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Wahana Lingkungan Hidup Indonesia



ACTOR MAPPING ANALYSIS

WHO ARE BEHIND THE FIRES?

Tracing the Capital, Power, and Business Group Affiliations Behind the Companies with the Highest Indications of Forest and Land Fires

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Image 1. Findings on Areas Affected by Forest and Land Fires in South Kalimantan. (doc. WALHI South Kalimantan)

Executive Summary

The 2026 forest and land fires show that fire risk remains concentrated in plantation and forestry concessions controlled by large business groups. Tracing the companies with the highest hotspot counts reveals that many entities are connected through networks of subsidiaries, business affiliations, and complex beneficial owner structures, including those involving cross-border ownership structures.

These findings show that forest and land fires cannot be viewed merely as a problem of permit-holding companies at the operational level. Economic benefits, decision-making, and business control often sit at the level of the wider corporate group. Therefore, an accountability approach that focuses only on a single corporate entity risks overlooking the primary actors behind the control and use of land. Concentrations of hotspots were also found in areas linked to the Food and Energy National Strategic Project (PSN) in Merauke, indicating that fire risk is related not only to corporate practices but also to the governance of large-scale development and landscape management by state authorities.

Four key findings:



Foreign capital behind high-risk concessions

Nine corporations with the highest hotspot counts were identified as having shareholders or parent companies in Singapore, Malaysia, Hong Kong, and even secrecy jurisdictions (BVI, Samoa). The most alarming case is PT Mayawana Persada, whose ultimate beneficiary cannot be identified because its ownership structure ends in a secrecy jurisdiction. A total of 84 other companies were also identified as affiliated with groups originating from Malaysia and Singapore, including Sinar Mas, Wilmar, and Salim Group, which are legally based in Singapore.



Links to five businessmen close to the President

Iwan Bomba (Special Envoy of the President for Economy and Banking) at PT Golden Blossom Sumatera; **Edhy Prabowo** (Advisory Board, Prabowo-Gibran National Campaign Team/ TKN), **Widjono Hardjanto** (Executive Deputy Chair of Gerindra/ Advisory Board, Prabowo-Gibran TKN), and **Benny Pangbin** (Head of Cadre Potential Analysis and Development, Gerindra) at PT Kiani Lestari; as well as **Aburizal Bakrie** at PT Monrad Intan Barakat.



Two conglomerates dominate the Papua PSN

Of the 807 hotspots in the Merauke Food and Energy Development Area, 90 hotspots on six PSN Energy Estate entities are concentrated in First Resources and Wilmar International. The remaining 674 hotspots are in areas directly managed by the Coordinating Ministry for Food Affairs (Kemenko Pangan) and the Ministry of Agriculture—indicating a shared responsibility between corporations and the state.



Recurring affiliation patterns and accountability

The same business groups (First Resources, Sinar Mas, Wilmar) appear repeatedly across different legal entities, indicating that the fire problem is structural at the level of the business group (corporate group), not merely the negligence of individual subsidiaries.

Overall, this analysis shows that the fire patterns in companies with the highest hotspot counts are linked to corporate structures broader than the permit-holding companies themselves. The interconnections between companies within a single business group, the existence of beneficial owners who are not always easy to trace, and the involvement of economic and political actors show that fire analysis needs to be carried out not only at the operational level but also at the level of the business groups and networks of actors behind the control of concessions.

A Background

Forest and land fires[1] continued throughout 2026. WALHI's satellite imagery analysis shows that nearly 50 percent of hotspots are within the operational areas of corporations in the forestry and oil palm plantation sectors. From January to September 2026, WALHI observed about 30,927 hotspots, with West Kalimantan the province having the highest concentration at 9,529 hotspots, followed by Central Kalimantan with 7,141 hotspots. As a result, the Air Pollution Standard Index (ISPU) in these two provinces has consistently been in the unhealthy to hazardous categories.

Between 1 January and 7 September 2026, 9,951 hotspots were spread across the operational areas of 561 oil palm companies and 293 Commercial Forest Companies (PBPH) permit-holding companies in several provinces of Indonesia. The provinces with the most hotspots were West Kalimantan, followed by Central Kalimantan, East Kalimantan, South Papua, South Sumatra, Riau, West Papua, Maluku, Jambi, and South Kalimantan. Several companies were also recorded as being recidivist, in 2023, WALHI has reported the same companies to the Ministry of Environment and Forestry (KLHK).[2] For example, PT Mayawana Persada in West Kalimantan, PT Rimbun Seruyan in Central Kalimantan, PT Riau Andalan Pulp and Paper in Riau, PT Bumi Mekar Hijau in South Sumatra, and PT Restorasi Ekosistem Indonesia in Jambi.

Hotspot findings in concession areas are not only a matter of who started the fires, but also of who negligently failed to prevent them and why the state allows the situation to keep recurring. This analysis shows that forest and land fires are a consequence of failures in permit governance, ranging from the issuance of permits on peat ecosystems and poor oversight to

1 The forests and land here cover areas with both mineral and peat lands. Mineral soils are dominated by inorganic particles such as sand, silt, and clay, whereas peat soils are formed from the accumulation of plant remains that have not fully decomposed over thousands of years due to environmental conditions characterized by constant wetness, waterlogging, and low oxygen levels.

2 "WALHI Laporkan 194 Perusahaan yang Terduga Terbakar"[WALHI Reports 194 Companies Suspected of Burning], WALHI, 21 October 2026, https://www.walhi.or.id/walhi-laporkan-194-perusahaan-yang-terduga-terbakar

failures of law enforcement. Therefore, investigation of companies with high hotspot concentrations needs to go beyond the permit-holding entities and focus on the ownership structures and corporate networks behind them.

The study "Who Are Behind the Fires?" aims to identify and map the parties behind companies with high numbers of hotspots and/or fire incidents, including the relationships between permit-holding companies and their parent companies, shareholders, ultimate beneficial owners, business groups, and entities in other jurisdictions. This tracing is important to determine whether the companies with many hotspots are standalone entities or part of larger corporate networks, including connections with foreign investors and companies.

This study also aims to identify patterns of control and concentration of natural resource ownership, and to examine the relationship between corporate structures and the management track record of areas that have repeatedly burned. The analysis therefore does not stop at the company names listed in permit documents, but seeks to answer who derives economic benefit from the control and use of these areas, how their corporate networks are formed, and to what extent responsibility can be traced up to the parent company or beneficial owner.

This tracing is important in the context of law enforcement and permit evaluation. Identifying ownership structures can serve as a basis for promoting corporate transparency, evaluating companies that repeatedly experience fires, and ensuring that government action does not stop at operational entities on the ground, but also takes into account the interconnections and corporate responsibility within a single business group. At the same time, this study is expected to strengthen calls for the evaluation and revocation of permits of companies proven to be problematic, to keep them legaly responsible, to restore the ecosystems and to uphold the rights of communities affected by the fires.

B Methodology

WALHI prepared this study using a mixed-method approach that integrates quantitative and qualitative analysis, focusing on corporate tracing and spatial analysis to identify companies indicated to be responsible for fire incidents, while also tracing the actors connected behind these entities. The study method is divided into two phases. The first is the selection of companies based on a baseline of hotspots with a high confidence level.[3] Hotspot data were obtained from remote sensing sources such as NASA FIRMS, MODIS, VIIRS, and KLHK's SiPongi, then strictly filtered using only data with a confidence level above 80 percent to minimize detection errors. Spatial analysis was then carried out using GIS tools through an overlay process between the hotspot locations and company concession boundaries, such as oil palm plantation HGUs (Cultivation Rights) and forestry business permits. The result is a list of 30 companies indito the highest number of fire points within their concession areas.

Second, the study focuses on analyzing actor connections through secondary data, company documents, and General Legal Administration (AHU) data. Ownership structures, directors, commissioners, and inter-company relationships were traced to identify ultimate beneficial owners and patterns of corporate control. This information was confirmed through annual reports, sustainability reports, prospectuses, and other corporate documents. All data were then compiled into an actor-connection matrix to identify actor linkages, cross-ownership relationships, and groupings of companies within the same conglomerate.

3 A high confidence score indicates a greater probability of an active forest or land fire of 80 to 100 percent on the satellite detection scale (compared to medium: 30–79, and low: 0–29).



Image 2. Findings Regarding Suspected Forest and Land Fires at PT Kintap Jaya Wattindo, September 2026. (doc. WALHI South Kalimantan)

C

Baseline Kajian

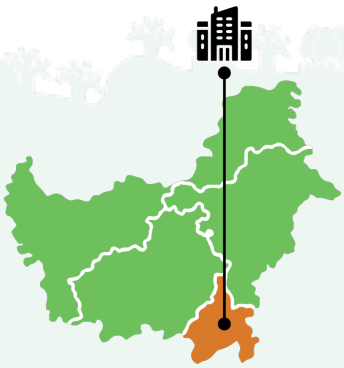
WALHI traced the corporate affiliations, ownership structures, and beneficial owner identities of companies whose concessions had the highest number of high-confidence hotspots from January to August 2026. The analysis covers 30 corporate entities, consisting of 15 oil palm plantation companies and 15 PBPH permit holders, as listed in Table 1 and Table 2. In addition, the study analyzed companies that were monitored in the field and confirmed to have experienced fires, namely:

PT Golden Blossom Sumatra in South Sumatera



Sumatera Island

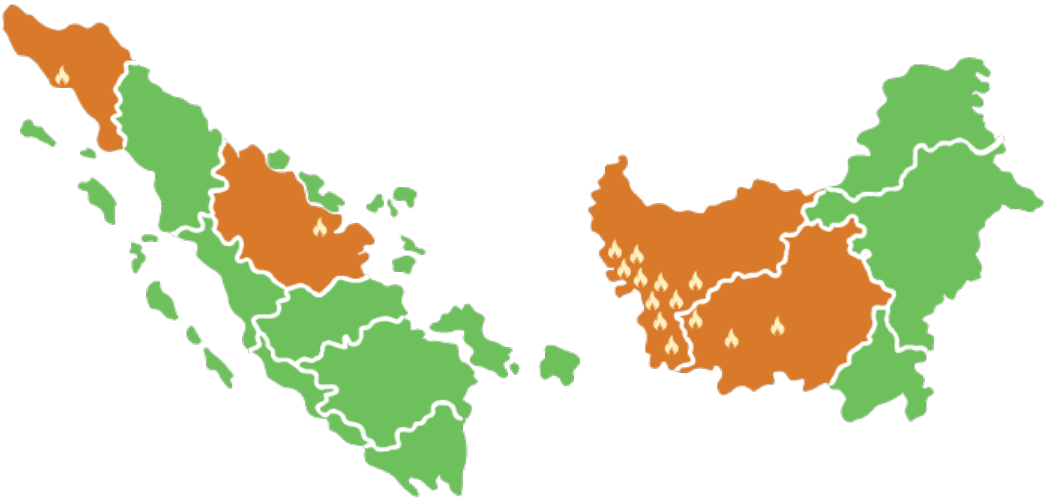
PT Monrad Intan Barakat in South Kalimantan



Kalimantan Island

We also added a specific analysis for the Papua region, where at least 807 fire points were detected from 1 January to 31 August 2026 in the development area of the Food and Energy National Strategic Project in Merauke, South Papua (see the list in Table 5).

Top 15 Oil Palm Plantation Concessions with the Highest Hotspot Counts (1 January–31 August 2026)



Sumatera and Kalimantan Island

No	Company Name	Province	Regency/City	Number of Hotspots
1	PT Mekar Karya Kahuripan	West Kalimantan	Ketapang	312
2	PT Sinar Karya Mandiri	West Kalimantan	Ketapang	254
3	PT Kayung Agro Lestari	West Kalimantan	Kayong Utara	229
4	PT Arjuna Utama Sawit	Central Kalimantan	Katingan	165
5	PT Ragam R. R	West Kalimantan	Kubu Raya	131
6	PT Sungai Putri Agro Sawit	West Kalimantan	Ketapang	126
7	PT Kalbar Inti Plantation	West Kalimantan	Melawi	116
8	PT Benua R. R.	West Kalimantan	Kubu Raya	93
9	PT Bumi Subur Lestari	West Kalimantan	Kubu Raya	77
10	PT Panca Surya Agrindo Sejahtera	Riau	Pelalawan	73
11	PT Sumber Mardhika Graha	Central Kalimantan	Lamandau	69
12	PT Agro Majusejahtera	West Kalimantan	Ketapang	61
13	PT Gelora Sawita Makmur	Aceh	Nagan Raya	50
14	PT Jalin Vaneo	West Kalimantan	Kayong Utara	46
15	PT Globalindo Alam Perkasa	Central Kalimantan	Kotawaringin Timur	46

Table 1

Top 15 Forestry Plantation Permit Companies with the Most Hotspots (1 January–31 August 2026)

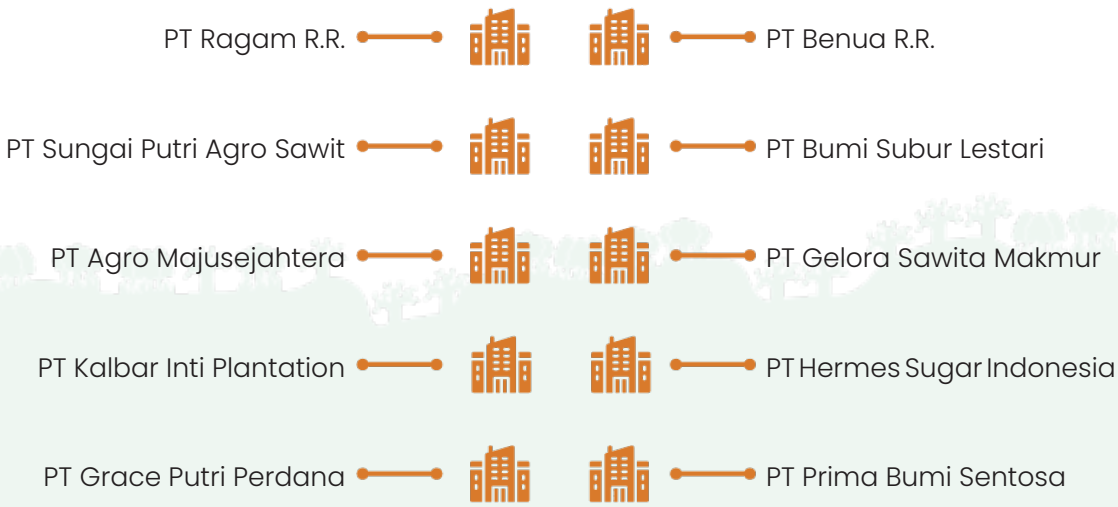


No	Company Name	Province	Regency/City	Number of Hotspots
1	PT Bumi Mekar Hijau	South Sumatra	Ogan Komering Ilir	552
2	PT Finnantara Intiga	West Kalimantan	Sanggau	189
3	PT Inhutani Iii Nangapinah	West Kalimantan	Melawi	188
4	PT Mayawana Persada	West Kalimantan	Kayong Utara	176
5	PT Hutan Ketapang Ind (formerly Kertas Basuki R)	West Kalimantan	Ketapang	142
6	PT Grace Putri Perdana	West Kalimantan	Ketapang	138
7	PT Hermes Sugar Indonesia	Central Kalimantan	Kotawaringin Timur	90
8	PT Kiani Lestari	East Kalimantan	Kutai Timur	88
9	PT Prima Bumi Sentosa	West Kalimantan	Ketapang	87
10	PT Inhutani I (Unit Labanan)	East Kalimantan	Berau	83
11	PT Bumi Hijau Prima	Central Kalimantan	Kapuas	74
12	PT Arfak Indra	West Papua	Fak Fak	71
13	PT Merbau Pelalawan Lestari	Riau	Pelalawan	68
14	PT Wahana Samudera Sentosa	South Papua	Merauke	64
15	PT Wanakerta Ekalestari	West Kalimantan	Ketapang	61

Table 2

Based on tracing of AHU and OSS data, company reports, corporate publications, and various other open sources, WALHI identified the affiliations and ownership structures of 22 companies. This tracing shows that 20 companies with high hotspot levels in their concessions and 2 companies with fires are connected to larger business groups through shareholdings, shared management, or control relationships.

Meanwhile, 10 companies could not be adequately identified, whether in terms of ownership structure, management composition, or the identity of their beneficial owner. These companies are:



These identification limitations are mainly due to the lack of corporate disclosure by private companies (non-listed companies), limited public access to data on company shareholders and management, and the lack of adequate information in the AHU database and other open sources. This finding shows that transparency of corporate ownership in the plantation and forestry sectors remains a major challenge that may hinder public oversight and efforts to ensure accountability for forest and land fire risks in concession areas.

D Corporate Affiliations Behind the Hotspots

This section describes the affiliation patterns and ownership structures of corporations linked to the high-level hotspots in oil palm and commercial forest concessions. Tracing the ownership chains shows that the fire problem in these concessions is not an isolated incident at the level of individual legal entities, but reflects a structural pattern involving capital networks, large business groups, and even proximity to circles of power.

Walhi observed four main findings. First, the significant involvement of foreign capital in high-risk corporations, with parent entities and shareholders domiciled in Singapore, Malaysia, Hong Kong, and even secrecy jurisdictions and tax havens such as the British Virgin Islands and Samoa—a condition that complicates the enforcement of cross-border environmental legal liability. Second, the discovery of links between five businessmen close to the President and the management structures of three PBPH and oil palm permit-holding corporations with high-confidence hotspots, raising questions of governance ethics as well as the urgency of fit and proper tests for corporate management.

Third, the recurrence of affiliations of several large business groups across more than one concession-holding entity confirms that fire-prone land-clearing practices are structural at the business group level, not merely due to negligence of subsidiaries—making it relevant to examine the doctrine of corporate culture and business group liability. Fourth, the concentration of hotspots in the Food and Energy National Strategic Project area in Merauke, Papua, which leads back to two large conglomerates (First Resources and Wilmar International), while also revealing allegation of joint liability since most of the other hotspots are in areas institutionally managed directly by the government (Kemenko Pangan and the Ministry of Agriculture).

Overall, this study affirms that researching fires in concessions requires an approach that reaches not only the subsidiary legal entities, but also the controlling business groups, cross-jurisdictional beneficial owners, and the government institutions overseeing the related national strategic projects.

1 Companies Affiliated with Foreign Capital

Tracing the ownership chains of corporations with the highest hotspot distributions reveals a consistent pattern: the involvement of foreign parent entities and major shareholders domiciled in neighboring countries, particularly Singapore, Malaysia, and Hong Kong, as well as several jurisdictions outside the region such as the British Virgin Islands (BVI), Samoa, South Korea, and India.

Companies with the highest fire incidence affiliated with foreign capital

NO	Corporation	Group or Shareholders	Country or Jurisdiction
1	PT Kayung Agro Lestari	First Resources	Singapore
2	PT Panca Surya Agrindo	First Resources	Singapore
3	PT Arjuna Utama Sawit	Saham dimiliki Premier Palmoil Energy Pte Ltd dan PT Oilim Agriculture (First Borneo Group)	Indonesia; Singapura
4	PT Sumber Mardhika Graha	PT Triputra Agro Persada Tbk; Salween Investment Pte Ltd; Gochean Holdings Incorporated	Singapura; Cayman
5	PT Finnantara Intiga	Nordic Forest Development Pte Ltd	Singapura
6	PT Hutan Ketapang Industri	Sampoerna Agri Resources Pte Ltd	Singapura
7	PT Mayawana Persada	Green Ascend Group Limited; Balaji Investment Group Holdings Limited	British Virgin Islands (BVI); Samoa
8	PT Hermes Sugar Indonesia	Hermes Distillery Pvt Ltd	India
9	PT Globalindo Alam Perkasa	Musim Mas	Singapura

Table 3

The table above shows at least nine corporations with the high level hotspots and identified as having ownership links, either direct or indirect, with parent entities or shareholders domiciled in neighboring countries or in jurisdictions outside the region. PT Kayung Argo Lestari and PT Panca Surya Agrindo are both part of the First Resources business group following the acquisition of PT Austindo Nusantara Jaya Tbk by PT Ciliandra

Perkasa in 2025.[4] Their parent company, First Resources Limited, is listed on the Singapore Exchange, so the chain of control over both entities is also subject to Singapore's capital market legal regime, and goes beyond Indonesian legal jurisdiction.[5]

Additionally, there is PT Arjuna Utama Sawit, which is owned by the First Borneo Group via the Singapore-based Premier Palmoil Energy Pte Ltd—holding a 63.3% stake.[6] Premier Palmoil Energy Pte Ltd is wholly owned by Tableware Incorporated Pte Ltd, whose shares are divided equally between Alexander Thaslim and Chan Lucille Caroline. The remaining 36.67% of PT Arjuna Sawit Utama's shares is held by PT Oilim Agriculture—a British Virgin Islands company[7]—60% of which is owned by PT Ceram Permata Pertiwi; tracing the ownership further reveals that PT Ceram Permata Pertiwi is also owned by Alexander Thaslim (30%) and Caroline Lucille Chan[8](70%). Meanwhile, PT Sumber Mardhika Graha falls under PT Triputra Agro Persada Tbk, which has had foreign minority shareholders since 2012: Salween Investment Pte Ltd—an investment vehicle of the Government of Singapore Investment Corporation (GIC)—and Gochean Holdings Incorporated, an investment vehicle partially owned by the Cayman Islands-based TPG Capital.[9]

Among holders of Commercial Forest Concessions (PBPH), foreign capital involvement is evident in PT Finnantara Intiga, whose majority shares are held by Singapore-based Nordic Forest Development Pte Ltd, an entity

4 "Selesai Akuisisi, First Resources Lanjutkan Tender Wajib ANJT Rp1.813 per Saham," Bisnis.com, 25 August 2025, https://market.bisnis.com/read/20250825/192/1905206/selesai-akuisisi-first-resources-lanjutkan-tender-wajib-anjt-rp1813-per-saham.

5 "Austindo (ANJT) Rombak Pengurus Usai Diakuisisi First Resources," Bisnis.com, 7 May 2025, https://market.bisnis.com/read/20250507/192/1875266/austindo-anjt-rombak-pengurus-usai-diakuisisi-first-resources.

6 "Premier Palmoil Energy Pte. Ltd.," SGPBusiness, https://www.sgpbusiness.com/company/Premier-Palmoil-Energy-Pte-Ltd.

7 International Consortium of Investigative Journalists (ICIJ), "Premier Palmoil Energy Pte. Ltd.," Offshore Leaks Database, https://offshoreleaks.icij.org/nodes/12170972.

8 Mighty Earth, Rapid Response Report No. 23 (Januari 2020), https://www.mightyearth.org/wp-content/uploads/Rapid-Response-Report-23_final.pdf; Mighty Earth, Rapid Response Report No. 49 (Maret 2025), https://mightyearth.org/wp-content/uploads/2025/10/RR49_v3.pdf.

9 Bursa Efek Indonesia, [dokumen keterbukaan informasi PT Triputra Agro Persada Tbk], April 2021, https://www.idx.co.id/StaticData/NewsAndAnnouncement/ANNOUNCEMENTSTOCK/From_EREP/202104/960f00ca8c_d89a475e3a.pdf. ; PT Triputra Agro Persada Tbk., Prospektus Penawaran Umum Perdana Saham (Jakarta: PT Triputra Agro Persada Tbk., 1 April 2021), https://www.idx.co.id/media/9769/14_-tapg-prospektus-ipo-2021.pdf.; "Entitas Usaha Triputra Group di Bidang Agribisnis Bakal IPO, Lepas 925 Juta Saham," Bisnis.com, 18 Maret 2021, https://market.bisnis.com/read/20210318/192/1369276/entitas-usaha-triputra-group-di-bidang-agribisnis-bakal-ipo-lepas-925-juta-saham.

affiliated with the Finnish Stora Enso business group, with the remaining shares held by PT Purinusa Ekapersada, the parent corporation of the Sinar Mas/Asia Pulp & Paper (APP) group.[10] PT Globalindo Alam Perkasa, although owned by the Karim family, operates under the banner of Musim Mas Group (Musim Mas Holdings Pte. Ltd., headquartered in Singapore).[11] In addition, 80% of the shares of PT Hutan Ketapang Industri were transferred to Singapore-based Sampoerna Agri Resources Pte Ltd in November 2025, shortly after its parent company, Sampoerna Agro Tbk, was sold by the Sampoerna Strategic Group to AGPA Pte Ltd, a subsidiary of South Korea's POSCO International Corporation.[12]

The most alarming case in terms of ownership transparency is PT Mayawana Persada, all its shares were transferred between late 2022 and 2023 to Green Ascend Group Limited, domiciled in the British Virgin Islands (BVI), and Balaji Investment Group Holdings Limited, domiciled in Samoa—two jurisdictions widely known as secrecy jurisdictions that do not disclose shareholder data to the public, so the ultimate beneficiary of this company could not be identified.[13] Several independent investigations have revealed links between PT Mayawana Persada and Sukanto Tanoto's Royal Golden Eagle (RGE) business group, although RGE denies any ownership or form of control over the company.[14] Nevertheless, in May 2026, APRIL announced that PT Mayawana Persada had officially become its supplier.[15]

10 "Ringkasan Publik PT Finnantara Intiga 2025," Sustainability Dashboard, 2025, https://sustainability-dashboard.com/documents/115225/0/RINGKASAN+PUBLIK+PT.FI_2025.pdf; "Riset Ungkap 20 Perusahaan Surga Pajak Berpusar ke Sinar Mas," CNN Indonesia, 29 May 2018, https://www.cnnindonesia.com/ekonomi/20180529230606-92-302109/riset-ungkap-20-perusahaan-surga-pajak-berpusar-ke-sinar-mas.

11 Musim Mas, "Keberadaan Global," https://www.musimmas.com/id/tentang-kami/keberadaan-global/

12 "Jual 80% Saham Hutan Ketapang, SGRO Kantongin Duit Rp 990 Miliar," CNBC Indonesia, 28 November 2025, https://www.cnbcindonesia.com/market/20251128095120-17-689275/jual-80-saham-hutan-ketapang-sgro-kantongin-duitrp-990-miliar; "Grup Sampoerna Jual Seluruh Saham SGRO kepada AGPA Pte. Ltd," Antara News, 20 November 2025, https://www.antaranews.com/berita/5253877/grup-sampoerna-jual-seluruh-saham-sgro-kepada-agpa-pte-ltd

13 "Investigasi Mayawana: Pemilik Maya, Kerusakan Nyata," Betahita.id, 13 May 2024, https://www.betahita.id/sorot/10098/investigasi-mayawana-pemilik-maya-kerusakan-nyata; Mighty Earth, "Letter from Government Ministry Tells Indonesia's Largest Deforester to Stop Clearing," 23 April 2024, https://mightyearth.org/article/letter-from-government-ministry-tells-mayawana-persada-to-stop-clearing/

14 International Consortium of Investigative Journalists (ICIJ), "An 'Anonymous' Company Secretly Linked to an Indonesian Billionaire Is Destroying Borneo's Rainforests, Environmentalists Say," 2 December 2025, https://www.icij.org/investigations/deforestation-inc/an-anonymous-company-secretly-linked-to-an-indonesian-billionaire-is-destroying-borneos-rainforests-environmentalists-say/

15 APRIL Group, "APRIL Fiber Supply Source – APRIL Sustainability Dashboard," diperbarui per 31 August 2026, https://sustainability.aprilasia.com/april-fiber-supply-source/

Another company, PT Hermes Sugar Indonesia, is reported by one source to be ninety-five percent owned by India's Hermes Distillery Pvt Ltd. However, as this information is based one reference only, it requires further verification before a firm conclusion can be drawn.[16]

The concentration of foreign capital in corporations with the highest fire vulnerability raises a distinct legal problem: the limited effectiveness of administrative and civil liability mechanisms for environmental damage when the ultimate major beneficiaries are domiciled outside Indonesian jurisdiction. This is relevant to Presidential Regulation Number 13 of 2018 on the Application of the Principle of Recognizing Beneficial Owners of Corporations, which requires corporations to disclose their true beneficial owners, but whose implementation has not been optimal for layered ownership structures leading to offshore jurisdictions such as the BVI and Samoa.

In addition to the nine companies above, we also traced the country of origin or the country of the beneficial owners of the 372 companies we have reported to the President. There are at least 27 Malaysian and 66 Singaporean palm oil companies—comprising 52 palm oil companies and 14 companies holding commercial forest permits. Note that although business groups such as Sinar Mas, Wilmar, and Salim Group are known to originate from Indonesia, they are legally based in Singapore because their global parent companies are registered, headquartered, and listed on the Singapore Exchange (SGX).[17]

The following is a list of companies identified as having links to these two countries:

16 Note: the information on the ownership of PT Hermes Sugar Indonesia by Hermes Distillery Pvt Ltd (India) traced in this study comes from only one public reference, EcoNusa, and therefore requires further verification through AHU Online data. See https://econusa.id/id/publikasi/studi-rantai-pasok-gula-di-indonesia-timur/

17 Singapore Exchange (SGX), "Highlights of Foreign Family Empires Listed on SGX," 9 May 2019, https://www.sgx.com/research-education/market-updates/20190509-highlights-foreign-family-empires-listed-sgx; IDX Channel, "9 Saham Milik Salim Group di Bursa Efek Indonesia, Intip Besaran Market Cap-nya," https://www.idxchannel.com/amp/market-news/9-saham-milik-salim-group-di-bursa-efek-indonesia-intip-besaran-market-cap-nya; Wilmar International, "Corporate Profile," https://www.wilmar-international.com/about-us/corporate-profile; dan Bursa Efek Indonesia (BEI), "Profil Perusahaan Tercatat: CEKA," https://www.idx.co.id/id/perusahaan-tercatat/profil-perusahaan-tercatat/CEKA.



Image 3. Findings on Forest and Land Fires at PT Monrad Intan Barakat, September 2026. (doc. WALHI South Kalimantan)

Number of companies indicated to have fires, by group affiliation and country of origin

No	Group Affiliation	Group Origin	Number of Companies
1	Sinar Mas (including APP)	Singapore	26
2	Wilmar	Singapore	21
3	Sime Darby	Malaysia	9
4	Genting Group	Malaysia	8
5	BHD Group	Malaysia	6
6	Musim Mas	Singapore	6
7	RGE/APRIL	Singapore	5
8	Lion Group	Malaysia	2
9	First Resources	Singapore	2
10	Salim Group	Singapore	2
11	Jcorp	Malaysia	1
12	Synergy Drive	Malaysia	1
13	Goodhope Asia Holdings Limited	Singapore	1
14	Premier Palmoil Energy Pte Ltd	Singapore	1
15	Salween Investment Pte Ltd	Singapore	1
16	Nordic Forest Development Holdings Pte Ltd	Singapore	1
17	**TOTAL**		**93**

Table 4

FIRE FINDINGS IN THREE SINGAPORE-BASED COMPANIES IN RIAU

PT Riau Andalan Pulp and Paper (RAPP) is a PBPH holder affiliated with the APRIL/RGE Group, while PT Arara Abadi and PT Sekato Pratama Makmur are affiliated with the APP/Sinar Mas Group. Both groups are domiciled in Singapore. Natural forest fires occurred in the operational area of PT RAPP's Sungai Mandau Estate. Based on WALHI Riau's monitoring and spatial analysis of Sentinel-2 imagery, this ±71.9 ha fire was in swamp forest within a greenbelt area directly bordering a river. Ecosystem damage from the fires in PT RAPP's operational area also threatens the survival of protected wildlife, including the Sumatran tiger, because the site lies in the transition zone of the Giam Siak Kecil - Bukit Batu Biosphere Reserve (GSKBB). Next, fires in and around the PT Arara Abadi concession occurred around the end of March 2026. Counting the entire burned expanse both inside and outside the company's permit area—but still in its vicinity—the area reached 616.3 hectares. On Sunday, 17 May 2026, acacia planting was taking place in the burned area. Almost 400 meters from the fire boundary within the PT Arara Abadi concession stands a High Conservation Value (HCV) information sign. According to the company's 2026 public summary, the area has significant biodiversity and a landscape important for natural ecological dynamics. Finally, the PT Sekato Pratama Makmur (SPM) concession burned from mid to late March 2026. The total burned area, based on Sentinel-2 satellite imagery analysis, was approximately 115.3 hectares. At the site there is a fire-prone area sign bearing the logos of the Riau Regional Police and the Indonesian Navy. The fires in the PT SPM concession occurred around secondary natural forest where illegal logging is still ongoing. During field verification, the sound of chainsaws could be heard in the distance. The team even encountered two loggers stacking processed timber.

FIRE FINDINGS IN TWO MALAYSIA-BASED COMPANIES IN CENTRAL KALIMANTAN

WALHI Central Kalimantan's monitoring of two companies affiliated with Malaysia's Genting Group, PT Globalindo Agung Lestari and PT United Agro Indonesia, found at least 24 fire points spread across both permit areas. The fire points were in several location clusters in and around the concession areas, including areas bordering community land and forested areas. The burned company land is estimated at 10 hectares. Parts of the area are known to have peatland characteristics with a depth of ±1 meter.

2 Five Businessmen Closest to the President Behind Three Corporate Entities



Our actor analysis found five businessmen close to Prabowo Subianto through ownership of three corporate entities: Iwan Bomba behind PT Golden Blossom Sumatera, Aburizal Bakrie at PT Monrad Intan Barakat, and Edhy Prabowo, Widjono Hardjanto, and Benny Pangbin at PT Kiani Lestari.

Tracing PT Golden Blossom Sumatera, which is affiliated with Bomba Group, brought up the name of Iwan Bomba as the owner of Bomba Group. The group was originally established by PT Gozco Plantation in 2006 and acquired by PT Mitra Lintas Persada (MLP) in August 2019.[18] Iwan Bomba, or Setiawan Ichlas, the owner of Bomba Group, is a coal businessman and conglomerate from Palembang. After president Prabowo Subianto took office in October 2024, Iwan Bomba was sworn in as Special Envoy of the President for Economy and Banking.[19] Before his appointment, Iwan Bomba actively made political contributions as part of the Prabowo-Gibran National Campaign Team (TKN) in the 2024 presidential election.[20]

18 Golden Blossom Sumatra, "Golden Blossom Sumatra", https://www.gbs.id/id

19 InvestorTrust, "Jadi Utusan Khusus Presiden Bidang Ekonomi dan Perbankan, Ini Profil Setiawan Ichlas 'Crazy Rich' Palembang," 23 October 2024, https://investortrust.id/financial/45159/jadi-utusan-khusus-presiden-bidang-ekonomi-dan-perbankan-ini-profil-setiawan-ichlas-crazy-rich-palembang

20 Kumparan, "Profil Setiawan Ichlas, Utusan Khusus Presiden Bidang Ekonomi dan Perbankan," 24 October 2024, https://kumparan.com/profil-tokoh/profil-setiawan-ichlas-utusan-khusus-presiden-bidang-ekonomi-dan-perbankan-23mAay9bRG7



Prabowo Subianto
President of the Republic of Indonesia and Chairman of the Gerindra Party



Iwan Bomba (Setiawan Ichlas)

Presidential Special Envoy for Economic and Banking Affairs; former member of the Prabowo-Gibran National Campaign Team

↓

Owner of Bomba Group, affiliated with PT Golden Blossom Sumatera



Aburizal Bakrie

Advisory Board Prabowo-Gibran National Campaign Team

↓

Bakrie Group, in connection with PT Monrad Intan Barakat



Edhy Prabowo

A leading figure in the Gerindra Party; former Minister of Maritime Affairs and Fisheries

↓

CEO of PT Kiani Lestari and shareholder of PT Nusantara Agro Forestry



Widjono Hardjanto

Executive Vice Chair Gerindra Party; Advisory Council of the Prabowo-Gibran National Campaign Team

↓

Chairman of the Board of Commissioners of PT Bali Pasific Investama and Commissioner of PT Nusantara Agro Forestry



Benny Pangbin

Chair of the Analysis and Cadre Development Division, Central Executive Board of the Gerindra Party

↓

Board of Directors of PT Kiani Lestari

Profile of Iwan Bomba, the Coal Businessman Who Became Prabowo's Special Envoy), Iwan Bomba was reportedly embroiled in the controversy over PT Titan Infra Energy's US$450 million bad loan dispute at Bank Mandiri.[21] His name was linked to an alleged attempt to take over strategic assets related to the coal business in South Sumatra, although through his lawyer he denied the allegations and stated that the case was an ordinary corporate dispute.

21 Tempo, "Sosok Iwan Bomba, Pengusaha Batu Bara yang Jadi Utusan Khusus Prabowo," 24 October 2024, https://www.tempo.co/ekonomi/sosok-iwan-bomba-pengusaha-batu-bara-yang-jadi-utusan-khusus-prabowo-1144187

22 CNBC Indonesia, "9 Konglomerat Ini Bisa Cuan Besar Usai Prabowo Sah Jadi Presiden," 23 April 2024, https://www.cnbcindonesia.com/research/20240423101625-128-532536/9-konglomerat-ini-bisa-cuan-besar-usai-prabowo-sah-jadi-presiden

Besides Iwan Bomba, we also detected a company owned by Aburizal Bakrie, PT Monrad Intan Barakat, in South Kalimantan, which is among those with the fire indications.[22] Aburizal Bakrie, ex-minister and founder and leading figure of the Bakrie Group, is close to the Prabowo Subianto administration through his position as a member of the Board of Patrons of the National Campaign Team (TKN) in the 2024 General Election. Within the Bakrie Group's business network, PT Bakrie Sumatera Plantations Tbk (UNSP) is the parent company of PT Monrad Intan Barakat (MIB). This relationship is stated in the 2025 Annual Report[23] and the 2025 ESG Report of PT Bakrie Sumatera Plantations Tbk, which lists PT Monrad Intan Barakat as a subsidiary within the UNSP business group.

PT Monrad Intan Barakat was previously implicated in a forest and land fire (karhutla) case in 2019 in Banjar Regency, South Kalimantan. The company was recorded with 146 hotspots in its concession area and was subsequently named a corporate suspect.

While tracing the management and shareholders of PT Kiani Lestari, formerly known as Kiani Kertas, owned by Bob Hasan, we learned it has a history of links with the Nusantara Energy Group in 2004-2009, which at the time involved Prabowo Subianto as the majority shareholder of the winning bidding consortium, and that corporation has remained within the same business group to this day.[24] The board of directors includes Benny Pangbin Gayonie, who is currently part of the Gerindra Party's leadership as Head of Cadre Potential Analysis and Development.

The majority of PT Kiani Lestari's shares are in control of PT Bali Pasific Investama.[25] The management and shareholders of this company include Widjono Hardjono and Edhy Prabowo. Widjono Hardjanto serves as President Commissioner of PT Bali Pasific Investama and Commissioner of PT Nusantara Agro Forestry, and is known as one of Prabowo Subianto's trusted executives who helped build up the Nusantara Group since the early 2000s, together with Hashim Djojohadikusumo (brother of Prabowo) and Bambang Atmadja.[26] He is also recorded as one of the minority shareholders

23 PT Bakrie Sumatera Plantations Tbk., Annual Report 2025, 2026, https://www.bakriesumatera.com/storage/documents/2026/05/AR2025%20BSP.pdf

24 "Lika-Liku Kepemilikan Lahan Ratusan Ribu Hektare PT Kiani dan Prabowo," Katadata.co.id, 21 February 2019, https://katadata.co.id/berita/nasional/5e9a55230ae60/lika-liku-kepemilikan-lahan-ratusan-ribu-hektare-pt-kiani-dan-prabowo.

25 Partai Gerakan Indonesia Raya (Gerindra), Susunan Pengurus Dewan Pimpinan Pusat Partai Gerindra, https://gerindra.id/wp-content/uploads/2022/08/SUSUNAN-PENGURUS-DEWAN-PIMPINAN-PUSAT-PARTAI-GERINDRA.pdf

26 "Prabowo Jadi Calon Presiden Terkuat, Segini Jumlah Hartanya," CNBC Indonesia, 25 September 2023, https://www.cnbcindonesia.com/market/20230925085332-17-475182/prabowo-jadi-calon-presiden-terkuat-segini-jumlah-hartanya.

in the consortium of PT Anugrah Cipta Investama and PT Nusantara Energy that won the auction of PT Kiani Kertas from the Indonesian Bank Restructuring Agency (IBRA) in October 2002. Besides being connected to Prabowo Subianto's business chain, Widjono Hardjanto is also part of the Gerindra Party leadership as Executive Deputy Chair. During Prabowo Subianto's candidacy in the 2024 General Election, Widjono served on the Advisory Board of the Prabowo-Gibran TKN.[27] He is currently listed as an Independent Commissioner at Perusahaan Listrik Negara (PLN) Nusantara Power.[28]

Next, Edhy Prabowo serves as President Director of PT Kiani Lestari and is also a shareholder of PT Nusantara Agro Forestry. He is widely known as the former Minister of Marine Affairs and Fisheries (2019–2020) and former Chair of the Gerindra Party Faction in the House of Representatives (DPR RI), who was dismissed and criminally prosecuted in a corruption case involving lobster seed export permits, with a final and binding court ruling finding him guilty of corruption. This Gerindra Party cadre also served as Deputy General Chair of the Gerindra Party Central Executive Board (DPP) from 2012 to 2020.[29]

These facts raise important concerns under both governance and environmental law frameworks. First, the participation of a former public official, convicted of corruption involving the abuse of authority in natural resource management, in the leadership of a forestry company linked to extensive fire hotspots calls into question the integrity of current efforts to promote transparent and sustainable resource governance. Second, the track record of corporate decision-makers involved in previous natural resource corruption cases should serve as a key consideration in evaluating the suitability of management for companies operating under forest utilization permits. Incorporating such considerations into licensing and oversight processes reflects the precautionary approach necessary to mitigate governance and environmental risks.

27 Project Multatuli, "Jejaring Pengusaha Tambang hingga Media di Lingkaran TKN Prabowo-Gibran," 8 February 2024, https://projectmultatuli.org/jejaring-pengusaha-tambang-hingga-media-di-lingkaran-tkn-prabowo-gibran/

28 PT PLN Nusantara Power, Profil Perusahaan PLN Nusantara Power, https://www.plnnusantarapower.co.id/storage/investor_company_profile/sections/PZfjlQUyBAAWN4gOXYzXMnzSgCkxAnGB4Seu8G6J.pdf

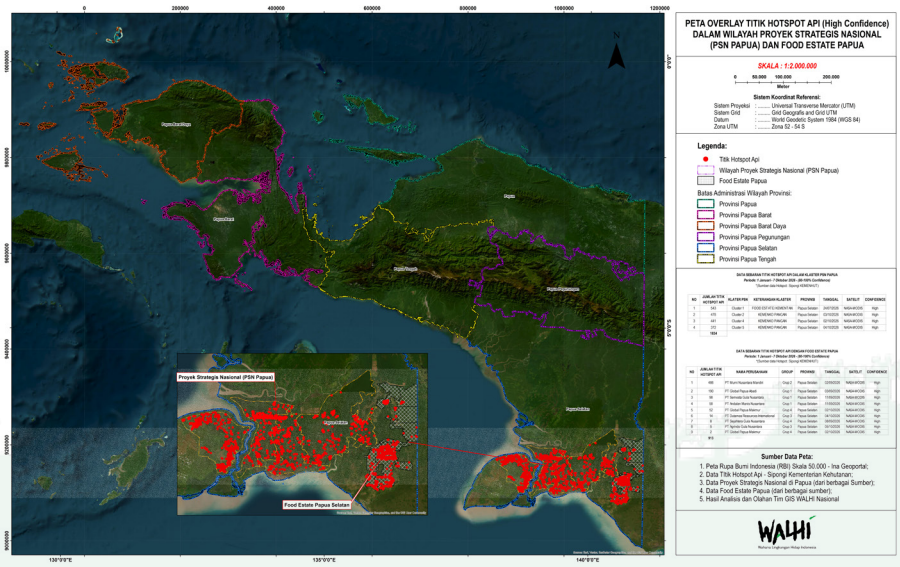
29 "Biodata Edhy Prabowo Menteri KKP & Hubungan dengan Prabowo Subianto," Tirto.id, 25 November 2020, https://tirto.id/biodata-edhy-prabowo-menteri-kkp-hubungan-dengan-prabowo-subianto-f7nu



Image 4. Findings on Forest and Land Fires at PT Monrad Intan Barakat, September 2026. (doc. WALHI South Kalimantan)

3 Conglomerates Behind the Hotspots in the Papua Food and Energy PSN

WALHI's spatial data analysis found at least 807 hotspots in the Food and Energy Development Area—a National Strategic Program—in Merauke, South Papua. The locations are detailed below.



List of companies indicated to have fires in Papua

No	Company Name	Group Origin	Number of Hotspots
PSN Energy Estate			
1	PT Global Papua Abadi	First Resources	57
2	PT Murni Nusantara Mandiri	Wilmar	40
3	PT Andalan Manis Nusantara	First Resources	23
4	PT Semesta Gula Nusantara	First Resources	10
5	PT Sejahtera Gula Nusantara	Wilmar	2
6	PT Agrindo Gula Nusantara	Wilmar	1
PSN FOOD ESTATE			
	Cluster	Managing Agency	
7	Cluster 4	Coordinating Ministry for Food	236
8	Cluster 1	Coordinating Ministry for Food	179
9	Cluster 2	Coordinating Ministry for Food	172
10	Cluster 5	Food Estate/ Ministry of Agriculture	87
TOTAL			**807**

Table 5





The data show that the hotspot concentration in the PSN Energy Estate is not isolated to individual companies, but leads back to two large business groups previously identified as controlling ten sugarcane plantations, sugar mills, and bioethanol concession holders in the area. These two business groups are First Resources Limited, through the shareholdings of the Fangiono family, and Wilmar International Group, through Tan Keng Liam and the involvement of Martua Sitorus.

Of the six entities recorded in the highest hotspot data, three—PT Semesta Gula Nusantara, PT Andalan Manis Nusantara, and PT Global Papua Abadi—belong to the same owner, First Resources. These three entities account for ninety hotspots of the total recorded for the group, with PT Global Papua Abadi the largest contributor. The other three entities, PT Murni Nusantara Mandiri, PT Agrindo Gula Nusantara, and PT Sejahtera Gua Nusantara, are all affiliated with Wilmar International Group, with PT Murni Nusantara Mandiri the dominant contributor in this group. This grouping confirms that the highest number of hotspots within the Papua Energy PSN are essentially concentrated in the same two corporate chains of control, so the fire problem in this area cannot be separated from operational policies at the level of the First Resources and Wilmar International business groups, rather than merely negligence at the level of individual subsidiaries.

Outside the concessions held by these private corporations, hotspot data in the nearby Food Estate area also show a significant distribution in areas managed by government institutions. Areas managed by the Coordinating Ministry for Food Affairs (Kemenko Pangan) are recorded in three clusters: 1) Ngguti District, Salam Epe Village; 2) Ilwayab District, Sigad Village; and

3) Ilwayab District, Bibikem Village. Meanwhile, the area managed by the Ministry of Agriculture is recorded in Kaptel District, Bu-Epe Village. The number of hotspots in these four food program clusters even exceeds that of each corporate entity identified earlier, with a total of 674 hotspots in areas institutionally under state coordination.



Haji Isam Behind the Merauke Food Estate

Some of the hotspot clusters in Ilwayab District are within the operational area of Jhonlin Group, owned by Andi Syamsuddin Arsyad, better known as Haji Isam, which was assigned by the state to clear land for the food estate, although a direct link between Jhonlin's activities and specific hotspots still requires further field verification. This finding highlights a new accountability gap: private implementing partners operating under state assignment, outside the usual forestry/land business permit regime, may blur legal responsibility between the assigning party (the government) and the field implementer (the private partner). Further tracing of the actors and the underlying agreement documents is needed



Image 5. Findings on Forest and Land Fires in the National Strategic Project (PSN Papua) and Papua Food Estate Areas. (doc. Ambrosius Mulait)

These findings show that the fire problem in the Papua Food and Energy PSN has a joint liability structure. On the one hand, there is corporate liability that can be traced through the ownership chains of First Resources and Wilmar International, as provided under Article 116 of Law Number 32 of 2009 on Environmental Protection and Management. On the other hand, the concentration of fire points in areas managed by Kemenko Pangan and the Ministry of Agriculture places this issue in the realm of the institutional accountability of the government as initiator and coordinator of the food estate program, including the obligation to ensure that strategic environmental assessments and environmental impact analyses are adequately carried out before and during land clearing. Accordingly, policy responses and law enforcement against fires in this area need to reach both the concession-holding corporations and the government institutions directly managing the national strategic project.

4 Recurring Business Group Affiliations and Accountability

Another finding that deserves attention is the recurrence of several large business groups across more than one business entity in the list of companies with the highest hotspot counts. The First Resources group/Fangiono family, for example, was identified as affiliated with at least 2 entities in the oil palm concession group, namely PT Kayung Agro Lestari and PT Panca Surya Agrindo, and 3 entities in the Merauke Food and Energy PSN concession group, namely PT Semesta Gula Nusantara, PT Andalan Manis Nusantara, and PT Global Papua Abadi. The Sinar Mas group/Widjaja family, through PT Purinusa Ekapersada, was identified as affiliated with PT Finnantara Intiga and is strongly suspected to also be affiliated with PT Bumi Mekar Hijau. Similar management patterns among business groups under the Wilmar International banner were also found in an entity in the PBPH concession group, PT Wahana Samudera Sentosa, and 3 entities in the Merauke Food and Energy PSN concession group, namely PT Murni Nusantara Mandiri, PT Agrindo Gula Nusantara, and PT Sejahtera Gua Nusantara. This list would be longer if we also included other companies below the top 20.

This recurrence confirms that the fire problem in many concessions, belonging to particular business groups—is not an isolated incident within each legal entity, but reflects structural practices at the business group level (corporate group) that oversees many subsidiaries with separate legal personalities. Under Article 116 of Law Number 32 of 2009 on Environmental Protection and Management, corporate criminal liability can in principle be imposed on both the business entity and the persons who gave the orders or acted as leaders of the activity. However, its application to business group structures that use many subsidiary legal entities as a shield against liability (corporate veil) still faces evidentiary obstacles, particularly in reaching parent companies or controlling parties that do not directly operate the burned land.[30]

30 The concept of "corporate culture" refers to an attitude, policy, rule, course of conduct, or practice existing generally within a body corporate, or in the part of the body corporate in which the relevant conduct takes place, which can serve as the basis for proving the element of corporate fault without having to point to the fault of a particular individual. For further explanation, see Brent Fisse and John Braithwaite, Corporations, Crime and Accountability (Cambridge: Cambridge University Press, 1993), chap. 2; compare Criminal Code Act 1995 (Cth) s 12.3(2); Attorney-General's Department (Australia), "12.3 Fault Elements Other than Negligence," in Commonwealth Criminal Code: A Guide for Practitioners, https://www.ag.gov.au/crime/publications/commonwealth-criminal-code-guide-practitioners-draft/part-25-corporate-criminal-responsibility/division-12/123-fault-elements-other-negligence.



Image 6. Findings on Forest and Land Fires in Central Kalimantan.
(doc. WALHI Central Kalimantan)

This also clarifies where accountability should be directed. The parties that should be held accountable are not merely the subsidiaries administratively registered as permit holders of the concessions, but also the parent companies or entities that in fact control operational policies across subsidiaries, namely First Resources Ltd., Wilmar International Group, and the Sinar Mas group. This factual control, rather than mere formal shareholding, should be the basis for applying the doctrine of piercing the corporate veil or single economic entity in the context of Indonesian environmental law.[31]

31 Phillip I. Blumberg, The Law of Corporate Groups: Procedural Problems in the Law of Parent and Subsidiary Corporations (Boston: Little, Brown and Company, 1983); compare with a study of a similar doctrine in the context of Indonesian company law in Chatamarrasjid Ais, Menyingkap Tabir Perseroan (Piercing the Corporate Veil): Kapita Selekta Hukum Perusahaan (Bandung: Citra Aditya Bakti, 2000).

The forms of accountability pursued should also be layered, including:



Administratively, supervision and sanctions by the relevant ministries should extend to all subsidiaries within a business group once a similar pattern of violations is identified in more than one entity, rather than only targeting the subsidiary that burned in a particular period[32]



Civilly, environmental restoration lawsuits under Article 87 of Law Number 32 of 2009 should also be directed at parent companies proven to have effective control over land management policies in the area, rather than stopping at subsidiaries as defendants[33]



Criminally, the element of corporate fault at the parent company level can be built from evidence of negligence in supervising and enforcing subsidiaries' compliance with the fire prevention policies that the business group itself has adopted[34]

32 Law Number 32 of 2009 on Environmental Protection and Management, Articles 76 and 82, which regulate various administrative sanctions, ranging from written warnings, government coercion, and suspension of environmental permits to revocation of environmental permits

33 Law Number 32 of 2009 on Environmental Protection and Management, Article 87

34 Supreme Court Regulation Number 13 of 2016 on Procedures for Handling Criminal Cases Committed by Corporations, particularly the provisions on the basis for corporate punishment due to negligence in exercising proper and reasonable supervision over activities carried out by management or parts of the corporation.



Image 7. Findings on Forest and Land Fires in Bengkalis Regency, Riau Province. (doc. WALHI Riau)

This last point is relevant because some of the business groups identified above already have group-level fire prevention policies (group-wide self-regulation). Wilmar International Group, for example, has published a No Deforestation, No Peat, No Exploitation (NDPE) policy since December 2013 that explicitly prohibits the use of fire in land clearing and replanting throughout its supply chain, including third-party suppliers.[35] First Resources Limited has also issued a NDPE policy since 2015, accompanied by a group-level Integrated Fire Management (IFM) program.[36] If such policies truly function as internal control instruments, they should be consistently passed down from the parent company to each of its subsidiaries, including evaluation and correction mechanisms once a violation is found at one subsidiary, so that the same pattern does not recur at other subsidiaries within the same group.

35 Wilmar International, No Deforestation, No Peat and No Exploitation Policy, 5 December 2013, accessed via https://www.wilmar-international.com/wp-content/uploads/2012/11/No-Deforestation-No-Peat-No-Exploitation-Policy.pdf.

36 First Resources Limited, Sustainability Report 2015 (Singapore: First Resources Ltd, 2015); First Resources Limited, Sustainability Report 2018 (Singapore: First Resources Ltd, 2018); see also "First Resources the Latest Palm Oil Giant to Announce Zero-Deforestation Commitment," Mongabay, 2015, https://news.mongabay.com/2015/07/first-resources-the-latest-palm-oil-giant-to-announce-zero-deforestation-commitment/..



Image 8. Forest and Land Fires in Jambi Province, Sumatra Island. (doc. WALHI Jambi)

The problem is that the data described above show that high hotspot counts recur across several different subsidiaries within the same business group, even in different periods and concession areas. This raises serious questions about the effectiveness of these policies: if group-level fire prevention commitments were genuinely enforced, there should be evidence of concrete corrective measures—such as internal audits, temporary suspension of land-clearing activities, or evaluation of subsidiary management—after the first violation at one entity, preventing recurrence at other entities.

Unfortunately, as of the writing of this study, there is no indication of such corrective measures, which can be read as evidence that these self-regulation policies have not functioned as binding operational norms on the ground, but merely as formal compliance documents at the parent company level. This reinforces the relevance of the corporate culture approach.[37] It also constitutes a form of indirect evidence (circumstantial evidence) that can be used to build an argument of negligence at the business group—or parent company—level. Accordingly, accountability for what has happened should be directed to reach the business groups that actually control land management policies in the concessions concerned, rather than stopping at the subsidiary legal entities alone..

37 The concept of "corporate culture" refers to an attitude, policy, rule, course of conduct, or practice existing generally within a body corporate, or in the part of the body corporate in which the relevant conduct takes place, which can serve as the basis for proving the element of corporate fault without having to point to the fault of a particular individual. For further explanation, see Brent Fisse and John Braithwaite, Corporations, Crime and Accountability (Cambridge: Cambridge University Press, 1993), chap. 2; compare Criminal Code Act 1995 (Cth) s 12.3(2); Attorney-General's Department (Australia), "12.3 Fault Elements Other than Negligence," in Commonwealth Criminal Code: A Guide for Practitioners, https://www.ag.gov.au/crime/publications/commonwealth-criminal-code-guide-practitioners-draft/part-25-corporate-criminal-responsibility/division-12/123-fault-elements-other-negligence.



Image 9. Forest and Land Fires in Jambi Province, Sumatra Island. (doc. WALHI Jambi)

E Conlusion

The 2026 forest and land fires show that the problem cannot be understood solely at the level of permit-holding companies or the fire events on the ground. The concentration of hotspots in plantation and forestry concessions reveal broader links to land control structures, corporate networks, and the prevailing governance of natural resources.

Tracing the companies with the highest hotspot counts reveals that some are connected to large business groups with cross-border ownership chains, including through entities domiciled in Singapore, Malaysia, South Korea, India, and even low-transparency jurisdictions such as the British Virgin Islands and Samoa. In some cases, identifying the ultimate beneficial owners remains difficult due to layered ownership structures and limited disclosure. This shows that corporate transparency remains a major challenge in efforts to trace those who derive economic benefit from the control and use of land.

Other findings show links between several companies and figures with political proximity or strategic positions within circles of power. In addition, the concentration of hotspots in the Merauke Food and Energy PSN area shows that the fire problem not only concerns corporations but also the institutional responsibility of the state in planning, managing, and supervising large-scale development programs.

The repeated appearance of the same business groups across various entities with high hotspot levels indicates that fire risk needs to be analyzed at the business group level, not merely at the level of subsidiaries as permit holders. This pattern raises questions about the effectiveness of internal



Image 10. Officials are fighting forest and land fires in West Kalimantan. (doc WALHI West Kalimantan)

oversight systems, the implementation of fire prevention commitments, and the corporate governance applied throughout the chain of business control.

Therefore, future handling of forest and land fires needs to focus on strengthening beneficial ownership transparency, tracing accountability up to the business group level, comprehensively evaluating concessions that repeatedly burn, and strengthening government and corporate accountability in preventing recurring environmental damage.

F Recommendations

Recommendations that state authorities can act upon include:

1. Conduct a comprehensive evaluation of permits, including Cultivation Rights (HGU) for palm oil plantations, Forest Utilization Business Permits (PBPH) for commerial forestry, Mining Business Permits, and other National Strategic Projects (PSN), particularly those located in peat and forest ecosystems

2. Impose administrative sanctions on permit-holding companies proven to have forest and land fires in their concessions and/or to have caused forest and land fires around their concessions. The administrative sanctions in question are:

- Government coercion
- Suspension of government services
- Administrative fines
- Freezing of Business Permits
- Revocation of Business Permits

3 Apply government coercion to permit-holding companies proven to have forest and land fires in their concessions and/or to have caused forest and land fires around their concessions, specifically

- Temporary suspension of production activities
- Seizure of goods or equipment with the potential to cause violations
- Remporary suspension of all activities
- Blocking
- or other measures aimed at stopping violations and restoring environmental functions

4 The administrative sanctions referred to in point 2.d and the government coercion in point 3a and 3c must be followed by a reduction of the concession area.

5 The government coercion referred to in point 3.d also includes withdrawing the privilege of permit-holding companies proven to have Forest and Land Fires in their concessions and/or to have caused Forest and Land Fires around their concessions to obtain loans/financing from banks.

6 Former concession whose business permits have been revoked, or land resulting from concession reductions, must not be transferred to other business actors or turned into concessions under new business permits. Except for former concession lands in conflict with Indigenous peoples, which must be returned to the Indigenous peoples.

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APPENDIX

1 COMPANIES SUSPECTED OF CAUSING FOREST AND LAND FIRES AFFILIATED WITH MALAYSIAN-BASED GROUPS

No	Number of Hotspots, (Jan–Sept 2026)	Group Affiliates	Company Name	Province
1	121	Jcorp	PT. Sumber Mardhika Graha	Kalimantan Tengah
2	13	Genting Group	PT. Sepanjang Inti Sury Utama 1	Kalimantan Barat
3	9	Sime Darby	PT. Duta Sumber Nabati 1	Kalimantan Barat
4	1	Sime Darby	PT. Langgeng Muara Makmur 2	Kalimantan Selatan
5	7	Sime Darby	PT. Laguna Mandiri 5	Kalimantan Timur
6	7	Genting Group	PT. Sepanjang Inti Surya Utama	Kalimantan Barat
7	6	Lion Group	PT. Kebun Aria 1	Kalimantan Barat
8	2	Genting Group	PT. Sawit Sehat	Kalimantan Barat
9	11	Genting Group	PT. Sepanjang Inti Surya Abadi 1	Kalimantan Barat
10	1	Genting Group	PT. Sawit Murni	Kalimantan Barat
11	2	Sime Darby	PT. Budidaya Agro Lestari 1	Kalimantan Barat
12	2	Sime Darby	PT. Bangun Maya Indah 1	Kalimantan Barat
13	3	Genting Group	PT. Sepanjang Inti Surya Mulia	Kalimantan Barat
14	10	Genting Group	PT. Sepanjang Inti Sury Utama 2	Kalimantan Barat
15	5	Genting Group	PT. Sepanjang Inti Surya Abadi 2	Kalimantan Barat
16	1	Sime Darby	PT. Mitra Austral Sejahtera 1	Kalimantan Barat
17	1	Sime Darby	PT. Mitra Austral Sejahtera 2	Kalimantan Barat
18	8	Sime Darby	PT. Sime Indoagro	Kalimantan Barat
19	1	Synergy Drive	PT. Duta Sumber Nabati 2	Kalimantan Barat
20	9	Sime Darby	PT. Mitra Austral Sejahtera 3	Kalimantan Barat

21	3	BHD Group	PT. Sawit Desa Kapuas 6	Kalimantan Barat
22	3	BHD Group	PT. Duta Surya Pratama 2	Kalimantan Barat
23	7	BHD Group	PT. Duta Surya Pratama 3	Kalimantan Barat
24	3	BHD Group	PT. Bintang Harapan Desa	Kalimantan Barat
25	2	BHD Group	PT. Duta Surya Pratama 4	Kalimantan Barat
26	16	Lion Group	PT. Kebun Aria 3	Kalimantan Barat
27	5	BHD Group	PT. Surya Borneo Indah 3	Kalimantan Barat

2 COMPANIES SUSPECTED OF CAUSING FOREST AND LAND FIRES AFFILIATED WITH SINGAPORE-BASED GROUPS

No	Number of Hotspots, (Jan–Sept 2026)	Group Affiliates	Company Name	Province
1	320	First Resources	PT Kayung Agro Lestari	Kalimantan Barat
2	73	First Resources	PT Panca Surya Agrindo	Riau
3	207	Premier Palmoil Energy Pte Ltd	PT Arjuna Utama Sawit	Kalimantan Tengah
4	69	Salween Investment Pte Ltd[1]	PT Sumber Mardhika Graha	Kalimantan Tengah
5	196	Nordic Forest Development Holdings Pte Ltd	PT Finnantara Intiga	Kalimantan Barat
6	46	Musim Mas	PT Globalindo Alam Perkasa 1	Kalimantan Tengah
7	1	Musim Mas	PT Unggul Lestari	Kalimantan Tengah
8	19	Musim Mas	PT Globalindo Alam Perkasa 2[2]	Kalimantan Tengah
9	22	Musim Mas	PT Sukajadi Sawit Mekar 2	Kalimantan Tengah
10	7	Musim Mas	PT Maju Aneka Sawit 3	Kalimantan Tengah
11	3	Musim Mas	PT Maju Aneka Sawit 5	Kalimantan Tengah
12	2	Wilmar	PT Mentaya Sawit Mas	Kalimantan Tengah

13	35	Wilmar	PT Benua Alam Subur	Kalimantan Tengah
14	23	Wilmar	PT Petak Malai Sawit Makmur 2	Kalimantan Tengah
15	41	Wilmar	PT Pukun Mandiri Lestari	Kalimantan Tengah
16	10	RGE Group	PT Archipelago Timur Abadi	Kalimantan Tengah
17	18	Wilmar	PT Daya Landak Plantation 1	Kalimantan Barat
18	23	Wilmar	PT Petak Malai Sawit Makmur 1	Kalimantan Tengah
19	20	Wilmar	PT Bawak Sawit Tunas Belum	Kalimantan Tengah
20	8	Wilmar	PT Alam Sawit Permai	Kalimantan Tengah
21	4	Wilmar	PT Eka Kaharap Itah	Kalimantan Tengah
22	7	Wilmar	PT Kerisawit Indonesia	Kalimantan Tengah
23	1	Wilmar	PT Buluh Cawang Plantation 1	Kalimantan Barat
24	1	Wilmar	PT Wilmar Sambas Plantation 1	Kalimantan Barat
25	18	Wilmar	PT Indoresins Putra Mandiri	Kalimantan Barat
26	6	Wilmar	PT Bumi Sawit Kencana 2	Kalimantan Tengah
27	43	Wilmar	PT Bumi Pratama Khatulistiwa 1	Kalimantan Barat
28	1	Wilmar	PT Agronusa Investama 3	Kalimantan Barat
29	5	Wilmar	PT Pratama Prosentindo	Kalimantan Barat
30	1	Wilmar	PT Putra Indotropical	Kalimantan Barat
31	2	Wilmar	PT Sarana Titian Permata	Kalimantan Tengah
32	2	Wilmar	PT Mustika Sembuluh 3	Kalimantan Tengah
33	1	Wilmar	PT Jatim Jaya Perkasa	Riau
34	6	Goodhope Asia Holdings Limited	PT Sariwana Adi Perkasa	Papua Tengah
35	65	Sinar Mas	PT Agro Majusejahtera	Kalimantan Barat
36	23	Sinar Mas	PT Kartika Prima Citra	Kalimantan Barat
37	15	Sinar Mas	PT Primanusa Mitraserasi	Kalimantan Barat
38	10	Sinar Mas	PT Bangun Nusa Mandiri	Kalimantan Barat
39	3	Sinar Mas	PT Nusantara Mukti Sentosa	Kalimantan Barat
40	6	Sinar Mas	PT Dutanusa Lestari	Kalimantan Barat
41	25	Sinar Mas	PT Smart Corporation 3	Kalimantan Barat
42	44	Sinar Mas	PT Cahaya Nusa Gemilang	Kalimantan Barat
43	3	Sinar Mas	PT Kencana Graha Permai	Kalimantan Barat
44	9	Sinar Mas	PT Anugerah Makmur Sejati	Kalimantan Barat
45	3	Sinar Mas	PT Agro Lestari Mandiri	Kalimantan Barat

46	7	Sinar Mas	PT Buana Tunas Sejahtera	Kalimantan Barat
47	8	Sinar Mas	PT Sentrakarya Manunggal	Kalimantan Barat
48	1	Sinar Mas	PT Persada Graha Mandiri	Kalimantan Barat
49	5	Sinar Mas	PT Kapuasindo Palm Lestari	Kalimantan Barat
50	3	Sinar Mas	PT Paramitra Internusa Pratama	Kalimantan Barat
51	4	Salim Group	PT Kebun Ganda Prima 2	Kalimantan Barat
52	1	Salim Group	PT Riau Agrotama Plantation 2	Kalimantan Barat
53	39	RER / APRIL-RGE Related	PT Restorasi Ekosistem Indonesia	Jambi dan Sumatera Selatan
54	22	RGE/APRIL Related Historical Structure	PT Tunas Timber Lestari (d/h PT Tunas Sawaerma)	Papua Selatan
55	2	RGE Connected / APRIL Related	PT Adindo Hutani Lestari	Kalimantan Utara
56	1	APRIL/RGE	PT Riau Andalan Pulp and Paper	Riau
57	13	APP/Sinar Mas Related	PT Buana Megatama Jaya	Kalimantan Barat
58	10	APP/Sinar Mas	PT Bumi Persada Permai (SK 337)	Sumatera Selatan
59	4	APP/Sinar Mas	PT Satria Perkasa Agung Unit (SK 102)	Riau
60	3	APP/Sinar Mas	PT Rimba Hutani Mas	Sumatera Selatan
61	2	APP/Sinar Mas	PT Wira Karya Sakti	Jambi
62	1	APP/Sinar Mas Related	PT Bukit Batu Hutani Alam	Riau
63	601	APP/Sinar Mas	PT Bumi Mekar Hijau	Sumatera Selatan
64	196	APP/Sinar Mas; historis Inhutani III + Stora Enso + Gudang Garam	PT Finnantara Intiga	Kalimantan Barat
65	21	APP/Sinar Mas	PT Sekato Pratama Makmur	Riau
66	14	APP/Sinar Mas	PT Arara Abadi	Riau

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