



**DEMANDING TRANSPARENCY AND  
CROSS-BORDER CORPORATE  
ACCOUNTABILITY FOR  
TRANSBOUNDARY HAZE  
POLLUTION**

**ADDRESSED TO:  
EMBASSY OF THE REPUBLIC OF INDONESIA, KUALA LUMPUR**

**PREPARED BY:  
GREENPEACE MALAYSIA  
HIMPUNAN ADVOKASI RAKYAT MALAYSIA**

**DATE OF MEMORANDUM SUBMISSION:  
4TH SEPTEMBER 2026**

Ref: GP/HARAM/HAZE-MEMO/09.2026

4<sup>th</sup> September 2026

**His Excellency Raden Dato' Mohammad Iman Hascarya Kusumo**

**Embassy of the Republic of Indonesia,**

233, Jalan Tun Razak, Imbi

50400 Kuala Lumpur, Malaysia

**MEMORANDUM: DEMANDING TRANSPARENCY AND CROSS-BORDER  
CORPORATE ACCOUNTABILITY FOR TRANSBOUNDARY HAZE POLLUTION**

Your Excellency,

We, the undersigned Civil Society Organisations (CSOs) and Non-governmental Organisations (NGOs), together with the concerned Malaysian citizens, call on the Embassy of the Republic of Indonesia in Kuala Lumpur to urge the Government of Indonesia to make full and public disclosure of corporate entities that hold concessions linked to wildfires and fire risks across the nation.<sup>1</sup> We do so on behalf of the millions of Malaysians whose health, livelihoods and daily lives are affected each year by the transboundary haze pollution originating from land and forest fires in Indonesia.

## **1. BACKGROUND**

Transboundary haze has recurred in the ASEAN region since at least the 1990s, driven substantially by fires linked to land clearing for agriculture and plantations in Sumatra and Kalimantan. In 2002, ASEAN Member States, with Malaysia as the first signatory, adopted the ASEAN Agreement on Transboundary Haze Pollution (AATHP) to prevent, monitor and mitigate this recurring crisis through national and regional action. This year's crisis once again shows that haze is not simply a matter of wind direction or weather. The wind may carry smoke across borders, but the root of the problem lies in recurring fires and the need for effective prevention and law enforcement.

We note that Indonesian authorities have, on several occasions, stated that companies linked to Malaysia are among those implicated in fires and haze-generating land-clearing

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<sup>1</sup> Indonesia inspects 19 companies linked to wildfires, official says, *Reuters*, August 31, 2026 <https://www.reuters.com/business/environment/indonesia-inspects-19-companies-linked-wildfires-official-says-2026-08-31>

activities in Indonesia.<sup>2</sup> Recently, an Indonesian lawmaker has called on Malaysia and Singapore to do more than raise concerns over the ongoing haze, arguing that Malaysia also have plantation interests in Indonesia<sup>3</sup> that have some role in the emergence of forest fires. It is important for the Indonesian government to provide evidence linking particular Malaysian or Singaporean-owned plantations to the ongoing fires.

We welcome this acknowledgement as a starting point for genuine cross-border accountability. However, an acknowledgement without disclosed evidence leaves the public in both countries no better able to hold anyone to account, and communities bearing health risks, economic burden<sup>4</sup> and threat to wellbeing, with no proper remediation.

## **2. OUR POSITION**

We do state clearly that this Memorandum is not directed against the Government or people of Indonesia. Indonesia, like Malaysia, bears the brunt of the fires and haze every year, and Indonesian communities living closest to the fires suffer the most directly. Our focus, as Malaysians, is on Malaysian corporate and governmental accountability. We are here to ask Indonesia to help us achieve that.

We believe accountability must be established on a reciprocal principle where each government should investigate and regulate its own companies operating within or linked to the other's jurisdiction, based on evidence that is publicly and openly shared between both countries.<sup>5</sup> If Malaysian companies are found responsible for the fires and haze in Indonesia, Malaysia must act against them and vice versa if Indonesian companies are responsible. This principle should apply consistently across the ASEAN region. Haze crosses borders freely, but communities are bearing the costs. Hence, the evidence and accountability that follow must be allowed to do the same.

## **3. OUR DEMANDS**

- That the Government of Indonesia formally disclose the concession maps, hotspot and fire investigation data, and any other evidence in its possession identifying Malaysian-linked companies associated with fires and haze in Indonesia.

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<sup>2</sup> Haze: IOI, Sime Darby among M'sian firms blamed for Indonesia forest fires, Malaysiakini, 2019 <https://www.malaysiakini.com/news/491858>

<sup>3</sup> 'You Have Plantations Here Too': Lawmaker Hits Back at Malaysia, Singapore Over Forest Fires, Jakarta Globe ID, August 21, 2026 <https://jakartaglobe.id/news/you-have-plantations-here-too-lawmaker-hits-back-at-malaysia-singapore-over-forest-fires>.

<sup>4</sup> CREA and Greenpeace, *The Health & Economic Impacts of Ambient Air Quality in Malaysia*, June 2022

<sup>5</sup> SUHAKAM, *Silent Enemy: Report on Haze Pollution and the Right to Clean Air*, September 29, 2024

- That the Government of Indonesia name, specifically and publicly, the Malaysian companies it has identified as being involved, so that Malaysian civil society, regulators and Parliament can pursue accountability within our jurisdiction.
- That the Government of Indonesia commit to sharing such evidence with the Government of Malaysia on an ongoing basis, through existing ASEAN Agreement on Transboundary Haze Pollution mechanisms or direct bilateral channels, rather than through public allegations and press statements alone.
- That both Governments commit to the principle of reciprocal disclosure and enforcement: each state investigates and holds accountable companies domiciled in its own jurisdiction, based on evidence shared openly between them.

#### 4. RECOMMENDATION

We commit, on receipt of credible evidence naming Malaysian-linked companies, to taking this fight for accountability back to Malaysia. We will use this evidence to press the Malaysian Government, Parliament and other relevant regulators to investigate and act against any Malaysian company found responsible, and to strengthen the case for a Malaysian Transboundary Haze Pollution Act, or an equivalent Clean Air Act provisions that would empower the Malaysian authorities with clear legal power to investigate and prosecute Malaysian citizens or corporations for haze-causing conduct, wherever in the region it occurs.

#### 5. CLOSING

People's health must come before corporate profit. Every haze season, Malaysians and Indonesians continue to face respiratory illness, school and business closures, long-term health and environmental damage that falls hardest on marginalised and vulnerable individuals such as children, the elderly and outdoor workers. We ask Your Excellency to convey this Memorandum, together with the accompanying petition and *The ASEAN Haze Trauma Report*, to the relevant authorities of the Government of the Republic of Indonesia.

We appreciate the Embassy and His Excellency for receiving this Memorandum and remain ready to engage constructively, in the shared interest of a haze-free ASEAN region.

Respectfully submitted,

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Greenpeace Malaysia  
**Heng Kiah Chun, Campaign Manager**

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Himpunan Advokasi Rakyat Malaysia (HARAM)  
**Brendon Gan, Chairman of HARAM**

**This Memorandum is duly endorsed by the following CSOs, NGOs and actors:**  
**ORGANISATIONS**

1. Greenpeace Malaysia
2. Himpunan Advokasi Rakyat Malaysia (HARAM)
3. SUARAM (Suara Rakyat Malaysia)
4. KUASA (Persatuan Aktivis Sahabat Alam)
5. Ecotourism & Conservation Society Malaysia (ECOMY)
6. Pertubuhan Pelindung Khazanah Alam
7. Gabungan Darurat Iklim Malaysia (GDIMY)
8. Alliance of River Three (ART!)
9. Bangsa Mahasiswa Universiti Kebangsaan Malaysia (BMUKM)
10. Suara Mahasiswa UMS
11. SPARC UTEM
12. Federasi Pemuda Kebangsaan (FEDERASI)
13. Re-Laut
11. MANDIRI

**INDIVIDUALS**

1. Nur Sakeenah Omar - Public Engagement Campaigner, Greenpeace Malaysia
2. Andrew J Sebastian - President, Founder & Chief Executive Officer, ECOMY
3. Qistina Qaisara - Timbalan Presiden MPP UMS