

CONTENTS

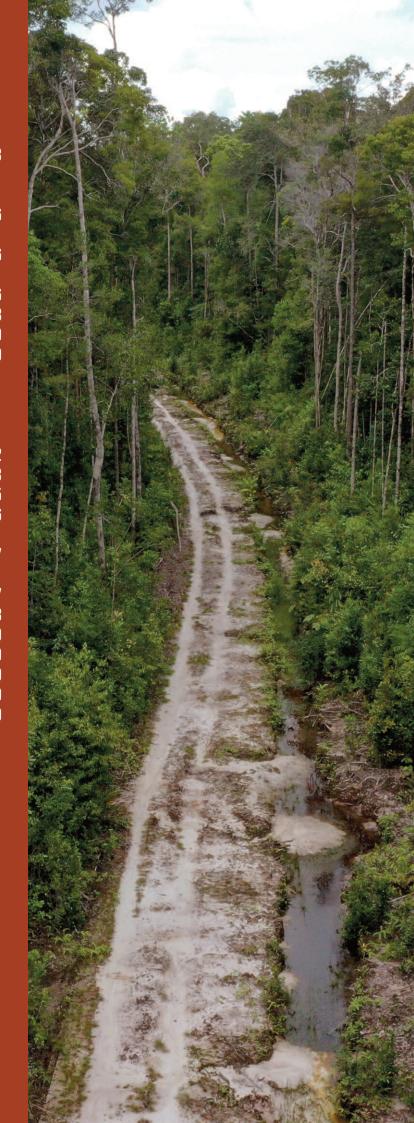
APPENDIX I: INDONESIAN TIMBER COMPANIES Sourcing from Land Clearing in 2024	3
APPENDIX II: COMPANY PROFILES	6
CONCESSIONS	6
PT Industrial Forest Plantation PT Bumi Hijau Prima PT Bina Sarana Sawit Utama PT Indosubur Sukses Makmur	6 8 9 10
INDONESIAN BUYERS OF DEFORESTATION WOOD	11
PT Basirih Industrial PT Wijaya Triutama Plywood Industri PT Kayu Multiguna Indonesia PT Putra Buana Indonesia Wood Industry PT Korindo Ariabima Sari	11 12 13 15 16
EU COMPANIES	17
Seiton BV Fepco International Dekker Hout Impan GmbH International Plywood BV Timber Trade Connection Kurz KG	17 18 19 19 20 20 20
APPENDIX REFERENCES	21

Cearthsight

Earthsight is a non-profit organisation committed to harnessing the power of primary investigative research and reporting to bring attention to pressing issues of human rights and environmental justice. We aim to get to the core of an issue, using a range of investigative research methods to obtain first-hand, documented evidence of crimes against both people and the planet which is irrefutable and impossible to ignore. By following the money and tracing supply chains, our research also aims to expose the complicity of consumers and financiers in abetting these abuses.

email: info@earthsight.org.uk www.earthsight.org.uk

Worried about privacy? Download the Signal app for free on your phone and message us securely at this number: +447391875237



APPENDIX I

Indonesian timber companies which in 2024 reported sourcing natural forest logs from land clearing or land preparation in timber plantation concessions, or from permits to clear land in agricultural or mining concessions. Source: RPBBI timber sourcing documents

COMPANY NAME	NATURAL FOREST LOGS FROM LAND CLEARING OR Land Preparation Permits Reported in 2024 Supply (M³)	NATURAL FOREST LOGS FROM SELECTIVE Logging Concessions (IUPHHK) (M³)	NATURAL FOREST Logs from other Sources (M³)	PERCENTAGE OF ALL NATURAL FOREST LOGS FROM LAND CLEARING OR LAND PREPARATION	SOURCES OF CONVERSION WOOD
PT Wijaya Tri Utama Plywood Industri	20,885	58,881	3,393	25%	- PT Tanjung Redeb Hutani (16,608m²), timber plantation concession in East Kalimantan - PT Bumi Hijau Prima (4,278m²), timber plantation concess in Central Kalimantan
PT Kayu Lapis Asli Murni	17,853	2,701	-	87%	- PT Indosubur Sukses Makmur (17,853m³), timber plantation concession in East Kalimantan
PT Basirih Industrial	17,280	11,261	11,100	44%	PT Tanjung Redeb Hutani (10,981m³), timber plantation concession in East Kalimantan PT Industrial Forest Plantation (3,755m³), timber plantation concession in Central Kalimantan PT Bumi Hijau Prima (2,543m³), timber plantation concess in Central Kalimantan
PT Putra Buana Indonesia Wood Industry	16,730	38,495	1,590	29%	PT Tanjung Redeb Hutani (5,196m²), timber plantation concession in East Kalimantan PT Indosubur Sukses Makmur (3,594m²), timber plantation concession in East Kalimantan PT Kaltim Bhumi Palma (7,939m²), oil palm concession in East Kalimantan
PT Korindo Ariabima Sari	14,497	103,116	-	12%	- PT Indosubur Sukses Makmur (14,497m³), timber plantation concession in East Kalimantan
PT Kayu Alam Perkasa Raya	11,834	16,884	19,055	25%	PT Tanjung Redeb Hutani (6,176m³), timber plantation concession in East Kalimantan PT Lentera Sawit Makmur (3,287m³), timber plantation concession in East Kalimantan PT Kooperasi Sawit Tallasau Berkah (2,371m³), palm oil cooperative in East Kalimantan
PT Kharisma Jaya Gemilang	11,239	140,744	8,659	7%	- PT Tanjung Redeb Hutani (11,239m³), timber plantation concession in East Kalimantan
PT Dewata Cipta Semesta	10,063	22,118	4,951	27%	 PT Tanjung Redeb Hutani (3,518m³), timber plantation concession in East Kalimantan PT Sendawar Adhi Karya (6,545m³), timber plantation concession in East Kalimantan
PT Nusa Persada Alpena	8,428	-	2,523	77%	- PT Mayawana Persada (8,428m³), timber plantation concession in West Kalimantan
CV Sinar Meranti Mandiri	7,820	877	-	90%	- PT Sendawar Adhi Karya (7,820m³), timber plantation concession in East Kalimantan
PT Taiyoung Engreen	6,879	-	-	100%	- PT Taiyoung Engreen (6,879m³), timber plantation concession in Central Kalimantan
CV Putra Shorea Timber	5,101	-	-	100%	- PT Tanjung Redeb Hutani (5,101m³), timber plantation concession in East Kalimantan
Surya Satrya Timur	4,373	110,339	15,574	3%	- PT Tanjung Redeb Hutani (4,373m³), timber plantation concession in East Kalimantan
UD Furqon	4,227	1,351	-	76%	- PT Sendawar Adhi Karya (4,227m³), timber plantation concession in East Kalimantan
CV Tunas Agro Primatama	3,531	1,566	-	69%	- PT Dinasti Mahakam Jaya (2,990m³), palm oil plantation in East Kalimantan - CV Gelang Kalung Prima Tama (541m³) East Kalimantan
PT Hutan Rindang Banua	3,382	-	-	100%	- PT Hutan Rindang Banua (3,382m³), timber plantation concession in South Kalimantan
PT Longhwa Jaya Timber	3,044	-	547	85%	- PT Swadaya Perkasa (3,044m³), timber plantation concession in East Kalimantan
PT Kayu Multiguna Indonesia	2,757	17,434	475	13%	PT Bina Sarana Sawit Utama (1,438m³), oil palm concessi in Central Kalimantan PT Graha Equity Investment (944m³), mining concession i Central Kalimantan PT Industrial Forest Plantation (224m³), timber plantation concession in Central Kalimantan PT Agro Borneo Lestari (151m³), timber plantation concession in Central Kalimantan
UD Anugrah Sawmill II	2,632	-	-	100%	- PT Industrial Forest Plantation (2,632m³), timber plantatio concession in Central Kalimantan
PT Orimba Alam Kreasi (subsidia of PT. SLJ Global Tbk.)	ry 2,500	-	21	99%	- PT Tanjung Redeb Hutani (2,500m³), timber plantation concession in East Kalimantan

RISKY BUSINESS | OCTOBER 2025

COMPANY NAME	NATURAL FOREST LOGS FROM LAND CLEARING OR Land Preparation Permits Reported in 2024 Supply (M³)	NATURAL FOREST LOGS FROM SELECTIVE Logging Concessions (IUPHHK) (M³)	NATURAL FOREST Logs from other Sources (M³)	PERCENTAGE OF ALL Natural Forest logs From Land Clearing or Land Preparation	SOURCES OF CONVERSION WOOD
PT Karunia Rimba Makmur Semesta	2,288	-	3,066	43%	- PT Waenibe Wood Industries (2,288m³), timber plantation concession in Maluku
CV Prima Papua	2,273	-	-	100%	- PT Subur Karunia Raya (1,238m³), oil palm concession in West Papua - Kopermas Kami-Nassey (1,035m³), nutmeg plantation concession in West Papua
PT Kayu Merapi Internusa	2,238	29,592	5,004	6%	- PT Kaltim Bhumi Palma (2,238m³), oil palm concession in East Kalimantan
PT Demas Raya (formerly PT Demas Raya Abadi, PT Hendrajaya Kariangau	1,996 u)	2,524	2,391	29%	- PT Hutan Berau Lestari (1,589m³), timber plantation concession in East Kalimantan - PT Tanjung Redeb Hutani (407m³), timber plantation concession in East Kalimantan
Dasa Intiga	1,605	27,857	-	5%	- PT Perintis Adiwana (1,605m³), timber plantation concession Central Kalimantan
PT Kayu Mas Abadi	1,553	-	4,770	25%	- PT Burni Hijau Prima (1,553m³), timber plantation concession in Central Kalimantan
UD Sinar Abadi	1,249	1,990	5,666	14%	- PT Hutan Produksi Lestari (1,079m³), timber plantation concession in Central Kalimantan - PT Sendawar Adhi Karya (110m³), timber plantation concession in East Kalimantan - PT Tanjung Redeb Hutani (60m³), timber plantation concession in East Kalimantan
CV Karya Sukses Mandiri	1,166	60	3,253	26%	- PT Panambangan (1,009m³), timber plantation concession in East Kalimantan - PT Bina Sarana Sawit Utama (157m³), oil palm concession in Central Kalimantan
PT Surya Kaltim Perdana	1,119	-	-	100%	- PT Sendawar Adhi Karya (1,119m³), timber plantation concession in East Kalimantan
CV Sejahtera Bumi Papua	1,052	1,228	1,018	32%	- PT Andalan Kahala Raya (1,052m³), coconut plantation in Papua
PT Segara Timber Co. Ltd	1,022	28,383	-	3%	- PT Sendawar Adkhi Karya (1,022m³), timber plantation concession in East Kalimantan
CV Tanjung Prima Lestari	990	2,118	90	31%	- PT Lentera Sawit Makmur (369m³), timber plantation concession in North Kalimantan - PT Berau Coal (220m³), mining concession in East Kalimantan - PT Berau Coal (Unit Binungan) (263m³), mining concession in East Kalimantan - PT Rapak Anugerah Prima Coal (139m³), mining concession in North Kalimantan
CV Sungai Berlian Jaya	968	223	-	81%	- PT Attaubah Jaya Bersama (501 m³), oil palm plantation East Kalimantan - PT Berau Coal (Unit Binungan) (467 m³), mining concession in East Kalimantan'
PT Prima Melak Industri	833	-	-	100%	- PT Alba Prima Nusantara (833m³), oil palm concession in East Kalimantan
PT Nagabhuana Aneka Piranti	794		2,420	25%	PT Bina Sarana Sawit Utama (230m³), oil palm plantation in Central Kalimantan PT Graha Equity Investment (218m³), mining concession in Central Kalimantan PT Industrial Forest Plantation (155m³), timber plantation concession in Central Kalimantan PT Agro Borneo Lestari (151m³), timber plantation concession in Central Kalimantan PT Babugus Wahana Lestari (40m²), timber plantation concession in Central Kalimantan
CV Anugerah Alam Raya	779	-	-	100%	- PT Industrial Forest Plantation (779m³), timber plantation concession in Central Kalimantan
CV Prima Putra Mandiri	702	:	-	100%	- PT Dinasti Mahakam Jaya (702 m²), palm oil plantation in East Kalimantan
UD Dwi Putra	600		-	100%	- PT Kahayan Putra Lestari (600m³) in Central Kalimantan
UD Karya Bakti II	587	-	-	100%	- PT Industrial Forest Plantation (587m³), timber plantation concession in Central Kalimantan

COMPANY NAME	NATURAL FOREST LOGS FROM LAND CLEARING OR Land Preparation Permits reported in 2024 Supply (M³)	NATURAL FOREST LOGS FROM SELECTIVE Logging concessions (IUPHHK) (M³)	NATURAL FOREST Logs from other Sources (M³)	PERCENTAGE OF ALL NATURAL FOREST LOGS FROM LAND CLEARING OR LAND PREPARATION	SOURCES OF CONVERSION WOOD
CV Berkat Jaya Utama	523	-	-	100%	- PT Sanur Hasta Mitra Mersama (523m³), timber plantation concession in Central Kalimantan
CV Sama-Sama Bahagia	416		-	100%	- PT Hutan Produksi Lestari (270m³), timber plantation concession in Central Kalimantan - PT Graha Equity Investment (56m³), mining concession in Central Kalimantan - PT Industrial Forest Plantation (47m³), timber plantation concession in Central Kalimantan - PT Taiyoung Engreen (44m³), timber plantation concession in Central Kalimantan*
CV Surya Utama	403	-	-	100%	- Prim. Kop. Satpomau (403m³) in North Kalimantan
CV Sumber Agung	308	-	521	37%	- PT Anugerah Hipbone Sejahtera (308m³), oil palm concession in Central Kalimantan
UD Setia Persada	299		-	100%	- PT Hutan Produksi Lestari (299m³), timber plantation concession in Central Kalimantan
PT Sumber Tata Citra Mandiri	293		1,695	15%	- PT Delonix Lestari Raya (293m³), timber plantation concession in Jambi
CV Sorong Timber Irian	266	1,330	-	17%	- Koperasi Siro Lestari Jaya (266m³), plantation concession in Southwest Papua
CV Maggeno CV	265	-	-	100%	- PT Indrabakti Mustika (265m³), nickel mining concession in Central Sulawesi
PT Sumber Kayu Mas Indonesia	253	-	6,297	4%	- PT Bina Sarana Sawit Utama (253m³), oil palm concession in Central Kalimantan
PT Mega Indah Wood	215	-	5,005	4%	- PT Bina Sarana Sawit Utama (215m³), oil palm concession in Central Kalimantan
UD Rudi	200	-	50	80%	- PT Pembangunan Sulteng (200m³) in Central Sulawesi
CV Suhamsyah	193	-	-	100%	- PT Agro Martua Sejahtera (193m³), plantation concession in North Sumatra
CV Nawa Papua Foresta	188	156	1,284	12%	- PT Andalan Kahala Raya (188m³), coconut plantation in Papua
PT Dewata Industrindo Forestry	168	27,713	12,658	<1%	- PT Agro Borneo Lestari (90m³), timber plantation concession in Central Kalimantan - PT Bina Sarana Sawit Utama (78m³), oil palm concession in Central Kalimantan'
PT Kumala Sakti Prima	103	-	-	100%	- PT Permata Borneo Abadi (103m³), timber plantation concession in East Kalimantan
CV Morawa Timber Industry	89	615	999	5%	- PT Sukses Putra Mandiri (89m³) in North Sumatra
Bhineka Karya PK	78	-	566	12%	- PT Industrial Forest Plantation (50m³), timber plantation concession in Central Kalimantan - PT Bina Sarana Sawit Utama (28m³), oil palm concession in Central Kalimantan
PT Sijas Express Unit 2	78	1,376	-	5%	- PT Andalan Kahala Raya (78m³), coconut plantation in Papua
CV Talisayan Gemilang	57	-	284	17%	- PT Swadaya Perkasa (57m³), timber plantation concession in East Kalimantan
PT Barata Adjie Nugraha	51	-	40	56%	- PT Pembangunan Sulteng (51m³) in Central Sulawesi
CV Rimba Mas Jaya	46	-	6,722	1%	- PT Industrial Forest Plantation (46m³), timber plantation concession in Central Kalimantan
PT Foresindo Sumber Alam Jaya	29	-	7,631	<1%	- PT Bumi Hijau Prima (29m³), timber plantation concession in Central Kalimantan
UD Sinar Marjaya	24	-	927	3%	- KUD Lancak Nauli (IPK pada IUP-B, Kab Tapsel) (24m³), plantation concession in North Sumatra
UD Cahaya Prima	21	-	70	23%	- KUD Lancak Nauli (IPK pada IUP-B, Kab Tapsel) (24m³), plantation concession in North Sumatra
CV Alco Timber Irian	20	-	-	100%	- Koperasi Siro Lestari Jaya (20m³) in Southwest Papua
UD Dinah Hamid Putra Kasindo	19			100%	- PT Graha Equity Investment (19m³), mining concession in

NB: These figures comprise combined totals of natural forest logs reported in RPBBI timber sourcing documents as coming from 'LC preparation of HTI planting land' (land clearing or preparation in industrial timber plantation concessions) and 'Other valid permits (ILS) or IPK' (forest clearance permits for oil palm, mining or other uses). Not all conversion wood included in these totals necessarily came from activity that would meet the definition of deforestation or forest degradation under the EUDR

NB: This table includes only reported supply of natural forest logs, and excludes timber harvested from mature plantations, semi-processed wood from other companies, waste wood and wood left over from 2023 supply

RISKY BUSINESS | OCTOBER 2025

APPENDIX II: COMPANY PROFILES

CONCESSIONS

PT Industrial Forest Plantation

Overview: Timber plantation concession in Central Kalimantan, covering 100,989 hectares (ha). Situated within the ecologically rich Muroi watershed, between the Kahayan and Kapuas rivers, where natural forests support one of the highest concentrations of orangutans in Kalimantan, as well as endangered gibbons, hornbills and sun bears.¹

Ownership: 97% owned by Pioneer Sage Sdn Bhd and 3% by Pioneer Astute Sdn Bhd, two Malaysian holding companies that are in turn owned by Samoan offshore company Golden Sail Group Ltd. Information on company ownership is not made public in Samoa, a secrecy jurisdiction.

PT Industrial Forest Plantation (PT IFP) has been linked to the Indonesian Royal Golden Eagle (RGE) Group through overlapping corporate officers and management structures. RGE's subsidiaries include APRIL, the second-biggest producer of pulp and paper in Indonesia. FSC disassociated from APRIL in 2013 over widespread deforestation and human rights violations in its supply chains, but is currently in negotiations with the company to readmit it to the certification scheme. It has been alleged that alongside its publicly acknowledged businesses, RGE operates a parallel network of 'shadow companies', including the PT Borneo Hijau Lestari group which comprises pulp and paper companies linked to widespread deforestation, PT IFP being among them. RGE and PT IFP have denied any association.

Deforestation: PT Industrial Forest Plantation has consistently ranked among the top deforesters in Indonesia's plantation wood sector in recent years, ranking

second after only PT Mayawana Persada in 2022, $^{\rm v}$ 2023 $^{\rm vi}$ and 2024: $^{\rm vii}$

- 2024: 962ha, of which 667ha were on peatviii
- · 2023: 6363ha, of which 1032ha were on peat
- 2022: 5163ha, of which 17ha were on peat
- · 2021: 1695ha, of which 10ha were on peat

Conflict with communities: The local community in Humbang Raya, whose village overlaps with the southern part of PT IFP's concession, has been in conflict with the company since 2018. During a visit in November 2024, members of the community told investigators that fishing and collecting wood have become significantly more difficult; that the company does not recognise customary or community-managed forest areas; and that the company has failed to fulfil promises to provide the community with crops to support their livelihoods. In 2019, the community staged a roadblock in protest, leading to confrontations involving police forces and threats of legal action.

Buyers of deforestation wood from PT Industrial Forest Plantation include:

- PT Basirih Industrial
- 3755m³ of natural forest logs in 2024ix
- 3610m³ of natural forest logs in 2023
- $2011 m^3$ of natural forest logs in 2022
- $989m^3$ of natural forest logs in 2021
- PT Kayu Multiguna Indonesia
 - 224m³ of natural forest logs in 2024
 - 606m³ of natural forest logs in 2023

For a full list of companies which reported deforestation wood from PT Industrial Forest Plantation in their timber supply in 2024, see Appendix I.







Company response: In an emailed response to the findings in this report, PT IFP denied any legal connection or relationship with RGE. They said that PT IFP ceased logging natural timber at the end of 2023, and stated that all operational activities related to land clearing and planting are in line with work plans approved by the Ministry of Environment and Forestry. The letter says that PT IFP always conducts outreach to communities before commencing company operations, involving community leaders at the local Dayak Indigenous community, and that the company has collaborated with the local community by

using local labour, providing social assistance and establishing partnerships. The letter states that regular monitoring and evaluation are carried out to ensure orangutan habitat in the concession is well maintained.

See the full response at https://www.earthsight.org.uk/risky-business-company-responses

PT Bumi Hijau Prima

Overview: Timber plantation concession in Central Kalimantan, covering 20,355 hectares (ha), directly to the north of PT Industrial Forest Plantation. Situated within the ecologically rich Muroi watershed, between the Kahayan and Kapuas rivers, where natural forests support one of the highest concentrations of orangutans in Kalimantan, as well as endangered gibbons, hornbills and sun bears.*

Ownership: 99.99% owned by PT Sutar Wanantara Kayu, which is 99.99% owned by PT Aswana Dhanakirti Sinergi. PT Aswana Dhanakirti Sinergi, also known as SINERGI Group, is 51% owned by Sunarno and 49% owned by Swandi.

Deforestation:

- · January-June 2025: 250ha
- · 2024: 490ha
- · 2023: 773ha
- 2022: 70ha
- · 2021: 32ha

Buyers of deforestation wood included:

- PT Wijaya Triutama Plywood Industri
 4278m³ of natural forest logs in 2024
- PT Basirih Industrial
 - 2543m3 of natural forest logs in 2024

For a full list of companies which reported deforestation wood from PT Bumi Hijau Prima in their timber supply in 2024, see Appendix I.

Company response: In an emailed response to the findings in this report, PT Bumi Hijau Prima confirmed the company is clearing natural forest and replacing it with planted forest, stating: "PT Bumi Hijau Prima is engaged in sustainable forest management using a silvicultural system of clear-cutting and artificial regeneration." They state that compensation has been provided to residents affected by the company's permit area. The response confirmed that the company's plan for 2025 includes selling wood, as well as planting plantation forests with fast-growing species sengon (also known as *Albizia*) and balsa.

See the full response at https://www.earthsight.org.uk/risky-business-company-responses







PT Bina Sarana Sawit Utama

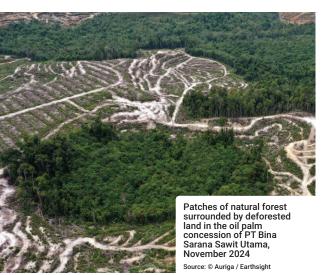
Overview: Oil palm concession in Central Kalimantan, covering 6318 hectares (ha). Located a few miles east of PT Industrial Forest Plantation and PT Bumi Hijau Prima.

Ownership: 99.99% owned by the NSS corporate group (also known as PT Nusantara Sawit Sejahtera), an Indonesian stock exchange-listed palm oil producer that owns and operates five plantation companies in Central Kalimantan. PT Nusantara Sawit Sejahtera/NSS Group is linked to the Salim Group, Indonesia's biggest conglomerate, via its beneficial owners. Williem Mathias Natigor Kalaii. Julius Wahyu Kalaij, and Truli Natascha Wilhelmina Kalaij. Williem Mathias Natigor Kalaij is the beneficial owner of Salim Group subsidiary PT Salim Ivomas Pratama; Julius Wahyu Kalaij is beneficial owner of Salim subsidiaries PT Salim Ivomas Pratama and PT Indofood Sukses Makmur; and Truli Natascha Wilhemina Kalaij is the beneficial owner of PT Ithaca Resources, also linked to the Salim Group. The Salim Group been implicated in significant deforestation and human rights violations across Indonesia via a complex network of subsidiaries and offshore entities.xi

Deforestation:

- · January-June 2025: 74ha
- · 2024: 506ha, of which 139ha were on peat
- 2023: 148ha, of which 16ha were on peat
- · 2022: 197ha, of which 36ha were on peat
- · 2021: 213ha, of which 16ha were on peat

Conflict with communities: PT Bina Sarana Sawit Utama's concession boundaries overlap with Marapit village, whose residents told investigators that company had not engaged with the local community about its concession boundaries and permit area, and no representatives from the village government or local community were present when land was measured. Residents said that when the company began land clearing, compensation was provided to only a few individuals in the local community, with many others yet to receive any funds. Marapit residents once blocked the access road to the concession in protest against the



company's activities, and were threatened with arrest. According to news reports, PT BSSU has destroyed sacred cultural sites of the Ngaju Dayak community, including ancestral gardens, sacred forest and holy stones, without consent or compensation. XII

Buyers of deforestation wood included:

 PT Kayu Multiguna Indonesia: 1438m³ of natural forest logs in 2024. PT Bina Sarana Sawit Utama was confirmed as the origin of a February 2025 shipment of 24 pallets (67.5 m³) of keruing plywood sent by PT Kayu Multiguna Indonesia to International Plywood in the Netherlands

For a full list of companies which reported deforestation wood from PT Bina Sarana Sawit Utama in their timber supply in 2024, see Appendix I.

Company response: The company did not respond to repeated requests for comment.



PT Indosubur Sukses Makmur

Overview: Timber plantation concession in East Kalimantan, covering 26,215 hectares (ha). The entire concession is orangutan habitat, and overlaps with the Mangkalihat and Sangkulirang karst areas, which are ecologically significant for biodiversity and water storage. The company is planting deforested areas with fast-growing eucalyptus, acacia and gamal trees.

Ownership: 85% owned by PT Kilau Sukses Pertama, which is in turn 50% owned by PT Sumber Permata Sejati and 50% owned by PT Elok Permata Indah. PT Sumber Permata Sejati is 99.99% owned by Timotius Taniwidjaja; and PT Elok Permata Indah is 99.99% owned by Lioe Seng Tjin. PT Indosubur Sukses Makmur is connected to the Salim Group via its President Director Eddy Sanusi, who is also the President Director of PT Bumi Resources tbk. and PT Adidaya Tangguh, a Salim Group subsidiary. Sanusi holds key roles in several notable companies, including PT Nusantara Berau Coal, PT Ithaca Resources and PT Belantara Pusaka.

Deforestation:

- · January-June 2025: 138ha
- 2024: 432ha
- · 2023: 289ha
- · 2022: 181ha
- · 2021: 105ha

Conflict with communities: The concession overlaps with the boundaries of three villages: Teluk Sumbang, Tanjung Mangkaliat and Sandaran. Indigenous (Dayak) residents of Teluk Sumbang say that the company's forest clearing has

made it increasingly difficult to access forest honey and rattan, their main sources of livelihood. Residents also say they have received no compensation for the company's encroachment onto their land, which was done without prior consultation, and that negotiations have been minimal.

Buyers of deforestation wood included:

- PT Korindo Ariabima Sari
 - 14,470m³ of natural forest logs in 2024
 - 9450m³ of natural forest logs in 2023
 - 3917m³ of natural forest logs in 2022
- PT Putra Buana Indonesia Wood Industry
 - $3594m^3$ of natural forest logs in 2024

In 2024, PT Indosubur Sukses Makmur was also the main supplier of natural forest timber to PT Kayu Lapis Asli Murni (17,853m³ of natural forest logs, 87% of the company's total supply), which exports plywood to the United States where it is used in the recreational vehicle (RV) industry (see the Earthsight and Auriga report *Unhappy Campers* on this topic).xiii

For a full list of companies which reported deforestation wood from PT Indosubur Sukses Makmur in their timber supply in 2024, see Appendix I.

Company response: The company did not respond to our requests for comment.

INDONESIAN BUYERS OF DEFORESTATION WOOD

PT Basirih Industrial

Overview: Plywood manufacturer with a factory in Banjarmasin, South Kalimantan, and a representative office in Jakarta. Produces plywood, veneer and flooring for trucks and containers, using tropical hardwood species including meranti and keruing.

Ownership: 75% owned by PT SAS Global Jaya and 25% owned by PT Kharisma Tricipta Mandiri. PT SAS Global Jaya is in turn majority owned by Amir Sunarko, while PT Kharisma Tricipta Mandiri is majority owned by Anwar Sunarko, and minority owned by Jimmy Sunarko.

PT Basirih Industrial is connected to another major timber product manufacturer and exporter, PT SLJ Global Tbk, formerly known as PT Sumalindo Lestari Jaya Tbk, via Amir Sunarko who serves as President Director of PT SLJ Global Tbk, in which he also owns a 4% stake.

PT Basirih Industrial is located in the same area as PT Wijaya Triutama Plywood Industri (see page 11), which is ultimately controlled by Aris Sunarko, the brother of Amir Sunarko. In 2024, PT Basirih Industrial supplied 3393m3 of natural forest timber to PT Wijaya Tri Utama Wood Industri.

Timber sources in 2024: 36,642m³ of natural forest logs and 2708m³ of plantation timber. 17,280m³ of natural forest timber were reported as coming from land clearing or land preparation in timber plantation concessions. These included:

- 10,982m³ from PT Tanjung Redeb Hutani, a timber plantation concession in East Kalimantan
- 3755m³ from PT Industrial Forest Plantation, a timber plantation concession in Central Kalimantan
- 2543m³ from PT Bumi Hijau Prima, a timber plantation concession in Central Kalimantan

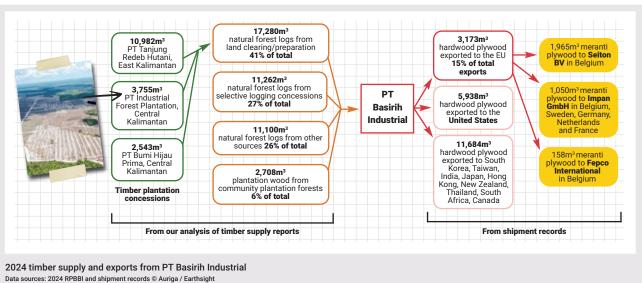
Timber sources in 2023: 36,865m³ of natural forest logs, and 5523m³ of plantation timber. 13,899m³ of natural forest timber were reported as coming from oil palm concessions, and 4271m³ from land clearing or land preparation in timber plantation concessions. Suppliers included:

- 3610m³ from PT Industrial Forest Plantation, a timber plantation concession in Central Kalimantan
- 661m³ from PT Babugus Wahana Lestari, a timber plantation concession in Central Kalimantan
- 7032m³ from PT Wana Jaya Abadi, an oil palm concession in North Kalimantan
- 6867m³ from Koperasi Produsen Bumi Putera in North Kalimantan

Timber sources in 2022: 131,762m³ of natural forest logs, and 3964m³ of plantation timber. 6386m³ of natural forest timber were reported as coming from an oil palm cooperative, and 26,757m³ of natural forest timber were reported as coming from land clearing or land preparation in timber plantation concessions. These included:

- 13,595m³ from PT Mayawana Persada, a timber plantation concession in West Kalimantan
- 4098m³ from PT Woyla Raya Abadi, an oil palm concession in Central Kalimantan
- 2833m³ from PT Dharma Hutani Makmur, a timber plantation concession in East Kalimantan
- 2540m³ from PT Sendawar Adhi Karya, a timber plantation concession in East Kalimantan
- 2011m³ from PT Industrial Forest Plantation, a timber plantation concession in Central Kalimantan
- 1681m³ from PT Bakayan Jaya Abadi, a timber plantation concession in East Kalimantan
- 6386m³ from Koperasi Produsen Bumi Putera, in the area of the oil palm concession PT Sebaung Sawit Plantation in North Kalimantan

Exports in 2024: At least 20,692m³ of hardwood plywood, of which at least 3173m³ were exported to European Union Member States. EU buyers in 2024 included:



RISKY BUSINESS | OCTOBER 2025

- Seiton BV, which imported 1965m³ of meranti plywood to Belgium (also imported 314m³ of meranti plywood from PT Basirih Industrial to the Netherlands and 79m³ to Belgium in January–April 2025)
- Impan GmbH, which imported 566m³ of meranti plywood to Belgium, 163m³ to Sweden, 161m³ to Germany, 122m³ to the Netherlands and 38m³ to France (Impan GmbH denied importing timber from Indonesia in an emailed response to our findings)
- Fepco International (Europe) NV, which imported 158m³ of meranti plywood to Belgium

Company response: The company did not respond to our requests for comment.

PT Wijaya Triutama Plywood Industri

Overview: Wood product manufacturer based in Banjarmasin, South Kalimantan, with an office in Jakarta. Produces plywood, veneer, blockboard and barecore for export.

Ownership: Ultimately controlled by Aris Sunarko of the Sunarko family, which also controls PT Basirih Industrial, PT SLJ Global and PT Wijaya Cahaya Timber tbk. 36% owned by PT Semangat Maju Sentosa, 10% by PT Wahana Foresta Abadi, and 3.5% by PT Mandiri Sejahtera Jaya Abadi, all of which are majority owned by PT Fortuna Sumber Anugrah, which is controlled by Aris Sunarko. Also 36% owned by PT Visi Mulia and 13.5% by PT Tanmizi Utama.

Timber sources in 2024: 83,160m³ of natural forest logs, and 94,719m³ of plantation timber. 20,885m³ of natural forest timber were reported as coming from land preparation in timber plantation concessions. These included:

- 16,608m³ from PT Tanjung Redeb Hutani, a timber plantation concession in East Kalimantan
- 4278m³ from PT Bumi Hijau Prima, a timber plantation concession in Central Kalimantan

This company also sourced 3393m³ of natural forest logs from PT Basirih Industrial, which has consistently sourced

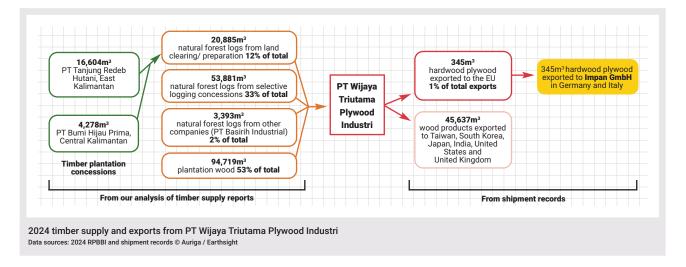
large volumes of timber derived from clearance of natural forest (see page 10).

Timber sources in 2023: 139,023m³ of natural forest logs, and 40,915m³ of plantation timber. 7643m³ of natural forest timber were reported as coming from oil palm concessions, and 38,222m³ from land preparation in timber plantation concessions. These included:

- 38,222m³ from PT Tanjung Redeb Hutani, a timber plantation concession in East Kalimantan
- 3686m³ from PT Tridaya Hutan Lestari, an oil palm concession in East Kalimantan
- 3565m³ from PT Kartika Nugraha Sakti, an oil palm concession in North Kalimantan
- 392m³ from PT Wana Jaya Abadi, an oil palm concession in North Kalimantan

Timber sources in 2022: 208,244m³ of natural forest logs, and 21,944m³ of plantation wood. 60,573m³ of natural forest wood were reported as coming from oil palm concessions, and 24,786m³ from land clearing or land preparation in timber plantation concessions. These included:

- 28,682m³ from PT Kartika Nugraha Sakti, an oil palm concession in North Kalimantan
- 21,025m³ from PT Wana Jaya Abadi, an oil palm concession in North Kalimantan
- 4246m³ from PT Tridaya Hutan Lestari, an oil palm concession in East Kalimantan
- 3184m³ from Koperasi Produsen Bumi Putera in North Kalimantan
- 2011m³ from PT Nunukan Bara Sukses, an oil palm concession in North Kalimantan
- 1425m³ from Koperasi Tagul Mandiri in North Kalimantan
- 20,330m³ from PT Tanjung Redeb Hutani, a timber plantation concession in East Kalimantan
- 3270m³ from PT Mayawana Persada, a timber plantation concession in West Kalimantan
- 782m³ from PT Agro Borneo Lestari, a timber plantation concession in Central Kalimantan
- 405m³ from PT Industrial Forest Plantation, a timber plantation concession in Central Kalimantan



Exports in 2024: Approximately 45,981m³ of wood products, of which approximately 345m³ were exported to European Union Member States.xiv The company's only EU buyer in 2024 was Impan GmbH, which shipment records indicate imported approximately 188m³ of meranti plywood to Germany, and approximately 156m³ of meranti plywood to Italy. Impan GMBH also imported approximately 242m³ of hardwood plywood to the United Kingdom in 2024. In an emailed response to our findings, Impan GmbH denied importing wood products from Indonesia.

Company response: The company did not respond to our requests for comment.

PT Kayu Multiguna Indonesia

Overview: Wood product manufacturer established in 1996 and based in Gresik, East Java. Uses a range of wood species, including meranti, in production of plywood, finger joint laminated board, door parts, wood pellets and other wood products.

The company website states: "As part of our commitment to sustainability, we are proud to announce that our wood products hold the prestigious Forest Stewardship Council (FSC) Certification" and "we are fully committed to complying with EUDR (European Union Deforestation Regulation) regulations. Every wood product we offer has gone through a rigorous verification process to ensure that the wood comes from a legal and sustainable source."

In November 2024, a company representative told undercover investigators from Earthsight and Auriga, posing as potential buyers, that all meranti logs came from selective logging concessions, and that the company does not buy logs from deforestation.

Despite these claims, the company has consistently sourced wood derived from deforestation (see page 13).

Ownership: 50% owned by Tan Churiko Tancho, who is also the official registered owner, and 50% owned by Tan Sam Tancho.

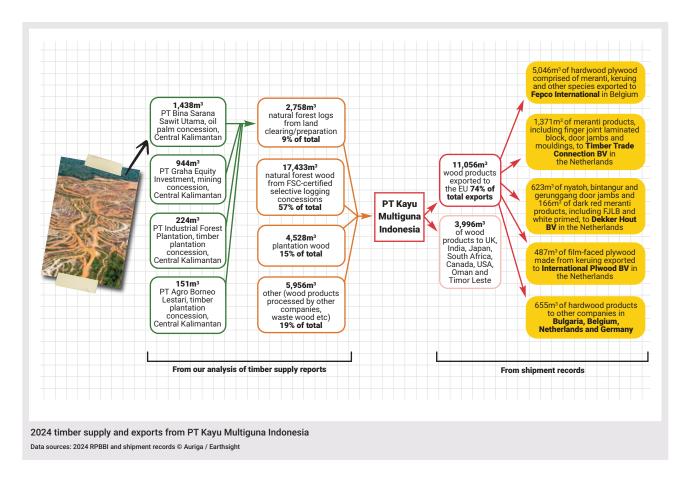
Timber sources in 2024: V 20,667m³ of natural forest logs, 4528m³ of plantation wood, 4593m³ of semi-finished processed wood and 943m³ of waste wood. 2382m³ of natural forest logs were reported as coming from oil palm or mining concessions, and 374m³ from land clearing or land preparation in timber plantation concessions. These included:

- 1438m³ from PT Bina Sarana Sawit Utama, an oil palm concession in Central Kalimantan
- 944m³ from PT Graha Equity Investment, a mining concession in Central Kalimantan
- 224m³ from PT Industrial Forest Plantation, a timber plantation concession in Central Kalimantan
- 151m³ from PT Agro Borneo Lestari, a timber plantation concession in Central Kalimantan

Timber sources in 2023:xvi 7695m³ of natural forest logs, 4478m³ of plantation wood, 2723m³ of semi-finished processed wood and 298m³ of waste wood. 2112m³ of natural forest logs were reported as coming from land clearing or land preparation in timber plantation concessions. These included:

- 803m³ from PT Babugus Wahana Lestari, a timber plantation concession in Central Kalimantan
- 606m³ from PT Industrial Forest Plantation, a timber plantation concession in Central Kalimantan
- 319m³ from PT Sanur Hasta [sic] Mitra Bersama, a timber plantation concession in Central Kalimantan
- 254m³ from PT Agro Borneo Lestari, a timber plantation concession in Central Kalimantan
- 130m³ from PT Balangan Indah Lestari, a timber plantation concession in Central Kalimantan





Timber sources in 2022: 14,003m³ of natural forest logs, 6438m³ of plantation wood, 4177m³ of semi-finished processed wood and 9830m³ of waste wood. 12,564m³ of natural forest logs were reported as coming from land clearing or land preparation in timber plantation concessions. These included:

- 7314m³ from PT Tanjung Redeb Hutani, a timber plantation concession in East Kalimantan
- 5249m³ from PT Mayawana Persada, a timber plantation concession in West Kalimantan
- 63m³ from PT Agro Borneo Lestari, a timber plantation concession in Central Kalimantan
- 22m³ from PT Babugus Wahana Lestari, a timber plantation concession in Central Kalimantan

Exports in 2024: A minimum of 15,082m³ wood products (excluding wood pellets), of which 11,056m³ (73%) were exported to the European Union, primarily the Netherlands (5400m³) and Belgium (5226m³). EU buyers in 2024 included:

- Fepco International (Europe) NV in Belgium, which imported 5046m³ of Indonesian hardwood plywood, comprised of meranti, keruing and other species
- Timber Trade Connection BV in the Netherlands, which imported 1371m³ of meranti products, including finger joint laminated block, door jambs and mouldings^{xvii}

- Dekker Hout BV in the Netherlands, which imported 623m³ of nyatoh, bintangur and gerunggang door jambs and 166m³ of dark red meranti products, including finger joint laminated block and white primed
- International Plywood BV in the Netherlands, which imported 487m³ of film-faced plywood made from keruing

Company response: In an emailed response to the findings in this report, PT Kayu Multiguna Indonesia stated that all their wood supplies come from legal and documented sources, in accordance with the EUTR. They said that the majority of their raw materials comes from FSC-certified sources, stating that in 2023, the company purchased 13,347.2m³ of FSC logs and 3133.63m³ of SVLK logs (i.e. non-FSC), and in 2024 purchased 14,100.84m³ of FSC logs and 2,964.08m³ of non-FSC logs. They stated that FSC and non-FSC logs are stored separately, and that for markets such as India, the United States and Japan, legality standards for wood are maintained but "the use of FSC is adjusted to the needs of each market."

PT Putra Buana Indonesia Wood Industry

Overview: A wood product manufacturer based in Kabupaten, Central Java. Uses a range of wood species, including bangkirai, kapur and meranti, to produce decking, beams and joinery.

In November 2024, a company representative told undercover investigators from Earthsight and Auriga that all the company's timber comes from logging concessions, and that the company has not bought logs from mining or palm oil companies for a long time. Despite this claim, the company has consistently sourced wood derived from deforestation (see below).

Ownership: 60% owned by Soediono and 40% owned by Rendy Theodorus Soediono.

Timber sources in 2024: 56,815m³ of natural forest logs, of which 7939m³ were reported as coming from oil palm concessions, and 8790m³ from land clearing or land preparation in timber plantation concessions. These included:

- 7939m³ from PT Kaltim Bhumi Palma, an oil palm concession in East Kalimantan
- 5196m³ from PT Tanjung Redeb Hutani, a timber plantation concession in East Kalimantan
- 3594m³ from PT Indosubur Sukses Makmur, a timber plantation concession in East Kalimantan

Timber sources in 2023: 54,933m³ of natural forest logs, of which 3800m³ were reported as coming from PT Kaltim Bhumi Palma, an oil palm concession in East Kalimantan.

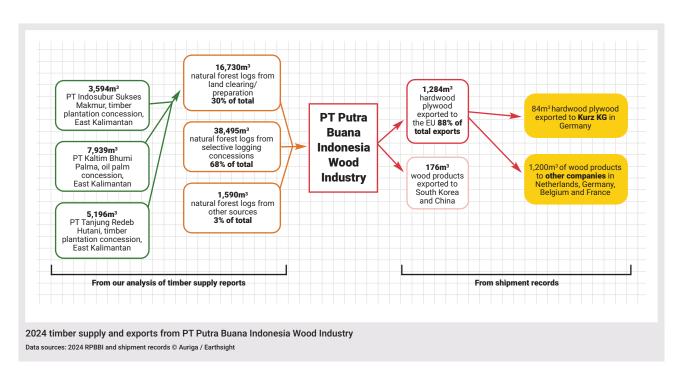
Timber sources in 2022: 52,095m³ of natural forest logs from selective logging concessions.

Exports in 2024: A minimum of 1459m³ of wood products, of which 1284m³ (88%) were exported to the European Union, including the Netherlands (1088m³), Germany (84m³), Belgium (56m³) and France (56m³). EU buyers in 2024 included:

 Kurz KG in Germany, which imported 84m³ of kapur decking. This company also imported 19m³ of bangkirai mouldings and 9m³ of kapur mouldings in January– March 2025

Company response: In an emailed response to the findings in this investigation, PT Putra Buana Indonesia emphasised that all their wood materials are sourced legally, in accordance with relevant regulations in Indonesia, and stated that reviews of SVLK audit reports indicated no legal violations by their suppliers. They wrote that exports to the companies above included FSC-certified wood products, mostly bangkirai and kapur, and that the company's internal control systems ensure physical administrative separation of FSC and non-FSC materials.

They stated they require their wood suppliers to meet strict legality and sustainability requirements, including no deforestation or forest degradation, and "no involvement in human rights violations, land conflicts, or violations of the rights of indigenous/local communities." They also said they have a policy to block or terminate suppliers engaged in unsustainable practices, including deforestation, forest degradation, or violations of forestry laws. (This does not appear to be consistent with the company's sourcing of wood from deforestation in PT Indosubur Sukses Makmur.) They said they are developing systems and procedures to ensure their supply chains comply with the EUDR.



PT Korindo Ariabima Sari

Overview: A wood product manufacturer established in 1988 and based in Pangkalan Bun, West Kalimantan. Uses various wood species, including meranti, to produce tropical hardwood plywood and veneer, primarily for export. Part of the Korindo Group, a Korean-owned conglomerate which produces timber, paper, rubber, palm oil and wind towers and has businesses in logistics, financial services and real estate.

The Korindo Group makes numerous sustainability claims. Its 'ESG Charter', which the group's website claims applies to all its holdings, subsidiary companies, joint ventures and third-party suppliers, lists commitments including:

- "Minimize greenhouse gas emissions, especially carbon dioxide (CO₂)."
- "Consistently protect and further study the remaining natural vegetation cover (forest cover) and its biodiversity."
- "Cease the development on High Conservation Value (HCV) or High Carbon Stock (HCS) areas. All natural forest clearance has been suspended since February 2017." (our emphasis)xviii

The Korindo Group's 'Timber Sourcing Policy' makes further commitments around sustainability, including:

- "Reducing and eliminating the use of timber from natural forest conversion by September 30, 2020, unless the conversion is justified by net social and environmental benefits within the surrounding landscape."
- "Avoiding timber from controversial sources, including illegally harvested wood, destruction of High Conservation Values (HCV), entities accused of violating human rights, civil rights, or traditional rights, and genetically modified trees."

Despite these policies, the company has consistently sourced wood derived from deforestation (see below).

The Forest Stewardship Council (FSC) disassociated from the Korindo Group in July 2021. FSC's Complaints Panel found that Korindo had been responsible for the destruction of over 30,000 hectares of forest in Papua in the previous five years and had violated the traditional and human rights of Indigenous peoples. The Korindo Group then failed to agree procedures to independently verify its compliance with improvement and remediation measures imposed on the Group in 2019. XIX At present, the FSC certification of PT Korindo Ariabima Sari remains terminated, along with the other companies under the Korindo Group.

Ownership: PT Korindo Ariabima Sari is 72% owned by Eun Ho Seung, the founder of the Korindo Group, and 28% owned by PT Bimaruna Niaga Sejahtera.

Timber sources in 2024: 117,613m³ of natural forest logs, 7203m³ of plantation wood, 58,792m³ of semi-finished processed wood and 4489m³ of waste wood. 14,497m³ of natural forest logs came from land clearing or land preparation in PT Indosubur Sukses Makmur.

Timber sources in 2023: 87,680m³ of natural forest logs, 7921m³ of plantation wood, 50,113m³ of semi-finished processed wood and 4111m³ of waste wood. 9450m³ of natural forest logs came from land clearing or land preparation in PT Indosubur Sukses Makmur.

Timber sources in 2022: 76,877m³ of natural forest logs, 17,109m³ of plantation wood, 25,642m³ of semi-finished processed wood and 3533m³ of waste wood. 3917m³ of natural forest logs came from land clearing or land preparation in PT Indosubur Sukses Makmur.

Exports in 2024: 81,650m³ of wood products, of which 7414m³ were exported to the European Union. EU buyers in 2024 included:

- Fepco International (Europe) NV in Belgium, which imported 6755m³ of hardwood plywood, of which 4883m³ were identified in shipment records as PEFC-certified hardwood plywood, while 1872m³ were not so identified
- Seiton BV in Belgium, which imported 589m³ of film-faced plywood. This company also imported 1145m³ of film-faced hardwood plywood to the Netherlands and 905m³ to Belgium in January–April 2025

Company response: In response to the findings above, PT Korindo Ariabima Sari (PT KAS) stated in a letter dated 8 August 2025 that rubber and palm oil businesses are no longer under the control of the Korindo Group, and have been transferred to the Tunas Sawa Erma Group. The letter stated that no wood from PT Indosubur Sukses Makmur was used in plywood supplied to Fepco or other EU companies, and that the 7414m³ of plywood exported to the EU in 2024 were produced with veneer from PT Korindo Abadi, in turn sourced from licensed forest concessions in Papua which primarily utilise selective logging. PT KAS said it has procedures in place to separate wood from selective logging and forest clearing, and that from April 2025, all plywood supplied to the EU will be PEFC-certified.

Regarding timber from PT Indosubur Sukses Makmur (ISM), the letter states that PT KAS entered a timber purchase agreement with a local distributor, Sentra Abadi Makmur (SAM), in October 2022. It states: "We discovered that some of the timber supplied by SAM originated from the ISM area, which is suspected of undergoing clear-cutting in 2024. We have pre-emptively halted timber purchases from SAM and ISM and will formally register this as a grievance case." (Note the company's statement to have not known wood was coming from PT Indosubur Sukses Makmur appears to be contradicted by the fact the concession is named as a source of timber in PT KAS's RPBBI timber sourcing reports from 2022, 2023 and 2024.)

The Korindo Group published on its website the letter sent by Earthsight and Auriga on 26 July 2025, relating to use of wood from deforestation. In response, it states that the group has stopped all transactions with Sentra Abadi Makmur and PT Indosubur Sukses Makmur, and has engaged SVLK auditing company PT Mutu Hijau Indonesia to conduct an independent audit.xx

EU COMPANIES

Seiton BV

Belgium-based wood product importer, manufacturer and wholesaler, founded in 2019. Manufactures and sells film-faced plywood products, comprising layers of different woods including Indonesian meranti, under the brand name Solid John. This is marketed for use in humid conditions, in roofing and cladding. Solid John plywood is widely available at retailers across Belgium, plus a smaller number of retailers in the Netherlands and Luxembourg. Companies which offer Solid John include Apok, Defrancq and VC Wood.

This company was the third-biggest importer of Indonesian plywood in Belgium in 2024, and the second-biggest in the period January–May 2025.xxi

In 2024, the company imported:

- 1808m³ of meranti plywood from PT Basirih Industrial
- 354m³ of plywood comprised of mersawa, nyatoh, keruing and bintangur from PT Korindo Ariabima Sari

In the period January–May 2025, the company imported:

- 393m³ of meranti plywood from PT Basirih Industrial
- 2050m³ of film-faced hardwood plywood, comprised of meranti, matoa/kasai (Pometia pinnata), merawan (Hopea mengarawan), mersawa (Anisoptera marginata), nyatoh (Palaquium sp.), resak (Vatica rassak), bintangur (Calophyllum sp.) and eucalyptus, from PT Korindo Ariabima Sari

The imports above represent 100% of the Indonesian timber the company imported in this period.

Company response: In an emailed response to the findings in this report, Seiton stated: "We aim to conduct our business in a transparent, responsible manner taking into account all related sustainability matters." They referred to a statement from PT Korindo Ariabima Sari that no logs from PT Indosubur Sukses Makmur were used in products sent to Europe. They clarified that while Seiton BV holds FSC and PEFC certification, they do not yet produce FSC-certified products, and have not yet sold any PEFC-certified products, but intend to shift to 100% PEFC in the future.

They stated: "We are in the midst of further optimizing our Timber raw material sourcing policy, taking in regard all national and international laws and regulations, especially the EUDR." They further wrote that they have developed a new code of conduct for their suppliers, which "is asking for specific engagement around a) Preserving natural resources and avoiding deforestation. b) Preventing any negative impact on biodiversity and natural habitats," along with reducing and controlling waste, and optimising use of natural resources.

Seiton further stated that they had stopped purchasing from PT Basirih Industrial, with final deliveries arriving in early 2025.





Fepco International

A Belgium-based importer and wholesaler of plywood and wood-based panels, founded in 1971, which sources plywood from countries including Indonesia, China and Brazil. The company sells meranti/lauan hardwood plywood from Indonesia, branded as 'Fepcoply', 'Fepcoplex' and 'Fepcoweb'.

This company is the biggest importer of Indonesian plywood into the EU. It imported more than 66% of all Indonesian plywood by value imported to Belgium in 2024. xxii The same year, the company's imports from Indonesia included:

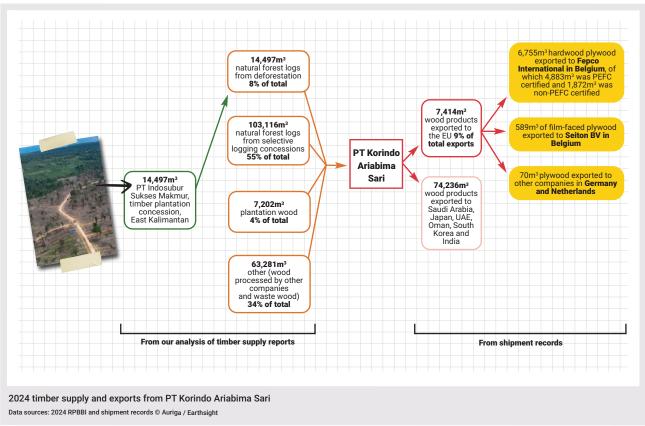
- 6755m³ of hardwood plywood from PT Korindo Ariabima Sari, of which 4883m³ were identified in shipment records as PEFC-certified hardwood plywood, while 1872m³ were not so identified
- 5046m³ of Indonesian hardwood plywood, comprised of meranti, keruing and other species, from PT Kayu Multiguna Indonesia. Fepco also imported 410m3 of hardwood plywood from PT Kayu Multiguna Indonesia in the period January-April 2025
- 158m³ of meranti plywood from PT Basirih Industrial

Company response: In emailed responses to Earthsight and Auriga, Fepco stated that in addition to ensuring all imports of Indonesian plywood are covered by validated FLEGT licenses, the company uses third-party services to verify documentation, flag risks, improve risk mitigation and engage with suppliers over corrective action when

necessary. In October 2025, they stated: "we are reviewing our due diligence procedures, including concession-level traceability, to ensure alignment with international best practices and to go beyond upcoming regulatory requirements."

Regarding specific suppliers, the company stated that all wood products supplied by PT Korindo Ariabima Sari were sourced from two PEFC-certified concessions in South Papua, with no material originating from PT Indosubur Sukses Makmur (PT ISM). Fepco said it had decided to switch to 100% PEFC-certified plywood from PT Korindo Ariabima Sari in 2024. They referenced a statement from PT KAS, saying: "We recognize that Korindo unknowingly received logs from a trader sourcing from PT ISM. Korindo has initiated a grievance investigation and has committed to transparency and corrective action if non-compliance is confirmed." (The suggestion that Korindo was unaware of logs coming from PT ISM is apparently contradicted by the fact the company reported the concession as a source of timber in its RPBBI timber sourcing reports from 2022, 2023 and 2024.)

On PT Kayu Multiguna Indonesia, Fepco International stated: "for 2024 and before, we relied on the legality documentation made available to us by the Government of Indonesia, in close cooperation with the European Union, under the SVLK/FLEGT licensing system." In August 2025, they wrote that since September 2024, Fepco has "sourced a steadily increasing volume of 100% FSC-certified plywood," and that it is Fepco's "firm intention" to shift to buying only 100% FSC-certified plywood from the company.



In October 2025, they stated: "despite the slow and uncertain progress of the EU in implementing the EUDR framework, we have nonetheless evolved towards purchasing exclusively from independently certified sources. We now purchase FSC-certified material from PT Kayu Multiguna Indonesia and PEFC-certified material from PT Korindo Ariabima Sari."

On PT Basirih Industrial, Fepco International stated: "The cooperation with this supplier has been fully terminated." In August 2025, they wrote: "We believe there is no basis to conclude that the uncertified and certified products Fepco imported from these companies were contaminated with deforestation-linked wood."

Fepco says it is "actively working toward full compliance with the EUDR by December 2025," and that an updated sourcing policy "prohibits sourcing from any supplier involved in deforestation or forest conversion, irrespective of legality." They also stated that their supplier assessment procedures will be expanded to consider activities in supply chains unrelated to Fepco. In response to Earthsight's question to clarify how they define a company as being 'involved in' deforestation, and whether this excludes suppliers which source a significant proportion of their log supplies from deforestation, Fepco responded: "In our definition, "involved in" refers to direct responsibility for such activities through ownership or active management of concessions where deforestation is taking place. We note your broader interpretation of the term and will take this into account in our ongoing policy reviews."

See the full response at https://www.earthsight.org.uk/risky-business-company-responses

Dekker Hout

This Dutch company, founded in 1885, manufactures and trades wood and composite products such as decking, fencing, garden furniture, planters, cladding and composite materials, including a range of outdoor products under its 'Elephant' brand. Dekker Hout products are sold across Europe, including in the Netherlands, Germany, France, Belgium, Austria, Ireland and the United Kingdom. The company sources a variety of tropical hardwoods from Indonesia, such as red meranti, dark red meranti and bangkirai, species which occur only in natural forest. These materials are primarily used in the production of decking, fencing, door frames, skirting boards and laminated profiles.

In 2024, the company's imports from Indonesia included:

 1564m³ of wood products from PT Kayu Multiguna Indonesia. These included 623m³ of nyatoh, bintangur and gerunggang door jambs, and 166m³ of dark red meranti products, including finger joint laminated block and white primed. The company also imported 123m³ of meranti products, including finger joint laminated block and white primed, from PT Kayu Multiguna Indonesia in the period January–April 2025 Company response: In an email to Earthsight and Auriga, Dekker Hout said they are "shocked by accusations of the involvement of Kayu Multiguna with clearcut timbers and have put all contracts and shipments from them on hold until the situation is clarified." The company states it sent a Dutch purchase manager to the PT Kayu Multiguna Indonesia factory on 22 July 2025, and among their observations was that all FSC-certified timber used in orders for Dekker Hout came from PT Gema Hutan Lestari on the island of Buru, while timber in "past SVLK FLEGT orders" (i.e. non-FSC certified wood) came from Kalimantan, specifically PT Mayawana Persada and PT Tanjung Redeb Hutani. (PT Mayawana Persada has cleared more than 33,000ha of natural forest since 2021, more than any other plantation company in Indonesia. Any natural timber from this concession is certain to have come from deforestation.)xxiii

The letter states: "It appears that Kayu Multiguna has bought timber from legal but non-sustainable sources on behalf of an Indian company for servicing the production of plywood. We do not want to be affiliated with the (possible) use of clearcut timber in Indonesia. Since we were not aware nor informed about this, we see this as a significant breach of trust and will investigate this thoroughly and discuss with them." It further says that once the EUDR is in full effect, Dekker Hout will accept only FSC and PEFC wood products, and says, "We will also be checking the origin of other timber at our suppliers' yard."

In a subsequent email in October 2025, Dekker Hout stated: "we have immediately suspended all pending contracts related to tropical hardwoods until this matter is fully resolved."

See the full response at https://www.earthsight.org.uk/risky-business-company-responses

Impan GmbH

A Germany-based importer of timber products, established in 1999. Imports a range of products including sawn timber, plywood and veneer from Indonesia, Malaysia, China, Poland, Ukraine and South America.

Imports plywood, blockboard, door blanks, laminated veneer and other timber products from Indonesia, from a range of species including meranti and keruing, which occur only in natural forest. This company was the biggest importer of Indonesian plywood in Germany in 2024, and the second-biggest importer of Indonesian plywood into the EU overall.xxiv In 2024, the company's imports from Indonesia included:

- 566m³ of meranti plywood imported into Belgium, 163m³ to Sweden, 161m³ to Germany, 122m³ to the Netherlands and 38m³ to France, from PT Basirih Industrial
- Approximately 188m³ of meranti plywood imported to Germany, and approximately 156m³ of meranti plywood to Italy, from PT Wijaya Triutama Plywood Industrixxx

Company response: In an emailed response to Earthsight and Auriga, Impan GmbH denied importing wood products from Indonesia. Impan GmbH is named as both the buyer and consignee of shipments of meranti products from PT Basirih Industrial and PT Wijaya Triutama in both commercially available shipment records and Indonesian Ministry of Forest export data. The company did not respond to our request to clarify their commercial relationship with plywood manufacturers in Indonesia, or name other companies who may have been the physical importer of this timber and for whom Impan GmbH was providing services.

See the full response at https://www.earthsight.org.uk/risky-business-company-responses

International Plywood BV

A Dutch importer and wholesaler of wood-based panels (plywood, boards, MDF and OSB), founded in 1985. Supplies the Dutch and Belgian timber and building materials trade, as well as the car bodywork construction, packaging and parquet industries.

In 2024, the company's imports from Indonesia included 558m³ of film-faced plywood (keruing) from PT Kayu Multiguna Indonesia. It also imported 207m³ of hardwood plywood from PT Kayu Multiguna Indonesia in the period January–April 2025.

Information provided by the company shows that a shipment of keruing plywood imported from PT Kayu Multiguna Indonesia in February 2025 originated from timber cut in the oil palm concession of PT Bina Sarana Sawit Utama, which cleared more than 500 hectares of natural forest in 2024.

Company response: In an emailed response to our findings, International Plywood stated: "We want nothing to do with plywood, that comes from deforestation in the favor of palm oil, soja etc etc.. We will do our utmost to avoid that." The company said it has been working to become EUDR compliant since early 2024. They stated that all Indonesian film-faced plywood imported in 2024 was for a particular customer, and that they do not keep Indonesian plywood in stock.

The letters says they asked PT Kayu Multiguna Indonesia for "the basic information to be EUDR compliant," including geolocation data, and that the plywood was FLEGT-certified. The letter states that importing certified sustainable plywood is a major goal of International Plywood, and that proportions of FSC and PEFC-certified wood in the company's total imports in 2024 increased compared to 2022, to 74% and 18% respectively. The letter suggests they will continue to source from PT Kayu Multiguna Indonesia, stating: "We will continue in doing business with [unspecified] companies that we know for a long time, with whom we have a long standing relationship and we can discuss on forehand what is right or wrong."

See the full response at https://www.earthsight.org.uk/risky-business-company-responses

Timber Trade Connection BV

A Dutch timber import agency, founded in 2001, specialising in tropical timber and plywood from Southeast Asia, China and South America.

According to shipment records, in 2024 the company's imports included 1371m³ of meranti products, including finger joint laminated block, door jambs and mouldings, from PT Kayu Multiguna Indonesia. The company also imported 415m³ of meranti products, including finger joint laminated block and white primed, from PT Kayu Multiguna Indonesia in the period January–April 2025.

Company response: In an emailed response to our findings, Timber Trade Connection stated that they act as agent and were not the physical importers of wood products from PT Kayu Multiguna Indonesia. The letter states: "We handle our current timberbusiness [sic] under the EUTR, which is still valid. The EUDR, as what you are referring to is not yet in place and yet we are very busy preparing for it."

The company did not respond to a follow-up request to share names of importing companies, and is included here because the company is named in shipment records as both the buyer and consignee of shipments of meranti products from PT Kayu Multiguna Indonesia.

See the full response at https://www.earthsight.org.uk/risky-business-company-responses

Kurz KG

A German importer and trader of wood products such as plywood, decking and façade cladding from Asia, North and South America. Sells garden wood under the brand Tiger Premium®, which includes decking made from bangkirai and kapur, species that are harvested only from natural forests in Southeast Asia.

In 2024, the company's imports from Indonesia included 84m³ of kapur decking from PT Putra Buana Indonesia Wood Industry. The company also imported 19m³ of bangkirai mouldings and 9m³ of kapur mouldings from PT Putra Buana Indonesia Wood Industry in the period January–March 2025.

Company response: In emailed responses to our findings, Kurz KG confirmed that they are supplied by PT Putra Buana Indonesia Wood Industry, and wrote: "As a matter of principle, we do not purchase any products that have not been exported in accordance with the new EUDR regulations." They stated that they only accept imports if accompanied by a set of documents, namely, FLEGT licences, certificate of origin, names of concessions of origin, and coordinates for the area of cutting. They listed a set of guidelines their suppliers must follow, including ensuring all timber is from legitimate sources, compliance with Indonesian regulations and "compliance with the principle of zero deforestation and no involvement in human rights violations." They state that PT Putra Buana Indonesia Wood Industry was judged to have fulfilled all these requirements.

APPENDIX REFERENCES

i. Betahita, 'Rumah Orangutan di DAS Muroi Kalteng Terancam Hilang', 26 November 2024,

https://betahita.id/news/detail/10731/rumah-orangutan-di-das-muroi-kalteng-terancam-hilang.html

ii. Greenpeace International, 'Under the Eagle's Shadow: Investigating the RGE/Tanoto Shadow Empire', May 2025,

81617d3f-under-the-eagles-shadow_progress-190525_medres.pdf **iii.** Earthsight, 'FSC must terminate negotiations with paper giant APRIL over its continued links to deforestation', 12 December 2024, https://www.earthsight.org.uk/news/FSC-APRIL-deforestation

iv. The Gecko Project, Bloomberg News, 'Insider testimony points to "sustainable" conglomerate as hidden hand behind destruction of rainforest', 15 October 2024,

https://thegeckoproject.org/id/articles/insider-testimony-points-to-sustainable-conglomerate-as-hidden-hand-behind-destruction-of-rainforest/

v. AidEnvironment, 'Two Companies Alone Cleared 10,600 Hectares of Indonesian Forest in 2022', February 2023, https://aidenvironment.org/two-companies-alone-cleared-10600-hectares-of-indonesian-forest-in-2022/

vi. TheTreeMap, '2023 Deforestation by the Wood Pulp Industry in Indonesia Surges, Hits Record Highs in Kalimantan', 26 February 2024, https://nusantara-atlas.org/2023-deforestation-by-the-wood-pulp-industry-in-indonesia-surges-hits-record-highs-in-kalimantan/vii. TheTreeMap, 'Industrial Wood Pulp Deforestation in Indonesia Slows in 2024', 11 April 2025, https://nusantara-atlas.org/industrial-wood-pulp-deforestation-in-indonesia-slows-in-2024/

viii. Deforestation figures in this report are based on analysis conducted by Auriga Nusantara. Deforestation is defined here as the loss of natural forest cover, and does not count tree cover loss in timber plantations and/or plantation forests. Natural forest is defined as a vegetative association dominated by naturally occurring woody growth, and therefore includes both primary and secondary forests. Deforestation figures for 2021–2023 were calculated by overlaying the University of Maryland's Global Land Analysis and Discovery (GLAD) gross cover loss and the Indonesian Ministry of Environment and Forestry's forest cover map. Deforestation figures for 2024 are taken from 'Status of Deforestation in Indonesia 2024', published by Auriga Nusantara. Deforestation totals may differ from those produced by other groups due to variances in definitions of forest, deforestation and calculation methodology

ix. All cubic metre figures in this report are rounded to the nearest whole number

x. Betahita, 'Rumah Orangutan di DAS Muroi Kalteng Terancam Hilang', 26 November 2024,

https://betahita.id/news/detail/10731/rumah-orangutan-di-das-muroi-kalteng-terancam-hilang.html

xi. See, for example, Rainforest Action Network, 'New Report Uncovers One of the Largest Cases of Illegal Rainforest Clearance in Borneo for Palm Oil Development', 11 April 2018, https://www.ran.org/press-

releases/new_report_uncovers_one_of_the_largest_cases_of_illegal _rainforest_clearance_in_borneo_for_palm_oil_development/; Chain Reaction Research, 'The Chain: Top Ten Deforesters Clear 8,100 Hectares on Oil Palm Concessions During 1H 2022, a Significant Increase Versus 2021', 26 September 2022,

https://chainreactionresearch.com/the-chain-top-ten-deforesters-clear-8100-hectares-on-oil-palm-concessions-during-1h-2022-a-significant-increase-versus-2021/

xii. Roni Sahala, 'Hutan Sakral Dikonversi Jadi Kebun Sawit, Ahli Waris Lapor Polisi', Liputan 6, 30 March 2024, https://www.liputan6.com/regional/read/5562344/hutan-sakral-dikonversi-jadi-kebun-sawit-ahli-waris-lapor-polisi; Roni Sahala, 'Diduga Serobot Tanah dan Rusak Situs Budaya, PT BSSU Dipolisikan', Liputan 6, 30 January 2024, https://www.liputan6.com/regional/read/5516427/diduga-serobot-

tanah-dan-rusak-situs-budaya-pt-bssu-dipolisikan; Inikalteng.com, 'Ahli Waris Ajak Jaya Ingin Lahan 113,5 Hektare Miliknya Dikembalikan', 24 April 2024, https://www.inikalteng.com/ahli-waris-ajak-jaya-ingin-lahan-1135-hektare-miliknya-dikembalikan/ xiii. Earthsight and Auriga Nustantara, 'Unhappy Campers: How America's RV industry is destroying Indonesia's rainforests', 19 August 2025, https://www.earthsight.org.uk/news/unhappy-campers

xiv. Available shipment records did not provide accurate cubic metre figures for exports from PT Wijaya Triutama Plywood Industri. This figure is an estimate based on US dollar value amounts given in shipment records, using a dollar per cubic metre average calculated from available records.

xv. In an emailed response to our findings, PT Kayu Multiguna Indonesia stated the figures (derived from official timber sourcing documents) do not match the company's records. Their response stated that in 2024, the company purchased 14,100.84 m³ of FSC logs and 2,954.08 m³ of SVLK logs

xvi. In an emailed response to our findings, PT Kayu Multiguna Indonesia stated the figures (derived from official timber sourcing documents) do not match the company's records. Their response stated that in 2023, the company purchased 13,347.2 m³ of FSC logs and 3,133.63 m³ of SVLK logs.

xvii. In an emailed response to our findings, Timber Trade
Connection stated that the company acts as an agent, rather than
the physical importer of Indonesian timber. They did not respond to
a follow-up request to share names of importing companies, and
are included here as an importer given the company is named in
shipment records as both the buyer and consignee of shipments of
meranti products from PT Kayu Multiguna Indonesia in 2024
xviii. Korindo Group website,

https://www.korindo.co.id/sustainability/

xix. FSC, 'FSC Announces Disassociation from Korindo Group'. 14 July 2021, https://fsc.org/en/newscentre/integrity-and-disputes/fsc-announces-disassociation-from-korindo-group; FSC, 'Overview of the complaints panel investigation findings', https://fsc.org/sites/default/files/2019-

 $11/Overview \begin{tabular}{l} 11/Overview \begin{tabular}{l} 20 of \% 20 findings \% 20 complaints \% 20 panel \% 20 investigation _Korindo.pdf \end{tabular}$

 ${f xx}.$ Korindo Group website, https://www.korindo.co.id/use-of-timber-from-deforestation/?lang=id

 ${\bf xxi}$. Earthsight analysis of shipment records under HS code 4412, by value

xxii. Earthsight analysis of shipment records under HS code 4412, by value

xxiii. Auriga Nusantara, Environmental Paper Network, Greenpeace International, Woods & Wayside International and Rainforest Action Network, 'Deforestation Anonymous: Rainforest destruction and social conflict driven by PT Mayawana Persada in Indonesian Borneo', March 2024,

https://www.greenpeace.org/international/publication/65885/deforestation-anonymous/

xxiv. Earthsight analysis of shipment records under HS code 4412, by value

xxv. Available shipment records did not provide accurate cubic metre figures for exports from PT Wijaya Triutama Plywood Industri. This figure is an estimate based on US dollar value amounts given in shipment records, using a dollar per cubic metre average calculated from available records