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agency



Forests

A Family Affair

Ongoing allegations of deforestation, corruption and human rights violations in Indonesia's palm oil industry.

August 2025



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ABOUT EIA

We investigate and campaign against environmental crime and abuse.

Our undercover investigations expose transnational wildlife crime, with a focus on elephants and tigers, and forest crimes such as illegal logging and deforestation for cash crops like palm oil. We work to safeguard global marine ecosystems by addressing the threats posed by plastic pollution, bycatch and commercial exploitation of whales, dolphins and porpoises. Finally, we reduce the impact of climate change by campaigning to eliminate powerful refrigerant greenhouse gases, exposing related illicit trade and improving energy efficiency in the cooling sector.

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ABOUT KAOEM TELAPAK

Kaoem Telapak (KT) is an environmental non-governmental organisation (NGO) working across forestry, agriculture, fisheries, and the rights of indigenous peoples and local communities. KT is working to strengthen governance in these broad overlapping areas, including monitoring illegal and illicit activities and communicating the findings. In 2016, KT grew out of Telapak, which was originally founded in 1996. KT is a member-based organisation.

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GLOSSARY OF TERMS

BPN: Badan Pertanahan Nasional (National Land Agency) a non-ministerial Government agency in Indonesia tasked with managing land affairs nationally.

CSR: Corporate Social Responsibility is a company's commitment to operate ethically while positively impacting society and the environment. Under Indonesian law, companies operating in sectors related to natural resources are required to undertake CSR through projects that improve social welfare and the environment.

EU DR: The EU Regulation on Deforestation-free Products requires companies placing certain commodities, including palm oil, on the EU market to conduct due diligence to ensure that they are legal, deforestation-free and traceable back to a plot of land.

HGU: the Right to Cultivate (Hak Guna Usaha) is the right to manage state-owned land for agricultural, fishery or livestock purposes. It is granted for a maximum of 35 years, can be extended for up to 25 years and renewed for an additional 35 years – with a maximum total of 95 years. The HGU is the final permit required and is the legal confirmation that all prior steps and permits have been completed and approved.

Food Estate: One of the National Strategic Projects (PSN) of Indonesia aimed at developing large-scale integrated agricultural areas in designated regions in Indonesia to boost national food production and self-sufficiency.

Forest Area (Kawasan Hutan): Land which has been officially designated by the Indonesian Government to permanently remain as forest, regardless of whether it currently contains tree cover. Land has to be approved for release from the Forest Area by the Government before it can be converted to non-forestry uses, such as agriculture, plantations or development.

Forest Area Task Force (Satgas PKH): Established through Presidential Regulation No. 5 Year 2025, the Task Force is mandated to address illegal plantations and other activities operating in Forest Areas.

FPIC: Free, Prior and Informed Consent is a human rights principle that gives communities, especially indigenous peoples and local communities, the right to give consent or reject activities or projects that will be carried out in their area, after they have received clear and complete information about the project, and without any coercion.

ISPO: ISPO stands for Indonesian Sustainable Palm Oil, a mandatory certification standard for the management of sustainable oil palm plantations in Indonesia.

IUP: Izin Usaha Perkebunan (IUP), or Plantation Business License, is a mandatory written permit issued by an authorised official for plantation companies engaged in cultivation and/or processing of products.

PIPIB: Indicative Map for New Permit Moratorium (Peta Indikatif Penghentian Pemberian Perizinan Berusaha) is a regularly updated map issued by the Indonesian Government which identifies peatland and forest areas where new permits for forest utilisation, forest area conversion and other land use changes are temporarily or permanently halted as part of Indonesia's efforts to reduce deforestation and improve forest governance.

Palm oil concession: In Indonesia, the legal right granted by the Indonesian Government to a company to use a specific area of state land for palm oil plantations.

Plasma smallholders: Farmers who manage small plots of palm oil (typically around 2ha) in partnership with a larger plantation company which provides technical support, financing and market access, as regulated by Indonesian law. Companies are legally required to allocate 20 per cent of their concession areas to plasma smallholders

PSN: National Strategic Projects (Proyek Strategis Nasional) are priority infrastructure and development projects designated by the Indonesian Government through Presidential Regulation which are considered strategically important for national economic growth and development goals. These projects receive special treatment including expedited permits, Government guarantees and priority problem-solving support.

Omnibus Law: The Omnibus Law (otherwise known as the Job Creation Law) is a comprehensive legislation passed in 2020 which simultaneously amends multiple existing laws in Indonesia, aimed at simplifying business licensing, attracting investment and creating jobs.

RSPO: RSPO stands for Roundtable on Sustainable Palm Oil, an international organisation which aims to create a sustainable palm oil industry through voluntary sustainable palm oil certification

SHM: Freehold Title (Sertifikat Hak Milik), a freehold land title certificate issued by Indonesia's BPN that represents the strongest form of land ownership. This permanent title grants full private ownership rights, including the ability to sell, transfer, mortgage or inherit the land.

Transmigration: Transmigration is a programme created by the Indonesian government to move people from a densely populated area to another area within Indonesia with the aim of improving welfare and equitable development, especially from densely populated areas to less densely populated areas.



Executive summary

Indonesia is the world's largest producer of palm oil, a substance used in thousands of everyday items including food stuffs, cleaning products, shampoo and as a biofuel.

Indonesian exports of palm oil and related products were worth almost \$28 billion in 2024.

The Fangiono family, through various family members, is linked to a multitude of palm oil companies in Indonesia. This report outlines the most urgent and ongoing alleged violations by these companies, as of 2025. The companies featured have been accused of deforestation, land-grabs, corruption, operating without proper permits and conflicts with local and indigenous people, with evidence suggesting these are continuing and even expanding issues.

Cases studies span Sumatra, Kalimantan and Papua – regions which not only represent different ecological zones but also host distinct indigenous populations and present different legal and political challenges.

The family is led by its patriarch – known by his first name, Martias – who was convicted in 2007 of obtaining palm oil permits through bribery and corruption. He was fined more than \$38 million and jailed for one-and-a-half years.

Today, the Fangiono family operates several major corporate groups, including First Resources, FAP Agri and

Ciliandry Anky Abadi, with Martias' relatives having key positions in these groups.

However, there have been numerous reports by NGOs over the years exposing the opaque corporate layers of the family's companies and alleging control of a network of shadow companies accused of dubious practices, such as deforestation and violating communities' rights.

Such charges have been largely denied by First Resources and FAP Agri, both of which have sustainability policies. But some prominent brands, including Unilever and PepsiCo, are reported to have suspended sourcing palm oil from them due to such allegations.

In this report, Kaoem Telapak (KT) and the Environmental Investigation Agency (EIA) outline how the number of companies linked to the family continues to grow and present ongoing allegations of illegal activities, human rights violations and environmental destruction connected with them, while asking how they can continue to act with impunity.

Above: Oil palm trees (*Elaeis guineensis*) grow in tropical countries like Indonesia and produce palm oil - one of the world's most versatile vegetable oils.



Key recommendations

To address the ongoing alleged legal violations, environmental degradation and human rights abuses associated with palm oil companies linked to members of the Fangiono family, the Indonesian Government, buyers, investors and certification bodies must investigate and take appropriate action.

For the Government of Indonesia:

- **Strengthen legal enforcement** – Ensure investigation and prosecution of any violations found and address systemic weaknesses that can allow companies to operate without valid permits or through corrupt practices
- **Protect indigenous and customary land rights** – Formally recognise and safeguard the land rights of indigenous peoples and local communities affected by palm oil and other operations
- **Halt forest and land conversion** – Stop illegal clearing, implement the moratorium on new permits in peatlands and primary forests and require environmental restoration where land is illegally or unethically degraded
- **Enforce social obligations** – Guarantee community consultation, smallholder schemes and benefit-sharing through corporate social responsibility (CSR), with mechanisms for grievance redress.

For certification schemes:

- **Improve certification integrity** – Strengthen certification by revoking credentials for violators, enhancing assurance and complaint systems and ensuring transparency.

For companies, financiers, buyers and other stakeholders:

- **Improve sourcing and investment due diligence** – Assess and respond to the serious, ongoing nature of the alleged violations and take into account the potential risks posed by the alleged interconnectedness of Fangiono-linked corporate groups
- **Ensure compliance with international regulations** – Align operations with global standards for human rights and environmental protection such as the EU Deforestation Regulation and the principle of Free, Prior and Informed Consent (FPIC) and build transparent supply chains
- **Ensure legal operations and environmental and social protection** – Ensure compliance with all legal requirements, end deforestation and peatland destruction and uphold indigenous and local community rights and fair and transparent partnerships.

Above: Indonesia is the world's third most forested tropical country, but it has lost huge areas of forest for oil palm plantations and other commodities.

Case highlights

Companies	Alleged Violations
Location: Riau	
PT Setia Agrindo Lestari, First Resources	<ul style="list-style-type: none"> Operating without HGU (land rights permit) since 2013 on part of its area Overlapping with deep peatland and PIPPIB (new permit moratorium zone) Failure to fulfil plasma and Corporate Social Responsibility (CSR) obligations – community protests in 2025 Continued operations despite an official cessation order in 2014 River pollution
PT Surya Dumai Agrindo, First Resources	<ul style="list-style-type: none"> Significant discrepancies between official permits and actual land control 114 hectares of land seized by the Forest Area Task Force in 2025 Not fulfilling CSR commitments
3 First Resources subsidiaries and one FAP Agri subsidiary (PT Riau Agung Karya Abadi)	Corruption in connection with obtaining extension of right to cultivate (HGU) licences from the Head of the National Land Agency (BPN) in Riau.
First Resources: PT Ciliandra Perkasa & other subsidiaries	<ul style="list-style-type: none"> Operating without HGU and/or within Forest Areas without the proper permits Forest Area Task Force sought control of companies in March 2025 due to the violations
Location: Kalimantan	
PT Setia Agro Abadi, NBA Group	<ul style="list-style-type: none"> Encroachment on transmigrant land (300ha) since 2015 without legitimate compensation. Renewed dispute in 2025 over 52ha of community-certified land Ranked 8th in forest conversion in 2024 – 607 hectares deforested
PT Karang Juang Hijau Lestari and PT Bulungan Hijau Perkasa, FAP Agri	<ul style="list-style-type: none"> Land acquisition process without proper FPIC Ongoing conflict since 2003 with Dayak Agabag indigenous peoples, including intimidation and repression of indigenous communities PT Bulungan Hijau Perkasa's permit obtained corruptly – part of Martias' corruption case Non-participatory and non-transparent plasma implementation in PT Karang Juang Hijau Lestari ISPO certification despite human rights violations
PT Agrindo Green Lestari and PT Citra Agro Abadi, CAA Group	<ul style="list-style-type: none"> Violation of Government Regulation No. 57/2016: canal construction on deep peatland and damage to peat ecosystems Conflict with indigenous communities Reported to ISPO certification body with no response to date.
Location: Papua	
PT Inti Kebun Sejahtera and PT Inti Kebun Sawit (CAA Group) and PT Sorong Global Lestari	<ul style="list-style-type: none"> Clearing of Moi indigenous land without land rights permit (HGU) or FPIC since 2021 Large-scale deforestation since 2022 – more than 6,000ha – worst deforesters in Indonesia for palm oil Destruction of sago groves belonging to the Klagilit Maburu clan Manipulated plasma scheme – PT Inti Kebun Sejahtera claimed 237ha without written agreement PT Inti Kebun Sejahtera holds active ISPO certification despite numerous violations Concerns around the acquisition of the companies, especially PT Sorong Global Lestari which acquired a former CAA Group company with revoked permit

Introduction and background

Indonesia has the third largest tropical rainforest in the world. It is the world's largest producer of palm oil, with more than 17 million hectares (ha) of plantations² – an area 70 per cent the size of the UK – and exports of palm oil and its derivative products worth approximately \$27.76 billion.³

Palm oil has been responsible for Indonesia losing an estimated three million hectares of forest in the past 20 years.⁴ Although deforestation rates have slowed, palm oil has still been one of the biggest drivers of forest loss in recent years. There are concerns it will increase again given that Indonesia recently proposed 20 million hectares of deforestation for crops.⁵

In Indonesia, the state grants rights to companies to use a designated area of land – 'concessions' – for palm oil cultivation with permits provided and with them being required to follow regulations and abide by applicable laws.

However, Indonesia's palm oil sector continues to be marred by persistent legal violations, ecological destruction and socio-economic injustices, particularly in areas inhabited by indigenous peoples and local communities (IPLCs), due to weak land tenure security and the vulnerability of IPLC to powerful corporate interests. Despite growing attention from the public and civil society, accountability and enforcement mechanisms are still lacking, allowing destructive business practices to continue.

Tenurial conflicts remain a persistent issue, often marked by disputes between companies and communities over land ownership and access rights. Companies are required to consult with affected communities prior to starting development, but there can be little oversight of this and conflict with local communities is common.

While the Indonesian Constitution and laws such as the Agrarian Law recognise the rights of indigenous peoples, weak implementation and enforcement of customary land ownership leaves indigenous communities vulnerable to land-grabbing and coercive negotiations. The gap between legal recognition and practical enforcement exposes communities to the continued loss of their ancestral lands and resources without consent, compensation or access to remedy.



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Reports indicate that Indonesian companies have often began operations without securing full legal permits, including forest release decrees and cultivation rights (HGU), or without proper FPIC, violating international human rights standards.⁶ As affirmed in Constitutional Court Decision No. 138/PUU-XIII/2015, land clearing and the commencement of plantation cultivation activities may only be carried out once a company holds both a Right to Cultivate (HGU) and a Plantation Business Permit (IUP).⁷

The situation has worsened since Indonesia's 2020 Omnibus Law (also known as the Job Creation Law) which changed many laws and regulations at once and is perceived to have weakened environmental and social safeguards in the business permitting process.

Although concessions allocated before July 2018 must still follow the previous permitting process, it introduced amnesties for companies operating without all the required permits.⁸ The Omnibus Law has been highly controversial, facing criticism for reducing workers' rights and favouring businesses at the expense of local communities and the environment.

Based on the decision of case number 168/PUU-XII/2023, the Constitutional Court (MK) stated that the formation of the Omnibus Law, especially in some articles related to labour, was declared unconstitutional. In 2024, the Constitutional Court also decided to improve the UUCK regarding the regulation of workers' rights, although this has not yet been fully implemented.⁹

Above: Oil palm plantations are often described as monocultures because they consist of a single crop planted in uniform rows, leading to reduced biodiversity.



The Fangiono family business empire

Various members of the Fangiono family have been linked - through them being ultimate owners, beneficiaries or directors - to a sprawling network of companies primarily engaged in palm oil, timber and, more recently, large-scale Food Estate developments in Indonesia.

These companies operate through several major corporate groups, including:

- First Resources
- FAP Agri
- Ciliandry Anky Abadi (CAA)
- PT Surya Dumai Industri (SDI)
- New Borneo Agri (NBA), also referred to as the Sulaidy companies
- Merauke Sugar Group.

Founding and early expansion: The Surya Dumai Group (SDG)

At the centre of the family network is Martias, a major player in Indonesia's timber and palm oil sectors since the 1980s. He founded PT Surya Dumai Industri (SDI),¹⁰ which grew into the Surya Dumai Group (SDG) - a loosely connected set of companies involved in timber and plantation development.¹¹

Martias' empire faced a major setback following his high-profile corruption trial when he was jailed and fined

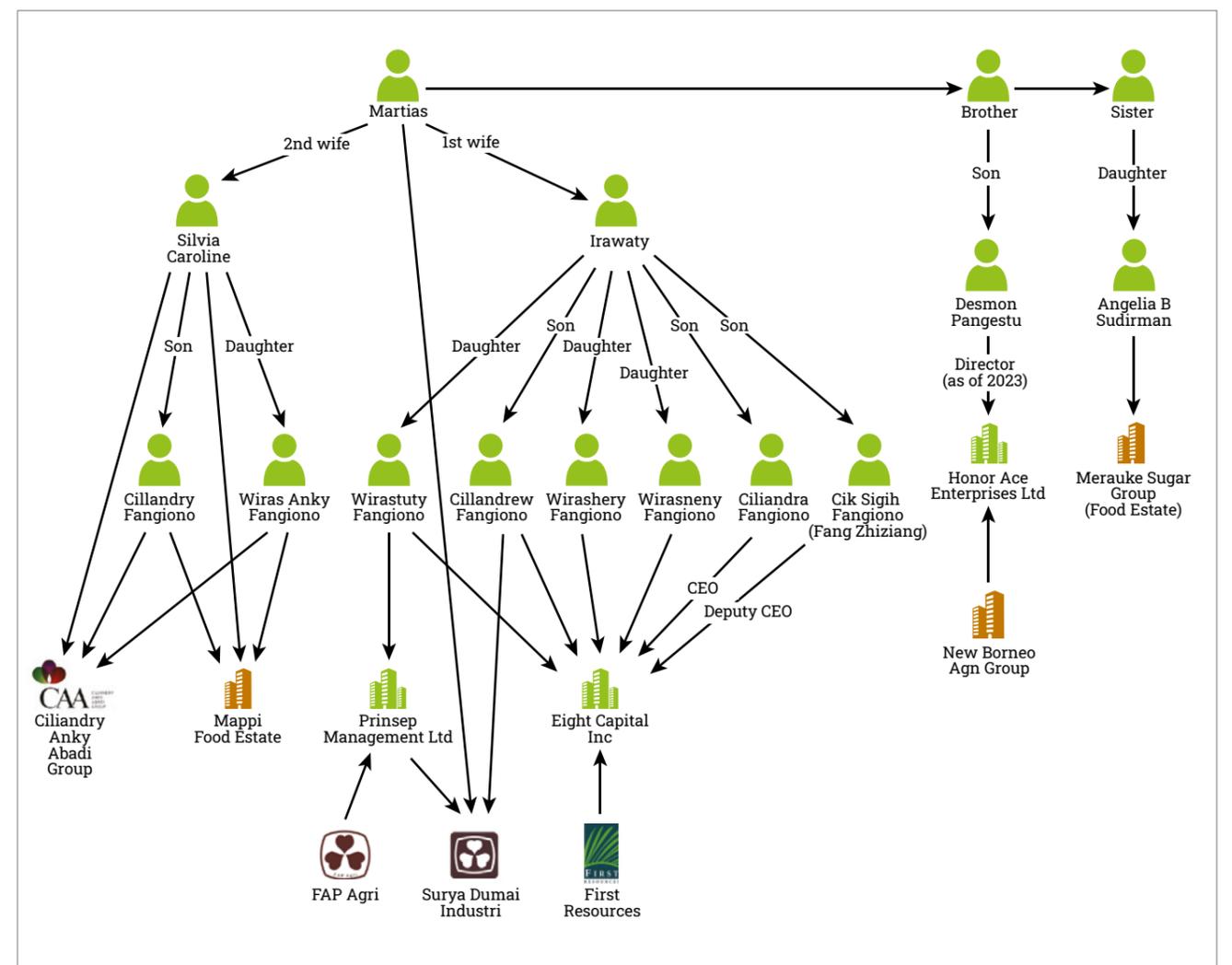
in 2007.¹² He had been found guilty of bribing officials to obtain permits for 11 palm oil concessions in East Kalimantan in the early 2000s, in which forests were cleared for timber extraction. The following year, PT SDI was delisted from the Indonesian Stock Exchange.¹³

Post-conviction restructuring and diversification

In response to the case - first reported to the Indonesian Corruption Eradication Committee (KPK) in 2004,¹⁴ with the court verdict in 2007 - SDG companies were restructured, with ownership transferred to other companies/groups, offshore entities or to other family members.

Although the KPK attempted to seize and auction off 19 SDG assets, including three subsidiaries of First Resources, to enforce the court's fine, Martias paid the fine in 2008 before asset seizure could be tested legally.¹⁵ Despite the conviction, many of the 11 companies involved in the court case continued operations - five became subsidiaries of FAP Agri and one a subsidiary of First Resources.¹⁶

Opposite page, bottom: Key Fangiono groups and family members



Key successor groups

Following Martias' conviction, members of the Fangiono family have retained and even expanded their corporate influence across Indonesia's palm oil and agribusiness sectors.

Through strategic restructuring, offshore ownership and transfer of control to other family members, the business empire has continued. Multiple successor groups now operate with significant land holdings and market presence:

1. First Resources Ltd

- **Origins:** main subsidiary is PT Ciliandra Perkasa, a former SDG company¹⁷ established in 1992,¹⁸ Singapore company established in 2004¹⁹
- **Listed:** Singapore Stock Exchange in 2007
- **Ownership:**²⁰
 - Controlling shareholders: Eight Capital Inc, whose ultimate beneficiaries are Martias' six children from his first marriage²¹
 - Leadership: two of Martias' sons – Ciliandra Fangiono (CEO and Executive Directive), Fang Zhixiang (Deputy CEO and Executive Director)
- **RSPO membership:** Joined in 2008
- **Locations:** East Kalimantan, West Kalimantan, Riau, Sumatera, Papua (with the acquisition of ANJ)

2. FAP Agri Group

- **Origins:** established in 2004; formerly named PT Fangiono Agri Plantation; group includes numerous SDG companies, including some that were part of the corruption trial;²² became majority owned by an offshore company in the British Virgin Islands in 2006.²³
- **Listed:** Indonesian Stock Exchange in 2021
- **Ownership:** Majority held by an offshore company; ultimate shareholder revealed as Wirastuty Fangiono, Martias' eldest daughter, in 2021.²⁴
- **Locations:** East Kalimantan, West Kalimantan, Riau

3. Ciliandry Anky Abadi (CAA) Group

- **Origins:** founded by Martias and his second wife, Silvia Caroline. After Martias' conviction, PT Ciliandry Anky Abadi (CAA) became majority owned by an offshore holding company in 2008²⁵



- **Ownership:** majority owned by Silvia Caroline and her two children with Martias (Ciliandry Fangiono and Wiras Anky Fangiono).²⁶
 - **Locations:** Riau, Kalimantan, Papua
- ### 4. PT Surya Dumai Industri (SDI)
- **Ownership:** remains a company where Martias still holds a large stake²⁷
 - **Legacy:** The original company of the Surya Dumai Group which was at the heart of the corruption case, although now largely peripheral to newer entities
 - **Listed:** delisted from Indonesian Stock Exchange in 2008

Additional groups

5. New Borneo Agri (NBA) Group:

- **Formerly:** also known as the Sulaidy companies. Up until 2017 an individual called Sulaidy – who has long-time connections with various Fangiono family companies – held most of the shares.²⁸
- **Ownership:** majority owned by an offshore holding company in the British Virgin Islands – its director was revealed to be Martias' nephew - Desmon Pangestu in 2023. Director of the company as of 2024 is Sulaidy.²⁹
- **Location:** Kalimantan

6. Merauke Sugar Group:

- **Ownership:** ultimate majority shareholder is Martias' niece, Angelia B. Sudirman³⁰
- **Location:** Merauke (Food Estate companies), South Papua

Recent acquisitions and expansion of influence

Food Estate Projects: massive land takeover

Some members of the Fangiono family have recently been revealed to be involved in National Strategic Projects (Proyek Strategis Nasional, or PSN) which pose significant threats to forests and local communities, in:

- Merauke Regency – sugarcane
- Mappi Regency – sugarcane and corn
- Sorong Regency (proposed) – palm oil.

The companies that are part of the **Merauke Food Estate** are linked to the Fangiono family through Martias' niece, **Angelia B. Sudirman**, being the ultimate majority shareholder.³¹ The **Mappi Food Estate** companies³² the companies of the **proposed Sorong Food Estate**, as well as one of the Merauke Food Estate companies', majority shareholders are ultimately **Silvia Caroline** and her and Martias' two children.³³

These projects form part of Indonesia's **Food and Energy Estate program**, a Government initiative aimed at increasing national self-sufficiency including in rice, sugar and bioethanol. Multiple existing regulations and protections can be overridden for National Strategic Projects.³⁴

Such projects are not new. Former Indonesian governments have tried to establish such estates in the region which have been met with fierce opposition and described as "ecologically induced genocide".³⁵

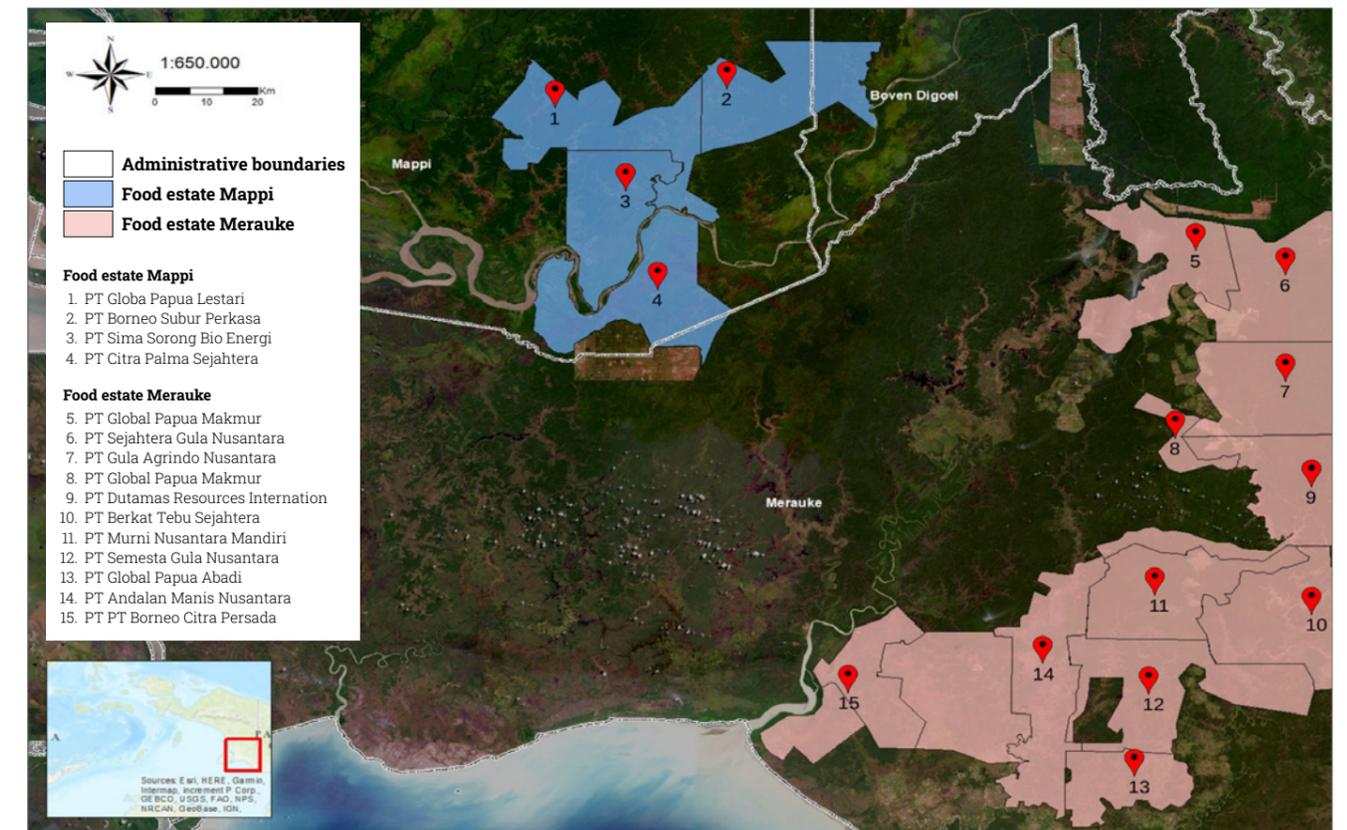


These estates span millions of hectares and threaten huge deforestation and conflict with indigenous communities in the area. Forest clearing has already begun in the Merauke Food Estate, notably in the concession PT Global Papua Abadi.

Other acquisitions

Companies held by various members of the family have also recently increased their operational presence in the **Southwest Papua region**, notably through the Ciliandry Anky Abadi (CAA) Group and its holding companies expanding their palm oil footprint and through **Angelia B. Sudirman** owning concessions for **carbon trading**,³⁶ raising further concerns about deforestation and community displacement (see *Papua section* for more detail).

Map: Merauke and Mappi Regency Food Estates





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The expansion strategy also continues through key acquisitions led by **First Resources Ltd**, further increasing their presence in Indonesia's palm oil sector:

- **late 2024:** First Resources acquired **17,600ha of oil palm land** from **PT Tri Bakti Sarimas in Riau**
- **May 2025:** First Resources completed the **acquisition of 91.17 per cent of PT Austindo Nusantara Jaya Tbk (PT ANJ)**,³⁷ a major palm oil producer with more than 150,000 hectares, including in North Sumatra, Belitung, West Kalimantan and South West Papua³⁸ and listed on the Indonesian Stock Exchange.

These acquisitions reflect ongoing expansion by various family members and associated corporate groups in the palm oil industry and beyond.

Links between the Fangiono companies

Despite efforts to present the Fangiono family's corporate groups as distinct and independent entities, there has been a growing body of evidence, as documented by NGOs, suggesting enduring linkages between First Resources, FAP Agri, New Borneo Agri (NBA), Ciliandry Anky Abadi (CAA), and Surya Dumai Industri (SDI), both historically and recently.

These connections raise serious concerns about transparency, accountability and the integrity of corporate disclosures.

Key evidence suggesting linkages includes:

As documented by NGOs, including Greenpeace and the Forest Peoples Programme (FPP):³⁹

- **shared business addresses**, including as recently as 2016-17 that CAA, FAP Agri, SDI and NBA group companies used the same address as PT Ciliandra Perkasa, the primary subsidiary of First Resources⁴⁰
- **overlapping personnel**, including in **management and shareholder roles**, across companies affiliated with different Fangiono family groups
- **Wirastuty Fangiono** being the ultimate shareholder of FAP Agri and an ultimate beneficiary in **First Resources**.

Above: Indonesia's forests are home to thousands of unique species of plants and animals and support millions of livelihoods.

As documented by the Gecko Project, a non-profit entity:⁴¹

- testimonies from previous employees (2011 and 2022) describing **First Resources, FAP Agri and NBA** as effectively part of the **same corporate group**
- **Aprinia Anggela**- being named as a **legal representative** for the owners of the **NBA companies** and as a **First Resources' employee**
- **Desmon Pangestu**, Martias' nephew, simultaneously listed as an **employee of First Resources** and the sole **director** of the main holding company for the **NBA Group**.

As documented by the news portal *Tempo*:

- In 2024, both **Martias and Wirastuty Fangiono** were reportedly present at the launch of a Food Estate concession in Merauke,⁴² operated by a company whose ultimate majority shareholder is Angelia B. Sudirman.

First Resources has publicly stated that concessions operated by other Fangiono-linked companies are not its subsidiaries nor associated companies and that it does not have ownership or management stakes in them, notably in CAA and NBA.⁴³

FAP Agri also responded similarly regarding First Resources to the Gecko Project article.⁴⁴ However, the breadth and consistency of evidence strongly suggests the groups have been and still may be inter-linked.

The Gecko Project has noted that nobody formally associated with the New Borneo Agri companies, including Desmon, Aprinia, the shareholders of Honor Ace Enterprises and Sulaidy himself, responded to its requests for comment, nor did CAA.⁴⁵

While both First Resources and FAP Agri have public sustainability policies,⁴⁶ the other groups do not. In response to such allegations, a number of buyers, including P&G, PepsiCo and Unilever, have suspended buying from First Resources.⁴⁷

NGOs have suggested that the frequent changes in addresses, ownership structures and company personnel across the groups may make it more difficult to establish links between companies and to conduct effective scrutiny.⁴⁸

RSPO Complaint

A complaint was filed to the RSPO in 2021 alleging that First Resources has ownership, control and influence over other companies which are effectively shadow companies in violation of the RSPO's Group Membership rules.⁴⁹

The RSPO finally reached a decision on 1 August 2025. The RSPO Complaints Panel has imposed a sanction in the form of a three-month suspension of RSPO membership due to First Resources failing to provide clarity and transparent information on its relationships with the other groups as part of the complaint process. While the complaint has not found that First Resources had control of FAP Agri, Ciliandry Anky Abadi or New Borneo Agri this is hardly surprising as it was limited by:

- the RSPO's membership rules and it seemingly relying on the formal ownership structures of the companies, as opposed to other evidence too, to identify control;
- some of the companies being owned by British Virgin Islands' companies, whose ownership structure and beneficial ownership information is not publicly available, as the RSPO notes; and
- the RSPO not being well set up to deal with hidden, shadow corporate structures with previous cases resulting in similar outcomes.⁵⁰

Both the complainant and First Resources have 60 days from the decision date to appeal.

Right to reply: First Resources and FAP Agri

KT and EIA asked the companies for a response to concerns that some of its employees, directors, shareholders and their associates are involved in other companies or groups and how it was mitigating the risks.

First Resources referred to its previous responses to other reports and also added that: *"We acknowledge that the recent allegations bear similarities to a case currently under review through the RSPO complaint system (Complaint Reference: RSPO/2021/04/EN). While we are still awaiting the outcome of this complaint, First Resources has continued to meticulously adhere to and respect the processes set out by the RSPO, maintaining full cooperation throughout. We kindly request all parties to respect the ongoing process and await the results before drawing conclusions or making any claims."*

FAP Agri replied that it was publicly listed on the Indonesian Stock Exchange and was governed by its regulations and Indonesian law, stating: *"The company is managed by an independent team of professionals and has no legal, financial, or operational affiliation with the parties mentioned in your letter, including the First Resources Group."*

CASE STUDIES

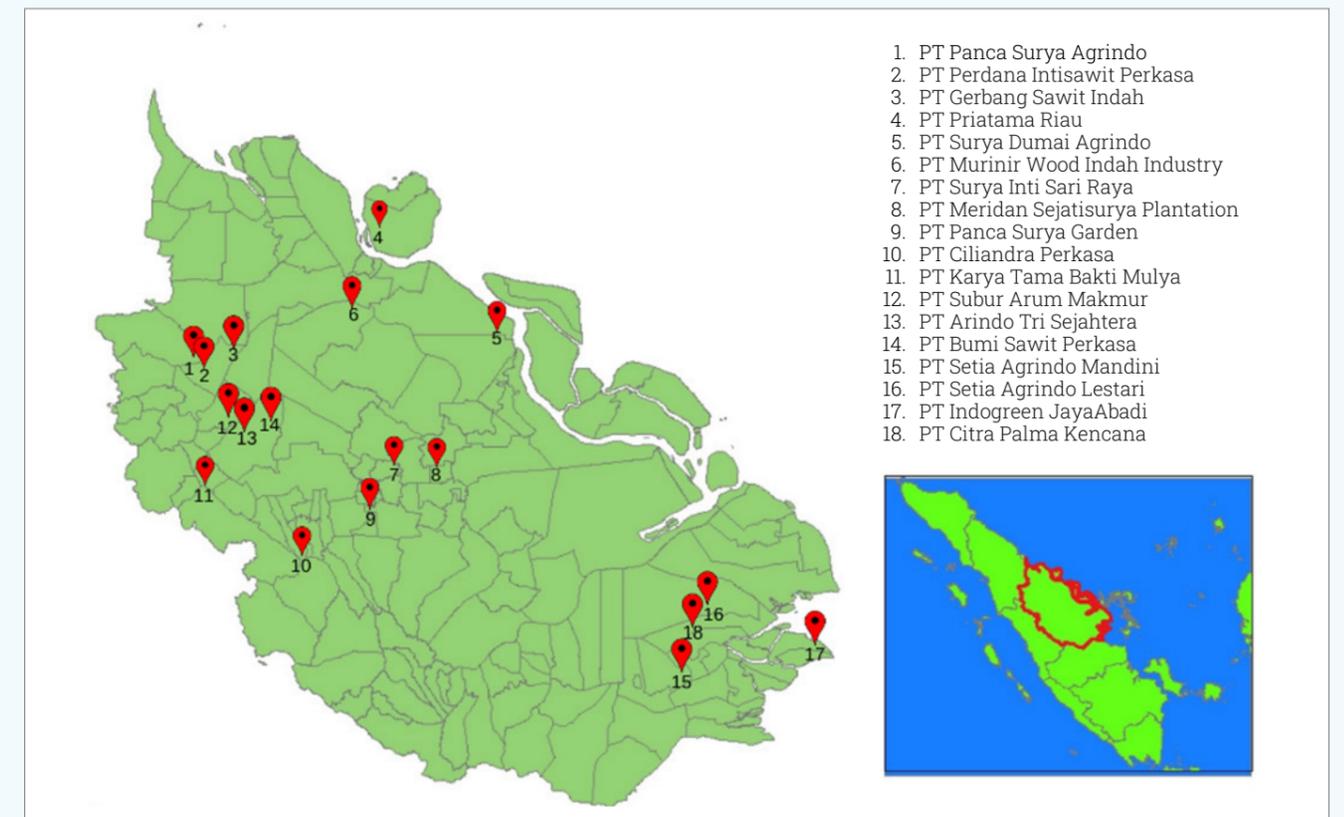
A. Riau, Sumatra

Riau Province, located on Sumatra Island, is the largest palm oil-producing region in Indonesia, hosting 238 oil palm plantation companies as of 2023.⁵¹ Of these, 219 are large-scale private companies which collectively control more than one million hectares of land. Overall Sumatra accounts for 53.5 per cent of Indonesia's palm oil plantation companies.⁵²

First Resources operations in Riau

First Resources (FR) is one of the largest groups operating in Riau, with at least 18 subsidiaries operating oil palm plantations. Six of these subsidiaries are certified under the RSPO.⁵³ However, serious alleged legal and regulatory violations have recently been linked to its operations, raising urgent concerns.

Map: Location of the First Resources subsidiaries in Riau





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Alleged corruption in the permitting process

During the 2023 corruption trial of Muhammad Syahrir, the former Head of the Riau Land Agency (BPN), an individual reportedly working for First Resources, Suhartono, was a witness. Syahrir reportedly received money from companies for land rights management, including from Suhartono in relation to the management of First Resources HGU extensions for four companies, according to the court's official decision, media reports and monitoring of the trial by non-profit organisation Senarai.⁵⁴

Suhartono processed new HGU applications for PT Riau Agung Karya Abadi in 2020, PT Perdana Inti Sawit Perkasa in 2021 and HGU extensions for PT Surya Intisari Raya in 2021⁵⁵ and PT Meridan Sejahtisurya Plantation in 2022. Suhartono is stated to have known M. Syahrir since his inauguration as Head of the Regional Office of BPN Riau. Suhartono stated in the BAP (Berita Acara Pemeriksaan/Inspection Report): 'That I once knew about the company giving something in the form of facilities or money or other goods to Muhammad Syahrir or other Riau BPN Parties'.

Syahrir was sentenced to 12 years in prison for accepting bribes from multiple companies in exchange for permits.⁵⁶ While no charges are known to have been brought against Suhartono, it is of note that, according to the sources, the four companies involved are First Resources' subsidiaries, despite one of these actually being a FAP Agri subsidiary.

Above: Suhartono testifies in the trial of M. Syahrir at the District Court for Corruption Pekanbaru.

Opposite page: Oil palm fruits are harvested and processed at mills, where they are crushed to extract palm oil.

Alleged illegal operations in Forest Areas and without permits

In March 2025, Indonesia's Forest Area Task Force – established to crack down on illegal land use in Forest Areas – allegedly moved to seek control of parts of 14 First Resources subsidiaries, according to news agencies, one of which reportedly contacted the Head of the Attorney General's Office's Legal Information Centre, as they were found to be:⁵⁷

- operating in Forest Areas without forest release permits and/or
- lacking valid HGU permits.

This allegedly includes PT Ciliandra Perkasa – First Resource's main subsidiary – which lacks a legally required HGU permit for part of its planted area.⁵⁸

An official decree by the Indonesian Ministry of Forestry shows the extent to which a number of First Resources' subsidiaries, as well as other companies, have been operating illegally in Forest Areas.⁵⁹

Although the Government is seeking to legalise some areas (through a controversial amnesty program introduced via the Omnibus Law),⁶⁰ it has rejected other areas from being legalised and is acting on them through its Task Force.

The action taken by the Task Force appears to follow on from a local association in Riau raising concerns in February 2025 that First Resources is not operating in accordance with the correct procedures and permits and that this could potentially amount to tax evasion amounting to 1.4 trillion IDR (approximately \$85 million).⁶¹

Right to reply: First Resources

KT and EIA asked First Resources how it responded to allegations of bribery in the HGU licensing process and whether it had conducted its own internal audit into the allegations.

The company replied that it adheres to all Governmental procedures and regulations related to the processing of HGUs, adding that it had: "Developed and implemented the Anti-Bribery, Corruption and Money Laundering Policy, which further reinforces its commitment to running its business operations on a foundation of integrity, transparency and honesty. The Company adopts a zero-tolerance policy towards any forms of bribery, corruption or money laundering in its business and the policy sets out the responsibilities of the group, its employees and stakeholders in observing and upholding this position."

Asked whether First Resources admitted that a number of its subsidiaries managed land without full HGU and/or within forest areas without area release permits, the company replied that it has complied with the legal requirements set by the Government: "Including the possession of Location Permits (Izin Lokasi), Plantation Business Permits (Izin Usaha Perkebunan/IUP), and/or Land Use Rights (Hak Guna Usaha/HGU).

The company added: "In the event of any discrepancies concerning plantation licensing, Law No. 11 of 2020 on Job Creation (commonly referred to as the "Omnibus Law") and Government Regulation in Lieu of Law (PERPU) No. 2 of 2022, along with their implementing regulations provide clear legal pathways for resolution."

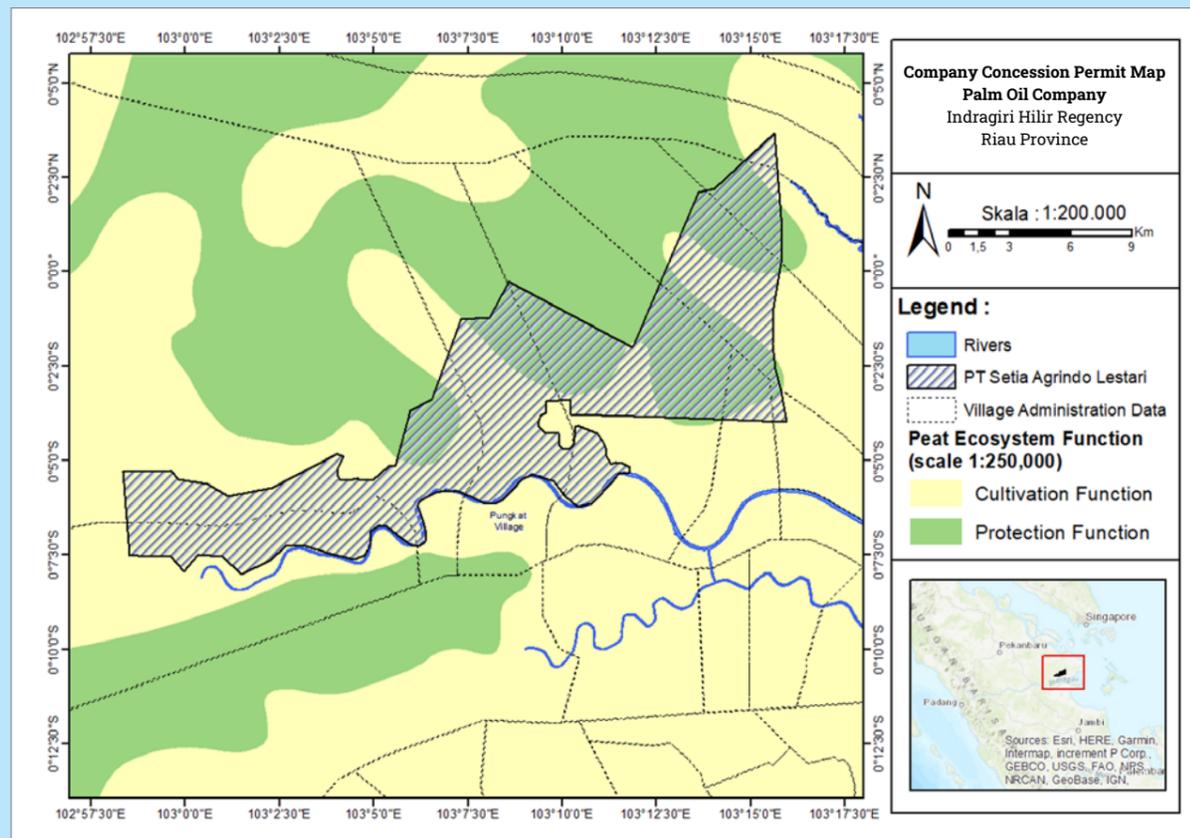


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Case Study 1: PT Setia Agrindo Lestari (First Resources)

Location: Simpang Gaung, Gaung District, Indragiri Hilir Regency, Riau Province
Concession Area: 17,095 hectares
Certification: none known

Map: PT Setia Agrindo Lestari concession with peat ecosystem function



Key alleged violations:

- **no full Right to Cultivate (HGU):** PT SAL has, as long documented by NGOs and media reports, operated without a HGU permit for part of its area since 2013⁶²
- **continued operations despite calls for cessation:**
 - temporary suspension was issued by the local government in 2014, but PT SAL continued its operations
 - formal letter of rejection sent by the residents of Pungat Village to the Ministry of Agrarian Affairs and Spatial Planning/National Land Agency (ATR/BPN) in 2018.⁶³
- **overlap with peatland areas:**
 - the concession has previously been reported as lying on deep peatland (>3m) that should have been protected as outlined on the Indicative Map for the Postponement of New Permits (PIPIB) at the time⁶⁴

- First Resources previously responded in 2016 that PT SAL does not lie within the moratorium zone.⁶⁵ However, according to the NGO WALHI (the Indonesian Forum for Living Environment) it did in 2013 when the company was operating.⁶⁶ A key issue raised by NGOs with the PIPIB map has been weak enforcement and companies getting their areas excluded, with the map revised every six months.⁶⁷ First Resources' has again responded that: "PT SAL's operational area does not overlap with the latest Peta Indikatif Penghentian Pemberian Izin Baru (PIPIB)."
- **river pollution:** PT SAL has been accused of contamination of the Rawa River, a vital water source:
 - First Resources previously responded that PT SAL made some improvements following a visit by the Ministry of Environment to evaluate water conditions in 2015⁶⁸
 - media reports, however, allege continuing river pollution in 2018.⁶⁹

Unfulfilled community obligations – 2025 protest

The company PT SAL allegedly has an ongoing conflict with villagers over a plasma scheme and the sharing of profits from the scheme.⁷⁰

The conflict supposedly started with farmers handing over land for partnership in 2014 but, after the land was planted and the crops had borne fruit, the farmers did not receive the proceeds from their crops.

Since then, representatives have reportedly continued to demand their rights. In 2023 it was reported that three farmer groups reported PT SAL to the Indonesian Business Competition Supervisory Commission (KPPU).⁷¹

Below: oil palm plantations can span huge areas replacing the native vegetation and causing conflict with the local people that live there.



Right to reply: First Resources

KT and EIA asked First Resources whether it acknowledged PT SAL was operating with a HGU license, if it had a official cancellation document for the 2014 operation termination order, what environmental recovery it had taken in relation to the alleged river pollution and damage to peatlands and whether it has fulfilled its CSR and plasma obligations.

First Resources confirmed PT SAL is still currently in the process of the obtaining the HGU license emphasizing that: "the HGU application is a multi-stage and collaborative process, requiring close coordination with various government authorities, and may therefore take a significant amount of time."

On 15 March 2025, residents of Lahang Hulu Village held a public protest against PT SAL, according to media reports, demanding:⁷²

- fulfilment of promised plasma partnerships and corporate social responsibility (CSR) programmes
- transparency in partnership agreements
- active community involvement in planning and implementation
- a full review of the company's operational license.

The media reported that to date there has been no official response from PT SAL or the local government to the latest developments.

Following the 2014 termination order, it stated that: "PT SAL engaged in meetings and discussions with the relevant government agencies to clarify the situation and to ensure continued compliance with applicable regulations."

On environmental recovery, it responded that it undertakes regular management and monitoring activities in line with relevant regulations and applies best management practices. It further stated CSR is part of its commitment to communities and it is fully committed to supporting the plasma program at PT SAL, specifically that "the plasma program for the community of Lahang Hulu Village has been realized and is currently operational."

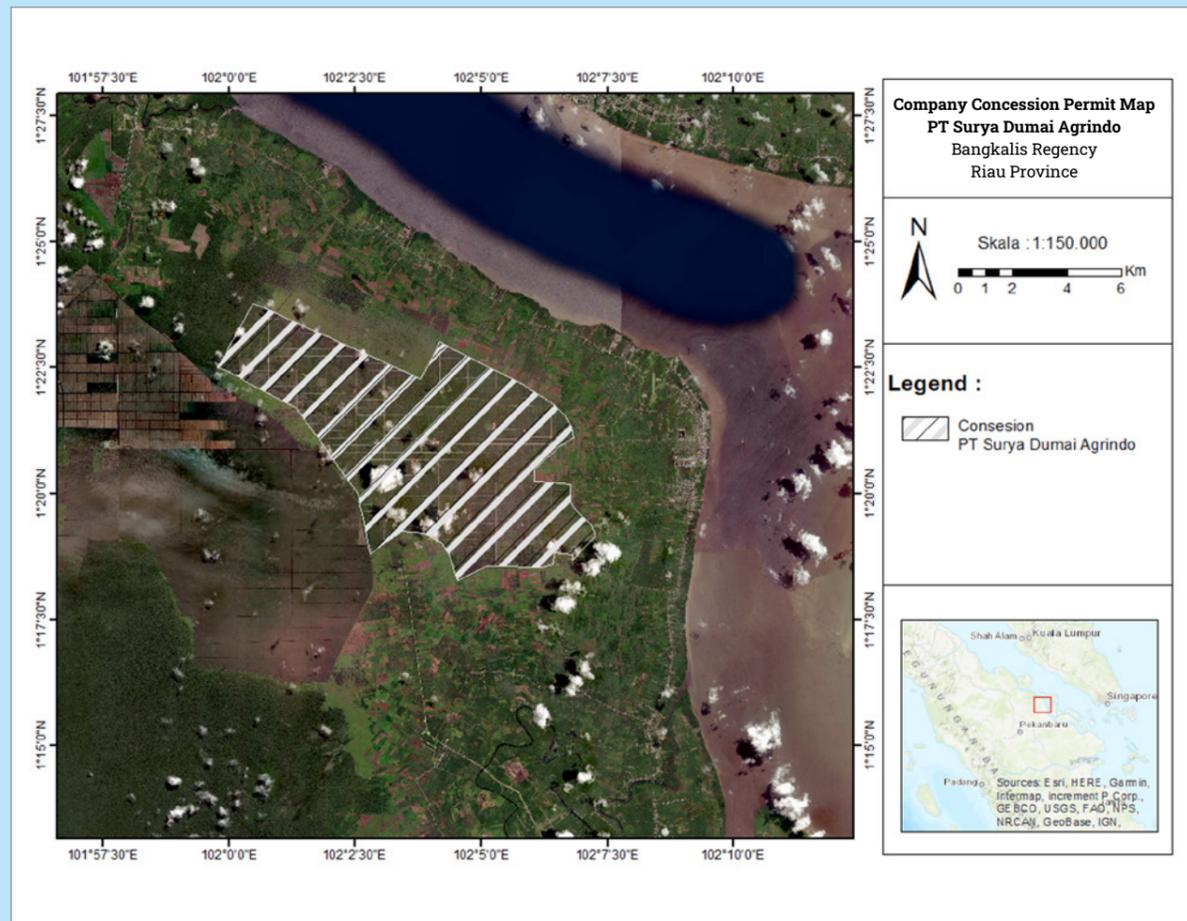
Case Study 2: PT Surya Dumai Agrindo (First Resources)

Location: Sungai Pakning, Bukit Batu District, Bengkalis Regency, Riau

Concession Area: 18,139 hectares

Certification: Applying for ISPO certification⁷³

Map: PT Surya Dumai Agrindo concession



Key alleged violations:

- operating and permit inconsistencies:
- allegedly operating in areas beyond its HGU permit area
- 114 hectares reportedly seized by the Forest Areas Task Force in March 2025 as still in Forest Area.
- not fulfilling CSR obligations: allegedly the company has not paid CSR to communities since 2011, as legally required.⁷⁴

Permit discrepancies and illegal use of land

PT SDA allegedly controls land exceeding the limits in its official licensing documents. This follows the BPN-ICI Riau (Indonesian Corruption Investigation National Working Agency - a local NGO in Riau) finding inconsistencies in its permits, including:

Permit Type	Issuer	Area (Ha)
Land Use Rights Title (HGU)	BPN-RI (Decree No. 2/HGU/2011)	6,869.80
Plantation Business License (IUP)	Bengkalis Regent (Letter No. 1449/Disbun/XI/2003)	8,200

The apparent overreach of 1,330.20ha raised concerns about the validity of PT SDA's land control. A formal request for land re-measurement was reportedly submitted by the BPN-ICI to the Head of the Bengkalis Regency Plantation Service on 18 February 2025.⁷⁵

According to media reports, on 4 March 2025 Indonesia's Forest Area Task Force (Satgas PKH) conducted a field operation, uncovering that PT

SDA has cultivated 114 hectares outside of its HGU area that is still in the Forest Area.⁷⁶ The Task Force has reportedly sought control of this area, with it being reported that the BPN-ICI is calling for the prosecution of PT SDA if land law violations are confirmed.⁷⁷

Below: Oil palm plantations may operate outside permit boundaries, with nearby mills processing potentially illegally sourced oil palm fruit.



Right to reply: First Resources

KT and EIA asked First Resources whether it acknowledges that PT SDA has a difference between its HGU area and the area physically controlled and what steps it has taken to address any illegal operations identified by the Task Force, and whether PT SDA is committed to its

CSR obligations and if it has done these since 2011. First Resources stated: "We believe that PT SDA's operational area is within the boundaries of its HGU and/or other relevant permits issued by the government authorities" and reiterated its commitment to CSR.



B. Kalimantan

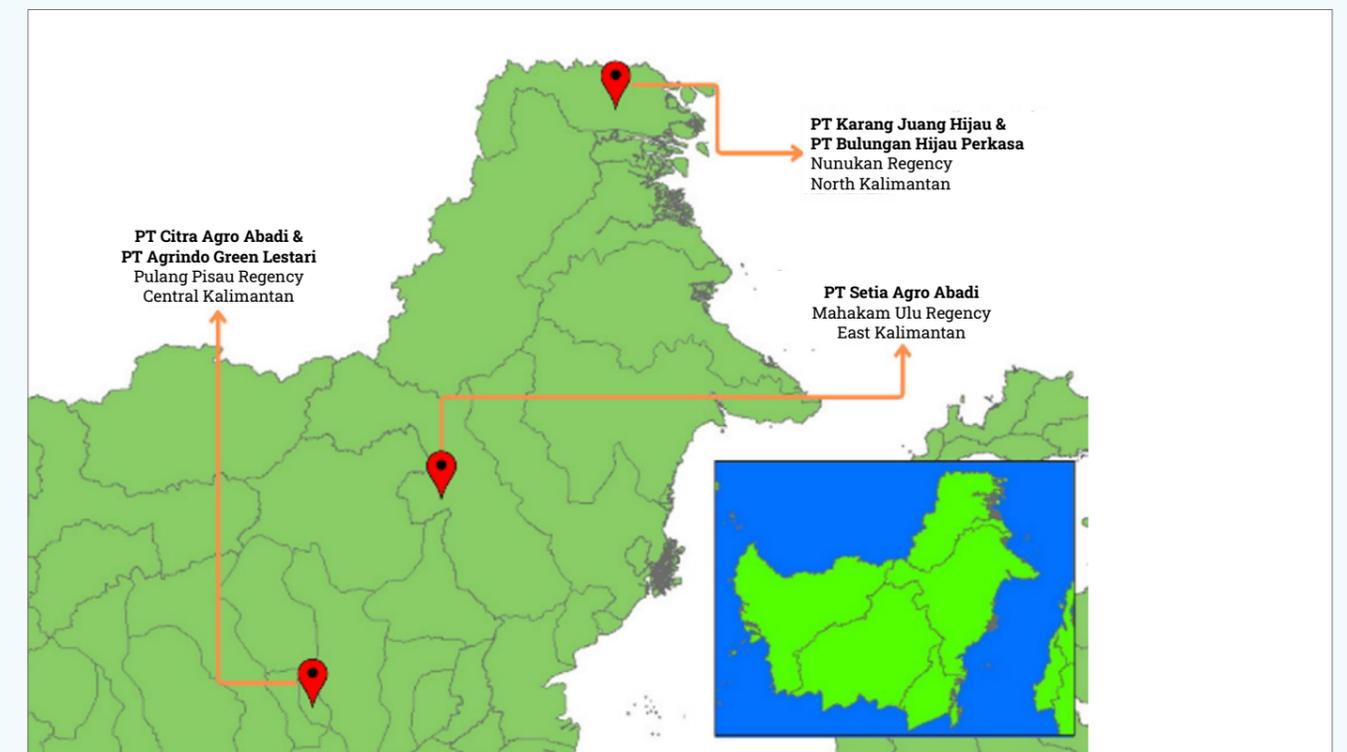
The island of Kalimantan has the second largest number (41.9 per cent) of oil palm plantation companies in Indonesia.⁷⁸ In 2023, the number of oil palm plantation companies in Kalimantan reached 955 plantation companies, of which 941 companies are large private companies that control about 6,402,200ha of land.⁷⁹

Fangiono group presence in Kalimantan

All four major corporate groups that have been linked to Fangiono family members operate in Kalimantan, including:

- First Resources
- FAP Agri
- Ciliandry Anky Abadi (CAA)
- New Borneo Agri (NBA).

Map: Location of case study concessions in Kalimantan



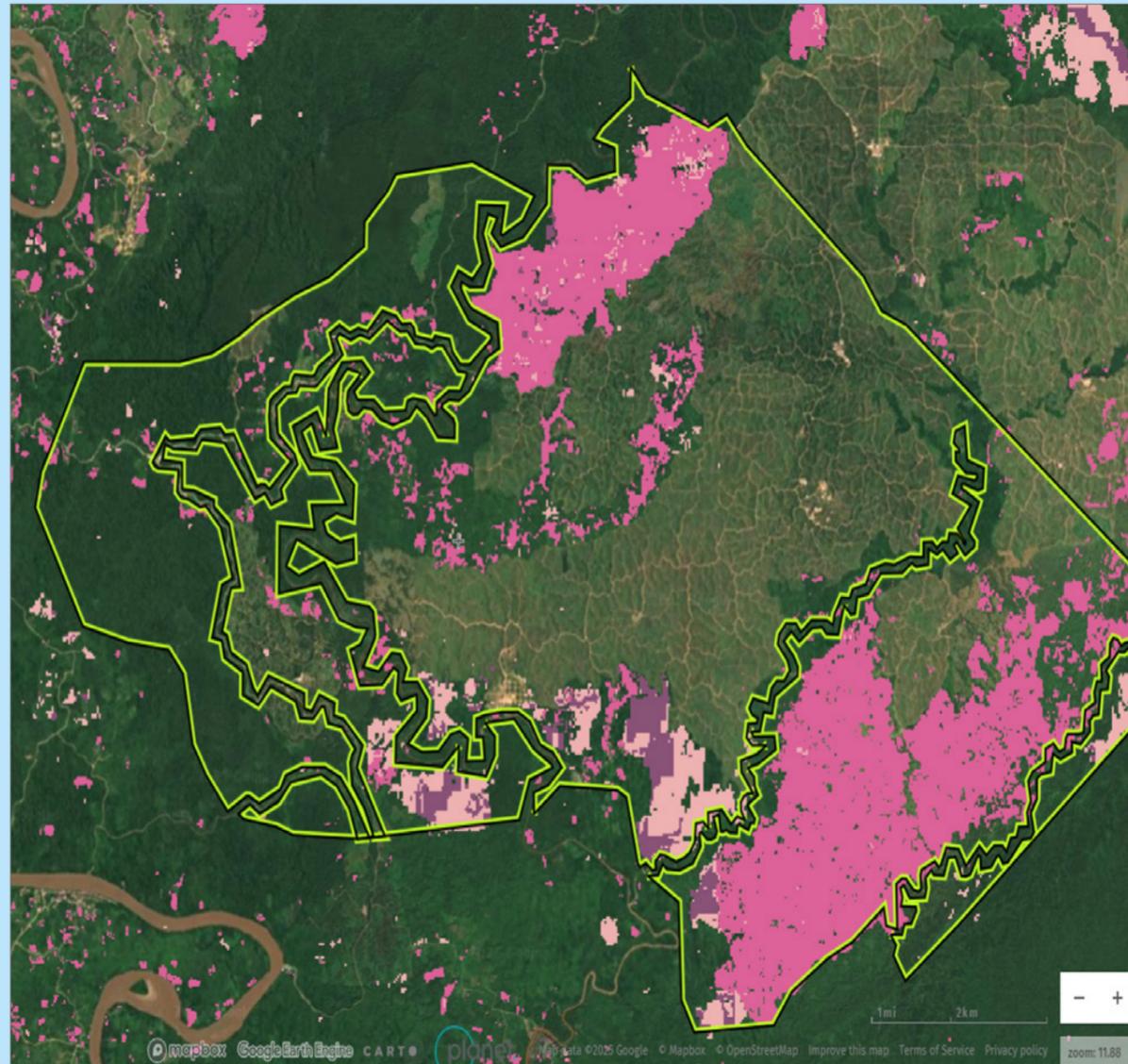
Case Study 3: PT Setia Agro Abadi (New Borneo Agri)

Location: Tri Pariq Makmur Village, Long Hubung District, Mahakam Ulu, East Kalimantan

Concession area: 18,118 hectares

Certification: none

Map: Tree cover lost from 2021 to 2025 (pink) in PT Setia Agro Abadi concession (Global Forest Watch)



Key alleged violations:

• Land-grabbing and community conflict:

- occupation of 300ha of transmigrant land without valid HGU permit, despite the community holding certified land titles. Mediation has been attempted since 2020 with no resolution. The community demands Rp76.5 billion (\$4.5 million) in compensation
- in 2025, 52ha of land with 52 legal ownership certificates were allegedly seized by the

company. Compensation payment was reportedly made by company, but to an unauthorised party.⁸⁰ A special team has been formed by the district government to address the conflict.

- **Deforestation:** in 2024, PT SAA cleared about 607ha of forest, ranking 8th nationally for the worst palm oil companies with deforestation, according to the forest monitoring platform Nusantara Atlas.⁸¹

Land grabbing

PT Setia Agro Abadi (SAA) is suspected of having seized land from the Long Hubung transmigration community, Mahakam Ulu. The community has an official certificate for the land, but the land has allegedly been taken by the company since 2006 and, until now, the company has not responded nor made compensation payments.

The community is understood to have reported the company to Commission I of the Mahulu DPRD (Regional People's Representative Council) since 17 March 2018, but did not get clarity, so on 7 February 2019 it reported the company to the then-Governor of East Kalimantan.⁸² The community again allegedly demanded its rights in 2021 and compensation of 76.5 billion rupiah for 170 hectares of land (at 450 million rupiah per hectare).⁸³

The problem of land disputes reportedly occurred again in 2025. The dispute involved 52 hectares of land owned by the community with 52 valid certificates of ownership. The community supposedly demanded compensation for land which

had allegedly been cultivated by the company without clear compensation.

According to media reports, PT SAA claims to have completed the land payment but the community refutes this and provides a statement that the payment was made instead to an unauthorised party. The Mahakam Ulu (Mahulu) District Government has formed a special team to handle the oil palm land dispute between residents of Matalibaq, Wana Pariq and Tri Pariq Makmur villages and PT Setia Agro Abadi, according to media reports.⁸⁴

PT SAA is one of the companies that will have its performance evaluated this year because it did not report the area of oil palm that had been harvested, the number of harvests and the number of workers involved, including environmental conditions.⁸⁵

No response was received from the NBA Group by KT and EIA in relation to this report.

Below: Oil palm fresh fruit bunches are harvested and transported by trucks to mills for processing



Case Study 4: : PT PT Karang Juang Hijau Lestari and PT Bulungan Hijau Perkasa (FAP Agri)

Location: Sebuku Subdistrict, Nunukan District, North Kalimantan Province

(PT. Bulungan Hijau Perkasa - BHP)

Certification: ISPO (Indonesia Sustainable Palm Oil)⁸⁷

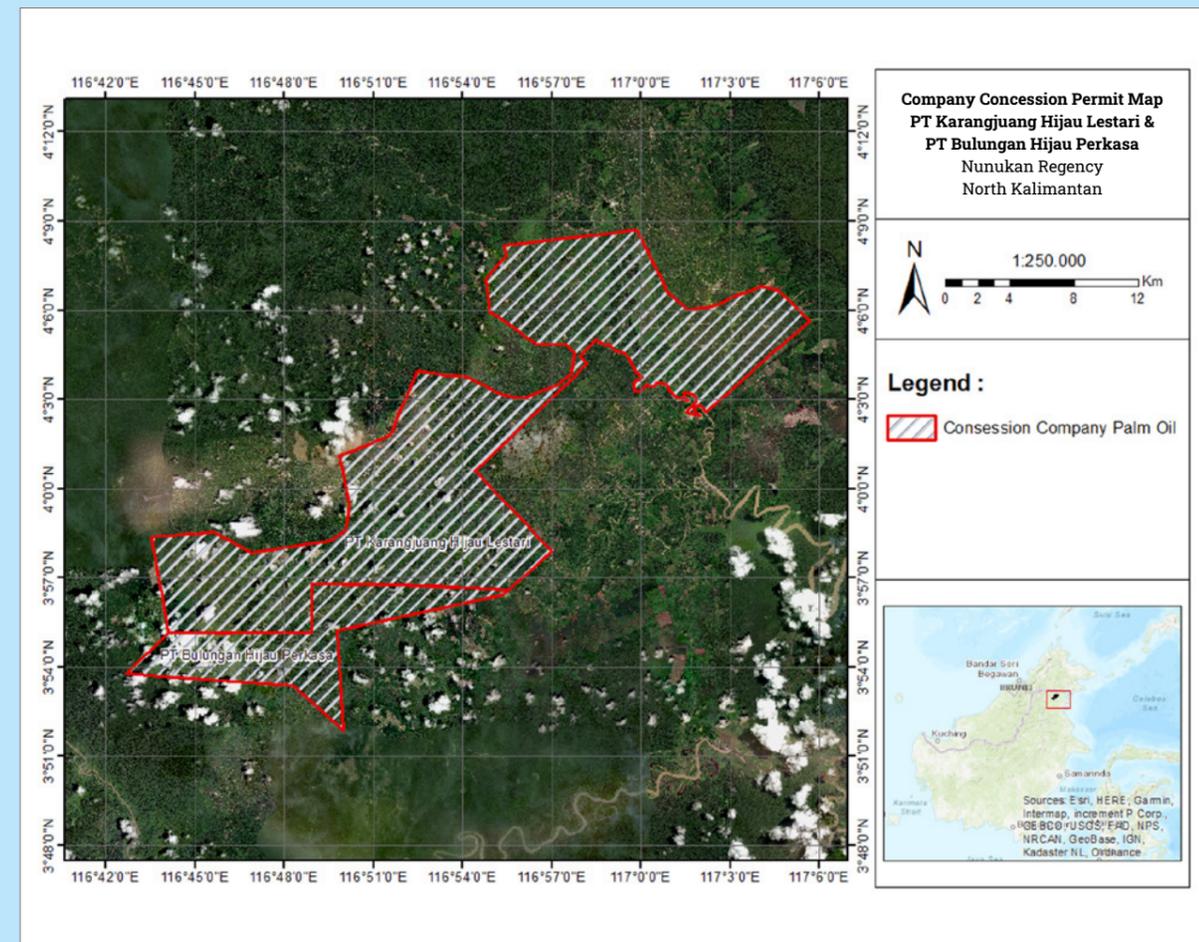
Concession area: 26,061 hectares (PT Karangjuang Hijau Lestari -KHL) 6,181 hectares

Permits: IUP, IPKH, HGU⁸⁶

Indigenous territory: Dayak Agabag

- PT KHL since March 2021
- PT BHP since November 2023

Map: PT Karangjuang Hijau Lestari and PT Bulungan Hijau Perkasa concessions



Key alleged violations:

- **lack of FPIC:** indigenous community (Dayak Agabag) land has allegedly been incorporated into the companies' HGU areas without proper consultation since 2003
- **social oppression:** indigenous community members have reportedly faced intimidation, repression and persecution when defending their rights
- **lack of plasma implementation:** the plasma scheme in PT KHL has allegedly not been

participatory, transparent or fair and the communities have never been adequately informed about the exact location of their plasma lands⁸⁸

- **corruption:** PT BHP was one of the companies involved in Martias' court case in which the permits were corruptly obtained
- **certification despite alleged ongoing violations:** PT KHL and PT BHP have been certified under the ISPO scheme in 2021 and 2023, respectively.

Impact on indigenous peoples - the Dayak Agabag

The companies have allegedly had a severe impact on, and continuing conflict with, the Dayak Agabag, the indigenous people who live in five villages around and within concessions, as documented by the media and NGOs.⁸⁹

The year of 2003 was reportedly the starting point of disaster for the Dayak Agabag when it is claimed their land was taken without proper FPIC process and consultancy, resulting in the land being included in the company's HGU area.⁹⁰ The community has reportedly lived under constant threat and uncertainty since losing its land, facing repression when asserting its rights.⁹¹ FAP Agri has sought to provide clarification to various buyers based on the allegations, including a statement in March 2024.⁹²

Community members who speak out allege they have been subjected to intimidation, discrimination and persecution. In May 2025, hundreds of community members staged further demonstrations after five residents, including the

Bebanas village head, were themselves summoned by the North Kalimantan Regional Police for land-grabbing, according to the media.⁹³ The management of PT KHL has reportedly strongly denied this was a form of criminalisation of the Dayak Agabag community.⁹⁴

Although these issues have occurred for more than decade, PT KHL and PT BHP both have ISPO certification. These certifications were granted seemingly without resolving past land issues and conflicts, raising questions about the credibility and rigour of the ISPO scheme.

Although, the situation of the Dayak Agabag has been extensively documented and raised through local and national advocacy channels, no meaningful remedy seems to have occurred.

FAP Agri provided a generic response to Kaoem Telapak and EIA in relation to this report, which is included separately.

Below: the destruction of rainforests to make way for oil palm plantations is one of the key concerns with its production



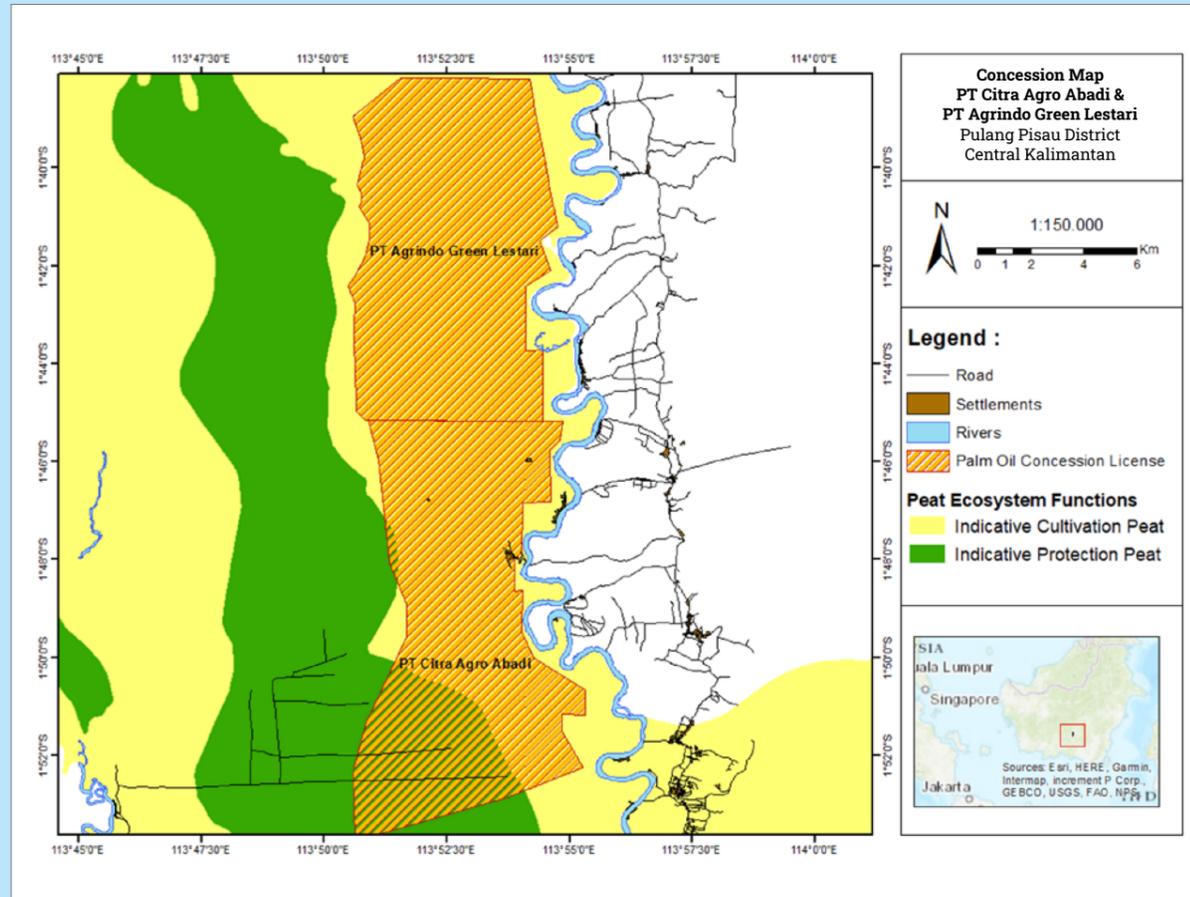
Case Study 5: PT Agrindo Green Lestari and PT Citra Agro Abadi (CAA Group)

Location: Pulang Pisau district, Central Kalimantan

Concession area: combined 18,224 hectares

Certification: ISPO

Map: Map of PT Citra Agro Abadi and PT Agrindo Green Lestari concessions and peatland ecosystems



Key alleged violations:

- **clearing of protected peatlands:** both companies have recently been exposed to have allegedly cleared peatlands protected under national law
- **conflict with indigenous communities:** companies have allegedly been involved with conflict with village communities⁹⁵
- **illegal clearing using fires:** in 2017 and 2018, the companies illegally used fires to clear the land and were sanctioned by the Indonesian Government⁹⁶
- **permits listed to be revoked:** both companies were listed to have their permits revoked in 2022 by the Ministry of Environment and Forestry,⁹⁷ although it is unclear if this ever occurred.

Right: Peatlands are often drained to make way for palm oil plantations, a practice that releases carbon, contributes to greenhouse gas emissions, and increases the risk of fires.



Alleged illegal peatland destruction

PT Agrindo Green Lestari (PT AGL) and PT Citra Agro Abadi (PT CAA) – both operated by the CAA group – have reportedly cleared 2,753ha of protected peatlands as of 2023, as outlined in a recent report by NGOs Kaoem Telapak and Pantau Gambut.⁹⁸

The peatlands are protected by law due to their depth and value in holding carbon but, despite this the companies appear to have built canals and drained the peatlands. PT Citra Agro Abadi has been documented to be building more canals across its area in 2024, suggesting it plans to drain further peatlands.

Both companies are ISPO-certified, despite the ISPO requiring companies to comply with national laws on protecting peatlands. On 25 April 2025, Kaoem Telapak submitted a formal complaint regarding PT

AGL and PT CAA being ISPO-certified. Currently, the complaint handling process is still ongoing, with the certification body denying such violations occurring by either company.

PT Mutu Hijau Indonesia, which is the ISPO certification body of PT CAA and PT AGL, responded to the complaint letter, stating that the company did not commit violations and was in accordance with the regulations and the coordinates given did not enter protected peat and were plasma plantations. The certification body only attached documents in the form of sustainability policies and maps, which Kaoem Telapak and Pantau Gambut do not consider clear enough, and minutes of land handover from the community. The Ciliandry Anky Abadi group did not provide a response in relation to this report.

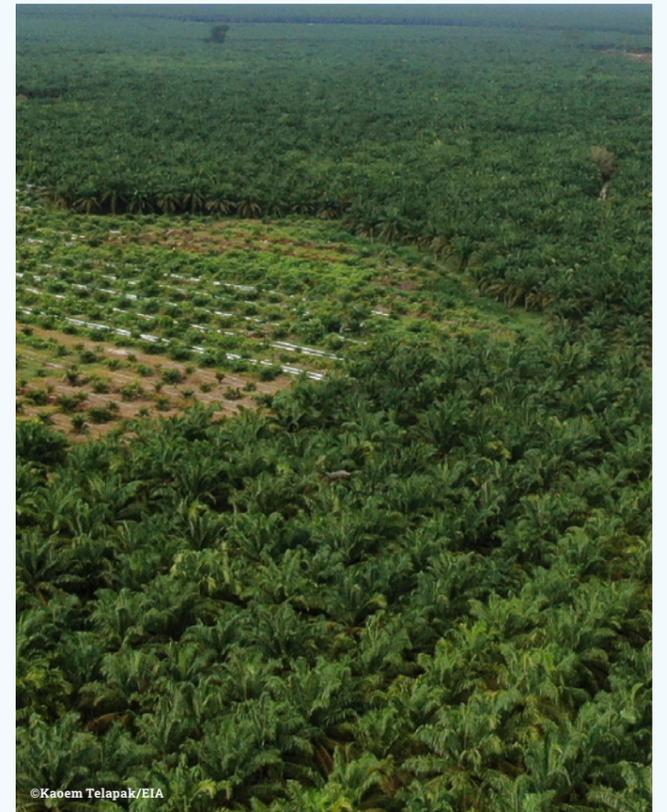
Below: Palm oil plantations can leave only isolated pockets of forest, fragmenting habitats and threatening wildlife survival.





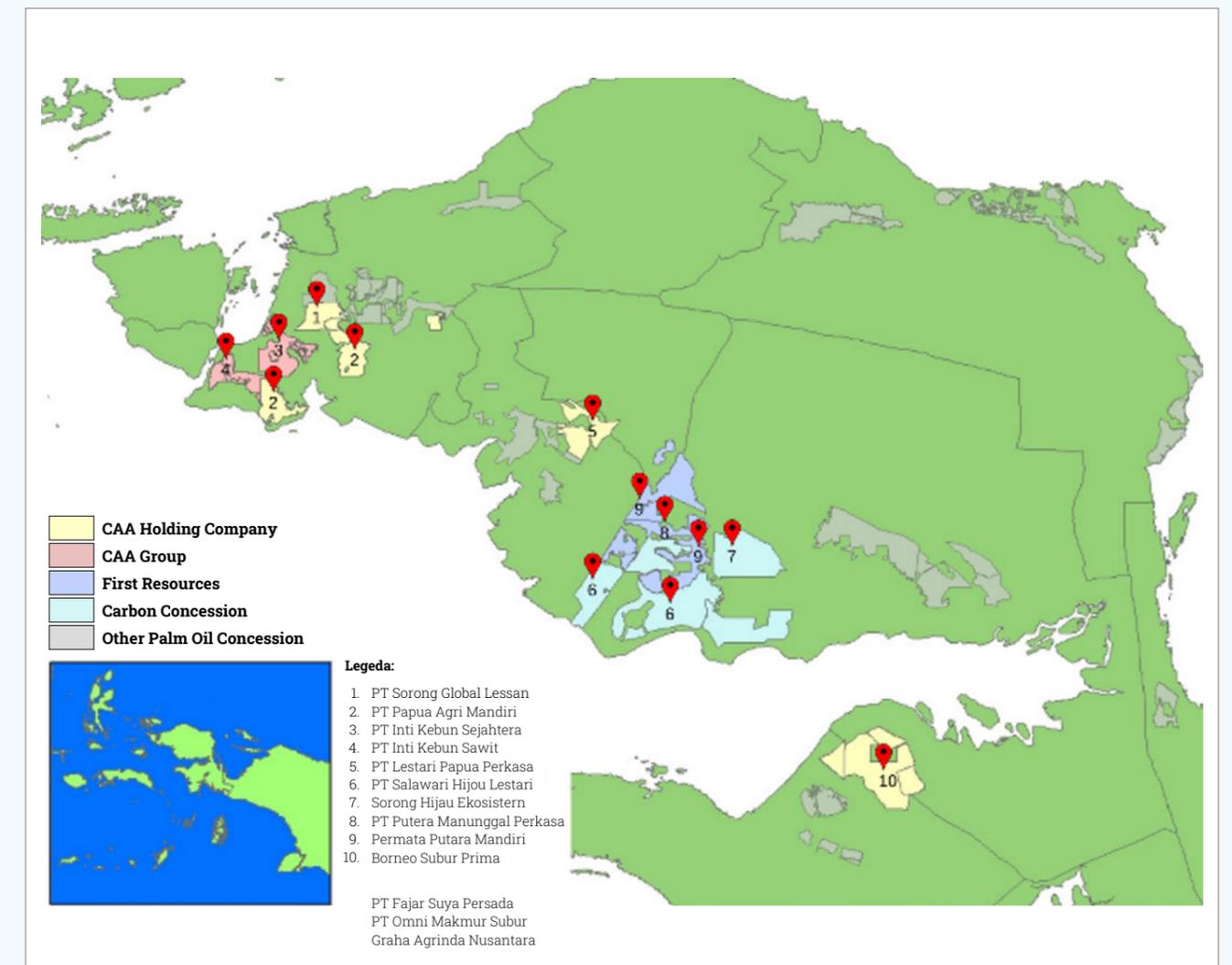
C. Papua

Papua is home to half of Indonesia's biodiversity and more than 250 indigenous groups. It has lost a huge 663,443ha of forest, mainly due to palm oil expansion often without indigenous consent.⁹⁹ In early 2024 alone, 765ha were cleared, as deforestation intensified in West Papua, sparking growing indigenous resistance.¹⁰⁰



Map: The location of companies in the West Papua and Southwest Papua regions

©Kaoem Telapak/EIA



Case Study 6: PT Inti Kebun Sejahtera, PT Inti Kebun Sawit and PT Sorong Global Lestari

Location: Sorong Regency, West Papua Province

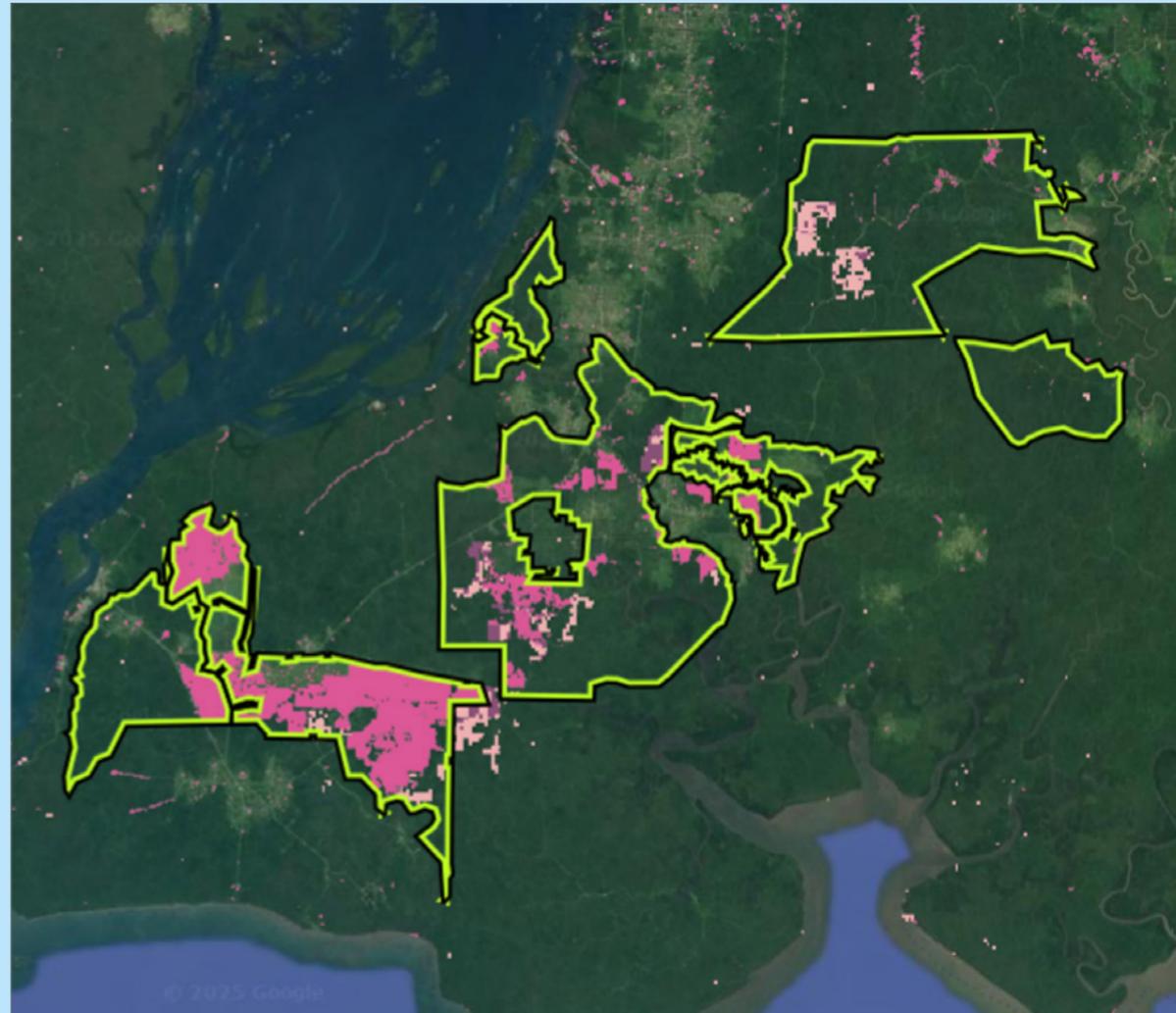
Concession area: 38,300 hectares PT IKSJ; 37,000 hectares PT IKS; PT SGL 16,305.16 hectares¹¹³

Certification: PT IKSJ ISPO (0045/MHI-ISPO, since 29 November 2021)

Map: Tree cover lost (pink) from 2021-25 in PT Inti Kebun Sawit (IKS), PT Inti Kebun Sejahtera (IKSJ) and PT Sorong Global Lestari (SGL) (Global Forest Watch)

Indigenous territory: Customary territories of the Moi people, primarily the Kutumun clan

PT IKSJ: no official information available



Key alleged violations:

- **large-scale deforestation:** extensive clearing of pristine forests since 2022 making the companies the worst deforesters for oil palm currently
- **illegal land-clearing:** parts of the cleared areas allegedly fall outside legally held HGU titles
- **community conflict and lack of FPIC:** alleged clearing of Moi indigenous land without consent, including the destruction of sago groves belonging to the Klagilit Maburu clan, part of the Moi tribe
- **manipulated plasma scheme:** the company has reportedly claimed 237 hectares of land, while the community states it only agreed to release 50ha for plasma development
- **river pollution:** alleged river pollution by PT Inti Kebun Sejahtera¹¹⁴
- **opaque acquisitions:** the acquisition process for all the companies lacked transparency, with the regaining of a revoked permit of particular concern.

Massive deforestation without confirmed legal land rights.

From 2022-25, PT Inti Kebun Sejahtera (IKSJ) and PT Inti Kebun Sawit (IKS) – both part of the CAA Group – have carried out extensive land clearing, including reportedly on the customary territory of the Moi indigenous people in Sorong Regency. Together they have deforested more than 6,000ha, making them the worst palm oil companies carrying out deforestation in Indonesia according to the forest monitoring platform, Nusantara Atlas.¹¹⁵

This has included clearing areas where the companies had not yet obtained their Land Use Rights (HGU) permit, based on monitoring previously conducted by Kaoem Telapak.¹¹⁶

A permit review by the local government of palm oil companies in 2021 found that while PT IKSJ held some forest release and HGU permits, these only applied to parts of its concession area.¹¹⁶ Similarly, although PT IKS was listed as holding a Land Use Rights (HGU) and Forest Release permit, out of its 37,000ha, only 5,828ha (16 per cent) were released from the Forest Estate and just 4,623ha (12.5 per cent) had HGU status.

This indicates that the companies had not completed the legal permitting process for the full concession areas, raising concerns over the legality of continued operations.

Below: Oil palm trees take about 3 to 4 years to reach maturity and produce fruit, lasting for up to 25 years before they need to be replanted; however, their planting often contributes to deforestation, peatland damage, and conflicts over land rights.



Alleged conflict with indigenous peoples

PT Inti Kebun Sejahtera (IKSJ) is reportedly involved in a major conflict with the Moi indigenous people.

The areas allegedly cleared include customary forests, sago groves and traditional agricultural lands which have long served as sources of food and cultural identity for the indigenous communities in the region.¹¹⁸ One of the most serious incidents has been the reported destruction of ancestral sago groves in Mageme Hamlet in 2023, used by the Klagilit Maburu clan – part of the Moi tribe. According to media sources, the land was cleared without prior consultation, warning or compensation.¹¹⁹

Separately, the Kutumun clan has stated it verbally agreed to release 50ha for a plasma scheme, but PT IKSJ has claimed 237.39ha without written consent or transparent documentation.¹²⁰ In 2022, the land was reportedly registered under the company's HGU, raising concerns about the scheme's legitimacy and lack of FPIC.¹²¹ Protests escalated through 2023–24, especially from youth, citing ancestral rights violations. Despite complaints to legal aid and indigenous NGOs, PT IKSJ and local authorities have taken no known steps toward conflict resolution.¹²²

Equally, PT Sorong Global Lestari – the rebranded CAA Group company (PT Inti Kebun Lestari), whose permit was revoked due to administrative and operational violations¹²³ – is allegedly attempting to take control of the Moi tribe's customary land. The company has recently started clearing forests.¹²⁴ The Moi indigenous community strongly rejects the presence of this palm oil company, with threats to its customary forest and ecosystem and its cultural survival and identity.¹²⁵

All three companies, along with three other companies ultimately owned by Silvia Caroline and her two children, are reportedly requesting support to form a National Strategic Project to the Governor of Southwest Papua, as of June 2025, which again is strongly rejected by the Moi people.¹²⁶

Such land-clearing violations not only potentially breach administrative law but also disregard the rights of indigenous peoples.¹²⁷ Under ISPO standards, this could constitute a serious violation of the principles of "legal compliance".¹²⁸ Yet PT IKSJ has ISPO certification, despite a complaint previously being raised under the ISPO scheme,¹²⁹ casting doubt on the credibility and enforcement of the ISPO system.

There has not been any known response by the CAA Group to any of the accusations and no response was received by KT and EIA in relation to this report.



Conclusion

Palm oil companies linked to members of the Fangiono family have caused extensive deforestation, allegedly violated indigenous rights, and seemed to have sidestepped national legal frameworks, including under the guise of formal certification schemes such as the ISPO system.

There appears to be a pattern of rebranding companies, operating without full permits and a lack of FPIC that is likely reflective of systemic governance failures, regulatory loopholes and weak enforcement. It raises serious questions about potential legality, transparency and compliance with national forest and land governance standards.

These cases represent major red flags under the EU Deforestation Regulation (EUDR), which prohibits the placing on the EU market of commodities linked to deforestation, land tenure violations or illegal activities. Buyers and investors must conduct enhanced due diligence to investigate:

- evidence of operations without all the legal permits
- corruption linked to land acquisition
- significant ongoing conflict with communities without proper FPIC
- lack of transparency in ownership structures
- questionable sustainability certifications.

The above developments warrant urgent review and potential exclusion of these companies.

Recommendations

For the Government of Indonesia

1. Strengthen legal enforcement

- **Investigate and enforce legal compliance through permit audits and sanctions**

Conduct comprehensive audits of HGU, IUP and forest release permits. Prosecute companies found operating without valid licenses or beyond permitted boundaries

- **Ensure consistent prosecution of violations**

Prevent impunity by ensuring enforcement mechanisms operate transparently and effectively across all levels of governance

- **Address systemic weaknesses**

Prevent corrupt practices and close loopholes that can allow companies to operate without valid permits

- **Support independent monitoring**

Enable transparent, third-party monitoring mechanisms to uphold legality and environmental and social safeguards.

2. Protect indigenous and customary land rights

- **Legal recognition of customary territories**

Recognise indigenous and local community territories in line with Constitutional Court Decision No. 35/PUU-X/2012, which states that customary forests are not part of state forests.

- **Enforce Free, Prior and Informed Consent (FPIC)**

Require properly implemented FPIC before plantation development and other land-use changes

3. Halt forest and land conversion

- **Immediate suspension of illegal clearing**

Stop all land clearing, especially on peatlands, without valid permits, in compliance with Government Regulation No. 57/2016

- **Protect forests and other landscapes**

Prevent the conversion of forests and ecosystems that hold significant value for biodiversity and Indigenous communities by fully implementing Presidential Instruction No. 5 of 2019 on the moratorium on new permits in peatlands and primary forests.¹³⁰

- **Environmental restoration**

Require responsible parties to restore ecosystems

degraded by illegal or unethical practices as part of reparative justice

4. Enforce social obligations

- **Guarantee community consultation and plasma schemes**

Ensure fair practices, community consultation, plasma implementation and institutionalise grievance mechanisms.

- **Transparent benefit-sharing**

Implement equitable schemes and CSR that share economic benefits with communities

- **Foster equitable partnerships**

Promote fair plasma schemes, transparent CSR initiatives and participatory land mapping to build trust and long-term cooperation.

For companies, financiers, buyers and other stakeholders

1. Improve sourcing and investment due diligence

- **Conduct robust due diligence**

Investigate and ensure companies are legally compliant and do not contribute to environmental or social harm

- **Engage alleged violators**

Engage companies named with alleged violations to seek resolution and accountability and suspend if needed

- **Account for corporate interconnectedness**

Assess risks arising from the alleged inter-relatedness of the Fangiono family companies and incorporate findings into due diligence

2. Ensure compliance with international regulations

- **Align with global standards**

Ensure operations comply with regulations such as the EU Deforestation Regulation (EUDR) and uphold international principles such as FPIC

- **Build Transparent Supply Chains**

Commit to full traceability, extending this to smallholders and cooperatives, and support them with capacity-building to ensure equitable participation

3. Ensure legal operations and environmental and social protection

- **Legal compliance**

Operations must be within the boundaries of permits, have all the required permits and follow all other legal processes

- **Stop deforestation and peatland destruction**

Commit and abide to halting deforestation and peatland loss

- **Protect indigenous rights and foster equitable partnerships**

Respect for indigenous and local community rights must be a core principle, as well as transparent benefit-sharing arrangements—such as fair plasma schemes and community-driven CSR initiatives

For certification bodies

- **Revoke certification for violators**

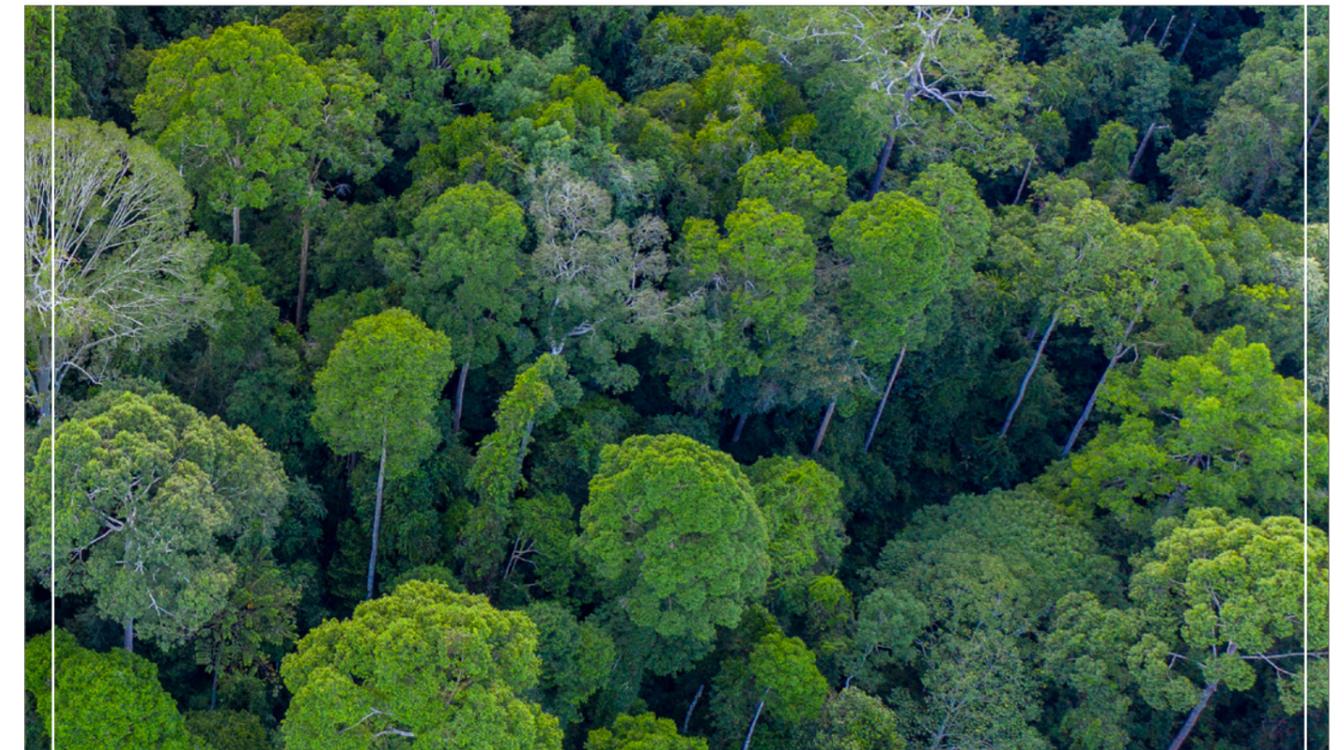
Suspend or withdraw certification from companies proven to violate laws or Indigenous rights

- **Strengthen complaint and audit systems**

Improve the responsiveness to verified complaints and bolster audit practices to detect real-world violations

- **Ensure transparency and accountability**

Prevent greenwashing by increasing the integrity of certification decisions and prioritizing human and environmental rights



Methodology

To ensure the validity and objectivity of our findings, this reporting methodology was designed with a comprehensive approach. We adopted a mixed-methods research approach, blending in-depth qualitative methods through sensitive interviews with victims and witnesses, as well as focused group discussions, with quantitative data obtained from the analysis of official documents, satellite imagery, and field surveys.

The entire primary data collection process strictly adhered to ethical protocols, including informed consent, guaranteed confidentiality and the safety of respondents. The collected data was then meticulously analysed using thematic coding, narrative analysis and the application of geographic information systems (GIS) to visualise environmental impacts.

The full responses received from First Resources and FAP Agri in relation to this report can be found [here](#).

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