the CPO supplier list, include verification of land legality, estates' location analysis, as well as commitment to zero burning.

2. *The Genting Group is sourcing from palm oil concessions located in East Kalimantan via its suppliers such as KLK.*

Since commencement of operations in 2017 up until 2019, GMMR had only sourced less than 2% of its crude palm oil ("CPO") from third party suppliers located in Kalimantan. No CPO supplies were sourced from third parties in Kalimantan from 2020 onwards.

3. *The Genting Group has not publicly disclosed detailed lists of palm oil suppliers to its facilities.*

This statement is inaccurate. All our CPO suppliers are listed in the GENP Sustainability Report for 2019 and 2020, copies of which are on our website www.gentingplantations.com; the relevant pages are attached for easy reference. Genting Group does not have any palm kernel crushers nor does it process palm kernel oil.

4. *Please clarify if the Genting Group's Integrated Biorefinery Complex in Sabah is sourcing from palm oil mills and concessions located in North and/or East Kalimantan.*

Please be referred to our response in Item 2 above.

We believe that based on the facts provided in our responses above, it is incorrect and a misrepresentation to allege that the Genting Group had contributed to massive deforestation through its CPO suppliers in Kalimantan from 2009 to 2019.

In addition to the above, we have also stepped up efforts in providing traceability to mills and plantations in recent years to strengthen our commitment in producing sustainable produce. To date, our traceability to plantation for our external CPO suppliers stands at 87%. Meanwhile, we continue to work towards achieving 100% traceability in two years' time.

GENP is a member of the Roundtable on Sustainable Palm Oil ("RSPO"). We aspire to achieve a balanced integration of ethical, social, environmental and economic considerations in all aspects of our business to create sustainable long-term shared values with all our stakeholders and society at large.

We would like to affirm that as a responsible oil palm grower, GENP is committed to the No Deforestation, No Peat and No Exploitation ("NDPE") principle. We had conducted High Conservation Value ("HCV") assessments in all our concessions since 2005. High Carbon Stock ("HCS") and HCV-HCS assessments have also been conducted since 2015.

We hope that the above has provided factual clarity in clearing the Genting Group and GENP from the abovementioned allegations.

Thank you.

Yours faithfully,

GENTING PLANTATIONS BERHAD



Koh Chung Shen

Head, Sustainability Department

Our Oil Mills, Biodiesel Plants and Refinery								
No	Parent Company	Subsidiary	Operating Unit Name	Certification				Coordinates
				RSPO	ISCC EU	MSPO	ISPO	
1	Genting Plantations Berhad	Genting Oil Mill Sdn Bhd	Genting Ayer Item Oil Mill ("GAIOM")	IP	Yes	Yes	n/a	1°51'24.19"N 103°12'36.55"E
2		Genting SDC Sdn Bhd	Genting Indah Oil Mill ("GIOM")	2020	Yes	Yes		5°22'31.1"N 116°56'08.0"E
3		Genting SDC Sdn Bhd	Genting Trushidup Oil Mill ("GTHOM")	MB	Yes	Yes		5°33'47.8"N 117°58'46.4"E
4		Genting SDC Sdn Bhd	Genting Mewah Oil Mill ("GMOM")	MB	Yes	Yes		5°31'04.9"N 117°42'31.7"E
5		Genting SDC Sdn Bhd	Genting Tanjung Oil Mill ("GTOM")	MB	Yes	Yes		5°25'21.5"N 118°16'23.3"E
6		Genting SDC Sdn Bhd	Genting Sabapalm Oil Mill ("GSOM")	MB	Yes	Yes		5°57'54.3"N 117°22'26.8"E
7		Genting SDC Sdn Bhd	Genting Jambongan Oil Mill ("GJOM")	MB	Yes	Yes		6°39'07.4"N 117°26'46.5"E
8		PT Sepanjang Intisurya Mulia	Mulia Oil Mill ("MOM")	MB	No		Yes	1°22'59.8"S 110°28'45.6"E
9		PT Globalindo Agung Lestari	Globalindo Oil Mill ("GOM")	2023	No	n/a	2023	2°35'06.5"S 114°35'44.2"E
10		PT Dwie Warna Karya	Golden Hill Oil Mill ("GHOM")	2022	No		2022	0°50'36.5"S 114°04'50.9"E
11		PT Kharisma Inti Usaha	KIU Oil Mill ("KIUOM")	2020	No		2020	3°00'10.6"S 114°56'12.7"E
12		Genting MusimMas Refinery	Genting MusimMas Refinery ("GMMR")	Yes	Yes	Yes	n/a	5°01'14.19"N 118°22'12.14"E
13		Genting Biodiesel Sdn Bhd	Genting Biodiesel ("GBSB")	Yes	Yes	Yes	n/a	5°01'37.35"N 118°20'29.98"E
14		SPC Biodiesel Sdn Bhd	SPC Biodiesel ("SPC")	2020	Yes	Yes	n/a	5°01'45.6"N 118°22'05.2"E

Our Suppliers – Our Plasma Smallholders						
No	Our Plasma	Certifications				Coordinates
		RSPO	ISCC EU	MSPO	ISPO	
1	Koperasi Sawit Trimulya Lestari	YES			YES	1°22'48.6"S 110°30'52.4"E
2	Koperasi Sawit Harapan Jaya	YES	n/a	n/a	YES	1°25'35.0"S 110°33'49.0"E
3	Koperasi Panca Mitra Abadi	YES			YES	1°42'28.0"S 110°38'27.0"E

Our Suppliers – Third Party Oil Mills & Refineries				
No	Parent Company	Third Party Palm Oil Mill	RSPO Status	Coordinates
1	Budaya Potensi Sdn Bhd	Sungai Ruku Palm Oil Mill	No	5°33'49.2"N 117°54'01.0"E
2	Cepat Wawasan Group Berhad	Prolific Yield Palm Oil Mill	No	5°43'02.9"N 117°49'39.4"E
3	FGV Holdings Berhad	KKS Baidun Ayu	No	5°04'52.2"N 118°56'23.1"E
4	FGV Holdings Berhad	KKS Embara Budi	No	5°07'55.4"N 119°05'32.8"E
5	FGV Holdings Berhad	KKS Kalabakan	No	4°22'12.1"N 117°30'45.0"E
6	FGV Holdings Berhad	KKS Mercu Puspita	No	5°12'20.9"N 119°00'49.5"E
7	FGV Holdings Berhad	KKS Nilam Permata	No	5°17'21.0"N 119°00'34.0"E
8	FGV Holdings Berhad	KKS Pontian Fico	No	5°25'18.6"N 118°08'40.7"E
9	FGV Holdings Berhad	KKS Umas	No	4°29'48.9"N 117°39'02.1"E
10	Glenealy Plantations Bhd	Timora Palm Oil Mill	No	5°18'17.0"N 118°20'24.3"E
11	Global Enterprise Oil Mill Sdn Bhd	Global Enterprise Oil Mill	No	5°29'24.4"N 117°59'18.8"E
12	Golden Elate Sdn Bhd	Golden Elate Sdn Bhd	No	5°08'14.2"N 118°50'16.7"E
13	Hap Seng Plantations Holdings Sdn Bhd	Jeroco Palm Oil Mill	Yes	5°25'47.0"N 118°25'01.5"E
14	Kim Loong Resources Bhd	Desa Kim Loong Sdn Bhd	No	5°07'47.7"N 116°15'56.0"E
15	Kim Loong Resources Sdn Bhd	Kim Loong Sabah Mills	No	5°28'05.6"N 116°59'23.8"E
16	Koong Shing Sdn Bhd	Koong Shing Sdn Bhd	No	4°49'31.9"N 118°03'46.6"E
17	Kuala Lumpur Kepong Berhad	KL-Kepong (Sabah) Sdn Bhd - Lungmanis Mill	Yes	5°05'02.2"N 118°35'17.7"E
18	Kuala Lumpur Kepong Berhad	KL-Kepong (Sabah) Sdn Bhd - Bornion Mill	Yes	5°36'31.1"N 117°47'19.3"E
19	Kuala Lumpur Kepong Berhad	KLK KALTIM (BERAU)	No	2°12'44.1"N 117°10'04.0"E
20	Kumpulan FIMA Berhad	PT Nunukan Jaya Lestari	No	4°12'12.2"N 117°15'07.7"E
21	Kwantas Oil Sdn Bhd	Haranky	No	5°12'47.0"N 118°03'51.8"E
22	Kwantas Oil Sdn Bhd	Mewah	No	5°15'15.0"N 117°54'36.0"E
23	Kwantas Oil Sdn Bhd	Pintasan	No	5°13'37.0"N 117°42'53.0"E
24	Lam Soon Plantation Sdn Bhd	Lam Soon Oil Mill	No	5°15'17.4"N 118°10'30.6"E
25	LCH Group of Companies	LCH Palm Oil Mill	No	5°39'43.3"N 117°48'40.4"E
26	Malbumi Group Sdn Bhd	Sukau Palm Oil Mill	No	5°34'06.3"N 118°12'20.4"E
27	Monsook Palm Oil Mill Sdn Bhd	Monsook	No	5°40'16.0"N 117°24'46.0"E
28	QL Resources Berhad	Pipit Mutiara Indah Oil Mill	No	3°19'29.0"N 117°10'25.1"E
29	Sawit Kinabalu Sdn Bhd	Sandau Mill Sdn Bhd (Sandau)	No	5°12'15.6"N 118°08'02.9"E
30	Sawit Kinabalu Sdn Bhd	Sandau Mill Sdn Bhd (Sebrang)	No	4°59'23.0"N 118°33'18.4"E
31	Sime Darby Plantation Berhad	Binuang Oil Mill	Yes	4°42'16.1"N 118°03'36.7"E
32	Sime Darby Plantation Berhad	Merotai Oil Mill	Yes	4°22'09.7"N 117°49'58.5"E
33	Tamaco Oil Mill Sdn Bhd	Tamaco Oil Mill (Mill 1)	No	5°14'42.0"N 118°19'39.2"E
34	Tamaco Oil Mill Sdn Bhd	Tamaco Oil Mill (Mill 2)	No	5°09'14.6"N 118°13'44.1"E
35	Tradewinds Plantation Bhd	Ladang Permai Sdn Bhd (Permai Mill)	No	5°11'14.4"N 118°26'25.0"E
36	Tradewinds Plantation Bhd	Ladang Permai Sdn Bhd (Batu Putih)	No	5°34'48.0"N 117°56'45.6"E
37	Tradewinds Plantation Bhd	Kumpulan Krisjati Sdn Bhd	No	4°49'43.1"N 115°15'54.3"E
38	Tung Hup Palm Oil Mill Sdn Bhd	Tung Hup Palm Oil Mill Sdn Bhd	No	5°16'53.2"N 117°52'14.7"E
39	Veetar Palm Oil Mill Sdn Bhd	Veetar Palm Oil Mill Sdn Bhd	No	5°20'11.0"N 116°56'33.2"E
40	Mewah Group	Mewah Datu Refinery	Yes	5°01'33.8"N 118°22'13.7"E

25	PT Agro Abadi Cemerlang	2021	n/a	n/a	2021	8,771	301.51	301.51	-0.339042	110.211381
26	PT Citra Sawit Cemerlang	2021			2021	14,858	1,488.31	6,550.69	-1.258306	110.664500
27	PT Dwie Warna Karya	2022			2022	12,872	1,203.68	1,203.68	-0.861444	114.075278
28	PT Susantri Permai	2022			2022	15,176	1,696.51	1,696.51	-0.888806	113.943556
29	PT Kapuas Maju Jaya	2022			2022	18,510	2,428.37	2,428.37	-1.081950	114.140881
30	PT United Agro Indonesia	2022			2023	6,723	573.62	604.87	-2.591389	114.589056
31	PT GlobalIndo Agung Lestari	2022			2021	29,609	3,432.32	6,122.94	-2.591389	114.589056
32	PT Palma Agro Lestari Jaya	2023			2023	11,727	3,207.50	3,272.92	0.781028	111.479639
33	PT Kharisma Inti Usaha	2022			YES	19,212	961.94	966.85	-2.992850	114.901825

Notes: *Genting Lokan Estate is certified together with Genting Mewah Estate

Our Oil Mills, Refinery & Biodiesel Plants

Operating Unit Name	Certification/Standards				Processing Capacity	Latitude	Longitude
	RSPD	ISCC EU	MSPD	ISPO			
Genting Ayer Item Oil Mill	IP	YES	YES		40 mt/hour	1.856719	103.210153
Genting Indah Oil Mill	2021	YES	YES		30 mt/hour	5.375306	116.935556
Genting Trushidup Oil Mill	MB	YES	YES		60 mt/hour	5.563278	117.979556
Genting Mewah Oil Mill	MB	YES	YES	n/a	45 mt/hour	5.518028	117.708806
Genting Tanjung Oil Mill	MB	YES	YES		80 mt/hour	5.422639	118.273139
Genting Sabapalm Oil Mill	MB	YES	YES		20 mt/hour	5.965083	117.374111
Genting Jambangan Oil Mill	MB	YES	YES		20 mt/hour	6.652056	117.446250
Mulia Oil Mill	MB			YES	80 mt/hour	-1.383278	110.479333
GlobalIndo Oil Mill	2022			2021	90 mt/hour	-2.584580	114.595861
Golden Hill Oil Mill	2022	n/a	n/a	2022	80 mt/hour	-0.843472	114.080806
KIU Oil Mill	2022			YES	60 mt/hour	-3.002944	114.936861
Cemerlang Oil Mill	2023			2023	60 mt/hour	0.338583	110.189361
Genting MusimMas Refinery	SCCS	YES	YES	n/a	600,000 mt/year	5.020608	118.370039
							HALAL JAKIM, KLBD KOSHER, MESTI and GMP by Ministry of Health Malaysia, HACCP by SIRIM Malaysia
Genting Biodiesel Sdn Bhd	SCCS	YES	YES	n/a	300,000 mt/year	5.027042	118.341661
SPC Biodiesel Sdn Bhd	SCCS	YES	YES	n/a		5.029333	118.368111
							European Standards EN14214, Malaysian Standards MS2008:2014

External CPO Supplier List

No	Oil Mill Name	Parent Company	RSPD	ISCC	MSPD	ISPO	Latitude	Longitude	Traceability to Plantation ("TTP")
Direct CPO Suppliers									
1	Desa Kim Loong	Desa Kim Loong Palm Oil Sdn Bhd				○	5.129927	116.265564	76.00%
2	Telupid	Kim Loong Sabah Mills Sdn Bhd				○	5.467278	116.989556	62.80%
3	Prolific Yield	Cepatwawasan Group Berhad				○	5.717481	117.827607	83.50%
4	Tung Hup	Tung Hup Palm Oil Mill Sdn Bhd				○	5.282445	117.868012	100.00%
5	Sungai Ruku	Sungai Ruku Oil Palm Plantation Sdn Bhd				○	5.563667	117.900278	75.00%
6	Sandau*	Sawit Kinabalu Sdn Bhd				○	5.204328	118.134136	100.00%
7	Sebrang*	Sawit Kinabalu Sdn Bhd				○	4.989722	118.555103	100.00%
8	Tamaco 1*	Tamaco Oil Mill Sdn Bhd				○	5.245000	118.327556	100.00%
9	Tamaco 2*	Tamaco Oil Mill Sdn Bhd				○	5.154061	118.228474	100.00%
10	Timora	Timor Enterprise Sdn Bhd				○	5.304724	118.340076	100.00%
11	Veetar	Veetar Palm Oil Mill Sdn Bhd				○	5.336397	116.942563	84.90%
12	Barnion	KL-Kepong (Sabah) Sdn Berhad	○ MB		○	○	5.608639	117.788694	100.00%
13	Pinang	KL-Kepong (Sabah) Sdn Berhad	○ IP		○	○	4.450414	118.278194	100.00%
14	Berau	Hutan Hijau Mas	○ IP, MB		○	○	2.212140	117.167170	100.00%
15	Pontian FICO	Pontian United Plantations Berhad				○	5.423837	118.145415	99.50%
16	Umas	FGV Palm Industries Sdn Bhd				○	4.496906	117.650576	81.00%
17	Kalabakan	FGV Palm Industries Sdn Bhd				○	4.370035	117.512487	81.00%
18	Permai	Ladang Permai Sdn Bhd				○	5.187332	118.440289	91.50%
19	Batu Putih	Ladang Permai Sdn Bhd				○	5.580000	117.946000	81.70%
20	Global Enterprise	Global Enterprise Oil Mill Sdn Bhd				○	5.490111	117.989556	80.81%
21	Jeroco 1	Jeroco Plantations Sdn Bhd	○ IP		○	○	5.431112	118.417224	100.00%
22	Jeroco 2	Jeroco Plantations Sdn Bhd	○ MB		○	○	5.431112	118.417224	100.00%
23	Binuang (SOU 28)	Sime Darby Plantation Bhd	○ IP			○	4.704457	118.060186	100.00%
24	Merotai (SOU 30)	Sime Darby Plantation Bhd	○ MB			○	4.369347	117.832905	100.00%
25	Sandakan Bay (SOU 26)	Sime Darby Plantation Bhd	○ MB			○	5.641362	118.166868	100.00%
26	Giram (SOU 29)	Sime Darby Plantation Bhd	○ MB			○	4.586785	118.193914	100.00%
27	Sukau	Sukau Palm Oil Mill Sdn Bhd				○	5.568408	118.205663	80.00%
28	Waris Selesa	Waris Selesa Sdn Bhd				○	4.869653	118.090641	5.00%
29	Baturong	IOI Corporation Berhad	○ IP			○	4.755300	118.088600	100.00%
30	Segamaha	Boustead Rimba Nilai Sdn Bhd	○ MB			○	5.210414	117.809660	100.00%
31	Lam Soon*	Lam Soon Plantations Sdn Bhd	○ IP			○	5.254833	118.175167	100.00%
32	Mewah*	Kwantis Oil Sdn Bhd				○	5.254581	117.909014	60.00%
33	Pintasan*	Kwantis Oil Sdn Bhd				○	5.229215	117.716900	100.00%
34	Haranky*	Kwantis Oil Sdn Bhd				○	5.212991	118.064422	28.80%
35	Kwantis Oil Sdn Bhd (Refinery)	Kwantis Oil Sdn Bhd	○ MB			○	5.021528	118.356361	77.35%
Average TTP									87.11%

Note: *Direct and indirect supplier (the oil mill has been supplying to Kwantis Oil Sdn Bhd)