

Demanding accountability

Strengthening corporate accountability and supply chain due diligence to protect human rights and safeguard the environment



Lessons from ten case studies of the Indonesian palm oil sector¹

This paper summarises some key findings of a human rights analysis and careful review conducted by FPP, TuK INDONESIA, PUSAKA and WALHI of the connections between ten controversial oil palm plantations in Indonesia and the downstream companies and financiers that invest in them or that trade, process or manufacture consumer goods from their products (Figure 1).¹

¹ See *Demanding Accountability: Strengthening corporate accountability and supply chain due diligence to protect human rights and safeguard the environment - Lessons from ten case studies of the Indonesian palm oil sector* FPP, TuK INDONESIA, PUSAKA, WALHI Riau, WALHI Jambi, and WALHI Sulawesi Tengah, June 2021 86pp.

Key points

1. Systemic social and environmental problems continue to plague the Indonesian palm oil industry and connected global palm oil supply chains:
2. Human rights abuses embedded in palm oil are frequently associated with land conflicts, weak land governance, deforestation and other environmental harm:
3. Corporate due diligence practices, if undertaken, often do *not* apply balanced integrated approaches to environmental and human rights due diligence
4. Corporate accountability of *all* actors along palm oil value chains to affected communities is weak or non-existent:
5. Action is needed now to ensure major strengthening of company and financier environmental and social governance (ESG) systems to fulfil corporate responsibilities and remedy unresolved community grievances;
6. Sustainable corporate governance legislation and supply chain regulations must require downstream companies and financial businesses to conduct due diligence along their entire supply and value chains;
7. Legal regulations on corporate actors must be backed up by robust verification and enforcement, and include obligations on businesses to take actions to address and remedy impacts on human rights and the environment and disclose due diligence and measures undertaken.



Community members and smallholders outside the Office of the Governor of Jambi protesting against illegal palm oil concession permits affecting their lands and forests. Credit: Sophie Chao

I. Summary

The supply chain analysis contained in this report finds that oil palm plantations and mills that are the declared holdings of Astra Agro Lestari, First Resources, Golden Agri Resources-Sinar Mas and Salim (Indofood) groups are associated with serious cases of social and environmental harm. Human rights abuses identified include the **denial of indigenous peoples' rights, expropriation of community lands without consent, involuntary displacement, violations of environmental rights, repression, harassment, criminalization and even killings of human rights defenders**. Despite these very serious, long term and well documented human rights abuses and environmental damage, on the ground, major downstream companies continue to invest in, or source products from these plantations, often without identifying, recording or remedying the social harms they are causing, contributing to, connected to, and profiting from.

Downstream companies investigated, which source palm oil from corporate group level suppliers controlling or sourcing from abusive plantations, include Cargill, Nestlé, PepsiCo, Unilever, Wilmar International, Archer Daniels Midland and AAK. Prominent financiers and investors include Blackrock International, ABN-AMRO, Rabobank, Standard Chartered, Citigroup, Lloyds Banking Group, JP Morgan Chase, as well as different pension funds and Asian banking groups (**Figure 2**). Most of the downstream companies investigated, and some of the investors, are prominent members of the Roundtable on Sustainable Palm Oil and other sustainability initiatives. Yet, despite the fact that the violations uncovered are clearly contrary to RSPO standards, as well as the companies' own 'No Deforestation, No Peat and No Exploitation' (NDPE) policies and commitments to apply the Social Requirements of the High Carbon Stock Approach (HCSA), it is found that trade and investment with harmful suppliers continue unchecked.

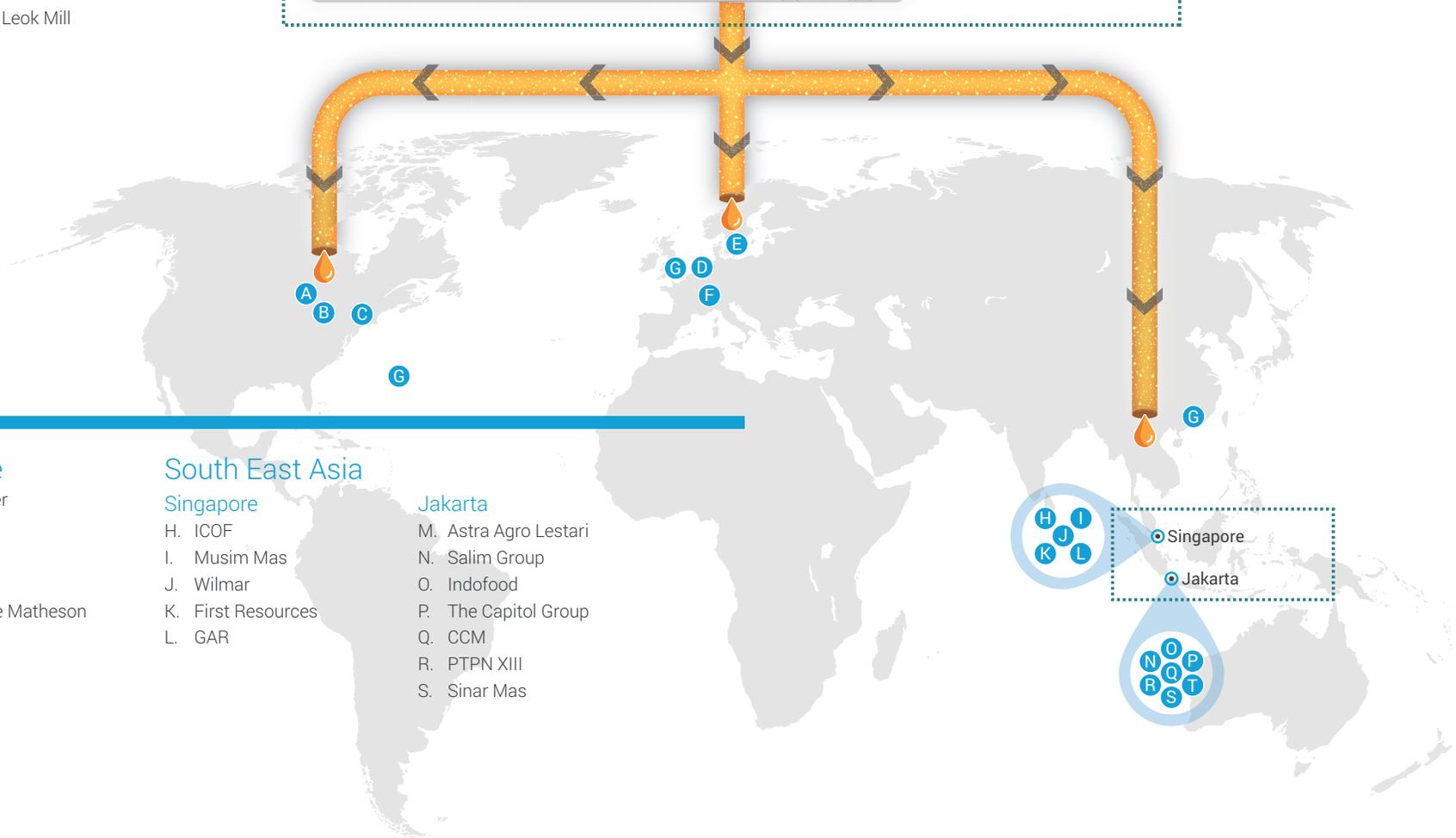
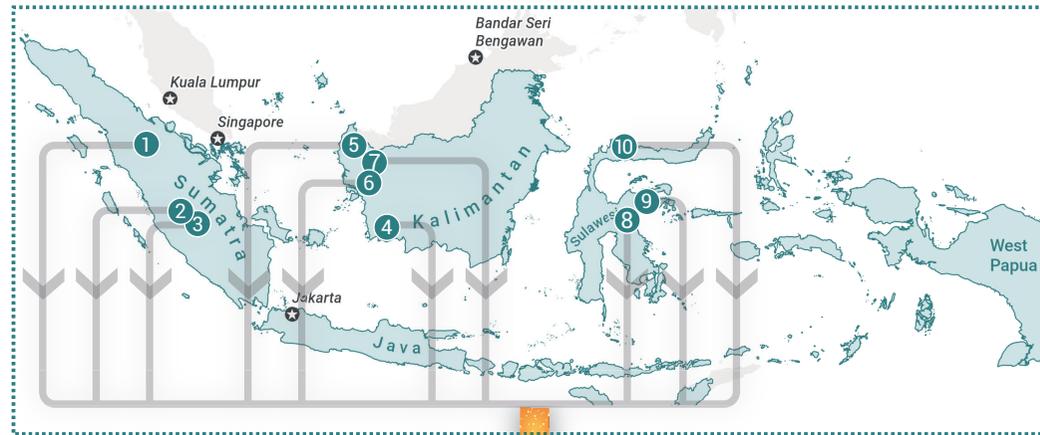
Dirty and destructive commodity chains – a global problem: As the world enters the third decade of the 21st century, the expansion of the commodity frontier funded by the global financial system continues to drive massive social, environmental and climate harms.² In the agri-business sector, supply chains for palm oil,³ beef,⁴ sugar,⁵ rubber,⁶ soybean,⁷ cotton,⁸ fruit⁹ and bananas¹⁰ are frequently stained by embedded human rights and environmental abuses committed upstream at the point of production.¹¹ Supply chains and the global commodity trade are often associated with violence and repression of indigenous peoples, communities and social organisations.¹² Agri-commodity markets are also infected by corrupted products¹³ and laundered illegal commodities supplied by banned producers who are the subject of judicial sanctions for illegal deforestation and rights abuse.¹⁴ At the same time, a growing body of science links large scale land conversion to agricultural monocultures for the production of commodities to the emergence and spread of harmful disease and pandemics.¹⁵ Reports from the frontline during the pandemic of 2020-21 indicate that harms associated with commodity trade are intensifying and set to cut yet deeper as producer countries and industry seek to 'rollback' regulation and enable economic 'recovery.'¹⁶ Major commitments are required by governments and the private sector to ensure that legal and policy protections for human rights, the natural environment and the climate are maintained and strengthened during and after the current pandemic.

Figure 1. Case study locations and palm oil supply chain actors

Mills

Indonesia

1. PT Pancasurya Agrindo – TAMBUSAI Mill
2. PT Sari Aditya Loka – PT SAL 1 Mill
3. PT Kresna Duta Agroindo – Jalatang Mill
4. PT Harapan Sawit Lestari – MANISMATA Mill
5. PT Mitra Intisejati Plantation – Bengkayang Mill
6. PT Perkebunan Nusantara XIII – Kebun Gunung Meliau Mill
7. PT Mitra Austral Sejahtera – PT MAS Mill + Plantation
8. PT Agro Nusa Abadi – Agro Nusa Abadi Mill
9. PT Kurnia Luwuk Sejati – Toili Mill
10. PT Hardaya Inti Plantations – Leok Mill



Supply chain actors

US

- A. Cargill
- B. ADM
- C. PepsiCo

Europe

- D. Unilever
- E. AAK
- F. Nestlé
- G. Jardine Matheson

UK

South East Asia

Singapore

- H. ICOF
- I. Musim Mas
- J. Wilmar
- K. First Resources
- L. GAR

Jakarta

- M. Astra Agro Lestari
- N. Salim Group
- O. Indofood
- P. The Capitol Group
- Q. CCM
- R. PTPN XIII
- S. Sinar Mas

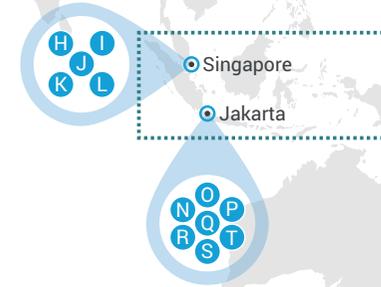
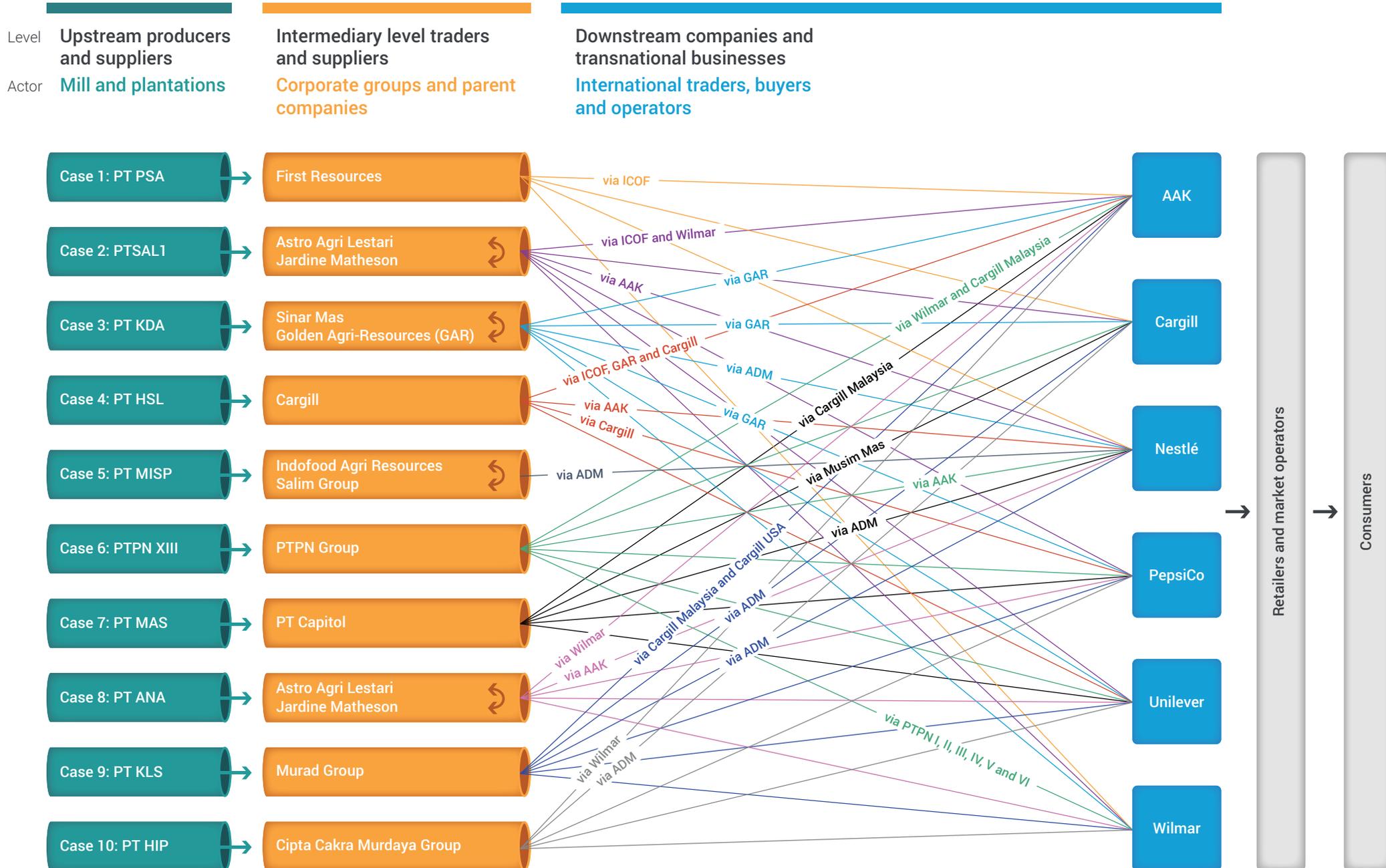


Figure 2. Supply chain connections



II. Core findings

Supply chain contamination

- Palm oil sourced from unsustainable plantations, mills and refineries in Indonesia is often contaminated by unresolved **current and historical human rights abuses** (as in all 10 cases studied)¹⁷
- Palm oil plantations and supply chains continue drive multiple land conflicts and associated negative human rights impacts across Indonesia¹⁸
- Extensive areas of customary community land in Indonesia have been converted to commercial land permits known as *Hak Guna Usaha* (HGU) without genuine FPIC and with no proper legal contract with affected indigenous communities
- Flawed FPIC processes linked to concessions and land leasing for oil palm development have been founded on misinformation leading to longstanding tenure disputes, conflicts and grievances, and protracted complaints that are ongoing and unresolved in 2021 (e.g., affecting Dayak territories across Indonesian Borneo)
- In addition to violations of indigenous peoples' land rights and FPIC, other injustices connected with palm oil supply chains in breach of international human rights law, the UN Guiding Principles on Business and Human Rights and industry sustainability standards include, among others, **infringements of the right to food security, clean water, and a healthy environment** and **denial of access to remedy** for harmful supply chain impacts



Orang Rimba communities dispossessed by PTSAL plantations suffer persecution from company security guards as 'squatters' on their own customary lands, which are now blanketed in palm monocultures. Credit: Warsi

Defective due diligence and weak systems of environmental and social governance (ESG)

- Existing ESG systems of downstream companies are failing to identify (or overlooking) numerous unresolved human rights abuse cases and related outstanding community grievances upstream in Indonesia, which should be being picked up and addressed through due diligence;
- Even where companies have statements and palm oil sourcing policies with human rights and NDPE commitments, including on land rights and FPIC, they often do *not* have practical procedures to apply them in supply chain operations and investments;
- Palm oil businesses often lack effective and credible verification frameworks to assess compliance with their NDPE commitments and applicable legal and industry social and environmental standards;
- Voluntary palm oil certification schemes like the RSPO and their auditors are failing to identify land conflicts, FPIC violations and community grievances in member subsidiaries and supply chains;
- Current “ESG” risk and performance ratings for agribusiness corporate groups and commodity suppliers used by downstream companies and investors to conduct due diligence are *not* reliable (information is often seriously incomplete and suffers from self-reporting bias);
- Downstream companies and international financiers provide little or no public information on their corporate due diligence procedures for identifying and addressing impacts and risks associated with suppliers, partners and clients in the palm oil sector, and hence **failing to meet standards set out in the UNGP reporting framework**;
- Businesses and investors mostly **fail to disclose the actions** they will take or have already implemented in cases of non-compliance and reported harm (e.g. on detecting land conflicts, threats to human rights defenders etc); nor do they disclose thresholds they have set that if breached will result in suspension of suppliers or the termination of business relations.

“Until now the much-needed proper remedies and rights of the impacted communities have not been resolved properly. We urge investors and buyers of palm oil from PT Pancasurya Agrindo (PT PSA) to take and share accountability in upholding human rights remedies. The affected communities are demanding their land be returned,”

Director of WALHI Riau, 2020

Weak redress and remedy

- Communities in Indonesia harmed by corporate oil palm operations must often endure human rights abuses and grievances with **no effective remedy** for years or even decades (if at all);
- Powerful corporate groups and palm oil conglomerates are still **washing their hands of responsibility** to remedy community grievances by divesting 'problematic' subsidiaries (e.g., Sime Darby divestment of PT MAS in 2019);
- Existing palm oil industry accountability mechanisms such as the RSPO complaints system are typically **slow and ineffective** (e.g., PT MAS case affecting Dayak Hibun communities in W Kalimantan) ;
- Downstream company **verification** that supplier remedies are effective and community grievances have been resolved to the satisfaction of affected rightsholders is **weak or non-existent**.

Positive practices in palm oil business: This review finds that since 2017 there has been notable progress in the palm oil sector in improving supply chain transparency through transnational company disclosure of suppliers and mill lists using a common reference known as the **Universal Mill List**.¹⁹ Some downstream companies update their published mill lists at least annually and some do this more regularly (e.g. Nestlé, AAK, ADM Europe), and several (e.g. Nestlé) disclose how specific mills and third party palm oil producers are tied to their direct "Tier 1" suppliers. Public disclosure of full supplier lists including third party suppliers should be adopted by other agri-commodity sectors and supply chain actors, **including** by upstream domestic businesses, corporate groups, processors and restailers; and must be required in emerging regulations and mandatory legislation on corporate governance, supply chain due diligence and transparency.



In addition to land grabbing and deforestation, palm oil mills in Indonesia and in other producer countries are often denounced for air and water pollution adversely affecting the health and water rights of adjacent communities
Credit: Rhett A Butler / Mongabay

III. Demanding corporate accountability and calling for change

The case studies highlight a range of demands on supply chain actors made by affected rights holders and communities, including calls on international finance businesses and downstream companies to **investigate** the cases concerned and address human rights impacts and unresolved grievances. Specific community demands for **time-bound action plans** to facilitate land restitution and reparations are also made on Sime Darby, Cargill Inc, Astra International Group/Jardine Matheson, AAK, Nestlé, PepsiCo, Wilmar and Unilever. Affected communities emphasise the need for dedicated and transparent follow up and **monitoring of remedial measures and agreements**. In some cases, downstream companies are requested to **suspend purchasing** of palm oil from harmful suppliers, such as PT Kurnia Luwuk Sejati.

“We still want our customary land back and proper remedy. PT Mitra Austral Sejahtera (PT MAS) converted 1,462 hectares of customary land in Kerunang Hamlet and Entapang Hamlet to a business use permit (HGU) without a proper FPIC process – this was deceitful behaviour. We don't want to lose our customary land...”

Community leader, Entapang Hamlet, Bonti Subdistrict, West Kalimantan, 2020

The report additionally presents actionable recommendations for companies and investors on upgrading due diligence to better protect human rights and the environment. Lessons from the case studies are also used to make recommendations to state actors developing statutory regulations on corporate governance and sustainability regulations for ‘forest-risk’ supply chains. Core recommendations for different actors derived from detailed proposals for action set out in the full report are the following.

Transformation imperative for the 21st century: Indigenous peoples and communities impacted by harmful global commodity trade have long called for binding statutory regulation of commodities and corporate actors to uphold human rights, protect indigenous territories and remove “embodied” rights abuse, climate damage and environmental destruction from commodities.²⁰ Social movements and the UN are calling on companies and financiers to upgrade their social and environmental governance systems to take actions to ensure **zero tolerance** to land grabs, killings and violence against human rights and environmental defenders in their business operations and investments.²¹ Alongside, demands for greater legal regulation and accountability of businesses and the finance industry worldwide, indigenous peoples and climate justice movements are calling for transformations towards sane, humane, equitable and agro-ecological economic systems, alternative economies and a move away from industrial chemical-based monocultures and economic growth models grounded in large-scale extraction and industrialisation.²²

A. Specific demands of affected communities

The report highlights a range of demands made by adversely affected communities in the 10 specific supply chains investigated, including calls on downstream companies and international finance businesses to **undertake independent investigations** of the cases concerned and **take actions to address human rights impacts and unresolved grievances**. Specific community demands for **time-bound action plans** to facilitate **land restitution and reparations** are also made on Sime Darby, Cargill Inc, Astra International Group/Jardine Matheson, AAK, Nestlé, PepsiCo; Wilmar and Unilever. Affected communities emphasise the need for dedicated and transparent follow up and **monitoring of remedial measures and agreements**. In some cases, downstream companies are requested to **suspend purchasing** of palm oil from harmful suppliers, such as PT Kurnia Luwuk Sejati.

B. General recommendations to supply chain actors

In addition to specific demands put to transnational businesses and financiers, the report sets out a set of proposals for action for different supply chain actors.

Downstream companies and market operators

- ☞ Implement own measures and support collective sector-wide initiatives and actions to enable **credible independent verification of compliance** with business and human rights and sustainability standards, including field-based verification of respect for community tenure, FPIC, NDPE and HCSA commitments;
- ☞ Apply **specific due diligence on tenure governance** and use credible information sources to **identify and address contested tenure rights and land conflicts** and related community grievances upstream in supply chains;
- ☞ Develop and **adopt dedicated due diligence procedures on human rights and environmental defenders** to identify and address violence, intimidation, repression and criminalisation of communities affected by harmful supply chain impacts and abusive corporate conduct;
- ☞ **Include binding human rights and environmental provisions in business partnerships and supply contracts** to require upstream suppliers to apply specific standards in their operations and enforce these in their own supply chain;
- ☞ Publicly **disclose due diligence actions planned or underway to address adverse supply chain impacts and risks** in line with the UNGP Reporting Framework: such disclosure should relate to *particular* operations, suppliers and jurisdictions (beyond generalised statements);
- ☞ Develop, adopt and disclose **non-compliance action protocols**, setting out what a company or financier will do in practice on detecting non-compliance in their supply chain or portfolio.

Investors and finance industry

- 👉 Develop and adopt due diligence practices to *verify* and cross-check ESG rating information on potential clients, investees and borrowers using independent information sources such as media, civil society, academic studies and community reports;
- 👉 Adopt and publish a code of practice to only finance and invest in oil palm companies and agribusiness corporate groups, concessionaires, mills, refineries and land developers able to demonstrate compliance with international human rights and environmental standards;
- 👉 Use contracts, finance agreements and other sources of leverage to promote adherence to agreed standards, including compliance with the UNGPs and related international law standards on human rights and seek to maximize leverage on clients and partners;
- 👉 Fully disclose lending, underwriting, asset ownership and investments in high-risk sectors, including information on beneficial ownership and shareholder interests in oil palm and other agribusiness companies to ensure transparency, including interests in shadow companies registered in offshore secrecy jurisdictions.

Policy makers and legislators

It is emphasised that to be effective, statutory measures and regulations on business and human rights and 'forest risk' supply chain sustainability must ensure, *inter alia*:

- 👉 Corporations are obliged to identify, address and remedy impacts in their supply chains and portfolios;
- 👉 Application of corporate due diligence and disclosure requirements throughout company supply and value chains, business partnerships and portfolios (covering *both* direct and indirect suppliers);
- 👉 Establishment of robust monitoring, verification and enforcement mechanisms to support compliance;
- 👉 Strong sanctions for companies in violation of applicable due diligence laws and supply chain regulations;
- 👉 Access to judicial remedy in the courts of the country where companies are domiciled for rights holders and communities negatively affected by their operations, business relations and investments.

"We are now calling on palm oil buyers from Astra Agro Lestari like Unilever, Nestle, PepsiCo, Cargill and Wilmar as well as other downstream actors to share responsibility and work in collaboration to support land restitution for Orang Rimba in PT SAL,"

Spokesperson, KKI Warsi, 2020

Endnotes

- 1 This briefing and the detailed report summarised have been compiled by Tom Griffiths (FPP) and Norman Jiwan (FPP Associate) in collaboration with TuK INDONESIA, PUSAKA, WALHI Riau, WALHI Jambi, and WALHI Sulawesi Tengah.
- 2 Portfolio Earth (2020) *Bankrolling Extinction: the banking sector's role in the global biodiversity crisis* <https://portfolio.earth/wp-content/uploads/2020/10/Bankrolling-Extinction-Report.pdf>
- 3 E.g. Amnesty International (2020) Why palm oil in products is bad news <https://www.amnesty.org.uk/indonesia-palm-oil-wilmar-human-rights-plantation>; Andrianto, A et al (2019) "Expansion of Oil Palm Plantations in Indonesia's Frontier: Problems of Externalities and the Future of Local and Indigenous Communities" *Land* **8**(4)(2019):56 <https://doi.org/10.3390/land8040056>
- 4 EIA (2021) *Tainted Beef: How criminal cattle supply chains are destroying the Colombian Amazon* EIA-US, Washington DC https://content.eia-global.org/assets/2021/05/Tainted_Beef-EIA.pdf Amnesty International (2019) *Brazil: Fence off and bring cattle: Illegal cattle farming in Brazil's Amazon* <https://www.amnesty.org/download/Documents/AMR1914012019ENGLISH.PDF>; HRW (2019) *Rainforest Mafias: How Violence and Impunity Fuel Deforestation in Brazil's Amazon* Human Rights Watch <https://www.hrw.org/report/2019/09/17/rainforest-mafias/how-violence-and-impunity-fuel-deforestation-brazils-amazon>
- 5 Weitzner, V et al (2021) "The Green Monster": Perspectives and Recommendations from the Black People of Northern Cauca, regarding the Sugar Sector in Colombia, FPP-PAC Case Study, June 2021
- 6 E.g. Earthsight (2019) "Alleged human rights abuses at Cameroon rubber plantation pile pressure on Sudcam" <https://www.earthsight.org.uk/news/idm/human-rights-abuses-cameroon-rubber-plantation-pressure-sudcam>
- 7 Giraud M E (2020) "Dependent development in South America: China and the soybean nexus" *Journal of Agrarian Change* **20**(1)(2020):67-78
- 8 <https://www.theworldcounts.com/challenges/consumption/clothing/cotton-farming-water-consumption/story>
- 9 E.g. Foxvog L and Rosazza G (2020) *Fyffe's Melon Farms exposed: The Fight for Justice in the Honduras* ILRF, el-UITA, 3F International <https://laborrights.org/sites/default/files/docs/FyffesHondurasReport.pdf>;
- 10 E.g. Oxfam (2020) *Sweet Fruit, Bitter Truth* Oxfam Germany - <https://www.oxfam.de/system/files/20150530-oxfam-suesse-fruechte-bittere-wahrheit.pdf>
- 11 Ritchie, H (2020) - "Environmental impacts of food production" <https://ourworldindata.org/environmental-impacts-of-food>
- 12 See for example, COICA (2021) *Declaration of Human Rights Emergency of Indigenous Human Rights Defenders in the Amazon Region - Blood in the jungle, we demand justice, April 14, 2021* <https://coicamazonia.org/wp-content/uploads/2021/04/DECLARATION-OF-THE-HUMAN-RIGHTS-EMERGENCY-.pdf>
- 13 On bribery and corruption in Indonesian commercial land concessions and environmental licensing for land conversion for commodity production, see, for example, <https://www.thejakartapost.com/academia/2020/07/29/the-natural-resources-graft.html>; On company 'kickback' practices in order to receive favours from local government, see also <https://www.thejakartapost.com/news/2020/09/30/kpk-identify-graft-methods-used-by-regional-heads-to-get-back-campaign-funds.html>
- 14 E.g. <https://www.theguardian.com/environment/2020/jul/27/revealed-new-evidence-links-brazil-meat-giant-jbs-to-amazon-deforestation>
- 15 See, for example, Gibb R et al (2020) "Zoonotic host diversity increases in human-dominated ecosystems" *Nature* **584**(7821)(2020): 398-402. doi: 10.1038/s41586-020-2562-8; See also Shah, H.A., Huxley, P., Elmes, J. et al (2019). "Agricultural land-uses consistently exacerbate infectious disease risks in Southeast Asia" *Nature Communications* **10** (2019): 4299 <https://doi.org/10.1038/s41467-019-12333-z>
- 16 Dil, S et al (2021) *Rolling back social and environmental safeguards in the time of COVID-19: The dangers for indigenous peoples and for tropical forests* AMAN, APEM, CNTI, Equidad, ISA, FPP, Middlesex University and Lowenstein International Human Rights Clinic (Yale Law School) <https://www.forestpeoples.org/sites/default/files/documents/Rolling%20Back%20Social%20and%20Environmental%20Safeguards%20-%20Global%20Report%20ENGLISH%20FINAL.pdf>
- 17 See, for example, MacInnes A (2021) *First Resources: Hiding in the Shadows* FPP, Moreton in Marsh https://www.forestpeoples.org/sites/default/files/documents/First%20Resources%20-%20Hiding%20in%20the%20Shadows%20report_1.pdf; FPP (2020) "Large scale bribery and illegal land-use violations alleged on large parts of Golden Agri Resources palm oil plantations" <https://www.forestpeoples.org/en/palm-oil-rspo/press-release/2020/large-scale-bribery-and-illegal-land-use-violations-alleged-large>; Global Witness (2020) *Trading Risks: How ADM & Bunge are failing Land & Environmental Defenders in Indonesia*, Global Witness, London <https://www.globalwitness.org/en/campaigns/environmental-activists/indonesia-palm-oil-traders-are-failing-land-and-environmental-defenders/>; Conant, J, Madan G and Warmerdam, W (2020) *Doubling Down on Deforestation: How the Big Three Asset Managers Enable Consumer Goods Companies to Destroy the World's Forests*, FoE US and Profundo, Creative Commons https://1bps6437gg8c169i0y1drtgz-wpengine.netdna-ssl.com/wp-content/uploads/2020/09/DD_Deforestation.pdf; Greenpeace (2021) *Destruction: Certified* https://www.greenpeace.org/static/planet4-international-stateless/2021/03/f66b926f-destruction_certified_09_03_21.pdf; RAN (2020) *The need for Free, Prior and Informed Consent: an evaluation of the policies and standard operating procedures of 10 major corporate groups involved in forest risk supply chains in SE Asia* https://www.ran.org/wp-content/uploads/2020/12/RAN_FPIC_2020_vF-2.pdf; Jong H N (2019) "Seeking justice against palm oil firms, victims call out banks behind them" *Mongabay News*, 10 October 2019 <https://news.mongabay.com/2019/10/palm-oil-banks-dutch-indonesia-liberia-astra-agro-gvl/>; Greenpeace (2019) *Burning down the house: How Unilever and other global brands continue to fuel Indonesia's fires* <https://storage.googleapis.com/planet4-international->

- stateless/2019/11/5c8a9799-burning-down-the-house-greenpeace-indonesia-fires-briefing.pdf; TUK Indonesia (2019) "Unsustainable Sime Darby, buyers and financiers must stop their business relations" <https://www.forestpeoples.org/en/palm-oil-rspo/press-release/2019/press-release-unsustainable-sime-darby-buyers-and-financiers-must>; EIA (2019) *Who Watches the Watchmen 2? The continuing incompetence of the Roundtable on Sustainable Palm Oil's (RSPO) assurance systems* <https://eia-international.org/wp-content/uploads/WWtW2-spreads.pdf>; Human Rights Watch (2019) *When We Lost the Forest, We Lost Everything: Oil Palm Plantations and Rights Violations in Indonesia* Human Rights Watch and AMAN, Amsterdam and Jakarta https://www.hrw.org/sites/default/files/report_pdf/indonesia0919_web.pdf; Earthsight (2019) "Indonesian anti-corruption body denounces deforestation license for oil palm giant guilty of wrongdoing" <https://www.earthsight.org.uk/news/idm/indonesia-anti-corruption-body-denounces-deforestation-license-oil-palm-sulawesi>; Greenpeace (2018) *Final Countdown: Now or never to reform the palm oil industry* https://cdn.greenpeace.fr/site/uploads/2018/09/Final_Countdown_Pages_19092018lite-version-1.pdf <http://www.hardaya.co.id/production.html>;
- 18 See, for example, Jong H N (2021) "Palm oil conflicts persist amid lack of resolution in Indonesian Borneo" *Mongabay Series: Indonesian Palm Oil, 15 March, 2021* <https://news.mongabay.com/2021/03/palm-oil-conflicts-lack-of-resolution-in-indonesian-borneo-west-kalimantan/>
 - 19 Sargent S, Papadopoulou M, Gonzalez I, Bakker H, den Hartog P, Carillo A, Rosenbarger A and Munroe T (2020) "Universal Mill List: a standardized methodology for creating a global database of palm oil mills" *WRI Technical Note, March 2020* <https://files.wri.org/s3fs-public/universal-mill-list-standardized-methodology-creating-global-database-palm-oil-mills.pdf>
 - 20 *Palangka Raya Declaration on Deforestation and the Rights of Forest Peoples* (2014) http://www.forestpeoples.org/sites/default/files/news/2014/03/declaration_english.pdf; *Industrial Agricultural Supply Chains, Human Rights and Deforestation – A Call to Action* (2016) <http://www.forestpeoples.org/sites/default/files/news/2016/05/call%20to%20action%20-%20single.pdf>; *Call to Action: "Closing the Gap Forum"* Amsterdam, February 2018 https://www.forestpeoples.org/sites/default/files/documents/EN%20rec%20web_0.pdf
 - 21 *Geneva Declaration* (2019) https://3f24981b-c8f8-4fbc-af3c-265866c85eaf.filesusr.com/ugd/d6f494_a0e74da310a440b38bdd66d70453756f.pdf OHCHR (2019) *Time to act: Protect defenders who speak up against business impact on people and planet* UN Office of the High Commissioner on Human Rights, Geneva - Social Media Posting <https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=25416&LangID=E> See also, Martone, F (2019) *Enough! Pledging zero tolerance to attacks against environmental and human rights defenders* ZTI and FPP https://www.forestpeoples.org/sites/default/files/documents/Enough_Pledging%20zero%20tolerance%20to%20attacks%20against%20environmental%20and%20human%20rights%20defenders_0.pdf
 - 22 FOSPA (2020) *CARTA DE MOCOA - Volvamos a la tierra: llamado a la unidad de los pueblos para entretener los caminos hacia una vida digna en la Amazonía* <http://www.forosocialpanamazonico.com/wp-content/uploads/2020/11/CARTA-DE-MOCOA.pdf>



Armed police intimidate and confront Indigenous Jelai Dayak villagers at a road blockade built to protest at PT HSL application for renewal of a commercial land use permit on customary lands they maintain were taken without their free, prior and informed consent, June 2021
Credit: Didin