

A close-up photograph of an orangutan clinging to a tree trunk. The orangutan has reddish-brown fur and is looking upwards and to the left. The background is a blurred green forest.

'ORANGUTAN CAPITAL' *Under Siege*

New Evidence Shows Illegal Deforestation
in Indonesia's Leuser Ecosystem

'ORANGUTAN CAPITAL' *Under Siege*



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In July 2024, Rainforest Action Network commissioned Pléiades Neo¹ satellites to fly above Indonesia’s Rawa Singkil Wildlife Reserve to capture unprecedented 30cm resolution imagery to map the extent of illegal deforestation within the reserve since the deforestation cut-off dates adopted by the palm oil sector’s No Deforestation, No Peatland and No Exploitation (NDPE) policy commitments, and the emerging European Union Deforestation Regulation (EUDR).

This report documents the alarming destruction of some of the highest-priority conservation areas within the Leuser Ecosystem, a renowned hotspot for biological diversity and carbon sequestration. This globally important tropical rainforest reserve is known as the “Orangutan Capital” of the World due to the highest-density populations of critically endangered Sumatran orangutans known to exist anywhere.

This is the first time that high-resolution imagery showing the extent of palm oil development in this region has been published, showing the extent of the palm oil development crisis in this region. This level of analysis is not possible using publicly available satellite imagery. It allows for the age of individual oil palms to be determined, indicating whether illegal plantations have been established outside of the compliance dates for the policies of major brands and banks.



PHOTO: Ulet Ifansasti / Wildlife Asia / RAN / Racing Extinction

Key Findings from the Investigation:



RAN found that 2,577 hectares (6,367 acres) of deforestation occurred within the boundaries of the Rawa Singkil Wildlife Reserve since June 2016, with 662 hectares (1,715 acres) cleared since the December 2015 deforestation cut-off date adopted by global brands. A further 1,915 hectares (4,732 acres) of the reserve was cleared after the December 2020 cut-off date outlined in the European Union Deforestation Regulation (EUDR).



A total of 652 hectares (1,613 acres) of illegal palm oil plantations were documented within the protected reserve. Four hundred and fifty-three hectares (1,117 acres) of these can be identified as having the characteristics of a closed canopy, meaning they can be considered 'productive' and that illegal palm oil fruit in these locations could already be making its way into the supply chains of major palm oil traders and brands.



Brands at risk of exposure to illegal palm oil include Procter & Gamble, Nestlé, Mondeléz, PepsiCo, and Nissin Foods. Banks financing traders demonstrably exposed to illegal palm oil in 2024 include MUFG, Rabobank, UBS, HSBC, and ING. Other banks exposed to further high-risk traders in the region include Singapore's DBS, UOB, OCBC, BNP Paribas, and Malaysian banks Maybank and CIMB.



Alarming, deforestation was found to have increased inside the reserve after the adoption of 'no-deforestation' cut-off dates. The highest levels of deforestation, 74% of the total since 2016, occurred after the EUDR cut-off date of December 31, 2020. A core issue is that brands and their suppliers still do not know where all the palm oil they source is grown, an essential requirement for compliance with the EUDR.



Despite its status as a legally protected area, the reserve saw a fourfold increase in deforestation between 2021 and 2023. The crisis that is unfolding appears to be a systematic attempt to cause degradation in intact peat forest areas before the conclusion of the national government's field validation of the reserve boundaries to officially reduce the reserve size and normalize the illegally cleared areas.



This investigation documents the rise of a new palm oil 'laundering' loophole in which wealthy land speculators use the cover of smallholder farmers to avoid accountability for illegal deforestation. The evidence presented demonstrates that palm oil remains the main driver of illegal deforestation inside the reserve, and the actors responsible are primarily land speculators, not family-managed smallholder farms.

Palm Oil Expansion Crisis in the "Orangutan Capital of the World"

The Leuser Ecosystem in the Sumatran province of Aceh is renowned around the world by scientists, conservationists, and wildlife lovers as the only place left where critically endangered orangutans, tigers, elephants, and rhinos still exist in the same forest.² With roughly 2.6 million hectares (6.4 million acres) of intact primary forest, the Leuser Ecosystem is widely considered one of the most important expanses of intact forest left in Southeast Asia. The most ecologically rich and vulnerable parts of the Leuser are its remaining lowland coastal forest and peatland regions. The Singkil-Bengkung Trumon region is the largest, the most intact, and the most valuable of all these areas.³

Covering roughly 286,000 hectares (706,588 acres) in the southwest corner of the Leuser, Singkil-Bengkung Trumon is a worldwide hotspot for biological diversity and one of the highest-priority conservation landscapes on the planet.^{4,5,6,7,8} It comprises the critically important Singkil and Kluet peatlands — ancient, deep, and carbon-rich peatlands storing immense amounts of greenhouse gases safely and naturally underground.

Its peatlands and surrounding lowland rainforests provide some of the last, best habitats critical to the continued survival of endangered Sumatran elephants, orangutans, and tigers. The area has been called the "Orangutan Capital of the World" because it is home to the densest populations of orangutans anywhere. Avoiding the extinction of these iconic wildlife species requires keeping these lush forests of the Leuser Ecosystem standing.

Despite its conservation value and importance to local communities, these lowland rainforests and peatlands face a renewed onslaught of new roads, canals, and deforestation for Conflict Palm Oil plantation development. Over the past decade, over 18,000 hectares (44,000 acres) of forests within the Singkil-Bengkung region have been cleared, leaving 234,000 hectares (578,000 acres) of rainforests remaining. This area decreases every year due to deforestation and the drainage of peatlands.

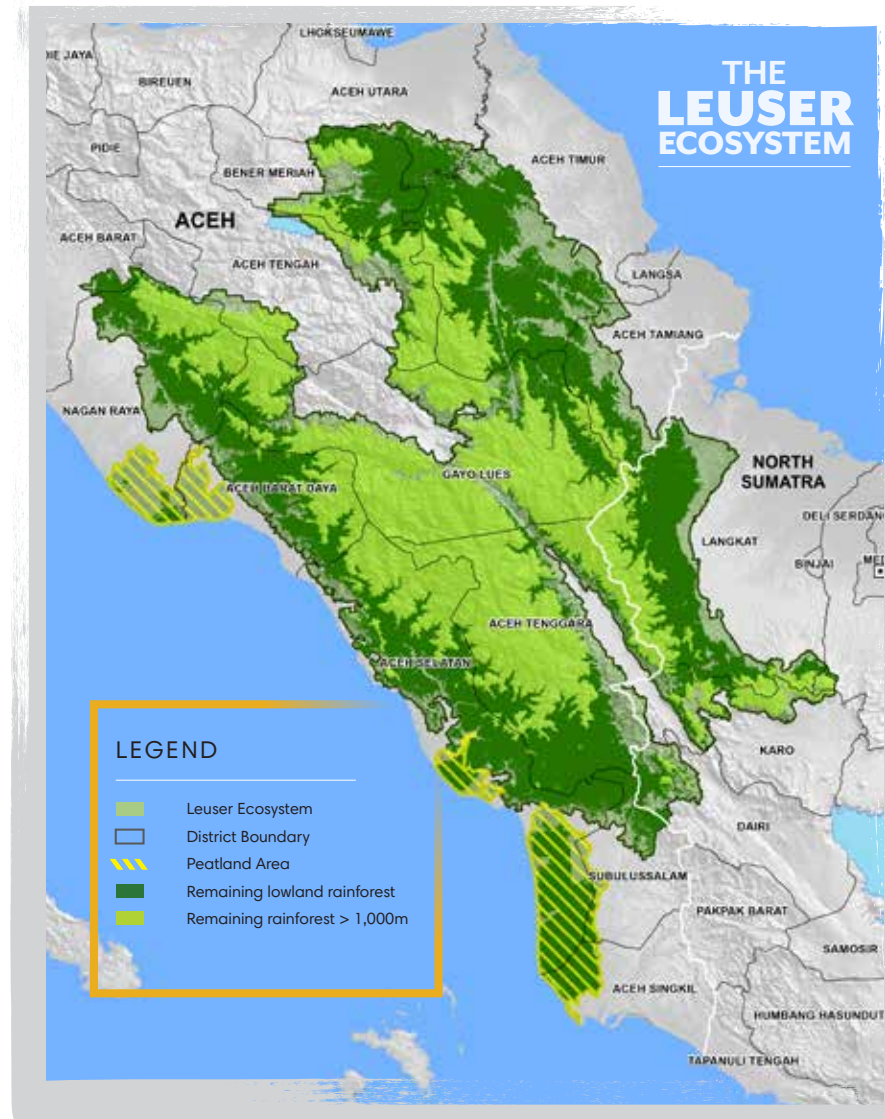
PHOTO: Paul Hilton

The remaining 87,000 hectares (215,000 acres) of peatland forests in the Singkil peatland are afforded the highest levels of protection under Indonesian law within the nationally designated Rawa Singkil Wildlife Reserve.^{9,10} In the past ten years, approximately 2,600 hectares (6,425 acres) of critical lowland forest habitat inside the Rawa Singkil Wildlife Reserve boundaries have been cleared, and a significant driver of the clearing has been the expansion of oil palm plantations. An extensive network of roads and drainage canals have been constructed to allow the deep peatlands to be drained and planted with oil palm plantations.

The Rawa Singkil Wildlife Reserve has had legally protected status since 1998. However, national government agencies are in an ongoing process of validating and demarcating the reserve boundaries. During this period, there has been a pronounced spike in deforestation with a fourfold increase in deforestation between 2021 and 2023. The deforestation crisis unfolding appears to be a systematic effort to degrade intact peat forest areas within the reserve, thereby eroding conservation values and allowing land speculators to appropriate landbanks for the cultivation of palm oil plantations or to sell at a later date. This is evident from the correlation between intact peat forests being cleared and a proposal to the Aceh Selatan district government to strip these areas of their conservation status to make additional areas available for development.¹¹

Whilst the rates of deforestation are at levels that haven't been seen before during the last decade that RAN has been monitoring the Leuser Ecosystem, palm oil encroachment is not new within the protected Rawa Singkil Wildlife Reserve. There is a history of moving boundaries to accommodate encroached areas. Since its establishment, local conservationists have raised concerns about changes to the reserve's boundaries, to accommodate palm oil development which has reduced the size of the area protected from 102,400 hectares (252,000 acres) to approximately 80,000 hectares (198,000 acres).¹²

Given the scale of the crisis, in 2024 RAN undertook satellite analysis and field investigations to determine the extent of the destruction in this orangutan stronghold and to identify the actors responsible for the expansion of illegal palm oil plantations within the Rawa Singkil Wildlife Reserve.



Apes from Space: Unprecedented Satellite Resolution Allows for Most Detailed Monitoring Ever of the “Orangutan Capital of the World”

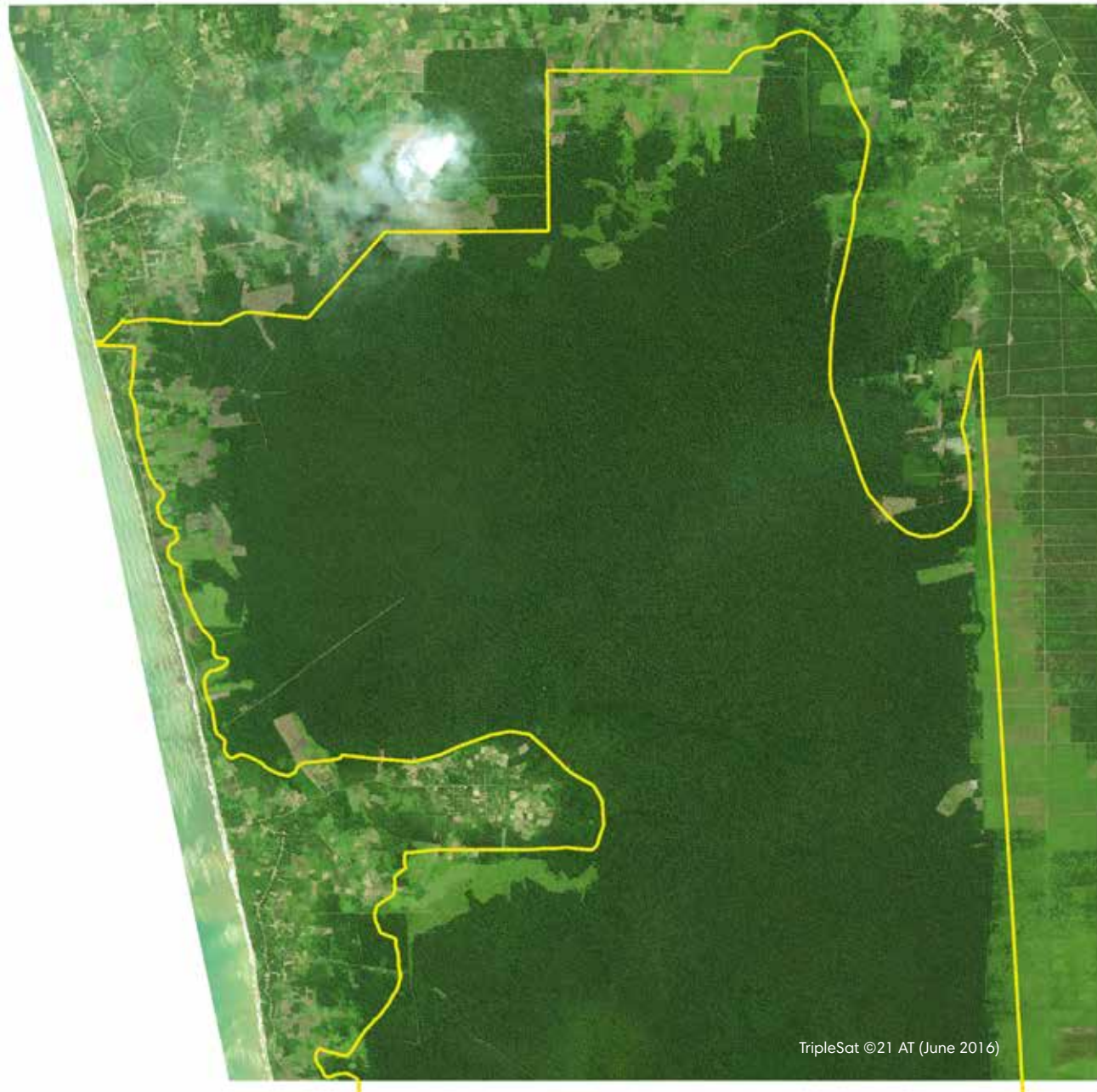
In July 2024, RAN commissioned Pléiades Neo¹³ satellites to fly above the Rawa Singkil Wildlife Reserve to document the palm oil expansion crisis in the Singkil peat swamp. The aim was to capture high-resolution imagery that could be used to map the extent of deforestation within the reserve since the deforestation cut-off dates that have been adopted by the palm oil sector, and the emerging European Union Deforestation Regulation (EUDR), and identify the locations and age of palm oil plantations that have been planted illegally inside the reserve. RAN has now published the imagery and results on Nusantara Atlas¹⁴ — a publicly available monitoring platform — and they are alarming.

This is the first time that high-resolution imagery of this level has been published showing the extent of the palm oil-driven crisis in this protected wildlife reserve.

The very high-resolution optical constellation of two identical Pléiades Neo satellites phased at 180° from each other enabled images to be obtained showing a bird's-eye view of the area. The imagery enables detailed analysis to be undertaken on the basis of 30 cm resolution, meaning individual planted palm oil trees can be seen from a very young age. This level of analysis is not possible using publicly available satellite imagery, which tends to be restricted to imagery of 4.5-meter resolution.

The high-resolution imagery and analysis definitively show that the palm oil mills, traders, and global brands sourcing from this area have failed to end deforestation for palm oil in the “Orangutan Capital of the World” since the deforestation cut-off dates set in their published policies and the European Union Deforestation Regulation. To make matters worse, deforestation has increased, not decreased, inside the reserve after the adoption of these cut-off dates and No Deforestation, No Peatland, and No Exploitation (NDPE) policies. In fact, the highest rates of increase have occurred after the EUDR cut-off date.

2016



TripleSat ©21 AT (June 2016)

HIGH RESOLUTION IMAGERY showing the forest cover in June 2016. This imagery was used to determine the extent of deforestation after the palm oil sector cut-off dates of December 2015.

Imagery provided by Triple satellites @21 AT (June 2016).
Imagery is available on Nusantara Atlas which is powered by [TheTree Map](#).

2024



Pléiades Neo ©Airbus DS (July 2024)

HIGH-RESOLUTION IMAGERY showing illegal deforestation and palm oil plantations inside the Rawa Singkil Wildlife Reserve in the Leuser Ecosystem.

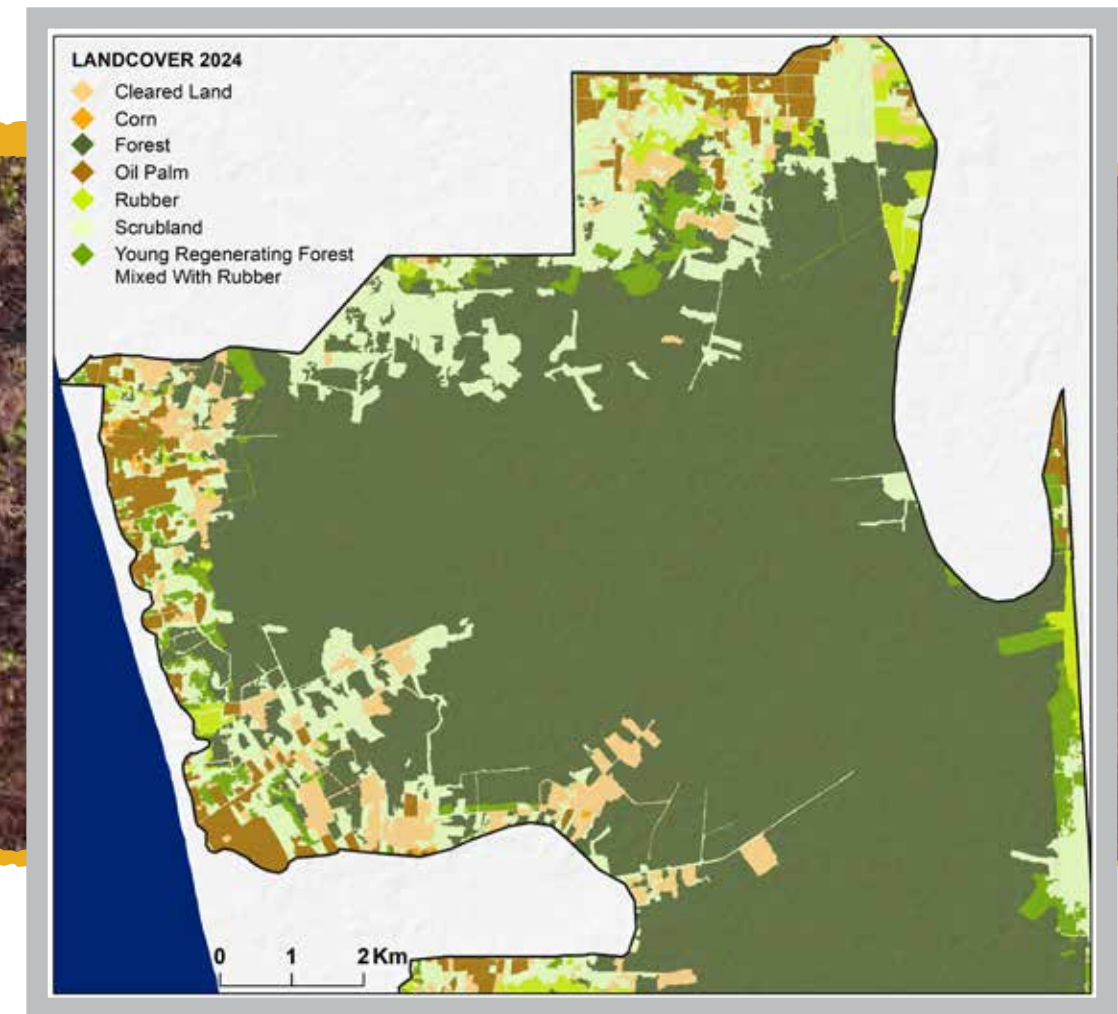
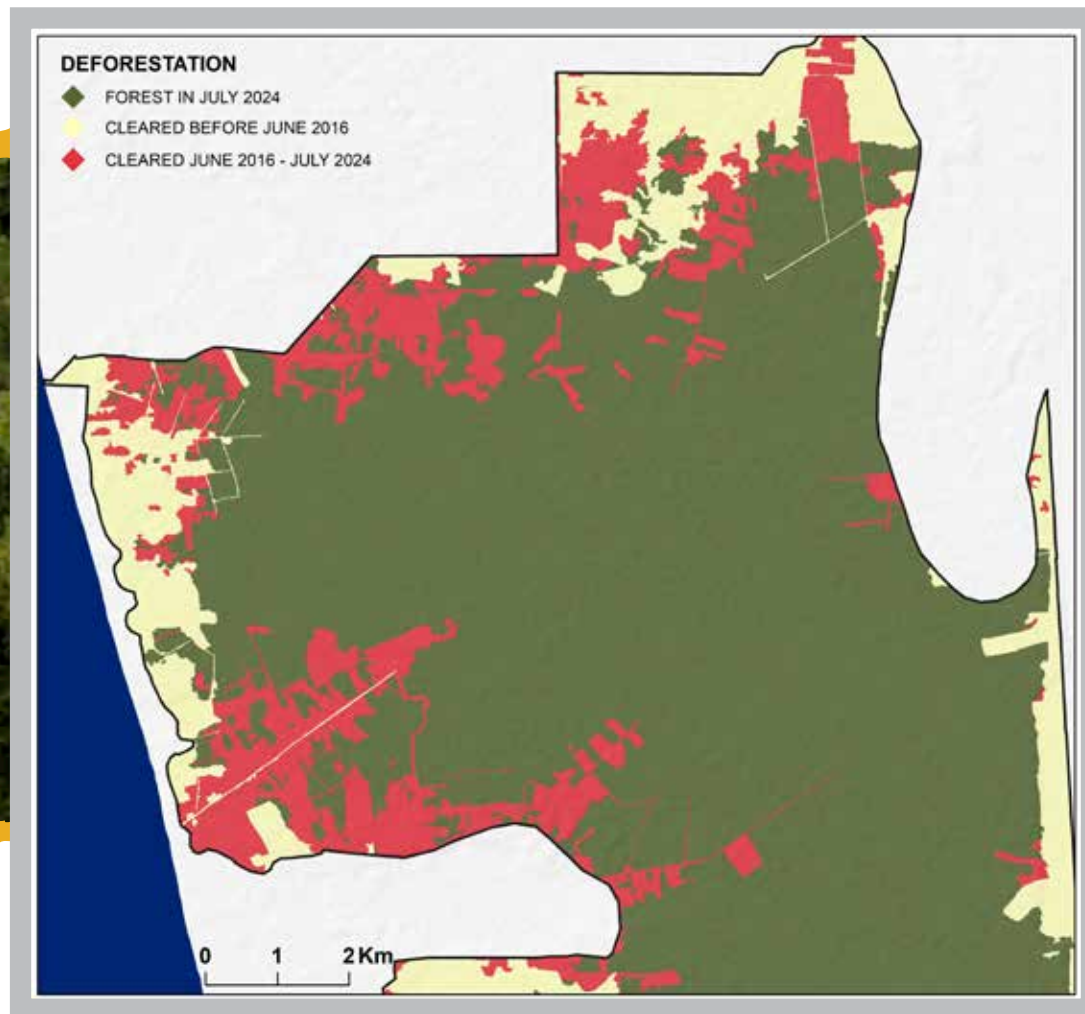
Imagery provided by @Airbus DS (July 2024) using Pléiades Neo satellites.
Imagery is available on Nusantara Atlas which is powered by [TheTree Map](#).



We found at least 2,577 hectares (6,367 acres) of deforestation has occurred within the boundaries of the Rawa Singkil Wildlife Reserve since 2016. 662 hectares (1,613 acres) of this area were cleared between December 2015 and 2020. The remaining 1,915 hectares (4,732 acres) were cleared after December 2020. December 2015 is the deforestation cut-off date that has been adopted by global brands and the palm oil sector — and December 2020 is the cut-off date outlined in the European Union Deforestation Regulation (EUDR).

Given the resolution of the imagery, we were able to determine the extent of illegal palm oil planted within the reserve, how old the planted oil palms are, and when the lands they were grown on were cleared. A total of 652 hectares (1,613 acres) of illegal palm oil plantations were identified inside the protected reserve. 453 hectares (1,117 acres) of these illegal palm oil plantations have a closed canopy and can be considered 'productive,' which takes 3-4 years after planting. Palm oil fruit that has been grown illegally in these locations could already be making its way into the supply chains of major brands.

A total of 200 hectares (494 acres) of oil palm is less than 3 years of age, meaning it was planted after the deforestation cut-off date of 2020 in the EUDR. These plantations will mature over the coming year/s and once they produce fruit are also at risk of entering global supply chains — including the European Union — despite the fact that they were produced in a manner that is not compliant with the requirements of the EUDR regulation.¹⁵



Map showing the extent of illegal deforestation within the Rawa Singkil Wildlife Reserve after December 2015 — the deforestation cut-off date adopted by major brands and the palm oil sector.

Satellite analysis of imagery from Pléiades Neo ©Airbus DS (July 2024) carried out by The TreeMap.

Map showing the land cover mapped using the high resolution imagery of the Rawa Singkil Wildlife Reserve. Illegal oil palm areas within the Rawa Singkil Wildlife Reserve are shown in brown.

Satellite analysis of imagery from Pléiades Neo ©Airbus DS (July 2024) carried out by The TreeMap.



Global Brands and Banks Driving the Palm Oil Deforestation Crisis

Palm oil is being grown illegally inside the nationally protected Rawa Singkil Wildlife Reserve and previous exposes published by RAN show that oil has been used to manufacture snack foods sold across the world by Procter & Gamble, Nestlé, Mondelez, Colgate-Palmolive, PepsiCo, Unilever, Kao, and Nissin Foods. In 2019¹⁶ and again in 2022,¹⁷ the brands named here were found purchasing palm oil from multiple mills¹⁸ that have continued to source palm oil resulting from the illegal clearing of lowland rainforests within the nationally protected Rawa Singkil Wildlife Reserve. These mills are located immediately next to areas of illegal encroachment into the reserve and to this day lack the necessary procedures to trace the location where the palm oil they sell is grown, a key requirement for complying with the No Deforestation, No Peatlands, No Exploitation (NDPE) policies to which all of these brands have publicly committed.

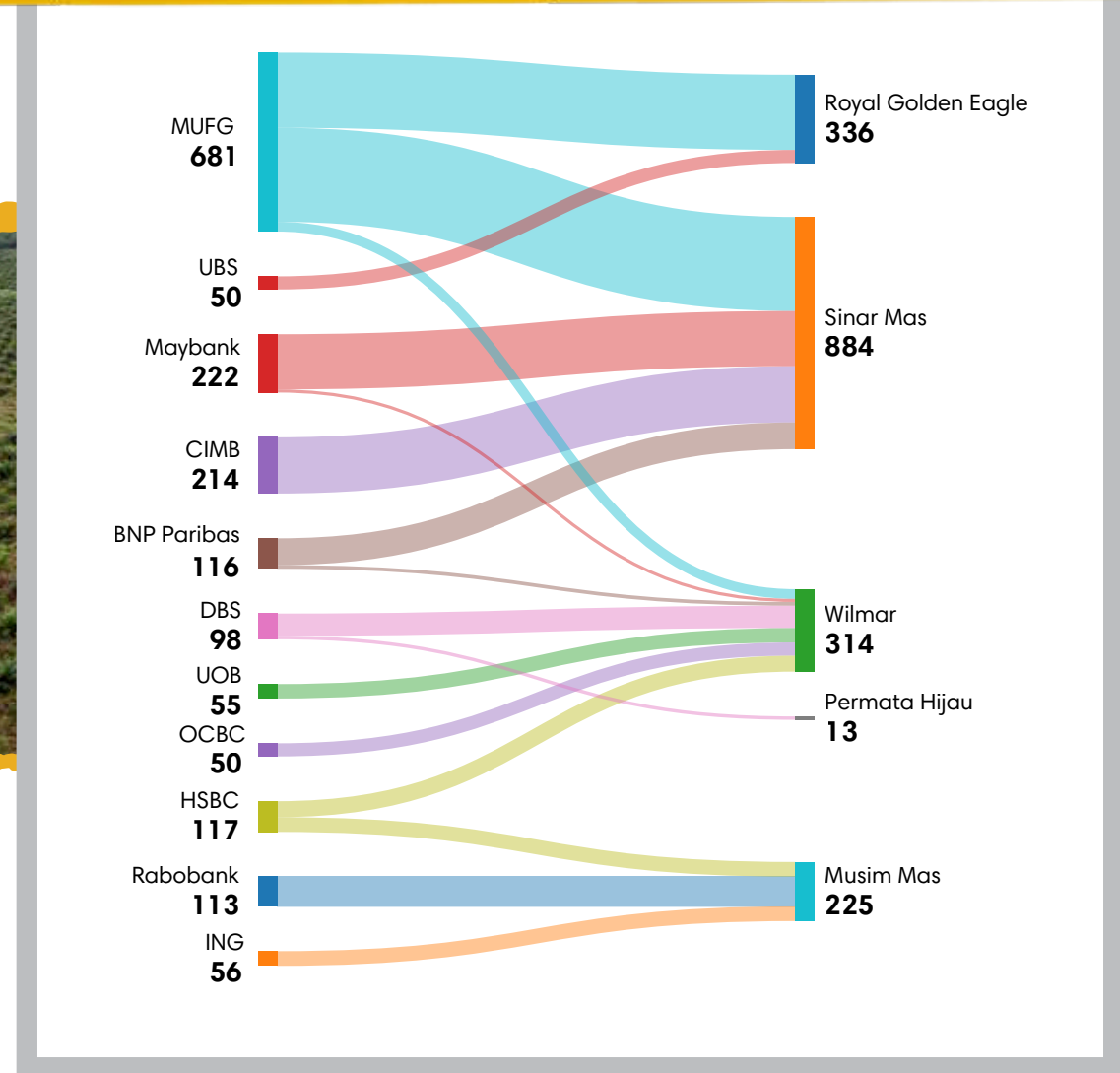
RAN's field investigations in September - October 2024 once again found evidence that palm oil grown illegally inside the protected Rawa Singkil Wildlife Reserve is being supplied to a mill that has repeatedly been exposed for sourcing and supplying illegal palm oil — the PT. Global Sawit Semesta mill continues to be listed as a supplier to Procter & Gamble,^{19,20,21} Nestlé,^{22,23} Mondelez,²⁴ PepsiCo,²⁵ and Nissin Foods.²⁶ This means these brands are at risk of manufacturing their consumer products using illegal palm oil that has been produced at the expense of the “Orangutan Capital of the World.”

PHOTO: Nanang Sujana / RAN

Banks with NDPE commitments for the palm oil sector are exposed to five traders sourcing from mills surrounding Rawa Singkil Reserve and the Leuser Ecosystem Region — Wilmar International, Royal Golden Eagle (Apical Group), Sinar Mas Group (Golden Agri Resources), Permata Hijau Group, and Musim Mas. All five traders are at high risk of sourcing illegal palm oil grown inside the Rawa Singkil Wildlife Reserve from recently deforested areas, as the traders' traceability, monitoring, due diligence, and compliance systems are inadequate.²⁷

The field investigations, conducted in September - October 2024, and outlined below, show how Royal Golden Eagle Group, Musim Mas, and Permata Hijau are sourcing from PT. Global Sawit Semesta, the same mill previously exposed for illegal sourcing in 2019 and 2022.^{28,29} As shown in Figure 1, these three traders are financed by banks including Japanese bank MUFG and European banks ING, UBS, HSBC, and Rabobank. While this mill does not appear in the latest mill lists of Wilmar and Golden Agri Resources, they have sourced from this mill in the past, and remain at risk of sourcing illegal palm oil. These two traders are financed by MUFG, Malaysian banks CIMB and Maybank, French bank BNP Paribas, and Singapore banks UOB, DBS, and OCBC.

FIGURE 1: Credit (USD Millions) from January 2020 - June 2024 from banks with NDPE policies to corporate palm oil operations of five traders with active sourcing from suppliers located in the Leuser Ecosystem region in Indonesia. Data from forestsandfinance.org





Laundered:

The New Loophole Scapegoating Smallholder Farmers for Deforestation Driven by Land Speculators

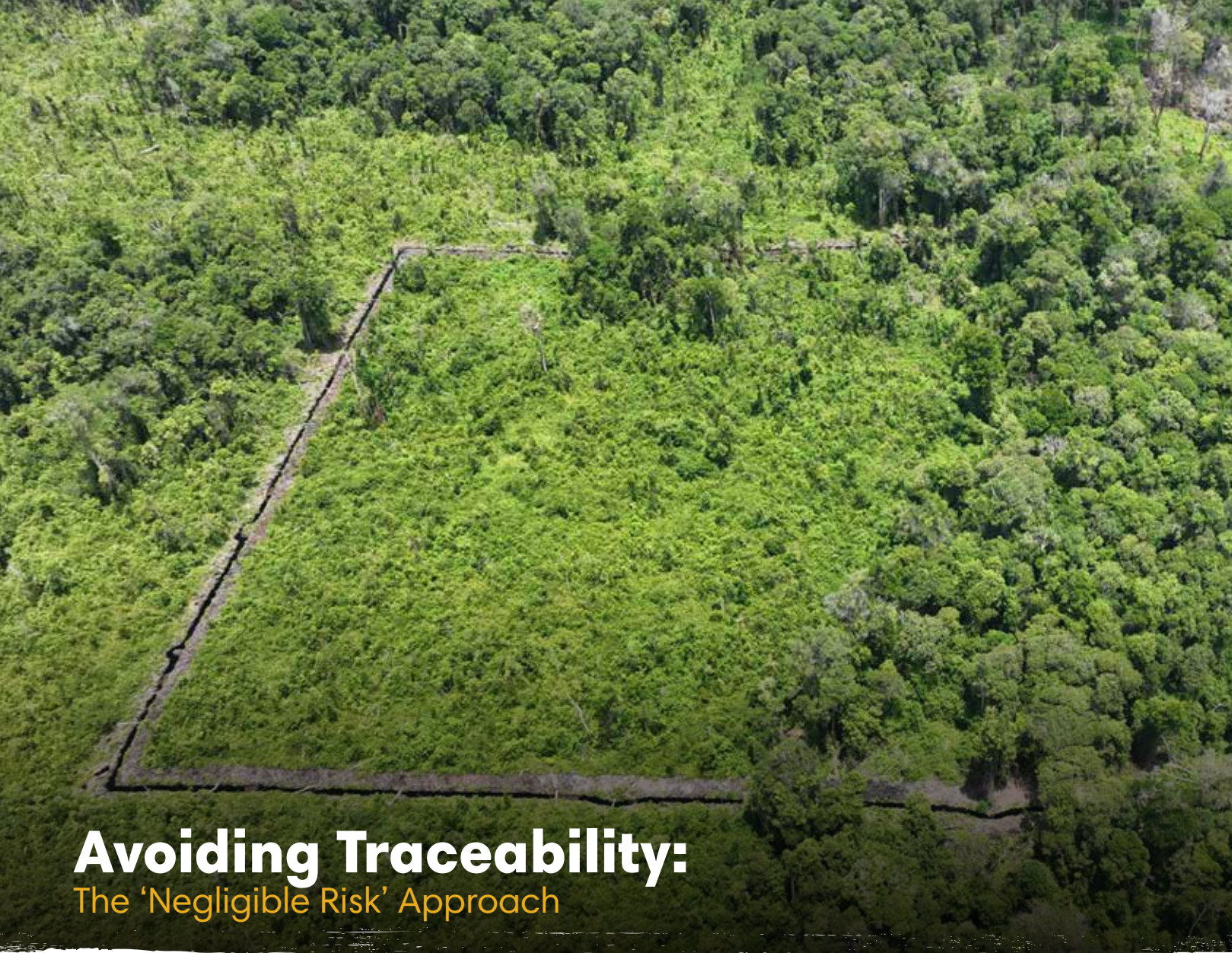
Historically, palm oil-driven deforestation occurred inside government-allocated oil palm concessions in Indonesia.^{30,31,32,33} However, more recently, deforestation for palm oil is now occurring *outside* concession boundaries.^{34,35,36} While such clearance is often carried out by family-run smallholders, the crisis in Rawa Singkil Wildlife Reserve demonstrates an emerging pattern of forest destruction by opportunistic land speculators masquerading as smallholders. These actors are typically locally influential individuals who wield power and have access to the resources needed to clear forests and develop new palm oil farms or plantations.

Approximately 40% of global palm oil production is produced by smallholder farmers.³⁷ Yet definitions utilized in the palm oil sector do not adequately distinguish between family run smallholder farms and land speculators that accumulate various land units or titles to create their own network of plantations. Land speculators are different from family run smallholder farmers that tend to manage their lands using their own family labor--which limits the size of their farms to less than 10 hectares (25 acres) in Indonesia.³⁸

PHOTO: Paul Hilton / Global Conservation

This laundering scheme creates a dangerous blindspot that leaves brands with no idea if they may in fact be sourcing from the land speculators responsible for the destruction of the “Orangutan Capital of the World.”

Deforestation is being committed by a variety of land speculators within the palm oil industry that often remain invisible palm oil suppliers to major brands with ‘No Deforestation’ commitments because the brands have largely failed to fully map their supply chains down to the plantation or farm level. So while a brand may be confident that there is no deforestation inside the large company-owned oil palm concessions they source from, substantial palm oil in their supply chains may come from actors driving deforestation outside formal concession boundaries. This laundering scheme creates a dangerous blindspot that leaves brands with no idea if they may in fact be sourcing from the land speculators responsible for the destruction of the “Orangutan Capital of the World.”



Avoiding Traceability: The 'Negligible Risk' Approach

The European Union Deforestation Regulation (EUDR) requires traceability of raw materials to the geo-location of production.³⁹ Palm oil lobby groups have argued that this process is onerous due to logistical and financial obstacles and would adversely affect smallholders. This argument likely influenced the decision by the EU Commission to propose a delay in EUDR implementation by a year, until December 31st 2025, and to 2026 for smallholder suppliers.^{40,41}

It is critical that legitimate family-run smallholder farms are not excluded from NDPE and EUDR-compliant supply chains due to a lack of traceability or compliance with deforestation-free requirements. In order to ensure their inclusion, brands—and their suppliers, the major agribusiness traders that import palm oil to the European Union—must invest in programs that support legitimate smallholder farmers in improving their practices to align with NDPE policies and EUDR requirements. They also need to improve supply chain traceability, monitoring, and compliance systems throughout their supply chains to end the sourcing of Conflict Palm Oil from land speculators responsible for deforestation outside concessions.

PHOTO: Paul Hilton / Global Conservation

Instead of investing in effective traceability systems to the point of production, and programs that support smallholders to achieve compliance, the industry led Palm Oil Collaboration Group⁴² developed a loophole referred to as the 'minimal smallholder deforestation' approach.⁴³ The approach seeks to define predetermined geographic regions as de-facto 'negligible risk' areas thereby sidestepping traceability and deforestation-free requirements. This approach will be trialed imminently and may provide a pathway for untraceable 'independent smallholder' volumes of palm oil to be included in public reporting on the fulfillment of "No Deforestation" commitments.

One example of where this new loophole is being used is via the NDPE Implementation Reporting Framework⁴⁴ (NDPE IRF). The NDPE IRF is being used as a tool to support deforestation-free claims and may be used by brands and traders as an example of the due diligence they are doing to comply with the EUDR.^{45,46,47,48} It has also been integrated into 'deforestation-free' roadmaps by industry forums such as the Consumer Goods Forum's Forest Positive Coalition⁴⁹ and the Agribusiness Roadmap to 1.5.⁵⁰ The widespread use of the IRF and its 'minimal smallholder deforestation' approach is concerning as it may provide loopholes that enable the lack of full traceability to the source to continue in global palm oil supply chains and 'deforestation-free' claims to be made in a way that turns a blind eye to deforestation driven by land speculators. In places like the Rawa Singkil Wildlife Reserve, this innocuous seeming loophole can result in a 'death by a thousand cuts' that cumulatively cause existential levels of destruction for the critical habitat that remains there.



PHOTOS (Above left and below): Paul Hilton / Global Conservation



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CASE STUDIES:

The Land Speculators Behind Illegal Deforestation and Palm Oil Development in the Rawa Singkil Wildlife Reserve

In the Leuser Ecosystem, rampant deforestation in the Rawa Singkil Wildlife Reserve is being driven by land speculators outside government-allocated concessions that are given to large palm oil companies. This finding is supported by evidence and images collected during field investigations and the analysis of high-resolution imagery which shows a coordinated system of selling land certificates for lands located inside the reserve to outside parties, the use of costly machinery during land clearing and draining of peatlands, and a systematic pattern of land development for palm oil that differs from the land use change footprint of subsistence farming or family managed smallholder farms.

In 2024, RAN undertook investigations to identify the land speculators that were responsible for the deforestation crisis inside the Rawa Singkil Wildlife Reserve observed in the high resolution satellite imagery. Field investigations confirmed that the actors responsible for the recent uptick in deforestation were land speculators, not family smallholder farmers. Sources speaking on background have confirmed that land speculators are involved in the sale of land certificates to outsiders, the supply of palm oil fruits grown in their illegal plantations (and in some cases legal plantations outside the reserve), and the dealing of palm oil fruits to the network of mills in the Singkil-Bengkung Trumon region. Their power and resources result from a position afforded to them through their current, or past work, in powerful authorities. Sources speaking on background also indicate that significant 'behind the scene' investors may also be providing finance to the land speculators to acquire land permits (Hak Malik) from district government officials and to pay for labor and machinery costs to clear and drain lands and plant oil palm.

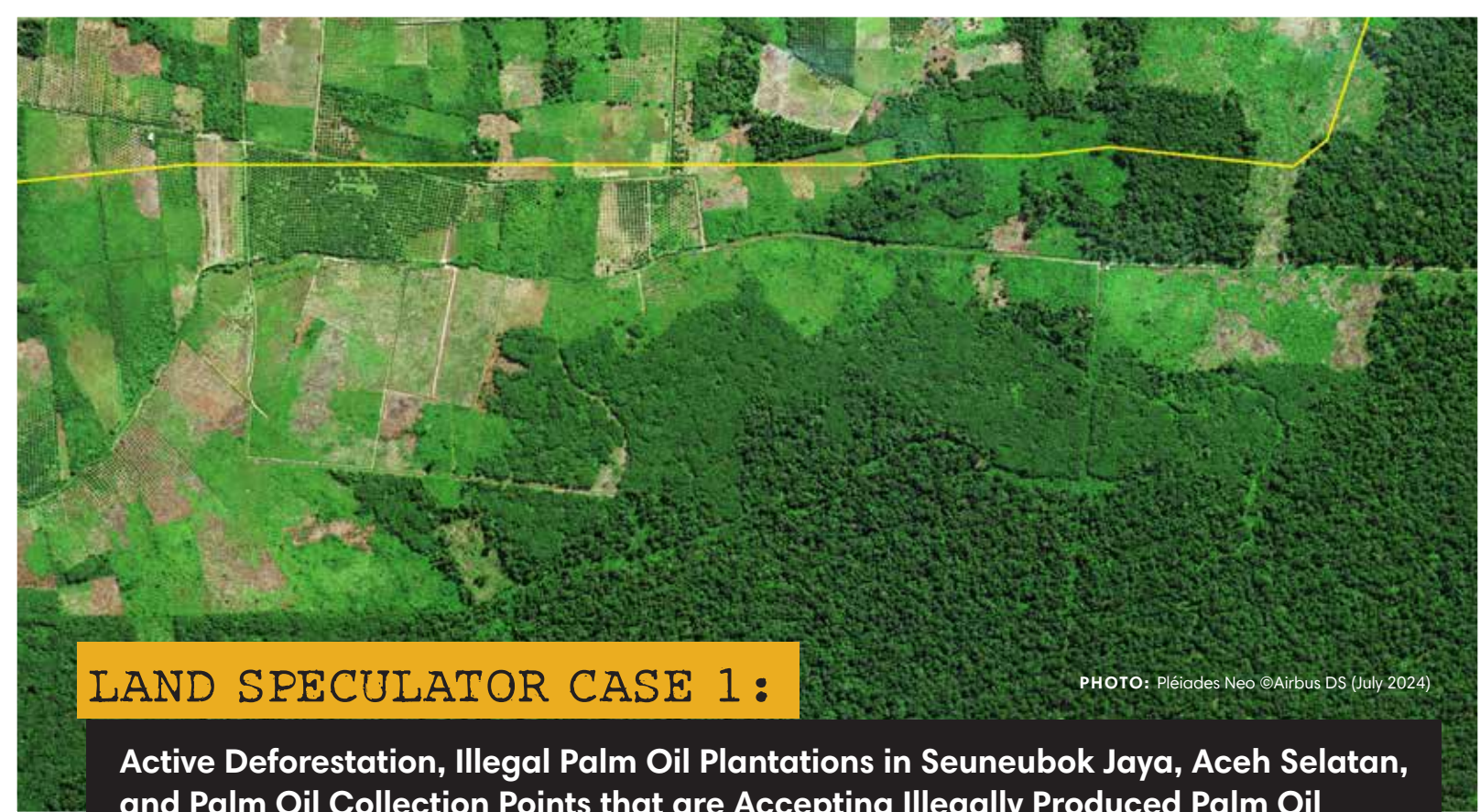
PHOTO: Paul Hilton / Global Conservation

The first step in our investigation was to identify where the highest rates of deforestation were inside the Rawa Singkil Wildlife Reserve. Our analysis found the largest extent of deforestation and clearing and draining of peatlands was in the administrative village areas of le Meudama, Seuneubok Jaya, Teupin Tinggi, Seuneubok Pusaka, Keude Trumon, Lhok Raya, Padang Harapan, Ujong Tanoh, and Kuta Padang. We then identified and documented five land speculation cases in three village areas with high rates of deforestation: le Meudama, Seuneubok Jaya, and Lhok Raya. The findings of our investigation, and a map showing the location of each case, are shown below:



High-resolution imagery showing illegal deforestation and palm oil plantations inside and surrounding the Rawa Singkil Wildlife Reserve and the locations of five cases of land speculation that we identified in the le Meudama, Seuneubok Jaya and Lhok Raya village administrative areas, Aceh Selatan. MAP: Pléiades Neo ©Airbus DS (July 2024).

This investigation builds on our research findings in 2019 and 2022, which identified three additional cases of land speculation by other actors involved in illegal palm oil development within the reserve. One case was Mr. Mahmudin⁵¹ in the le Meudama village in the Aceh Selatan district. The second was Ibu Nasti⁵² in the village of Binanga in Subulussalam, and the third case⁵³ involved a local elite in Seuneubok Pusaka also in Subulussalam. RAN has decided not to publish the names of the new land speculators we have identified at this time.



LAND SPECULATOR CASE 1 :

PHOTO: Pléiades Neo ©Airbus DS (July 2024)

Active Deforestation, Illegal Palm Oil Plantations in Seuneubok Jaya, Aceh Selatan, and Palm Oil Collection Points that are Accepting Illegally Produced Palm Oil

PROFILE OF LAND SPECULATOR :

Evidence obtained by RAN indicates that this land speculator has a position enabling him to sell land certificates for lands inside the Rawa Singkil Wildlife Reserve to outside parties. (i.e., he acts as a land sales agent to other land speculators and smallholder farmers). Evidence obtained indicates that this land speculator has illegal plantations and also sold land certificates to Mr Mahmudin — the land speculator exposed in the RAN’s ‘Carbon Bomb Scandals’ report (2022)⁵⁴ — and other land speculators profiled below. He owns a palm oil brokering business called (UD Daya) with a collection point in le Meudama. Field investigations undertaken in September and October 2024 documented active deforestation and canal development and this land speculator accepting oil palm fruit grown in illegal palm oil plantations located inside the reserve. Investigators followed trucks from his collection points to a nearby mill showing that this land speculator is supplying illegally produced palm oil fruits to a mill called PT. Global Sawit Semesta which supplies traders and global brands.

AREA :

A total of 120 hectares (296 acres) in three areas inside the Rawa Singkil Wildlife Reserve.



- GPS Coordinates for 100 ha area (247 acres):** 02°43'39.42" N 97°41'28.50 E
- GPS Coordinates for recent clearing and canal development:** 02°43'39.42" N 97°41'27.40" E
- GPS Coordinates for 8 ha area (20 acres):** 02°43'35.02" N 97°40'23.09 E
- GPS Coordinates for 12 ha area (29 acres):** 02°43'39.24" N 97°40'52.33 E
- GPS Coordinates of collection point in le Meudama:** 02°44'3.04" N 97°38'41.85" E

DATE OF CLEARANCE :

Most recent documentation of active logging and forest clearance and drainage of peat soils for new canals was undertaken in September 2024 in the area covering 100 hectares. Earlier clearing was identified in June 2022 using satellite analysis. Field investigations undertaken in February 2024 confirmed that these areas now have young oil palm plantings.



The bulldozer that has been used to clear forests for illegal palm oil plantations in land speculator 1’s area inside Rawa Singkil Wildlife Reserve is left parked just outside the boundaries of the reserve, Seuneubok Jaya, Aceh Selatan. September 2024.

New forest clearance and canal development for illegal palm oil plantation in land speculator 1’s area inside the Rawa Singkil Wildlife Reserve, Seuneubok Jaya, Aceh Selatan. September 2024.

GPS Coordinates:
02°43'52.09" N 97°41'29.81" E

GPS Coordinates:
02°43'39.42" N 97°41'27.40" E



New oil palm plantings in land speculator 1’s illegal palm oil plantation area inside Rawa Singkil Wildlife Reserve, Seuneubok Jaya, Aceh Selatan. February 2024.

A palm oil collection point operated by Land Speculator 1 located in le Meudama village, Trumon district, Aceh Selatan. His palm oil broker business is called UD. Daya. October 2024.

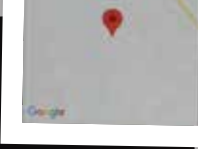
RAN documented the collection and transport of oil palm fruits grown illegally inside Rawa Singkil Wildlife Reserve in Seuneubok Jaya, to this collection point that is operated by Land Speculator 1 and sold to a mill called PT. Global Sawit Semesta. October 2024.

GPS Coordinates:
02°43'34.74" N 97°40'23.15" E

GPS Coordinates:
02°44'3.04" N 97°38'41.85" E

GPS Coordinates:
02°44'3.04" N 97°38'41.85" E

In October 2024, RAN's investigators followed trucks carrying oil palm fruits from land speculator 1's collection point to a mill called PT. Global Sawit Semesta — a mill repeatedly exposed for supplying the world's brands with illegal palm oil grown in the Orangutan Capital of the World.⁵⁵



A truck operated by Land Speculator 1's palm oil brokering business arrives at the PT. Global Sawit Semesta's mill late at night to deliver oil palm fruits grown illegally inside the Rawa Singkil Wildlife Reserve.

GPS Coordinates:
02°37'3.942"N 98°1'15.276"E

A truck operated by Land Speculator 1's palm oil brokering business was documented to be leaving PT. Global Sawit Semesta's mill after delivering oil palm fruits grown illegally inside the Rawa Singkil Wildlife Reserve. October 2nd 2024.

GPS Coordinates:
02°37'3.10"N 98°1'14.51"E

A truck operated by Land Speculator 1's palm oil dealing business was documented to be leaving PT. Global Sawit Semesta's mill after delivering oil palm fruits grown illegally inside the Rawa Singkil Wildlife Reserve. October 2nd 2024.

GPS Coordinates:
02°37'2.95"N 98°1'14.32"E



LAND SPECULATOR CASE 2 :

Deforestation, Use of Fire, and Illegal Palm Oil Plantations in le Meudama village, Aceh Selatan

PHOTO: Pléiades Neo ©Airbus DS (July 2024)

PROFILE OF LAND SPECULATOR :

Evidence obtained by RAN indicates that this land speculator has cleared and burned lands to establish illegal palm oil plantations within the Rawa Singkil Wildlife Reserve. He is also in a position that enables him to sell land certificates for lands located inside the reserve to outside parties.

AREA :

10ha (25 acres) inside Rawa Singkil Wildlife Reserve



GPS Coordinates:

02°44'47.82" N 97°39'45.63 E

DATE OF CLEARANCE :

The most recent documentation of illegal deforestation, fire use, and oil palm plantings within the reserve was undertaken in February 2024. Earlier clearing was identified using satellite analysis in June 2022.



Image of GPS showing the location of recent clearing and burning of peat forests for oil palm inside the Rawa Singkil Wildlife Reserve by land speculator 2 in le Meudama village area, Aceh Selatan. February 2024.

GPS Coordinates:
02°44'49.46"N 97°39'46.29"E

Oil palm seedlings were planted on burnt ground surrounded by felled trees inside the Rawa Singkil Wildlife Reserve by land speculator 2 in the le Meudama village area, Aceh Selatan. February 2024.

GPS Coordinates:
02°44'49.12"N 97°39'46.14"E



Oil palm seedlings were planted in a nearby area of the land speculator 2's land inside the Rawa Singkil Wildlife Reserve in le Meudama village area, Aceh Selatan. February 2024.

GPS Coordinates:
02°44'49.12"N 97°39'46.14"E





LAND SPECULATOR CASE 3 :

New Canal Development, Deforestation, and Illegal Palm Oil Plantations in le Meudama village, Aceh Selatan

PHOTO: Pléiades Neo ©Airbus DS (July 2024)

PROFILE OF LAND SPECULATOR :

Evidence obtained by RAN indicates that this land speculator has a position that has enabled him to acquire land certificates for lands located inside the reserve for palm oil development. Recent field investigations identified the clearance of forests and establishment of new canals to drain peatlands in preparation for the establishment of illegal palm oil plantations.

AREA :

50 ha (124 acres) inside Rawa Singkil Wildlife Reserve.



GPS Coordinates:

02°44'27.98" N 97°41'53.91 E

DATE OF CLEARANCE :

Most recent documentation of illegal forest clearance and canal development was undertaken in February 2024.

New canal development in peat forest inside Rawa Singkil Wildlife Reserve, Seuneubok Jaya village area, Aceh Selatan. February 2024.

GPS Coordinates:
02°44'28.41"N 97°41'57.41"E



Logging of peat forest inside Rawa Singkil Wildlife Reserve, Seuneubok Jaya village area, Aceh Selatan. February 2024.

GPS Coordinates:
02°44'28.34"N 97°41'57.21"E





LAND SPECULATOR CASE 4 :

Illegal Deforestation in Seuneubok Jaya, Aceh Selatan

PHOTO: Pléiades Neo ©Airbus DS (July 2024)

PROFILE OF LAND SPECULATOR :

Evidence obtained by RAN indicates that this land speculator has a position that has enabled him to acquire land certificates for lands located inside the reserve for illegal palm oil development. He has recently cleared forests and established new canals to prepare lands for the establishment of illegal palm oil plantations.

AREA :

100 hectares (247 acres).



GPS Coordinates:

02°44'32.00" N 97°42'20.21 E

DATE OF CLEARANCE :

Most recent documentation of illegal forest clearance and canal construction was undertaken in February 2024. Earlier clearing was observed via satellite analysis in October 2023.



Clearing of peat forest inside Rawa Singkil Wildlife Reserve, Seuneubok Jaya village area, Aceh Selatan. February 2024.

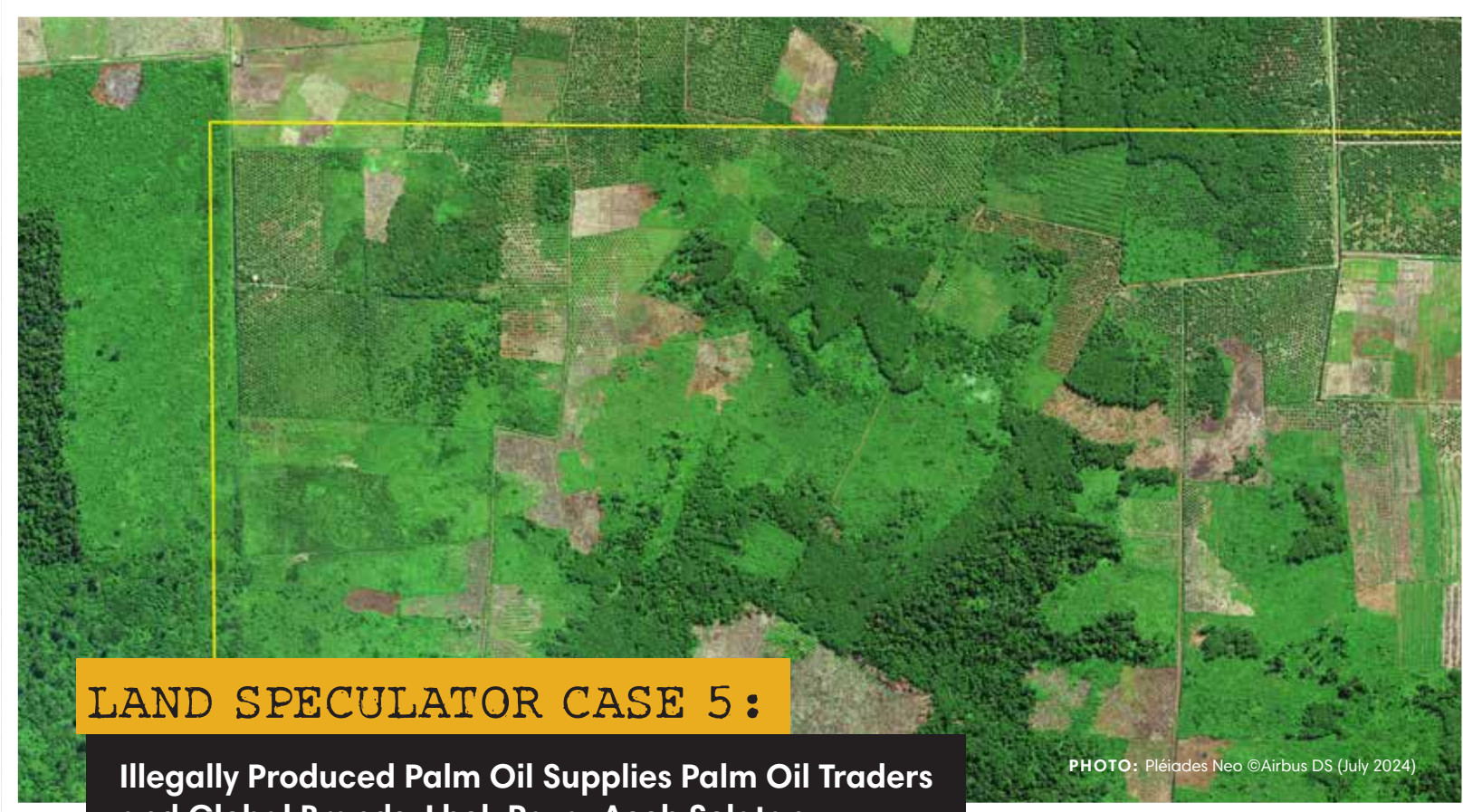
GPS Coordinates:
02°44'32.66"N 97°42'19.42"E



Clearing of peat forest inside Rawa Singkil Wildlife Reserve, Seuneubok Jaya village area, Aceh Selatan, Indonesia. February 2024.

GPS Coordinates:
02°44'32.57"N 97°42'19.57"E





LAND SPECULATOR CASE 5 :

Illegally Produced Palm Oil Supplies Palm Oil Traders and Global Brands, Lhok Raya, Aceh Selatan.

PHOTO: Pléiades Neo ©Airbus DS (July 2024)

PROFILE OF LAND SPECULATOR :

Evidence obtained by RAN indicates that this land speculator has lands that have been illegally developed into oil palm plantations inside the reserve. RAN's investigations found that some of the plantations are producing palm oil fruit that are being harvested and sold to a dealer with a nearby collection point. The case study below shows that land speculator 5 is supplying palm oil fruits to PT. Global Sawit Semesta — a mill supplying Royal Golden Eagle (Apical),⁵⁶ Musim Mas,⁵⁷ and Permata Hijau Group⁵⁸ — and PT. Aceh Trumon Anugerah Kita which is supplying Permata Hijau Group^{59,60} and Pacific Palmindo Industries.⁶¹ These traders are supplying global brands with illegally produced palm oil produced by this land speculator, including Procter & Gamble, Nestlé, Mondeléz, PepsiCo, and Nissin Foods. The broker involved in collecting and transporting oil palm fruits from the illegal plantation inside the reserve to the two nearby mills is called RAM Ud. Iqbal Jaya. This broker has a collection point located in the Cot Bayu village area in central Trumon district, Aceh Selatan.

AREA :

18 hectares (44 acres) within Rawa Singkil Wildlife Reserve. 7 hectares (17 acres) are productive oil palm plantations.



GPS Coordinates for 100 ha area (247 acres):

02°50'42.11" N 97°41'22.01" E

GPS Coordinates for recent clearing and canal development:

02°50'45.88" N 97°41'20.42"E

DATE OF CLEARANCE :

Lands cleared in 2012. Oil palm plantings began in 2014 and continued until 2017.



Land speculator 5's illegal palm oil plantation inside Rawa Singkil Wildlife Reserve, Lhok Raya village area, Aceh Selatan. September 2024.



GPS showing the location of land speculator 5's illegal plantation inside Rawa Singkil Wildlife Reserve, Lhok Raya village area, Aceh Selatan. September 2024.



Land speculator 5's illegal plantation has been planted on drained peatlands inside Rawa Singkil Wildlife Reserve, Lhok Raya village area, Aceh Selatan.



GPS Coordinates:

02°50'45.88"N 97°41'20.42"E



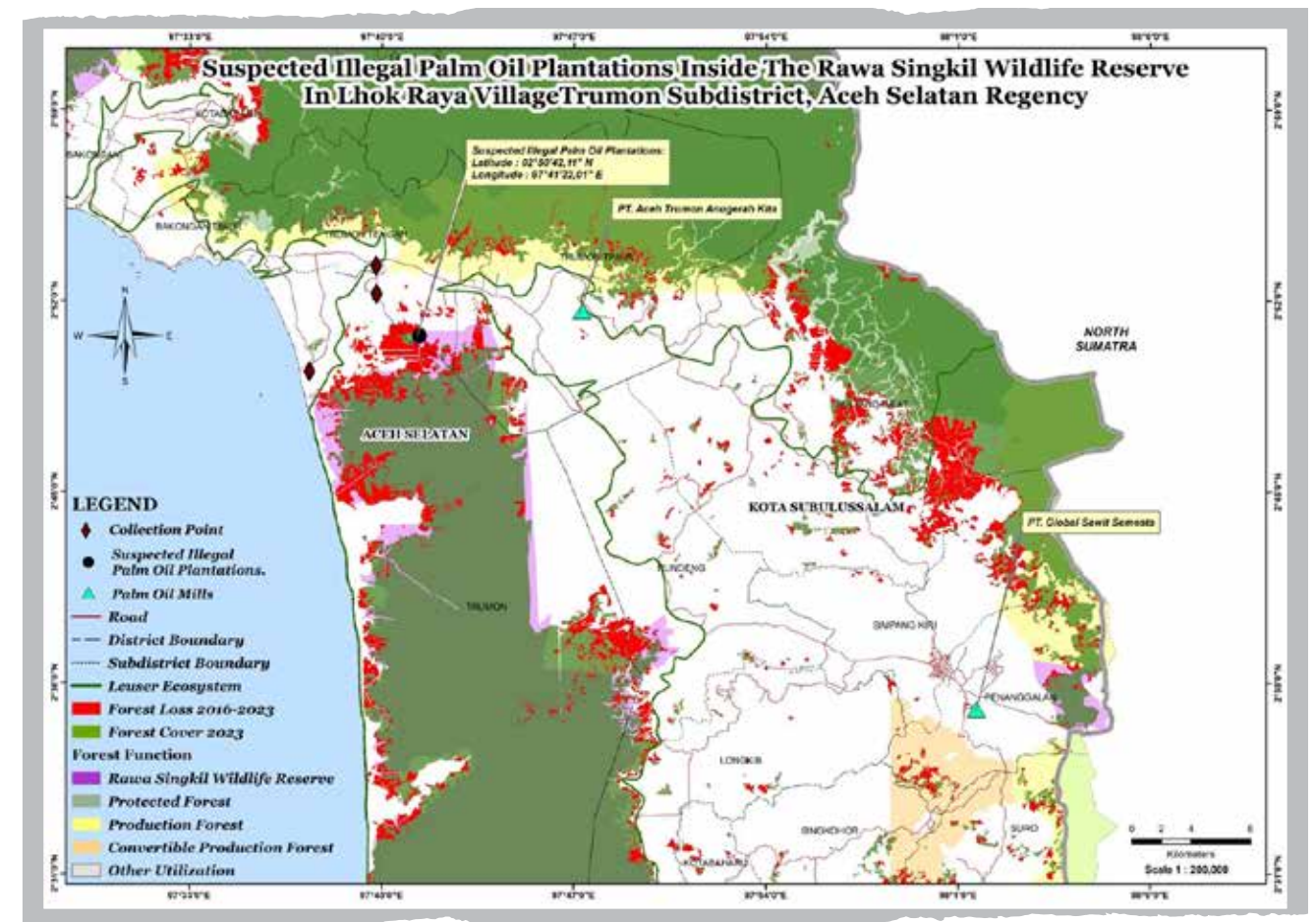
Receipt provided by the broker RAM Ud. Iqbal Jaya who is involved in collecting and transporting oil palm fruits from the illegal plantation to two nearby mills, PT. Global Sawit Semesta and PT. Aceh Trumon Anugerah Kita.



Palm oil broker truck carrying oil palm fruits sourced from land speculator 5's illegal palm oil plantation entering PT. Global Sawit Semesta, Penanggalan, Subulussalam. Early October 2024.



Broker leaving PT. Global Sawit Semesta with an empty truck after delivering palm oil fruits produced illegally inside the Rawa Singkil Wildlife Reserve. Early October 2024.

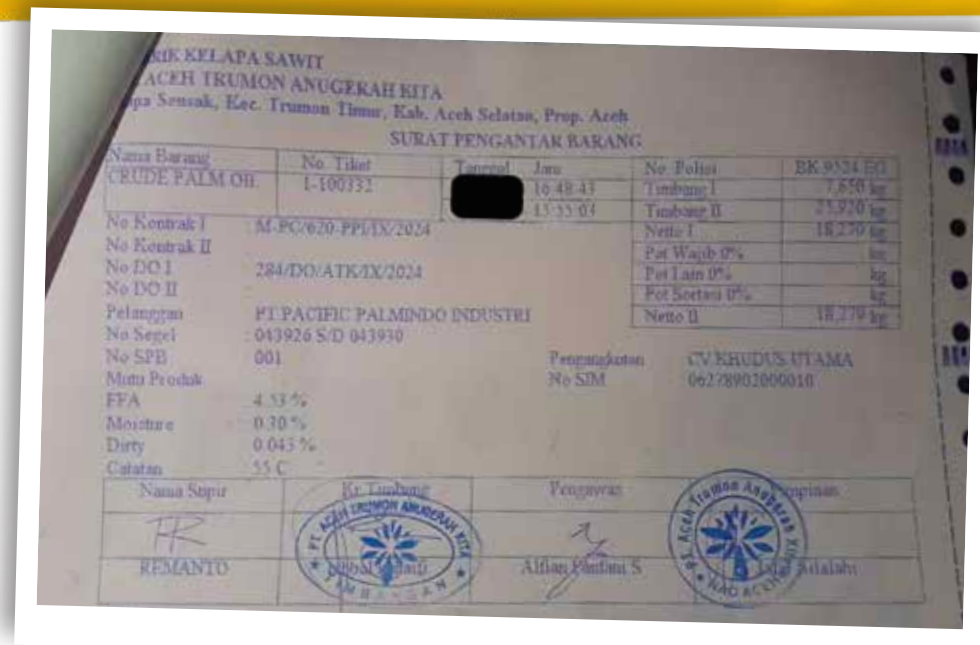


The map above shows the location of the illegal palm oil plantation controlled by land speculator 5, which is close to the collection points and network of palm oil mills sourcing from the region. RAN found evidence that illegally produced palm oil fruits were transported from this illegal plantation to the newest mill, which was recently constructed and is called PT. Aceh Trumon Anugerah Kita.

RAN's investigation has collated evidence that shows that oil palm fruits grown illegally inside Rawa Singkil Wildlife Reserve in Lhok Raya, Aceh Selatan are collected and transported to PT. Global Sawit Semesta — a mill repeatedly exposed for supplying the world's brands with illegal palm oil grown in the Orangutan Capital of the World.

Major traders Royal Golden Eagle Group (Apical),⁶² Musim Mas,⁶³ Golden Agri Resources^{64,65,66} Wilmar,⁶⁷ and Permata Hijau Group have all confirmed their past sourcing relationships with PT. Global Sawit Semesta (PT. GSS) via published supplier or grievance lists.⁶⁸ Apical⁶⁹ and Musim Mas⁷⁰ have issued reports claiming that PT. GSS has improved its traceability systems and stopped sourcing illegally produced palm oil after being exposed in RAN's 2022 Carbon Bomb Scandals. PT. GSS also claimed to have put traceability to the plantation mechanism in place in September 2022.⁷¹ **This case shows once again that PT. GSS is still sourcing illegal palm oil grown inside the reserve and the traceability and deforestation-free claims being made by palm oil traders Royal Golden Eagle Group,⁷² Musim Mas⁷³ and Permata Hijau Group⁷⁴ and global brands like Procter & Gamble^{75,76,77} Nestlé^{78,79} Mondelez,⁸⁰ PepsiCo⁸¹ and Nissin Foods⁸² simply can not be trusted.**

RAN has also collated evidence showing oil palm fruits grown illegally inside Rawa Singkil Wildlife Reserve in Lhok Raya, Aceh Selatan are collected and transported to the newest palm oil mill in Aceh Selatan called PT. Aceh Trumon Anugerah Kita (PT. ATAK). This evidence confirms RAN's previous findings that this mill is driving the increase in the expansion of palm oil plantations in the region.⁸³ PT. ATAK remains a supplier to Permata Hijau Group despite the mill's lack of adequate traceability and compliance systems.⁸⁴ Permata Hijau Group is the palm trader that sources from the largest number of mills in Aceh, including mills that are on the 'no-buy' lists of its peers due to their non-conformances with NDPE requirements.^{85,86} Our investigations also found that PT. ATAK supplies PT. Pacific Palmindo Industries.⁸⁷



Receipt showing that PT. ATAK supplies crude palm oil to PT. Pacific Palmindo Industries. Collected in September 2024.



A Way Forward

Collaborative Action Is Needed to Deliver a Solution for the Singkil Bengkung Trumon Region

The global market now demands palm oil that is free of deforestation, peatland development, and exploitation of communities and workers, especially in global biodiversity hotspots like the Leuser Ecosystem. However, these commitments still need to be adequately implemented on the frontlines of palm oil expansion in the “Orangutan Capital of the World” in Aceh, Indonesia, where deforestation is increasing. Advancements are needed in the palm oil industry because global brands and their customers remain exposed to illegal sources of Conflict Palm Oil grown by land speculators inside the Rawa Singkil Wildlife Reserve.

Global brands and banks implicated must immediately take action to halt business-as-usual practices with their suppliers and clients that are driving the expansion of palm oil by land speculators into the Rawa Singkil Wildlife Reserve. Transparent and independently verifiable monitoring, traceability, and compliance systems must be put in place to stop the sourcing of illegal palm oil from within the reserve.

Banks providing credit to palm oil groups with trading operations in the region must *require* clients to prove full traceability. The recently announced expectations for banks on deforestation⁸⁸ published by the Institutional Investors Group on Climate Change specifies that banks conduct detailed risk assessments for high-risk sectors or regions, and carry out proactive monitoring and compliance.

PHOTO: Paul Hilton / Global Conservation

Investments are needed in the establishment of multi-stakeholder programs that develop and implement a common and just vision to protect the lowland rainforests and peatlands of the Singkil-Bengkung region from further destruction as well as diversify economies and drive investments in low-carbon, community-led, small-scale agriculture that respect the rights of communities and smallholder farmers to manage their lands and improve livelihoods. To date, programs have been established with support from PepsiCo, Unilever, and Musim Mas that aim to protect lowland rainforests in the Eastern part of the Leuser Ecosystem,⁸⁹ but not in the four districts in Southern Aceh where the deforestation risk is the greatest and growing. **RAN is calling on all brands, traders, and banks that are complicit in the Singkil crisis to invest in these programs without delay.**

The companies named in this report were asked to comment on the findings presented. Details of their responses are available on: [RAN.org/leuser-watch/orangutan-capital-under-siege/](https://ran.org/leuser-watch/orangutan-capital-under-siege/).

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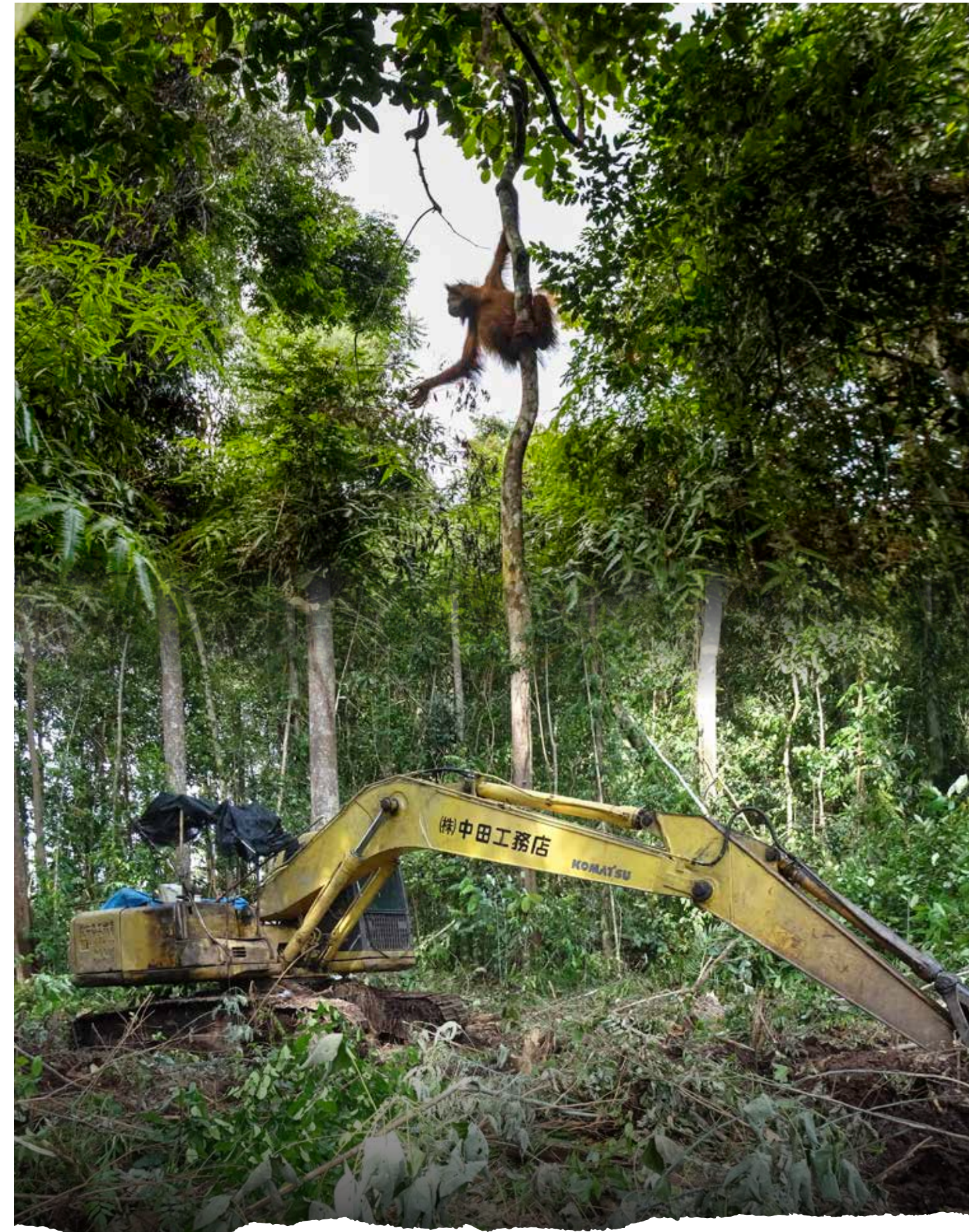


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