

# FOREST FRONTLINES

## PT. Toba Pulp Lestari: A Corporate Culprit Repeat Offender

### *Revised Analysis of deforestation in RGE's pulpwood operations in North Sumatra, Indonesia*

In March 2024, RAN [published](#) the results of satellite analysis we commissioned to determine the extent of forest loss in PT. Toba Pulp Lestari's industrial tree plantation (HTI) concessions in Indonesia from 2015-2023. PT. Toba Pulp Lestari Tbk (PT. TPL) is a Royal Golden Eagle (RGE) connected company, since Mr. Sukanto Tanoto of the Tanoto family is its ultimate beneficiary. Our initial analysis of satellite imagery was based on the 2000 KLHK map for land cover in Indonesia and found that PT. TPL concessions lost 1,390 ha (3,434 acres) of natural forest after the introduction of RGE's '[no deforestation](#)' policy in 2015. At least 392 hectares (963 acres) of this forest loss occurred after December 2020, the deforestation cut-off date for FSC Full Forest Management certification.

On March 21, 2024 PT. Toba Pulp Lestari issued a [response](#) to Rainforest Action Network's publication that stated that false allegations were made in RAN's report. In light of PT. TPL's response, RAN commissioned further spatial analysis using the 2014 land cover map provided by the Indonesian Ministry and Forestry as a baseline to determine the forest area. **This analysis found 424 hectares of natural forest were cleared within PT. Toba Pulp Lestari's concessions after the introduction of RGE's '[no deforestation](#)' policy in 2015. At least 306 hectares of this forest loss occurred after December 2020, the deforestation cut-off date for FSC Full Forest Management certification.**

The satellite analysis commissioned by RAN utilized Planet satellite imagery, the *Hansen et al* Global Forest Change dataset by the peatland map and 2014 land cover data from the Indonesian Ministry and Forestry/ KLHK, GLAD Alerts and burned area data from MODIS -GFW and MODIS USGS NASA and an internal database on concession boundaries.

The following table presents the findings from RAN's additional analysis on natural forest loss inside PT. Toba Pulp Lestari's concessions in North Sumatra.

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

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

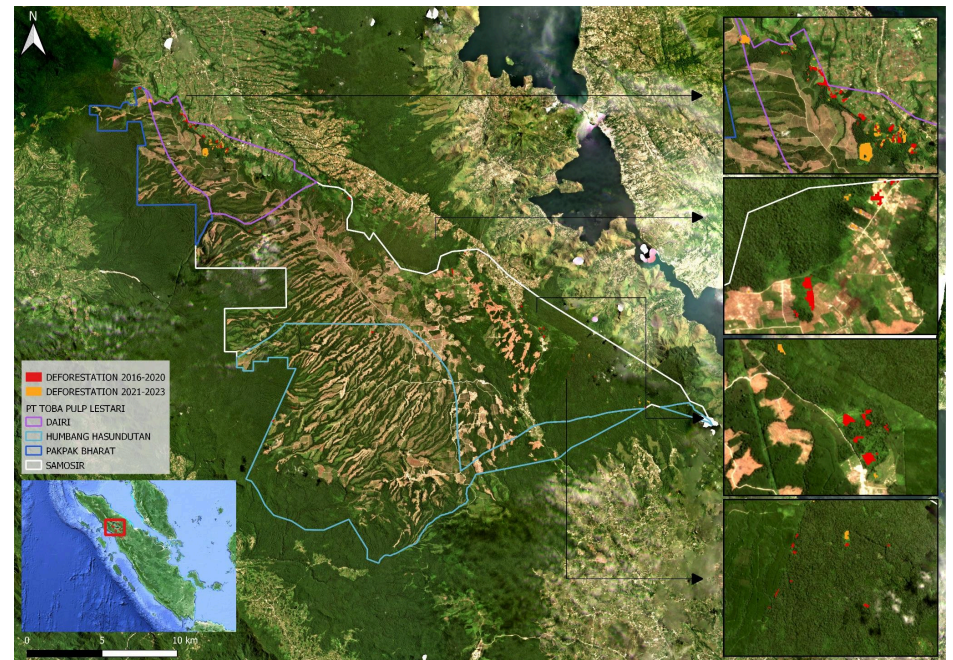
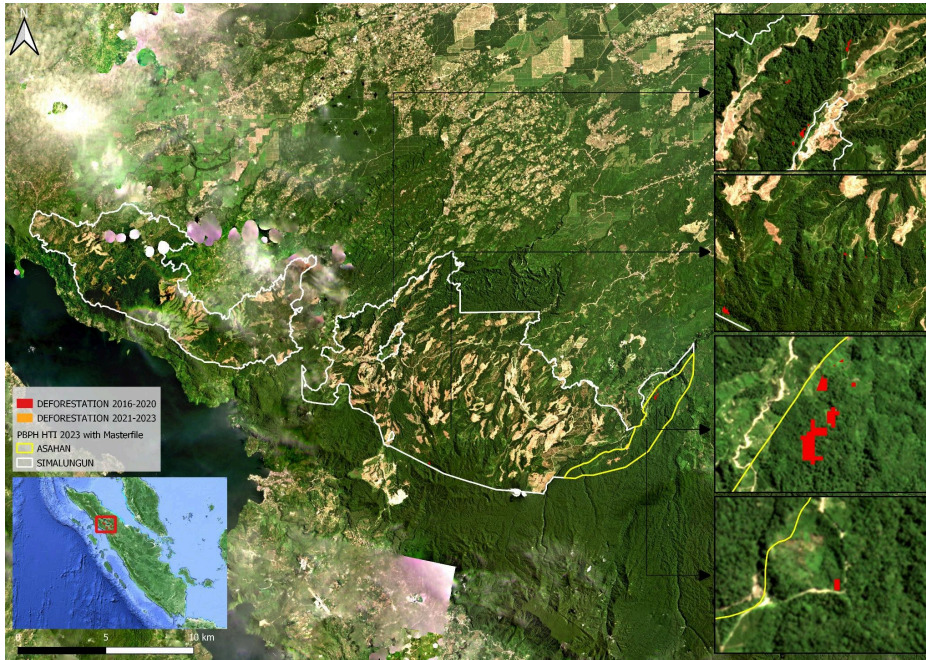
DISTRICT	DEFORESTATION (ha) in PT TPL concessions based on 2014 KLHK land use cover baseline											
	2015	2016	2017	2018	2019	2020	2021	2022	2023	Subtotal	>FSC/EUDR Cut-off (>2020)	> RGE Forest Policy (>2015)
Asahan	3.98							0.09		4.07	0.09	0.09
Dairi	12.17	3.61	9.18	2.22	5.67		21.24	20.20	1.62	75.91	43.06	63.74
Humbang Hasundutan	1.26							0.84	0.45	2.54	3.83	3.83
Kota Padang Sidempuan	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Padang Lawas Utara	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Pakpak Bharat	0.41			1.23	0.13		0.68	0.18		2.63	3.49	4.85
Samosir	10.08		8.65	4.80	6.26	2.46	5.44	3.20	2.96	43.84	11.60	45.36
Simalungun	2.08		0.73	0.54						7.18	0.00	5.10
Tapanuli Selatan	0.00	0.0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Tapanuli Tengah	0.04			0.25	0.15		0.43			0.87	0.43	0.83
Tapanuli Utara	17.53	8.58	3.27	6.01	36.04	2.36	120.66	99.25	23.52	317.22	243.43	299.69
Toba Samosir	0.18						0.51			0.69	0.51	0.51
											306.44	424

## Maps of Deforestation

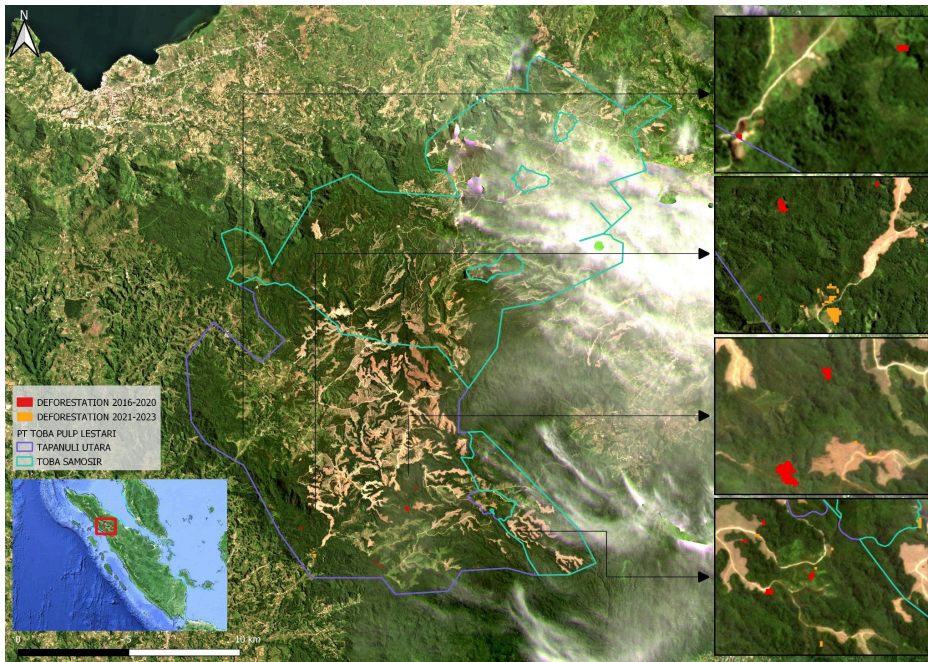
The four maps shown below present the extent of deforestation inside PT. Toba Pulp Lestari's concessions across its operations in North Sumatra after the 2015 and 2020 deforestation cut-off dates using the 2014 KLHK land cover layer.

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

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



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



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

