

## Indonesia's INDC is not fit for purpose

Indonesia has prepared a draft Intended Nationally-Determined Contribution (INDC) submission for the COP21 climate summit. This is the country's international communication showing how it plans to deal with climate change in the context of its national priorities and circumstances.

### The INDC offers nothing on peatland protection or fires – a major source of emissions

In terms of Land Use, Land-Use Change and Forestry (LULUCF) emissions, Indonesia's final INDC draft demonstrates a half-hearted approach to emissions reduction, containing few plans for how reductions will be achieved. In particular, the plan says nothing about protecting or restoring peatlands or preventing peat fires, a major source of pollution as well as carbon emissions.

### The government appears to be backtracking on zero deforestation commitments

Despite Indonesia's commitments under the New York Declaration on Forests and the soon-to-be-ratified Sustainable Development Goals, the recently released draft of the INDC shows a sharp shift in policy away from zero deforestation.

Although the penultimate draft says that Indonesia aims to 'protect its remaining forests by increasing efforts in the implementation of palm oil industry no-deforestation commitments',<sup>i</sup> in the final draft – published just four days later – this disappears and is replaced by the largely meaningless 'protect its remaining forests by reducing deforestation and forest degradation'.<sup>ii</sup>

This removal of even an indirect commitment to support zero deforestation came in a week of press statements by various officials backing away from forest protection.

- On August 26, Dr Nur Masripatin, director-general of climate change at MoEF, told the *Straits Times* that Indonesia cannot disclose any plantation concession information, even on a government-to-government basis, as part of attempts to combat fire hotspots.<sup>iii</sup> Directly, this demonstrates a failure to hold plantation companies responsible for fires on their land. More profoundly, it demonstrates a government with little interest in public accountability and the principles of open government.
- On 29 August, the Economic Ministry's deputy for food and agriculture coordination, Musdhalifah Machmud, stridently objected to palm oil companies' zero-deforestation pledges, claiming they breach the state constitution by refusing to plant on high-carbon-stock land.<sup>iv</sup>

Taken together, such statements and the change to the draft INDC show an intention to continue forest destruction.

### The government is hiding behind lack of transparency and inscrutable data

Alongside failing in forest and peatland protection, the MoEF is making it difficult to analyse Indonesia's progress on emissions reductions, particularly in the land sector, by not publishing the data behind its claims and predictions. This despite Indonesia being a signatory to the Open Government Declaration.<sup>v</sup>

- The final INDC contains no analysis of Indonesia's emissions over the last ten years, no baseline predictions and no assessment of what reductions, in terms of tonnes of CO<sub>2</sub>e emissions in various sectors, would have to be achieved to meet the 26% target. There is nothing measurable.
- By contrast, a Bappenas presentation to MoEF on the National Action Plan on climate change (RAN-GRK) suggested a reduction of 307MtCO<sub>2</sub>e in land-based emissions (excluding peat) would be possible 2010-

2020, representing 81% of the 2010 emissions. Compared to a 2010 deforestation area of 500,000ha as shown in the FREL (see below) this would suggest reducing deforestation to below 100,000ha/year by 2020.

Despite this, the Presidential special envoy for climate change, Rachmat Witoelar, told the Jakarta Post at the time of the publication of the INDC draft that deforestation is declining, in spite of evidence to the contrary (see below).<sup>vi</sup>

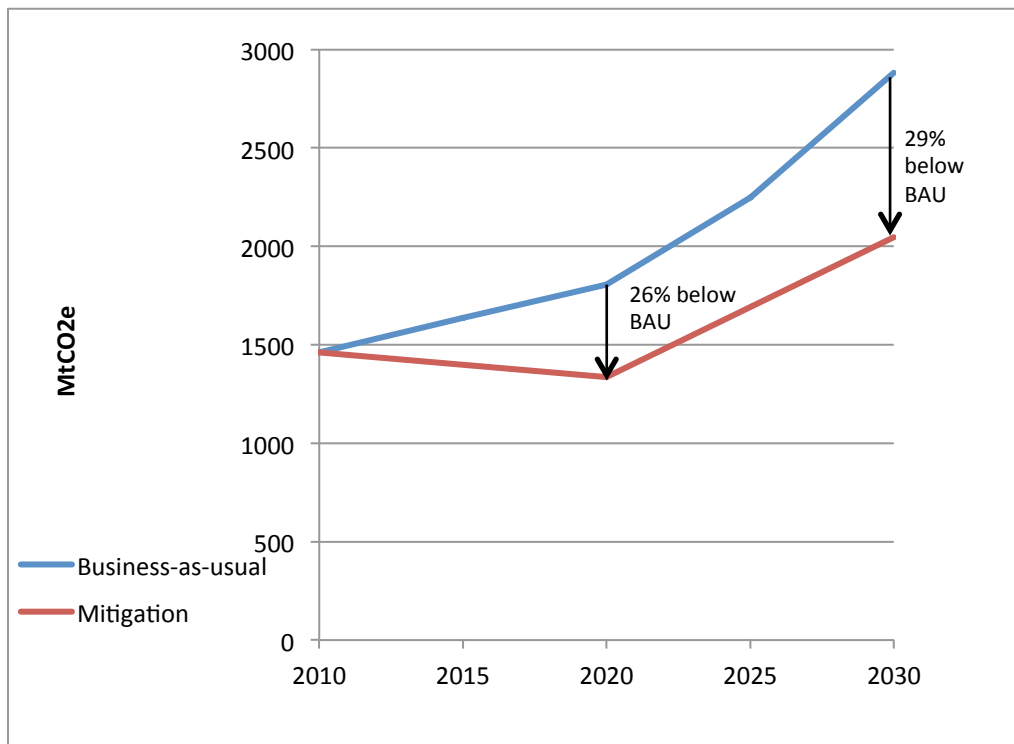
### The INDC methodology not available for public review

The INDC says its methodology ‘will refer to the National Inventory System of Greenhouse Gases (SIGN SMART), UNFCCC Biannual Update Report (BUR), and FREL-REDD+ document’. However, the first two sources are not yet fully published, or at least not available to the public, and the FREL REDD+ document (see elsewhere) contains major omissions, in that it does not estimate peat fire emissions and only includes peat decomposition emissions resulting from deforestation after 2000, thereby excluding considerable ongoing emissions from degradation of peat deforested before 2000. What is available of the SIGN reports also appears not to include peat fires, which worryingly suggests this area is not a priority for current MoEF thinking.

### Is the INDC a commitment to dramatic emissions rise?

The INDC’s only firm commitment is a very modest 3% further reduction in emissions by 2030 compared to business-as-usual (BAU) projections (on top of 26% by 2020).

The graph below shows these emissions reduction targets against the figures from the RAN-GRK 2010-2030 business-as-usual (BAU) scenario,<sup>vii</sup> demonstrating how the 2020 26% target would genuinely reduce emissions, but the new target of only 3% additional emissions reduction by 2030 abandons this improvement to return to a rapidly rising emissions trajectory. This trajectory is not specific to the RAN-GRK figures but would look similar under any reasonable BAU scenario.



## Ministry's own figures show deforestation trend is rising

In contrast to public claims of a decline in deforestation, various sources including MoEF's own maps show deforestation has risen since 2010. Figures based on MoEF maps and published as part of the REDD+ 'Forest Reference Emissions Level' calculations that underpin the INDC submission indicate net deforestation of around 500,000ha per year in 2009–2011, rising sharply to around 750,000ha in 2011–2012, including a small increase in deforestation on peat, from around 130,000 to around 140,000ha.<sup>viii</sup> MoEF published data for the subsequent one-year period 2012–2013 show net deforestation amounted to 840,000ha.<sup>ix</sup>

## Significant areas of forest remain earmarked for 'planned' deforestation and significant areas remain at risk from 'unplanned' forest destruction

As of 2012, Indonesia had 14.72m ha of forest in zones permitted for conversion to other uses.<sup>x</sup> Without legal change, at current rates of destruction, this forest may be lost before 2030.

Much deforestation is 'unplanned' – ie outside official concessions, often representing clearance for small or medium-scale agriculture. This accounts for a significant share of deforestation, although in the absence of government transparency about land tenure (see above), it is impossible to quantify accurately.

In line with Indonesia's commitments under the New York Declaration on Forests, combatting 'unplanned' deforestation will require providing communities with development opportunities that do not rely on forest destruction. The INDC plans to transfer 12.7 million ha of forest land to local management, but does not show adequate safeguards against forest destruction.<sup>xi</sup> While local-level management can lead to improved forest protection alongside improved development, the INDC emphasises 'active participation of the private sector'<sup>xii</sup> and does not specify whether or how this forest will be protected from clearance or degradation. In the light of current high levels of unplanned deforestation, this could be a recipe for disaster.

## In conclusion – disappointing

In the absence of the underlying data assumptions, or firm government commitment to end deforestation, the current INDC draft is a distraction from the real issues Indonesia and the world face as a result of climate change. This government PR exercise obscures rising deforestation rates, ignores the terrible climate pollution resulting from the destruction of millions of hectares of peatland and singularly fails to propose genuine solutions for the climate, biodiversity and community development.

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<sup>i</sup> (MoEF (2015) 'Intended nationally-determined contribution – Republic of Indonesia. Consolidated Draft 2.0 – Aug 26, 2015' p2)

<sup>ii</sup> (MoEF (2015) 'Intended nationally-determined contribution – Republic of Indonesia. Final Draft August 30 2015', p2).

<sup>iii</sup> (Soeriaatmadja, W (2015) 'Jakarta law forbids disclosing info on plantation concessions' *Straits Times* 26 August 2015 <http://www.straitstimes.com/asia/se-asia/jakarta-law-forbids-disclosing-info-on-plantation-concessions>).

<sup>iv</sup> (Jong, Hans (2015) 'Govt opposes zero-deforestation pledge by palm oil firms' *Jakarta Post* 29 August 2015 <http://www.thejakartapost.com/news/2015/08/29/govt-opposes-zero-deforestation-pledge-palm-oil-firms.html>)

<sup>v</sup> Commitments under this include 'to pro-actively provide high-value information, including raw data, in a timely manner, in formats that the public can easily locate, understand and use, and in formats that facilitate reuse' - See more at: <http://www.opengovpartnership.org/about/open-government-declaration#sthash.GwpYk4FU.dpuf>

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<sup>vi</sup> (Jong, Hans (2015) 'RI sets higher emission reduction target, focusing on energy' *Jakarta Post* 25 August 2015 <http://www.thejakartapost.com/news/2015/08/25/ri-sets-higher-emission-reduction-target-focusing-energy.html>)

<sup>vii</sup> (Sekretariat RAN-GRK (2015) 'Hasil Kaji Ulang dan Penyusunan INDC' <http://ranradgrk.bappenas.go.id/rangrk/component/content/article/92-bahasa/informasi-sektoral/193-hasil-inde> viewed 8 September 2015)

<sup>viii</sup> BP-REDD+ (2015) 'National Forest Reference Emission Level for Deforestation and Forest Degradation in the Context of the Activities Referred to in Decision 1/CP.16, Paragraph 70 (REDD+) Under the UNFCCC: A Reference for Decision Makers', p36

<sup>ix</sup> MoEF (2014) Deforestasi Indonesia Tahun 2012-2013, Kementarian Lingkungan Hidup dan Kehutanan/Ministry of Environment and Forestry, 2014, p54/55.

<sup>x</sup> Consisting of APL (7.48m ha) and HPK (7.24m ha) zones. BP-REDD+ (2015) 'National Forest Reference Emission Level for Deforestation and Forest Degradation in the Context of the Activities Referred to in Decision 1/CP.16, Paragraph 70 (REDD+) Under the UNFCCC: A Reference for Decision Makers', p44

<sup>xi</sup> (MoEF (2015) 'Intended nationally-determined contribution – Republic of Indonesia. Final Draft August 30 2015', p2)

<sup>xii</sup> (ibid, p2)