

【翻訳】

SMG/APP(エイピーピー)社の購入企業及び投資家へのアドバイザー(勧告)

2020年4月23日

WWF インドネシア

シナルマス・グループのアジア・パルプ・アンド・ペーパー社 (SMG/APP (エイピーピー) 社) は、インドネシアのスマトラ島とカリマンタン島において 30 年以上にわたり、200 万ヘクタールを超える自然林の破壊に関与し、野生生物の生息地破壊、泥炭開発による火災と温室効果ガス排出、ランドグラブといわれる問題のある土地取引、自然林の皆伐とパルプ材の植林地開発をめぐっての地域住民と紛争を引き起こしてきた (参照: 自然林破壊のタイムラインは[こちら](#))。

APP 社は、自らの方針の実施がさまざまな面で前進したという自己宣言を行ってきた。しかし、重要課題の多くについて、宣言はまったく透明性を欠いていた。インドネシアの NGO は、独立したモニタリングを行い、以下を明らかにした。

・自然林破壊ゼロ目標は繰り返し失敗した。

SMG/APP 社は、当初 2004 年まで、次に 2007 年、その後 2009 年までと自然林破壊ゼロの目標を掲げてきたが、全て失敗に終わっている<sup>1</sup>。その後さらに 2013 年をもって自然林破壊をやめると約束したが<sup>2</sup>、約束が発表された時にはすでに、パルプ材にできるスマトラ島の森は、同社のサプライヤーによってすべて伐採されていた<sup>3</sup>。2016 年、同社のインドネシアで 3 つ目となるパルプ工場が生産を開始した。この工場は年間 280 万トンの生産能力を有し<sup>4</sup>、NGO はこれではまた自然林破壊ゼロの約束が履行されない可能性があることを警告した<sup>5</sup>。以来 SMG/APP 社は、植林地からの供給が十分にあると請け合ったが、それが虚偽であることを何度も露呈することとなった。同社は、インドネシア、ベトナム、マレーシア、タイ、オーストラリア、南アフリカにおいて、原料サプライヤーが自然林破壊ゼロかどうかを確認するためのデューデリジェンスを十分に行わずに、サプライヤーを増やしてきた。NGO は、APP 社がサプライヤーを通じて自然林破壊に関与し続け、2013 年の自然林破壊を停止する誓約を守っていないという明らかな事例を突きとめた<sup>6, 7, 8, 9, 10, 11, 12, 13</sup>。2019 年 3 月、APP 社自身も 2013 年以降に自然林破壊を引き起こした複数の問題企業からの木材供給があったこと、もしくは他の関係があったことを認めた<sup>14, 15, 16</sup>。

・100 万ヘクタールの自然林と泥炭地を再生または保全するという 2014 年の誓約は、ほんのわずかしか実行していない<sup>17</sup>。

2015 年と 2018 年に、泥炭地にある SMG/APP 社サプライヤーの伐採許可地の多くで発生した深刻な火災とヘイズ (煙害) は、サプライヤーが伐採許可地で開発した泥炭地を再生させ、火災を防止する必要があることを改めて示した<sup>18, 19, 20, 21, 22</sup>。インドネシアの APP 社サプライヤーの伐採許可地には、約 140 万ヘクタールの泥炭地が含まれており、その大部分はすでに自然林が破壊され、アカシアが植林されている<sup>23</sup>。複数の NGO によると、SMG/APP 社の関連会社のうち何社かは、泥炭地再生と森林保護の法令<sup>24</sup>を遵守して

おらず、また SMG/APP 社はこれまでのところ泥炭地 7,000 ヘクタールの植林事業からの撤退を公表したにすぎない<sup>25, 26, 27, 28</sup>。泥炭地以外では、同社は、劣化した森林 5,000 ヘクタールの再生を開始したと発表している<sup>29</sup>。これを植林事業から撤退した泥炭地と合わせても、同社が再生を誓約した 100 万ヘクタールのわずか 1.2%にすぎない。

・ **社会紛争の解決は、困難な状況に直面し続けている。**

SMG/APP 社は、木材サプライヤーと地域住民との間に数百もの紛争があることを認めている。しかし、紛争事案とその解決の進捗について、第三者検証を可能にするデータを全く提示していない<sup>30</sup>。2019 年、現地 NGO は、土地の権利、強制退去、補償の不履行をめぐる進行中の地域社会との紛争で、SMG/APP 社が対処していない事案 100 件を特定した<sup>31, 32</sup>。

また、SMG/APP 社は、FSC<sup>®</sup> (Forest Stewardship Council<sup>®</sup>、森林管理協議会) から関係を断たれている。FSC は、環境責任を果たし、社会的に有益で、経済的にも継続可能な森林管理を保証するための、もっとも厳格な認証制度として広く認められている<sup>33</sup>。これは、SMG/APP 社は FSC 認証と商標の使用を含め、いかなる種類の関係ももつことができないことを意味する<sup>34</sup>。FSC が関係を断絶している世界でたった 6 社のうち<sup>35</sup>、最初にこれが決定したのが APP 社である。FSC は、「APP 社が、FSC の理念に抵触する破壊的な森林施業に関与するという、重大かつ、公開の情報がある」とし、2007 年に関係断絶を発表した<sup>36</sup>。

2017 年、FSC は APP 社との関係断絶を終了するためのロードマップ作成のプロセスを開始した。しかし、2018 年 8 月、FSC はこのプロセスを中断せざるをえなかった。理由は、「APP 社の企業構造と、同社に関係すると思われる複数の企業による、許容できない森林管理に関する申し立てについて、APP 社からの追加情報（が得られなかった）」ためである<sup>37</sup>。この FSC の決定は、SMG/APP 社が全ての関連会社についての情報開示に消極的な姿勢であること、つまり情報を開示しないことによって、自然林破壊への継続的な関与と、修復が必要とされる環境と社会への悪影響を隠すことができることが、繰り返し明らかになった末に下されたものである<sup>38, 39, 40, 41, 42</sup>。

WWF は企業と投資家に対し、以下に基づき、SMG/APP 社及びその関連会社とのビジネスを終了させるよう強く勧告する。

SMG/APP 社とその関連会社など、FSC と断絶関係にある、いかなる企業とも新規契約を結ばないこと。

2. 以下 (a)、(b) を含む、持続可能な紙パルプ調達方針を、期限を定めた計画とともに公表すること。

(a) FSC 認証製品またはリサイクル製品の調達を増やすこと

(b) FSC から関係を断絶されている企業の製品を排除すること

3. このような期限を定めた計画の進捗状況を公表すること。

より詳細な情報については、WWF インドネシア、Nursamsu ([nursamsu@wwf.id](mailto:nursamsu@wwf.id)) までご連絡ください。

【原文】 WWF Advisory to Buyers and Investors of Sinar Mas Group/Asia Pulp & Paper (SMG/APP)

[https://d2ouvy59p0dg6k.cloudfront.net/downloads/wwf\\_advisory\\_to\\_buyers\\_and\\_investors\\_of\\_smgapp.pdf](https://d2ouvy59p0dg6k.cloudfront.net/downloads/wwf_advisory_to_buyers_and_investors_of_smgapp.pdf)

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<sup>1</sup> Eyes on the Forest(2011) The truth behind APP's greenwash.

<https://eyesontheforest.or.id/uploads/default/report/Eyes-on-the-Forest-Investigative-Report-The-truth-behind-APPs-greenwash.pdf>

<sup>2</sup> Asia Pulp & Paper (1 February 2013) APP's Forest Conservation Policy.

<http://www.fcpmonitoring.com/Pages/OpenPDF.aspx?id=4>

<sup>3</sup> Eyes on the Forest (April 2013) Where are the trees?

<https://www.eyesontheforest.or.id/uploads/default/report/Eyes-on-the-Forest-Investigative-Report-Where-are-the-trees.pdf>

<sup>4</sup> The Straits Times (23 June 2017) APP mill can produce far more than expected, stoking worries.

<https://www.straitstimes.com/singapore/environment/app-mill-can-produce-far-more-than-expected-stoking-worries>

The article writes the following on production capacity of OKI mill: "The government license, issued by Indonesia's Capital Investment Coordination Agency (BKPM), showed that the mill had approval to produce up to 3.25 million tonnes of pulp a year".

<sup>5</sup> Koalisi Anti Mafia Hutan (2016) Will Asia Pulp & Paper default on its "zero deforestation" commitment?

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<sup>6</sup> Eyes on the Forest (December 2015) Penebangan hutan alam gambut oleh PT. Muara Sungai Landak mengancam ekosistem dan habitat orangutan.

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<sup>7</sup> Greenpeace International (16 May 2018) Greenpeace slams APP/Sinar Mas over links to deforestation, ends all engagement with company.

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## WWF Advisory to Buyers and Investors of Sinar Mas Group/Asia Pulp & Paper (SMG/APP)

**23 April 2020** -- Sinar Mas Group's Asia Pulp & Paper (SMG/APP) has a legacy of over 30 years of more than 2 million hectares of deforestation, destruction of wildlife habitat, fires and greenhouse gas emissions from peat development, and conflicts with local communities related to land grabbing, forest clearance and pulpwood plantation development in Sumatra and Kalimantan, Indonesia (see timeline of deforestation [here](#)).

APP has been self-publishing declarations of progress in various aspects of its policy implementation, but failed to provide any transparency on a wide range of key issues. Independent monitoring by Indonesian NGOs revealed that SMG/APP:

- **Repeatedly missed its zero-deforestation targets.** After missing its zero deforestation targets in 2004, 2007 and 2009<sup>1</sup>, SMG/APP committed to yet another deforestation cut-off year of 2013<sup>2</sup>. The commitment came after their suppliers had already cleared all the forest they could pulp in Sumatra at that time<sup>3</sup>. In 2016, SMG/APP's third pulp mill in Indonesia started production with a capacity of as much as 2.8 million tons of pulp per year<sup>4</sup>, causing NGOs to warn of SMG/APP's possible default on yet another zero-deforestation commitment<sup>5</sup>. Since then SMG/APP has repeatedly proven that its assurances of having enough plantation supply was false. SMG/APP has kept adding new fiber suppliers in Indonesia, Vietnam, Malaysia, Thailand, Australia and South Africa without conducting sufficient due diligence to ensure that the suppliers are deforestation free. NGOs have discovered consistent cases of APP missing the 2013 cut-off year by being involved in deforestation through their suppliers<sup>6, 7, 8, 9, 10, 11, 12, 13</sup>. In March 2019, APP itself admitted of sourcing wood from, or having other relationship with, controversial companies who caused deforestation since 2013<sup>14, 15, 16</sup>.
- **Made a minimum progress to implement their 2014 commitment to restore or conserve 1 million hectares of natural forest and peatlands**<sup>17</sup>. Serious regional haze and fires in many SMG/APP supplier concessions in peatland in 2015 and 2018<sup>18, 19, 20, 21, 22</sup> are the best reminders that they need to restore the peatland in their concessions and in so doing made less susceptible to fire. APP suppliers' concessions in Indonesia include almost 1.4 million hectares of peatlands and a lot of them are already deforested and planted with acacia<sup>23</sup>. However, NGOs found that some of SMG/APP's affiliated companies have failed to comply with peat restoration and forest protection regulations<sup>24</sup> and SMG/APP has only thus far publicly committed to retiring 7,000 ha of plantation on peat<sup>25, 26, 27, 28</sup>. Outside peatlands, SMG/APP announced starting restoration work in 5,000 ha of degraded forest<sup>29</sup> - together with the retired peatlands representing only 1.2% of the 1 million hectares they had publicly committed to restoring.
- **Continue to face challenges to resolve social conflicts.** SMG/APP has acknowledged hundreds of conflicts between their wood suppliers and the villages, but without providing any data on the cases and conflict-resolution progress to allow for independent verification<sup>30</sup>. In 2019, local NGOs identified one hundred active conflicts over land rights, evictions, and unfulfilled compensation with local communities that remain unaddressed by SMG/APP<sup>31, 32</sup>.

SMG/APP has also been disassociated by Forest Stewardship Council (FSC), which is widely considered as the most robust certification system to ensure environmentally responsible, socially beneficial and economical viable management of forests<sup>33</sup>. This means that SMG/APP is not allowed to have any association of any kind with FSC, including use of any of its certificates and trademarks<sup>34</sup>. APP is the first among only six companies in the world that FSC remains disassociated from<sup>35</sup>. FSC's disassociation from APP was announced in 2007 amid "substantial, publicly available information that APP was involved in destructive forestry practices, which brought it into conflict with the FSC mission"<sup>36</sup>.

In 2017, FSC initiated a process to develop a roadmap for ending its disassociation with APP. However, in August 2018, FSC was forced to suspend the process due to "[the lack of] further information from APP related to its corporate structure and alleged unacceptable forest management activities by companies thought to be related to APP"<sup>37</sup>. FSC's decision followed a series of revelations about SMG/APP's unwillingness to disclose

all of their associated companies, that allowed them to hide their continuing involvement in deforestation and their total environmental and social negative impacts which need to be remedied<sup>38, 39, 40, 41, 42</sup>.

WWF strongly recommends that companies and financial investors end their business relationships with SMG/APP and its affiliates on the following basis:

1. Not enter into any new contract with companies that are disassociated from FSC, such as SMG/APP and its affiliates.
2. Publish a sustainable pulp & paper procurement policy with a time-bound plan to (a) increase sourcing of FSC certified or recycled products and to (b) eliminate products from companies that are disassociated from FSC.
3. Publish progress against the time-bound plan above.

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