



APRIL and IPEWG

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Date: 11 January 2015

Dear Madam/Sir,

We are writing you in relation to the recently published [report "Assessment of impacts of plantation drainage on the Kampar Peninsula peatland, Riau"](#). The report is made based on the latest science and remote sensing techniques and it shows that drained plantations on peatlands cannot be sustained.

APRIL group is a major concession holder on the Kampar Peninsula and therefore an important stakeholder in the discussion around the sustainable management of peatlands. The report reconfirms that APRIL's plantations on peatlands will eventually reach a level where drainage becomes impossible and plantations flood regularly. This is caused by a process of peat oxidation and subsidence due to the drainage which dries out the top layer of the peat. This letter is cc'd to APP which also holds concessions with drained plantations on the Kampar Peninsula.

The research shows that in 2014, 31% of the existing plantation area (including 5% of the existing pulp plantations) on the Kampar Peninsula already suffered from regular flooding and drainage problems. It is projected that even with the best achievable hydrological management of Acacia plantations on peatlands, within 25, 50 and 100 years, the area under duress will increase to 71%, 83% and 98% respectively. This makes nearly all plantations (pulp and oil palm) on the peatlands of Kampar Peninsula economically unfeasible in the middle to long term.

The report further confirms a 99% overlap between the fire-hotspots in the last 15 years and plantation areas on peatlands in the Peninsula. This shows the link between drained peatlands and fire and the incapability of plantation companies, including APRIL, to stop the reoccurrence of fire incidents.

In light of APRIL's SFMP 2.0, that includes protecting peat landscapes, investors, buyers and civil society stakeholders expect that APRIL manages its plantations on peatlands in an economically, environmentally and socially sustainable way. It is known from the Kampar Science Based Management Support Project (Kampar SBMSP) which was finalized in 2010, and further the data and analysis in the report above, that APRIL's plantation management on peatlands in Kampar Peninsula could not be considered as sustainable peatland management.

There are consistent claims from the pulp wood industry that peat loss and subsidence can be avoided by improved water management techniques. But the report underscores that such techniques, including the 'eco-hydro' peatland hydrology management model developed by APRIL,

can only reduce the rate of subsidence up to 20%, and result in impaired drainability, flooding and loss of productivity.

The “Kampar Ring”-approach developed by APRIL is supposed to protect the core area of Kampar Peninsula’s peat swamp forest. Apart from our belief that protecting forest may never be used as an excuse for large-scale deforestation, the Kampar Ring inevitably creates unintended severe impacts on this area and endangers its long-term conservation in the form of the offsite drainage impact of the plantations which may reach several kilometers into the adjacent peat swamp forests, resulting in vegetation’s die-back and making these areas susceptible for fire.

The research results conclude that not only the drainage-based plantations on peatland in the Kampar Peninsula are unsustainable, but they also pose a serious threat to the conservation of remaining natural peat swamp forests and the livelihoods of local communities. Whilst we applaud APRIL’s ambition to conserve the core area of Kampar Peninsula’s peat swamp forest in its recent expansion of the ‘Restorasi Ekosistem Riau’ initiative, without proper hydrological restoration of the drained plantations, the forests areas APRIL wants to protect will be under constant water stress and prone to fire hazard. In addition, peatland subsidence and fire will strongly impact on local communities’ livelihoods through flooding and haze putting lives in danger.

In view of the scientific evidence as shown above, we believe that continuous operation of drainage-based plantations on Kampar Peninsula is unfeasible and irresponsible. We therefore strongly suggest that APRIL start planning the socially and environmentally responsible phasing-out of its drainage-based plantations on peatlands, which should involve restoring hydrological conditions of currently drained concession areas on peatlands and the identification, piloting and upscaling of the use of alternative crops that require no drainage. APRIL should also seek advice to its Independent Peat Expert Working Group (IPEWG) to plan and execute sustainable management of its peatlands in an environmentally and socially way. This in order to reduce CO₂ emissions and reduce fire hazard, eventually stopping soil subsidence and enable APRIL to sustain productivity on peatlands, and help sustain the HCV peat swamp forest in Kampar’s core area, and local communities’ livelihoods.

Best wishes,

Marcel Silvius and Nyoman Suryadiputra, Wetlands International

Budi Wardhana, World Wildlife Fund

Lafcadio Cortesi, Rainforest Action Network

Sergio Baffoni, Environmental Paper Network

Susan Howatt, Canopy

Isnadi Esman, JMGR

Riko Kurniawan, Walhi Riau

Harry Oktavian, Scale-up

Zainuri Hasyim, Yayasan Mitra Insani

CC: Joe Lawson (Chair SAC), Tony Whitten (FFI), Peter White (WBCSD) and Aida Greenbury (APP)