

BEYOND

PAPER PROMISES



Assessing the Impacts of Corporate Pulp and Paper Commitments on Forests and Frontline Communities



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Rainforest Action Network (RAN) preserves forests, protects the climate and upholds human rights by challenging corporate power and systemic injustice through frontline partnerships and strategic campaigns.



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PUBLICATION DATE: JUNE 2018

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Executive Summary



Globally, the adverse impact of raw material production on the rainforest, climate, and frontline communities has become a well documented crisis. In response, many brand name companies have developed sourcing policies that establish purchasing requirements, assessing and restricting high-risk raw materials and suppliers in their supply chains. As more and more consumer brands have developed sourcing policies, on-the-ground producer companies in the supply chain have in turn developed similar policies, promising to protect forests, avoid tropical peatlands and respect human rights.

Still, despite these promises, the conditions on the ground often tell a different story. Around the world, communities are losing their lands and forests to plantations,¹ workers' rights and other human rights are not being respected,² intact forests are being felled,³ and carbon-rich peatlands are burning.⁴ In order to understand why these issues continue despite the adoption of ambitious policies by companies, it is necessary to understand and evaluate how policies are being implemented.

Policy implementation is often a complex and opaque process, with companies taking action — or failing to take action — behind closed doors. In order to bring the policy implementation process out into the open, RAN has developed a comprehensive implementation survey (see Annex 1 » [RAN.org/BPPsurvey](https://www.ran.org/BPPsurvey)), and used this survey to benchmark thirteen brand name companies in the pulp and paper sector. The survey was completed using available public information from company websites, reports, etc., and then was sent to each company for verification and additional input.

RAN found that, while a few companies are taking active steps to ensure that their policies are creating real change on the ground, many more companies are moving slowly — if at all — to turn their policy promises into real change on the ground. Companies like Scholastic, L Brands, Macmillan and Hachette are leading the pack, while pulp and paper giants like Askul, Office Depot, and Penguin Random House need to take urgent action to show the marketplace that they are serious about their commitments.

The following recommendations are key to ensuring policies have a real impact for forests and the people that depend on them. Full recommendations can be found at the end of this report.

In order to catalyze systemic change, companies must:

- » Define success as measurable improvement on the ground, including becoming more familiar with the impacts that their supply chain has created and the actions needed to create change.
- » Share leadership strategies and best practices for success with other companies who are seeking to implement their policies.
- » Serve as advocates with policy makers and other relevant actors in order to extend the environmental and social value proposition present in their policies to a wider audience.
- » Continue to push for policies and action from laggard companies to ensure that efforts to drive change are not undermined by companies that have not adopted robust policies.

In order to ensure best practice for policy implementation, companies must:

- » Establish time-bound performance targets for the implementation of pulp, paper and viscose sourcing policies.
- » Establish and maintain comprehensive, transparent monitoring and due diligence systems; require transparency; and establish effective grievance procedures.
- » Require independent verification of compliance with sourcing policies and supplier claims.
- » Update policies and policy implementation to make sure fundamental social and environmental risks and emerging issues are addressed, including
 - » Human Rights and Free, Prior and Informed Consent (FPIC)
 - » Remedy for environmental and social harm
 - » Preventing Deforestation through the application of the High Carbon Stock Approach
 - » Preventing Drainage and Loss of Tropical Peatlands and Restoring Forest and Peatland Ecosystems
 - » Zero tolerance on threats, intimidation and/or attacks on human rights defenders



Indonesia's Ecological and Cultural Values Under Siege



Although it has only slightly more than one percent of the Earth's land area, Indonesia's archipelago is also a biological and cultural treasure trove. The rainforests of Indonesia contain a staggering proportion of the world's plant and animal species — including 11 percent of the world's plant species, 10 percent of its mammal species, and 16 percent of its bird species. This diversity includes some of the world's most iconic endangered species, including orangutans, Sumatran tigers, Sumatran rhinoceroses and Sumatran elephants. Indonesia's forests are also home to some of the largest, most carbon-rich forests and tropical peatlands in the world.⁵ Pulp and paper products produced on drained peatland landscapes in Indonesia have the largest carbon footprints in the world.⁶ Not only is the development of industrial plantations on peatlands unsustainable (drained peat soils oxidize and subside over time, resulting in plantations becoming unviable),⁷ but the destruction of peat and forest ecosystems has made Indonesia among the largest emitters of greenhouse gases in the world.⁸

In Indonesia, over 80 million people live in and rely on their customary forests and lands for essential cash income, clean water, shelter, medicine, food and cultural identity.⁹ However, these communities rarely have legal rights to their land. In Indonesia, the government has maintained that the national forest estate — which constitutes approximately 70 percent of total land in Indonesia — is state-owned. Consequently, the state is empowered to make land use decisions and allocate licenses for industrial-scale plantations. This has resulted in plantation licensing and development that usually takes place without community consent and that regularly includes community farms, actively used forests, and even villages in industrial concession areas. The failure to respect land rights has frequently resulted in companies displacing communities from their land and livelihoods, destroying traditionally-owned farms and forests, and uprooting communities and cultures in the development of industrial plantations, resulting in widespread land disputes and social conflict. When communities have spoken out in protest, they have been arrested. They have faced intimidation by local police and military forces, and in two tragic examples, community leaders have been brutally murdered.

Pulp and paper products produced on **drained peatland landscapes** in Indonesia have the **largest carbon footprints in the world.**

Local Advocacy and Market Campaigns Spur Progress

The Indonesian pulp and paper sector's history¹⁰ of egregious practices and devastating impacts has made it the focus of local advocacy efforts and market-based campaigns that focus on key commodities and their supply chain links to US and international markets.

HOW PRESSURE TRAVELS THROUGH THE MARKETPLACE



RAN has worked with dozens of brand name companies, including office supply retailers, publishers, consumer goods companies, luxury and apparel companies and others to develop and adopt strong procurement policies. Hundreds of brand name pulp, paper and viscose buyer companies — including Ralph Lauren, LBrands (Victoria's Secret), Disney, Gucci, Tiffany's, Nestle, HarperCollins, Office Depot, Ricoh — have recognized that in many cases their supply chains were not traceable and that the raw materials and products that they were using and selling had the risk of being linked to deforestation, climate emissions and human rights violations. In response to their own company values, expectations of their customers and NGO campaigns, many developed sourcing policies that required the elimination of these risks from their supply chains. The over 400 Consumer Goods Forum member companies, which account for over US\$ 4 billion in combined sales annually, have pledged to "No Deforestation" 2020 commitments that apply to pulp and paper and other deforestation related commodities.



The public exposure, reform demands and economic pressure from buyers as well as public campaigns also led to groundbreaking “No Deforestation, No Peat, No Exploitation” (NDPE) commitments from Indonesia’s largest pulp and paper conglomerates: Asia Pulp and Paper/ Sinar Mas group (APP) and Asia Pacific Resources International Limited/Royal Golden Eagle group (APRIL) and affiliate Toba Pulp Lestari (TPL).¹¹ Collectively, these conglomerates produce more than 80 percent of pulp and paper made in Indonesia.

“As farmers, our only demand to Asia Pulp & Paper is to give us a chance to manage our land. We are not out to get rich, but only to make a living and provide for our grandchildren’s future...Let’s unite our will and strength, because if all farmers unite then nothing is impossible.”

- Sadili, Lubuk Mandarsah, JAMBI PROVINCE, INDONESIA

Since 2003, when (APP) first took community land for its plantations, local and regional farmers’ groups have organized to unite farmers to demand their rights and customary land be respected by the company.



“We are ready to defend our land to our very last breath, because this land is our life.”

- Abson Lumban Batu, Aek Lung, NORTH SUMATRA, INDONESIA

For generations, Indigenous Batak communities have planted benzoin trees in the forests on their traditionally-owned lands and have sustainably harvested the tree’s resin for an incense similar to frankincense. For many this is a significant cultural practice and the primary source of cash income. Pulp giant Toba Pulp Lestari (TPL) has taken over many of the benzoin forests clearing them for eucalyptus pulp plantations, directly threatening the livelihoods of many communities.

Photo of Op Grace Boru Siregar, in the benzoin tree forest on her traditionally-owned land in Onan Harbangan Nagasaribu. Op Grace is one of the few women who harvest benzoin resin, traditionally harvested only by men.



For the people of Lubuk Mandarsah in Indonesia, farming is more than a way of life, it’s an act of resistance. Asia Pulp and Paper (APP) took the communities’ customary land and cut down their forests for eucalyptus plantations. After APP harvested the eucalyptus, community members returned to the land and reclaimed it, planting their crops before APP could replant it with another monocrop pulp and paper plantation.





RAN'S BEYOND PAPER PROMISES CAMPAIGN

RAN's Pulp and Paper campaign, launched in 2009, has profiled the adverse impacts and egregious practices of the major Indonesian producers of pulp, paper, and viscose — Asia Pulp & Paper/Sinar Mas group (APP), Asia Pacific Resources International/Royal Golden Eagle group (APRIL/RGE) and Toba Pulp Lestari (TPL). These campaigns have called for end users — mostly popular brands — of pulp and paper, apparel, and other commodities driving deforestation, to adopt and implement responsible purchasing policies that are aligned with their values, and to use their influence to achieve positive change in the environmental and social policies and practices of the producers of these commodities. These campaigns have contributed to the adoption of “No Deforestation, No Peat, No Exploitation” commitments from APP, APRIL and TPL, as well as purchasing policies from global brands such as Ralph Lauren, LBrands (Victoria's Secret), Disney, Tiffany's, Victoria's Secret, HarperCollins, Office Depot, Ricoh and many others.

RAN's Beyond Paper Promises campaign aims to amplify the voices of communities on the frontlines and drive policy implementation to make sure that both buyers and suppliers follow through with their policy commitments and have independently verified, tangible and positive outcomes on the ground. As a first step in that process, RAN produced the interactive storytelling website, BeyondPaperPromises.org, which profiles communities in Indonesia impacted by both APP and TPL plantations. You will see many of those stories reprinted in this report. The Beyond Paper Promises implementation survey, and this resulting report, are the next step in this process, created with the aim of breaking down and assessing the sourcing policy implementation process, and benchmarking buyer companies' implementation efforts.

RAN has worked with dozens of brand name companies, including office supply retailers, publishers, consumer goods companies, luxury and apparel companies and others to develop and adopt strong procurement policies.

Unrealized Promises – Policies Not Delivering Sufficient Improved Outcomes



While the adoption of socially and environmentally responsible commitments by both buyers and suppliers of pulp, paper and viscose is a valuable first step, the real measure of success comes in the form of tangible improvements on the ground for forests and communities.

Asia Pulp and Paper (APP), Indonesia's largest pulp and paper producer; APRIL, Indonesia's second largest pulp and paper producer; and Toba Pulp Lestari (TPL), until recently Indonesia's only producer of dissolving pulp, used for viscose and rayon production, all have strong policies that have been developed in the last few years, committing to substantial change to protect forests and respect community rights. Progress has been made in halting the use of natural rainforest fiber to make pulp and paper, and in stopping natural forest conversion to industrial pulpwood plantations. These companies have also made notable progress in acknowledging the range of impacts they have caused, developing semi-public reporting systems and grievance procedures (that have yet to be proven effective), increasing investment in sustainability personnel and systems, conducting preliminary conflict resolution, restoration and conservation efforts and increased stakeholder information and consultation. However, even with these improvements, progress on the ground is failing to sufficiently address the sizable remaining social and environmental impacts associated with each companies' practices and the sector at large in Indonesia.

Widespread human rights issues remain pervasive problems for APP, APRIL and TPL pulp plantations in Indonesia. APP, for example, has been documented to have "hundreds of conflicts"¹² with communities across five provinces. Many of these communities are currently seeking remedy for the use and the clearance of their traditionally-owned forests and farms without their consent. APRIL has reported 43 conflicts in its RAPP division's concessions,¹³ which is just a small percentage of the 70 - 100 total conflicts that are reported to be associated with its long and short term suppliers.¹⁴ The Lake Toba region of the island of Sumatra, where TPL's land concession is located, is the ancestral home of the Indigenous Batak people. The Batak people have farmed the land and managed its forests for over 13 generations through a complex set of communal and individual customary rights, traditions, and rules. While TPL has not publicly reported on social conflicts within its concession, the significance of TPL's conflicts with local communities has been recognized by Indonesia's president and profiled by Indonesia's National Human Rights Commission.¹⁵ Informal estimates suggest that there are at least 20 conflicts within TPL's concession.¹⁶ In all cases, conflict locations, attributes, efforts to resolve and evidence related to claims that conflicts have been resolved are not reported. This is a critical obstacle to addressing, monitoring and verifying progress on this fundamental problem associated with the sector.

Issues around deforestation and climate change are also pervasive. APP and APRIL's plantations are associated with excessively high greenhouse gas emissions, due to the extensive areas the companies have planted on drained and cleared carbon-rich peatlands. About half of both APP and APRIL's industrial pulpwood plantation areas — approximately 500,000 ha. and 250,000 ha respectively — are located on drained peatlands. Degradation of peatlands accounts for more than half of Indonesia's total greenhouse gas emissions.¹⁷ Clearing, draining and planting on peatland soils results in two new significant sources of GHG emissions — peatland oxidation and peat fires. Once the peatland is drained and exposed to air, the accumulated peat begins to oxidize, releasing CO₂ to the atmosphere at an average rate of 100 tons CO₂e per hectare per year (averaged over 25 years following initial drainage and planting). The dried peat also becomes more susceptible to burning, resulting in extensive fires during the annual dry season.¹⁸ Plantation areas are at the center of this issue — in the dramatic 2015 fire season, 53% of all satellite detected fire hotspots in Sumatra were located within plantation concessions supplying APP.¹⁹ That year, Indonesia's emissions in three months from forest and peat fires exceeded the annual emissions of the entire German economy. The economic and health impacts of these issues are also significant — toxic smoke from the fires created a regional public health crisis across Indonesia, Singapore and into Malaysia, Thailand and the Philippines, affecting millions of people, disrupting travel, schools, and business and generating an estimated 16 to 30 billion USD in adverse economic costs.²⁰ In addition to the globally significant climate impacts of industrial plantations on drained tropical peatlands, plantations on

drained peatlands are, by nature, not sustainable. As drained peat soils oxidize, they subside. This means that most plantations have a limited number of rotations before planted areas become submerged or meet high acid non productive soils, rendering these areas non-productive.

Cutting across these failures, expanding production coupled with a lack of transparency plagues Indonesia's pulp and paper sector.²¹ The industry has expanded its manufacturing capacity beyond its ability to produce wood from existing plantations, creating intense pressure to expand its landbank and with it, new risks of harmful social and environmental impacts.²² APP, for example, has recently completed construction of one of the largest pulp and paper mills in the world — the OKI mill in South Sumatra — but it cannot account for how it will source a sufficient long-term supply of raw material or fiber for the mill while still keeping its commitments on halting deforestation and respecting rights. This means there is a major risk that the company will need to continue its dependence on drained peatlands and to expand its fiber base, carrying a significant risk of new social conflict and further deforestation.²³ APRIL has retooled pulp production lines to make dissolving pulp and may be adding additional pulp production capacity at its Kerinci mill site. The company's failure to be transparent about its expansion plans and social and environmental impacts makes it difficult for buyers to assess the risks of this controversial supplier.²⁴

"First we fought to regain our traditionally-owned land that Toba Pulp Lestari (TPL) took and planted for its plantation. At the time we faced much opposition and intimidation from TPL. They tried to stop us by carrying weapons and involving army and police officials. But we were not scared because we believed that we were fighting for something that is truly our right."

- Nurmala Boru Purba, AEK LUNG, NORTH SUMATRA, INDONESIA

In 2005, the Indigenous community of Aek Lung mounted a resistance movement to reclaim their land from pulp giant Toba Pulp Lestari (TPL). Community members began planting their own crops on their land after company plantations were harvested to provide for their livelihoods and feed their families.



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"When we farm on our land, TPL comes to harass us and threaten violence. TPL threatened me and said I cannot take this land and that I would be arrested. But I know that the land is ours so that is why I am farming here. We are not scared. We still work our farms because we know that this land is ours."

- Abson Lumban Batu, NORTH SUMATRA, INDONESIA

For the people of Aek Lung in Indonesia, farming is more than a way of life, it's an act of resistance. Pulp giant Toba Pulp Lestari (TPL) took the communities' traditionally-owned land and cut down their forest for eucalyptus plantations. After TPL harvested the eucalyptus, community members returned to the land and reclaimed it, planting their own crops before TPL could replant it with another monocrop pulp plantation.

Photo of Kristina br Hutabarat harvesting chilis on reclaimed community land.



“The community knows that this is their land, even without the support of the government, police, and others. The community took the initiative to occupy the land for their survival because they know it is their right. The community, especially the farmers, know that they will not survive without their land. That is why fighting for their land means fighting for their lives.”

- Sadili, Lubuk Mandarsah, JAMBI PROVINCE, INDONESIA

For the people of Lubuk Mandarsah, farming is more than a way of life; it's an act of resistance. Many years ago, Asia Pulp & Paper (APP) took the community's customary land and cut down their farms for eucalyptus plantations. After APP harvested the eucalyptus, community members returned to the land and reclaimed it by planting their crops before APP could replant it with another monocrop pulp and paper plantation.



“We fight because once our parents were free to plant rice and rubber. In the past, we had no problem in our ancestral land. But after Asia Pulp & Paper (APP) came along, we were always faced with obstacles. Nowadays, every time we want to plant...men in uniforms arrive with orders from APP. Their constant presence, day and night, has made it difficult for us to farm for subsistence. They tore down and burned our huts. We still fight every day. We don't know when we will succeed but we will continue to fight until the end.”

- Maymunah, Lubuk Mandarsah, JAMBI PROVINCE, INDONESIA

Community members regularly face intimidation and harassment from Asia Pulp & Paper (APP) security guards when farming their land, reclaimed from the company's plantation.

The issues on the ground are admittedly complex. While policy implementation and buyer and supplier companies' accountability plays a critical role in creating real change, it is important to acknowledge that private sector reform and action will, in most cases, not be sufficient to ensure lasting, equitable and tangible improvements for forests, the climate and communities. The complex nature and political economy

underlying the problems associated with industrial pulpwood plantations requires the involvement of government and other stakeholders, as well as the deployment of other approaches, tools and incentives. Even still, changed policies and practices by the private sector provide essential leverage for transforming the sector and addressing past and ongoing social and environmental harm.



"We can see that Asia Pulp & Paper [APP] has broken their commitment. APP said that it would resolve social conflicts without violence and would respect the communities' rights. However, we can prove that even after the commitment, the community is still intimidated, criminalized, and a murder even took place here."

- Frandody Taruna Negara, aka "Dody", Head of Tebo Farmers' Union (STT), IN LUBUK MANDARSAH, JAMBI PROVINCE, INDONESIA

A decade ago, Asia Pulp & Paper (APP), Indonesia's largest pulp and paper company, arrived in the community of Lubuk Mandarsah. APP took over customary land from the community without their consent in order to build a pulp and paper plantation. Since then, it has been in direct conflict with the community. In February 2015, community activist and farmer Indra Pelani was brutally murdered by security guards hired by APP.

APP, for example, has recently completed construction of one of the largest pulp and paper mills in the world — the OKI mill in South Sumatra — but **it cannot account for how it will source a sufficient long-term supply of raw material or fiber** for the mill while still keeping its commitments on halting deforestation and respecting rights.





The Beyond Paper Promises Survey

Benchmarking Sourcing Policy Implementation

At least in part, the failure of buyer and supplier policies to deliver improved social and environmental outcomes in Indonesia suggests that both supply and demand side companies are not adequately implementing their commitments. In order to assess how brands and consumer companies are making progress on implementing their policies, RAN has developed a framework outlining six fundamental elements of policy implementation and built out an in-depth survey, with questions covering each of these key elements (for details, see Annex [» RAN.org/BPPsurvey](https://ran.org/BPPsurvey)).

Our goals in developing the Beyond Paper Promises survey were to:

- » To increase transparency and therefore accountability in the implementation process for buyer-side companies
- » To identify key areas where companies can improve their implementation efforts
- » To identify leaders that can support other companies through their implementation efforts
- » Identify key recommendations that could help turn policy promises into real change on the ground

The process was as follows:

1. RAN drafted a survey, building off of existing implementation measurement efforts, including efforts by the CDP (formerly known as the Carbon Disclosure Project),²⁵ Supply Change/Forest Trends,²⁶ the Zoological Society of London,²⁷ Green Grades,²⁸ Ceres,²⁹ and others. The survey questions were designed to illuminate the intricacies of company progress on their respective implementation plans. The draft survey then underwent several rounds of peer review and edits from NGOs that added more technical expertise and consolidated the six key implementation elements into 31 targeted questions.
2. Next, a research profile for each company was created to compile all the publicly available information about a company's implementation efforts (*see below for information on company selection*). Surveys were then filled out using this publicly available data drawing from company websites and press statements, annual reports, Carbon Disclosure Project (CDP) survey responses, NGO reports, and other reporting bodies.
3. The survey, along with available answers, was then sent to companies in February - March 2018, with the request that they fill in the remaining details and correct any information that might be out of date.
4. Once updated, the survey was graded, and additional questions were identified for the company. These initial survey results and questions were then sent back to the company for review and updates, before an implementation grade was finalized.
5. Finally, the write up of the company was shared for any final additions or amendments, before it was finalized in this report.



Company selection:

With hundreds of pulp, paper, and fashion companies who have developed procurement policies, it was necessary for us to identify a subset of companies to research and profile. To do this, we made a number of key decisions:

1. In order to be able to have a better understanding of overall trends in implementation, we choose to look at companies in a number of different sectors, including publishers, office supply companies, and fashion companies.
2. Opening the door to transparency on implementation is a sensitive process. With this in mind, we choose to work with companies with whom RAN already has a relationship (generally through policy development with RAN).

Despite that, coming from different sectors, the similarities between policy commitments and the implementation process mean that these companies are eminently comparable. The biggest difference is in terms of the dates of policy development—meaning that some companies have had less time to implement their policies. Where this is the case it has been clearly noted in the results and in the analysis below.

Scoring:

The methodology for scoring the company surveys was designed to recognize companies for strong policies and implementation plans, effective implementation systems, supply chain traceability, verification, monitoring, and reporting, with extra credit awarded for engaging in advocacy efforts. The survey sections and their accompanying scores are reflected on a 100 point scale as follows:

- A. Sourcing Policy (20 points)
- B. Implementation Preparation and Planning (15 points)
- C. Policy Implementation Systems (20 points)
- D. Supply Chain Traceability, Assessment and Action (30 points)
- E. Verification, Transparency, Monitoring and Reporting (15 points)
- F. Advocate (Extra Credit, +10)

Each question in the survey has a proprietary point value that's weighted to reflect its importance and adds up to the total value for each respective section. For a detailed description of each survey section see Appendix 1.

Public v. Non-public information

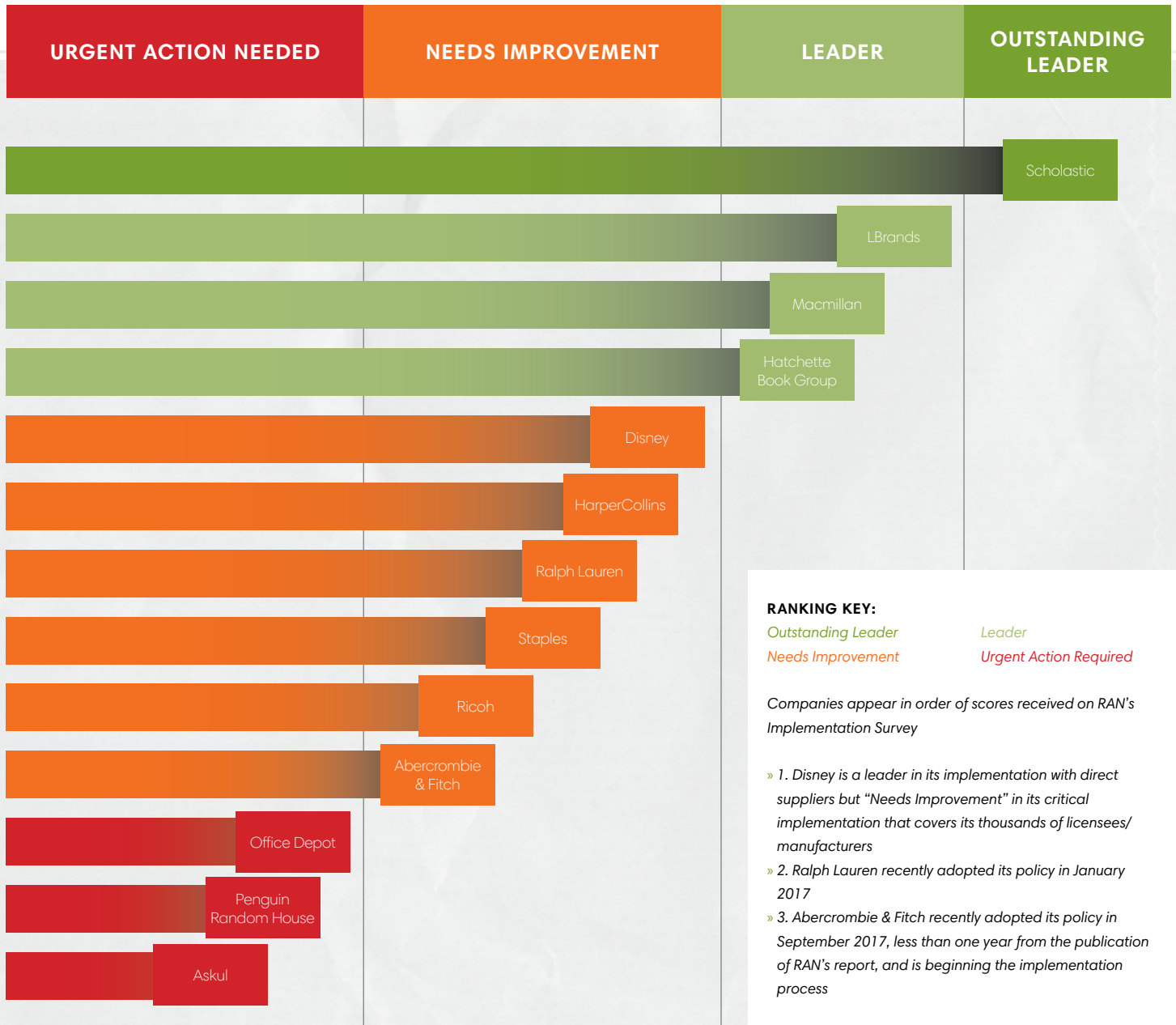
Understanding that there are sensitivities around making implementation processes public, this survey only required (gave a pass/fail grade) that the policies themselves were publicly available. Beyond policies, RAN worked with companies under the terms of an agreement not to disclose sensitive information, and/or relied on company self-reporting.

Limitations of the study

Despite extensive efforts to ensure that the information collected is as accurate as possible, it is still important to identify the limitations in our ability to analyze how well companies are doing in implementing their policies.

- » There is not a culture of transparency in policy implementation. While RAN worked with companies with whom we have endeavored to build a relationship of trust, two companies (Abercrombie & Fitch and OfficeDepot) still choose not to reply to our survey, which meant that their grades are based on publicly available information exclusively.
- » Self reporting always comes with limitations. While relying on self reporting was critical in getting complete results, it is not possible for RAN to verify all answers provided by companies.
- » Grading company surveys is a subjective process based on RAN's interpretation of publicly available data and company responses to survey questions. To offset this we assigned weighted point totals to each question and graded each on a spectrum of how far along the company is in its implementation efforts. We did our best to remain objective in our scoring and apply similar points to company answers across the board.

TURNING POLICIES INTO REAL CHANGE: LEADERS AND LAGGARDS



SECTORS: LEADERS AND LAGGARDS

Office Supply Sector

COMPANY	RANK
Staples	Needs Improvement
Ricoh	Needs Improvement
Office Depot	Urgent Action Required
Askul	Urgent Action Required

As a sector, office supply companies have had pulp and paper procurement policies for the longest amount of time, yet still are not leading when it comes to implementation. This trend is troubling due to the massive volume of paper these retailers sell and their prominent consumer brand recognition. Overall, most office supply companies have strong policies but in recent years have fallen off in their commitment to follow through with implementation. Unfortunately, this lack of movement is a trend across the sector and demonstrates these companies' general lack of accountability to the public. We recommend these companies financially re-invest in their sustainability departments and take proactive due diligence and robust action on their supply chains. With the high volumes of paper purchased by office supply companies, they have a key opportunity to leverage change and demonstrate leadership. Failure to do so leaves these companies open to the reputational and material risk associated with human rights violations and forest destruction.



COMPANY	RANK
Scholastic	Outstanding Leader
LBrands	Leader
Macmillan	Leader
Hachette Book Group	Leader
Disney*	Needs Improvement
HarperCollins	Needs Improvement
Penguin Random House	Urgent Action Required

Outstanding Companies appear in order of scores received on RAN's Implementation Survey

* Note: Publishing is a small percentage of Disney's global enterprises and paper buy. Their policy applies to all aspects of their paper procurement across all business units and licensees.

Almost universally, publishers have adopted relatively strong policies and have been steadily moving forward in their implementation efforts. While some are lagging behind the pack (ie Penguin Random House), Scholastic, Macmillan and Hachette continue to lead through a demonstrated commitment to implementation, proactive due diligence, and concrete action. Effective use of verification tools like fiber testing, fiber declarations

and active follow-up when results did not match up with declaration distinguished them from other sectors. Though publishers make up a smaller percentage of total market share compared to the office supply sector, they have influence beyond their tonnage and set a positive example for other sectors to follow.



Indra Pelani, a 23-year-old activist and farmer from Lubuk Mandarsah, Jambi Province, Indonesia was brutally beaten to death by APP's pulp and paper plantation security guards on February 27, 2015. The community of Lubuk Mandarsah continues to remember and mourn his tragic loss.

PHOTO: WALHI JAMBI



Fashion and Apparel Companies

COMPANY	RANK
LBrands	Leader
Ralph Lauren ¹	Needs Improvement
Abercrombie & Fitch ²	Needs Improvement

Companies appear in order of scores received on RAN's Implementation Survey

1. Ralph Lauren recently adopted its policy in January 2017

2. Abercrombie & Fitch recently adopted its policy in September 2017, less than one year from the publication of RAN's report, and is beginning the implementation process

Fashion brands have been the most recent adopters of procurement policies of those surveyed for this report. Many fashion companies are moving quickly to adopt policies to minimize their risk of human rights abuses and forest and peatland destruction through their use of wood-based fibers for their rayon and viscose fabrics. In total, over 100 fashion brands have adopted policies, with a number of key brands showing leadership in supporting other brands to move forward on meaningful implementation. While much remains to be seen from these companies as they develop and carry out implementation and due diligence systems, Ralph Lauren and LBrands are off to a strong start in moving swiftly to set a high bar for this entire, rapidly shifting sector.

LEADERS AND LAGGARDS

Outstanding Leader



Only one company stands out as an outstanding leader in policy implementation. Scholastic is a children's publishing, education and media company with \$1.74 billion in revenue in 2017. The foundation of Scholastic's strength is in its policy, which was adopted in 2008. Scholastic has set stringent standards and targets and timelines--adopting even more ambitious goals along the way--and to date has achieved over 70% FSC certification for its paper supply chain. The company goes a step further and augments its FSC certification with additional verification measures including regular supplier monitoring and fiber testing down to the mill level. These efforts are enforced through a strict Code of Conduct for suppliers and contract cancellations for those that do not meet the Company's standards.

Scholastic's stringent standards, use of fiber testing and fiber declaration and proactive follow up with suppliers, as well as its use of timelines and targets for improved performance, place it in a leadership role, where it can build on its substantial impact by sharing knowledge with other companies who are seeking to improve their implementation efforts. Scholastic's example demonstrates that, even being a relatively small sized company, effective planning, creating systems, due diligence, verification, monitoring and reporting can be done effectively and wield an impact far above its size.



Leaders

Three brands have shown leadership in their policy implementation processes. While there is still more that needs to be done, they are actively working to implement their policies and to ensure that their promises are being kept.

The logo for Lbrands, featuring the word "Lbrands" in a simple, sans-serif font.

LBrands is a \$12.6 billion (revenue, 2016) global apparel retailer that uses wood-based fabrics in an assortment of its products, including for its most popular brand, Victoria's Secret. LBrands originally adopted a sustainable sourcing policy for paper in 2006 and updated it in January 2017 to include cellulosic fibers. The foundation of LBrands' leadership is in its sourcing policy--the strongest overall of all policies surveyed for this report. The company matches that with strong implementation plans and systems, actions and verification procedures to carry it out. One stand-out aspect is the company's commitment to measurable performance requirements for suppliers that, if not met, result in contract non-renewal or termination. We encourage LBrands to continue to demonstrate its leadership by verifying information from suppliers through methods like routine fiber testing and following through on its commitment to public reporting.

The logo for Macmillan, featuring a red stylized 'M' icon followed by the word "macmillan" in a lowercase, sans-serif font.

Macmillan USA is a \$850 million (revenue, 2017) publishing house that first adopted its sourcing policy in 2014 and is anticipating releasing a revised policy later this year. The company has made consistent progress on implementation and stands out for its focus on targets for greenhouse gas emissions reductions and analysis of its paper. Overall the company has a strong policy and well-considered implementation systems. However, Macmillan has become overly reliant on Forest Stewardship Council (FSC) certification in outsourcing its due diligence and implementation systems related to Asian suppliers. RAN recommends it take additional due diligence measures to better understand and be able to apply leverage through its supply chain. The company gives equivalence to PEFC/SFI and FSC in its North American supply chain where it considers its sources as low risk, which is not accurate. In order to improve, Macmillan should assess and acknowledge potential risks in its North American supply chain, conduct additional due diligence for Asian suppliers and incorporate land use emissions into its paper carbon footprint analysis and targets.

The logo for Hachette Book Group, featuring a stylized 'H' icon followed by the word "hachette" in a lowercase, sans-serif font and "BOOK GROUP" in a smaller, uppercase, sans-serif font below it.

Hachette Book Group (HBC) is the US division of global publisher Hachette Livre, a \$2.72 billion (revenue, 2017) company. HBC adopted a responsible paper sourcing policy in December 2009. This policy set clear FSC certification benchmark goals for 2015 and 2020.³⁰ Since then, the company has hit those targets and achieved 97% FSC by the end of 2017. Additionally, the company has excelled at its supply chain transparency and verification through supplier surveys and fiber testing and has eliminated high-risk sources like APP and APRIL. We commend Hachette for sticking by its commitment to public, annual environmental progress reporting from its Environmental Task Force. RAN encourages Hachette to continue to expand its leadership and strengthen its global practices in line with its more robust UK paper procurement policy.

Needs Improvement

The following companies are at a crossroads in terms of policy implementation. These companies have disparate things they are doing well, as well as challenges and steps that need to be taken. Each company needs to step up their efforts and realize the opportunity to uphold their company values, be responsible leaders, and ensure that they use their influence to get improved outcomes on the ground.



Disney, which had \$55.14 billion in annual sales (2017), includes five major business units and many licensees. Together, these business units have a sizable supply chain, which includes thousands of manufacturers and licensees and a substantial use of paper for packaging, publishing, tissue and promotional materials for their Disney products, entertainment, parks and cruise ship operations. Since adopting its excellent paper sourcing policy in October 2012, Disney has done a commendable job in developing systems, planning, risk assessment, follow-up action and verification of policy compliance with the vendors that it purchases from directly. However, after this initially strong start, the company is now at a crossroads in its approach and policy implementation with its licensees, which consists of thousands of licensees and manufacturers, many located in Asia, and therefore constitute a sizable portion of its potential risk and leverage. RAN is encouraging Disney to set time-bound targets and implementation systems for its licensees, but the company has been slow to move forward in part due to the complex nature of its supply chain. We look forward to our continued work with Disney and encourage the company to expedite its implementation approach and adoption of targets for licensees that are consistent with RAN recommendations.



HarperCollins is the \$1.64 billion (revenue, 2017) publishing subsidiary of media giant, NewsCorp. HarperCollins adopted a paper policy in 2012 and revised it in 2016. Overall, its performance in our survey resulted in a respectable score but not enough to position it as a leader. While HarperCollins, and its parent company NewsCorp, overall have a respectable policy and strong implementation systems in place, the company's vague responses to our survey left many questions unanswered about the progress it has made. Based on the limited amount of available information, the company could greatly improve its supply chain traceability and due diligence and follow up procedures. We also encourage HarperCollins to be more publicly transparent and vocal about its efforts.

RALPH LAUREN

Ralph Lauren is a \$6.65 billion (in sales, 2017) fashion retailer that uses wood-based fabrics in an assortment of its apparel and products. Since adopting its viscose and rayon sourcing policy in January 2017, Ralph Lauren has demonstrated enthusiasm for reimagining its entire approach to sustainability and sourcing its raw materials. With its excellent policy on cellulosic fibers (viscose), the company is well positioned to develop and pilot robust tracking and assessment systems and due diligence and follow up procedures. This rapid progress is evidenced in its Corporate Responsibility Report, released in March 2018. Ralph Lauren's strong policy and Vendor Code of Conduct and compliance threshold embedded within its contracts, are important first steps. However, Ralph Lauren still has a long way to go to make sure its policy is implemented. Ralph Lauren needs to take the next step by fully mapping its supply chain, conducting risk assessment, and establishing robust monitoring and verification procedures that can lay the groundwork for ensuring the other raw materials it uses are socially and environmentally responsible.

STAPLES

Staples is a \$18.25 billion company (sales, 2017) with a large paper sector footprint. Since it initially adopted a procurement policy in January 2010, the company has taken a leadership role in several multi-stakeholder initiatives related to paper, climate and sustainability. However, following Staples' acquisition by private equity firm Sycamore, and the restructuring and the downsizing of its sustainability department, the company appears to have lost momentum to implement and build on its early achievements. Though a commendable revision of its paper sourcing policy is anticipated soon, its systems — including personnel — for implementation, due diligence process and monitoring and verification procedures need improvement. The company has lost its leadership position in the industry and is failing to use its considerable influence to secure improved social and environmental outcomes on the ground in Indonesia and elsewhere. We urge Staples to step back into a leadership position by focusing on reinvesting in its sustainability department, pro-actively implementing its policy and securing improvements on the ground.

RICOH

Ricoh is a Japanese business machine and office supply company with world wide sales of \$18.73 billion dollars (2017). Ricoh demonstrated mediocre performance in the implementation of its paper sourcing policy in relation to its international peers. However, with the adoption of its policy, and with its decision to avoid high risk Indonesian suppliers, Ricoh could be considered a leader within Japan, where about one third of the copy paper used is from Indonesia and many companies have inadequate policies and implementation systems. The company should improve its standing and have better social influence by announcing its internal procurement policy publicly in the near future, continuing to avoid products from APP and APRIL and other high risk suppliers. The self-validation of policy implementation by each division within the company should be assessed and possibly changed and the company should take a more proactive approach to securing improved social and environmental outcomes with high risk suppliers. Much of Ricoh's potential has yet to be realized and we look forward to working with Ricoh to increasing its leadership in Japan and globally.

Abercrombie & Fitch

Abercrombie & Fitch is a company with \$3.49 billion in annual sales (2017). Abercrombie & Fitch adopted a procurement policy in September 2017, making it the most recent company to join those surveyed for this report. Its status as a recent adopter was taken into consideration and weighted in comparing it to other companies that have had much more time to develop and implement systems. The most relevant evaluation at this stage is in regards to its procurement policy, which is relatively strong and rooted in the development of key implementation systems and due diligence, monitoring and verification procedures through which it can meet its targets. In its policy the company publicly committed to establishing processes to improve its supply chain traceability and eliminate non compliant sources. We look forward to seeing the results of Abercrombie & Fitch's implementation efforts in the coming years.

Urgent Action Required

The following companies need to take urgent action to improve transparency, strengthen sustainability capacity and ensure that their policies are improved and implemented.

Office DEPOT

Office Depot is a \$10.24 billion company (revenue, 2017) that has an important position of influence on the market through its sizable paper buys. Unfortunately, this influential company received one of the worst scores of all the companies surveyed for this report. It appears that after adopting a strong policy in April 2004 the company has deprioritized the consumer demand for corporate social responsibility and is falling short on its implementation efforts. The most obvious manifestation of this is the dramatic reduction of the company's sustainability team tasked with carrying out policy implementation. The details of its implementation plan remain unknown or nonexistent, as do the majority of its implementation tracking systems and supply chain due diligence, traceability, monitoring and verification procedures. In the past, Office Depot demonstrated leadership in the sector, even providing leverage for the adoption of forest and peatland restoration commitments by APP. The company has a tremendous opportunity to influence Indonesian and other pulp and paper suppliers and help achieve the stated goals of its own policy by helping to ensure improved outcomes on the ground. With a solid procurement policy in place, Office Depot has a responsibility to recover from its lackluster performance in recent years. RAN looks forward to working with Office Depot to reposition itself as an industry leader moving forward.

Penguin Random House

Penguin Random House (PRH) is a publishing house with \$3.97 billion in revenue (2017). PRH first adopted its sourcing policy in January 2015 but is moving slowly with implementation. PRH declined to participate in many of the questions in our survey so many questions remain unanswered or unavailable. The evaluation for this report reflects its worldwide policy and excludes its UK procurement policy which is much stronger and includes a clear preference and commendable targets for sourcing FSC certified papers. The global policy is weakened by attributing equal value to less stringent certifications systems and appears to rely on the chain of custody standards (which focus on the assessment of the ability of a company to track and differentiate inputs that originate from specific certified sources from those that do not and ensure outputs are segregated and originate from those certified inputs) instead of full certification in its targets for paper sourcing. We urge PRH global to strengthen its global policy in line with its UK operations. Furthermore, RAN recommends that PRH take measures to increase its overall implementation systems, transparency, and supply chain assessment instead of relying on weak certification schemes.



Askul is a \$3.08 billion (annual sales, 2017) Japanese office supply retailer that demonstrated by far the worst performance in our evaluation. The company is the largest online copy paper seller in Japan and knowingly sources large amounts of paper from Asia Pulp and Paper (APP), the high-risk supplier profiled in this report and associated with ongoing human rights violations, community land conflicts and other controversial impacts. According to Askul's policy, adopted in 2004 (revised in 2005), and its survey response, the company appears to only apply its policy to its own branded copy paper and not other aspects of its business. The policy itself is vague and lacks specific targets for improvement and monitoring progress. The limited policy scope is also problematic and undercuts implementation efforts. The implementation plan, traceability, and monitoring also lack specificity and the company's vague responses to survey questions left much unknown or nonexistent. Despite a commitment to human rights in the policy, Askul uses a certification system that does not provide sufficient assurance that its policy is being met. RAN urges Askul to improve its policies and implementation systems and procedures and not to rely on certification systems such as IFCC/PEFC that do not provide adequate assurance that its commitments to environment and human rights are being met. RAN looks forward to working with Askul to improve its performance and take measures to ensure APP respects rights, resolves social conflicts and assesses and remedies past and ongoing harm to communities affected by its operations.





Recommendations for Improving Effectiveness and Outcomes

Policy implementation efforts and existing accountability systems are failing to create sufficient improvements for forests and local communities impacted by pulp, paper and viscose supply chains. Pulp and paper buyers must take increased responsibility for their global supply chains by stepping up efforts to turn their commitments into real change on the ground by prioritizing the following actions:

Best practice for policy implementation

- » **Establish time-bound performance targets for the implementation sourcing policies:** It is critical that buyers set measurable and outcome based performance targets and that they define and communicate their sourcing requirements and non-compliance thresholds with suppliers. Requirements for purchasing or coming back into compliance should be detailed, monitorable, verifiable and result in improved outcomes on the ground. Buyers should publish their time-bound performance targets, sourcing requirements and non-compliance protocols.
- » **Establish and maintain comprehensive, transparent monitoring and due diligence systems that enable monitoring of forests and peatlands, require transparency, and establish effective grievance procedures:** In order for buyer companies to be able to assess, measure and report on how progress is being made with suppliers' compliances with sourcing requirements, it is necessary for companies to proactively monitor their supply chains for compliance with environmental and human rights commitments. Buyer companies should establish or jointly support an effective, comprehensive, proactive, transparent deforestation and peatland monitoring system that rapidly detects instances of non-compliance across supply chains in Indonesia. In order for these due diligence systems to be credible, local communities must have proven access to: fair and open grievance procedures (in line with the UN Guiding Principles on Business and Human Rights);³¹ information related to their right to remedy for harm, to give or withhold their Free, Prior and Informed Consent to development on their lands; and financial support to access independent and expert advice to enable a level playing field in their dealings with supplier companies.
- » **Require independent verification of compliance in addition to any voluntary certifications used.** Though an important tool, voluntary certification systems differ in the quality of assurance they provide. Amongst pulp and paper and forestry certifications, FSC remains the leading certification tool and the only one with strong civil society backing. However, both the pace of emerging issues and the limitations of voluntary certification suggest that buyers must conduct additional due diligence and not rely solely on certification to assess compliance with their policies. Third-party certification remains an important tool, and those with the strongest standards and enforcement like FSC, should be prioritized. However, buyers must conduct additional due diligence to ensure compliance with their own environmental and human rights commitments that go beyond existing standards.



» **Update policies and policy implementation to make sure fundamental social and environmental risks and emerging issues are addressed:**

- » *Human Rights and Free, Prior and Informed Consent (FPIC):* Many companies have yet to specify that the internationally recognized³² basic human right of communities to be informed and to give or withhold their consent before a project is started. The exclusion of sources where FPIC has not been respected, and where, in many cases, this has led to land and social conflict should be incorporated into policies, due diligence and practice.
- » *Remedy for environmental and social harm:* The UN Principles on Business and Human Rights³³ establish the obligation of companies to remedy harm due to the violation of human rights. Recognition of the responsibility to “protect, respect and remedy” this harm should be adopted in company sourcing policies and required of suppliers.
- » *Preventing Deforestation and Violation of Land Rights through the application of the High Carbon Stock Approach:* Following its development by a broad cross section of private sector and civil society stakeholders, the High Carbon Stock Approach (HCSA)³⁴ has established a methodology and toolkit for defining and preventing deforestation and land rights violations whilst reducing greenhouse gas emission associated with new developments of pulp and oil palm plantations.
- » *Preventing Drainage and Loss of Tropical Peatlands and Restoring Forest and Peatland Ecosystems:* Buyers should avoid unsustainable and emissive pulp and paper sources linked to peatland destruction and require suppliers to halt any development on peatlands, undertake restoration and conservation of these ecosystems, encourage a retreat from peatlands in existing production landscapes, and contribute to these efforts themselves.
- » *Zero tolerance on threats, intimidation and/or attacks on human rights defenders:* Companies must clearly advocate for safe spaces for civil society, particularly in contexts in which either state or non-state actors have in practice restricted civil society voices. This zero tolerance policy should entail robust human rights due diligence processes to identify where potential risks to communities and defenders might develop.

(continued »)

Recommendations for Catalyzing Systemic Change:

- » **Define success as measurable improvement on the ground:** While policies and systems are important, it is even more vital that the end results — including better outcomes for the forest, the climate, and communities — are measured and improved. This means that companies need to become more familiar with the impacts that their supply chain has created on the ground and take appropriate action with suppliers and others.
- » **Share leadership strategies for success:** It is necessary for companies that have showed leadership in developing and implementing their policies to share lessons, strategies and tools with other companies in similar sectors. These examples and approaches can help other companies take action, level the playing field in a positive way and send a strong message to suppliers.
- » **Serve as advocates:** Companies must serve as advocates, and extend the environmental and social value proposition present in their policies to a wider audience. This can be done by educating consumers, expressing support for environmental and social justice issues with producers, and communicating with governments, other stakeholders and the media about key issues.
- » **Continue to push for policies and action from laggard companies:** It is vital that consumer companies continue to take action to ensure that efforts to drive change are not undermined by companies that have not adopted robust policies or are not adequately implementing the policies they have. To do this, companies must engage other buyer companies and encourage them to adopt and implement policies to protect forests and communities.



GET INVOLVED

RAN's Beyond Paper Promises campaign continues to drive policy implementation to protect forests and support frontline communities. Join us and take action by going to BeyondPaperPromises.org and clicking Take Action.

Learn more about the Rainforest Action Network (RAN) and it's work to preserve forests, protect the climate and uphold human rights by challenging corporate power and systemic injustice through frontline partnerships and strategic campaigns at RAN.org.

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Lake Toba is the largest volcanic lake in the world. Located in the middle of North Sumatra, Indonesia this fertile volcanic crater is home to Indigenous Batak communities that have been living in the region since time immemorial. This natural wonder supports a tourist economy that is threatened by deforestation and pollution from Toba Pulp Lestari (TPL).



Arga do Bona ni Pinasa
Diangka na Bisuk Maroha