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June 2025 Published by Greenpeace Indonesia Jl. HOS. Cokroaminoto No. 19 RT 1 / RW 2 Gondangdia, Kecamatan Menteng Jakarta Pusat, Indonesia Front cover photo: Sediment visible close to nickel mining operations on Kawe Island, Raja Ampat, discolouring the water in one of Indonesia's most biodiverse marine areas (04/05/25). Kawe island is located within the UNESCO designated Geopark. © Alif R Nouddy Korua/Greenpeace

#### **Greenpeace findings by numbers**

Total number of active, cancelled or expired nickel mining licences across Raja Ampat	16
Number of these licences partially or fully within UNESCO Geopark	12
Number of these licences within conservation areas or protected forests	10
Number of active nickel mining licences across Raja Ampat	5
Number of active nickel mining licences on 'small islands' as classified by Indonesian law	4
Number of nickel mining licences in Raja Ampat reactivated or reissued during 2025	2
Number of court cases currently underway by companies to reactivate or reissue nickel mining licenses in Raja Ampat	3
Number of active nickel mining licences still subject to court action by mining ministry	1
Number of new smelters planned at Sorong, near Raja Ampat (one nickel, one steel)	2

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#### **Summary**



An aerial view of Wayag Islands, Raja Ampat, reveals a breathtaking panorama of a turquoise lagoon nestled amidst towering karst limestone formations (27/08/2024). © Sumaryanto Bronto/Greenpeace

Raja Ampat is famous for its tropical islands, waters teeming with marine life, karst formations and pristine forests. It has become a 'bucket list' destination for Indonesian tourists and for divers from around the world. National Geographic and the New York Times have included Raja Ampat on their lists of top destinations for 2025,1 whilst CNN Travel has referred to it as 'The Last Paradise on Earth'2. Domestically, Raja Ampat has been referred to as 'Indonesia's favourite leading tourist spot,'3 whilst the view from one of its most famous locations, Piaynemo, has pride of place on Indonesia's one hundred thousand rupiah note. Meanwhile, in the eyes of conservation experts, the islands of Raja Ampat and the coasts of West Papua are 'the heart of the coral triangle'4 and are considered 'the epicentre of marine biodiversity.'5

<sup>1</sup> https://www.nationalgeographic.com/travel/slideshow/best-of-the-world-2025 and https://www.nytimes.com/interactive/2025/travel/places-to-travel-destinations-2025.html

<sup>2</sup> https://edition.cnn.com/travel/article/raja-ampat-indonesia-cmd/index.html

<sup>3</sup> https://rajaampatgeopark.com/2021/12/26/piaynemo-favorit-sosmed/

<sup>4</sup> https://rajaampatgeopark.com/our-heritage/bioheritage/

<sup>5</sup> https://www.conservation.org/places/birds-head-seascape



Underwater scene at Batu Rufus, Piaynemo, Raja Ampat (29/08/2024). @ Alif R Nouddy Korua/ Greenpeace

Raja Ampat is also home for communities of Indigenous West Papuans who have lived in the region for generations. These communities live in accordance with their traditional ways that are closely connected with the marine and coastal forest ecosystems in this area. Kristian Thebu is the Chairman of the Maya Tribal Council, which represents one of the first communities to live in Raja Ampat. He has said that "the forest is our mother, whom we must take good care of, nurture, so that she continues to provide life from generation to generation. The sea we honor it as if it were our father. It provides abundant blessings for life continuously until God comes."

As Raja Ampat's popularity continues to grow, so do the threats to its future. Increasing tourism has brought major challenges due to the widespread lack of management systems for waste and sewerage. A major coral bleaching incident took place towards the end of 2024 that researchers suspect may be linked to factors including warming oceans and inadequate sewage management. The incident has heavily impacted coral reefs in Central Raja Ampat.

Now another threat has emerged, as the nickel mining industry is expanding into the region, bringing huge risks to the environment, local livelihoods and to the future of Raja Ampat as a tourism destination. Nickel mining activities risk irreversible damage to coral reefs and terrestrial habitats through deforestation, sedimentation, and pollution. Despite a Government legal challenge to its licence, nickel mining company PT Mulia Raymond Perkasa (MRP) has recently set up a base camp for operations on Batang Pele. The location is close to homestays, major tourism attractions and important diving sites in Central Raja Ampat. Four other companies also have active licences to mine for nickel in Raja Ampat.

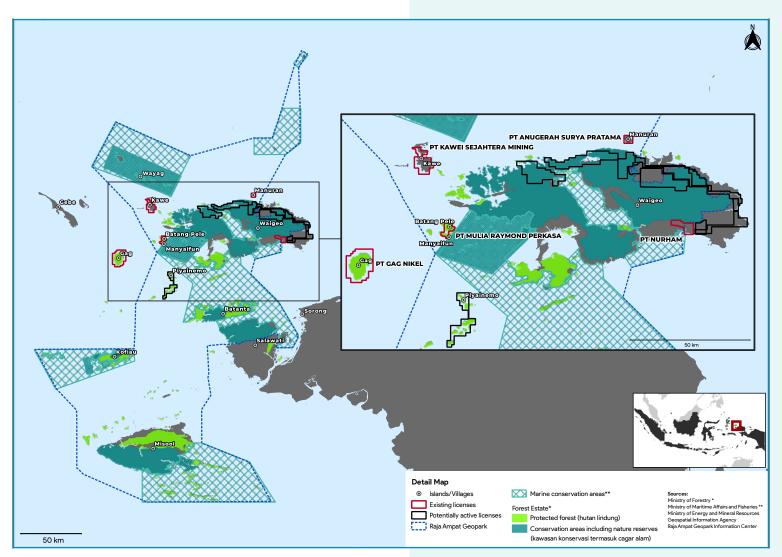
Four of the five active licences are located within the boundaries of the Raja Ampat UNESCO Global Geopark, an area that has been promoted for conservation and tourism. The impacts of mining are already visible in some locations. Forests have been destroyed and rain water runoff now carries sediment from the cleared areas. This is causing reef-smothering elevated turbidity in the sea, evident as discolouration of water near jetties and mines. Greenpeace analysis of Indonesian government and court data suggests that a further three companies are taking legal action to reinstate previously cancelled licences and that a number of other licences could also be reactivated.

<sup>6</sup> https://www.antaranews.com/berita/695009/artikel-hutan-adalah-mama-kita-laut-seperti-ayah-kita

<sup>7</sup> https://www.unesco.org/en/iggp/geoparks/raja-ampat

Using Indonesian government data Greenpeace has mapped the location of all licences in Raja Ampat and found five active licences alongside 11 previously issued and cancelled licences, making a total of 16 current and former licences across the archipelago. Of these, 12 sit within the boundaries of the Geopark. More than half are located within current or previously protected areas according to Indonesian government land classification (though it should be noted that companies can in some cases still legally access this land). Incredibly, one of Raja Ampat's most famous locations, Piaynemo, which has also become known as 'Jokowi Steps' after they were ascended by then President Joko 'Jokowi' Widodo,<sup>8</sup> is among the areas that were previously licenced for nickel mining.

Nickel ore from Raja Ampat is processed by smelters located at Indonesia Weda Bay Industrial Park (IWIP) in North Maluku. The industrial park supplies manufacturers of stainless steel and battery components for electric vehicles, among other buyers.



Map 1: All current and previously licenced areas in Raja Ampat, alongside protected areas.



📕 A Red Bird of Paradise (Paradisaea rubra) locally called Cendrawasih Merah, Raja Ampat (29/08/2024). © Jurnasyanto Sukarno/Greenpeace

# The importance of Raja Ampat

Raja Ampat is an archipelago located in the newly created Indonesian province of Southwest Papua, offshore from the island of New Guinea. It is a part of the larger territory referred to in English as West Papua. The area is renowned for its biodiversity both on land and at sea, with a huge range of marine life and terrestrial species, many of them endemic. It is particularly famous for species such as manta rays, sharks and turtles being present in large numbers and is often referred to as 'the crown jewels' or 'the heart of the coral triangle',9 a broader geographic area that is home to 75% of the world's coral species and about 2,500 fish species.<sup>10</sup> Meanwhile on land, according to the Raja Ampat Geopark website, there are 47 species of mammals, of which 1 is endemic (the Waigeo spotted cuscus), and 274 bird species, 6 of which are endemic.11

<sup>9</sup> See for example https://kkprajaampat.com/en/ and https://www.soulscubadivers.com/post/raja-ampat-s-coral-symphony-exploring-the-heart-of-the-coral-triangle

 $<sup>10 \</sup>quad \text{http://oceanexplorer.noaa.gov/okeanos/explorations/10} index/background/biodiversity/biodiversity.html \\$ 

<sup>11</sup> https://rajaampatgeopark.com/our-heritage/bioheritage/

The importance of Raja Ampat's biodiversity has been recognised by the Indonesian government, which has sought international recognition for the area. Large parts of the Raja Ampat archipelago were designated as a UNESCO Global Geopark in 2023. 12 Global Geoparks are 'sites and landscapes of international geological significance [that] are managed with a holistic concept of protection, education and sustainable development'. 13 During 2024 Indonesian media reported that authorities were also in the process of applying for UNESCO World Heritage status for Raja Ampat. 14

Large parts of the area both on land and at sea are also covered by at least some level of national government protection. According to the Raja Ampat Geopark website, "66% of Raja Ampat's terrestrial area is a Nature Reserve ... with 7 land conservation areas covering an area of 399,564 hectares" whilst at sea "5 Regional Water Conservation Areas or KKPDs cover an area of 1,125,940 hectares" and there are "2 National Water Conservation Areas or KKPN covering an area of 185,000 hectares." 15



An underwater scene in Raja Ampat (22/05/2013).
© Paul Hilton/Greenpeace

<sup>12</sup> https://www.unesco.org/en/iggp/geoparks/raja-ampat

<sup>13</sup> https://www.unesco.org/en/iggp/geoparks/about?hub=67817

<sup>14</sup> https://en.antaranews.com/news/327375/indonesia-eyes-unesco-biosphere-reserve-status-for-raja-ampat

<sup>15</sup> https://rajaampatgeopark.com/our-heritage/bioheritage/

These conservation designations have followed years of effort and intensive collaboration between various local, regional, national and international stakeholders and have led to claims that Raja Ampat is a rare example of a conservation success story.16 The aim has been to combine large-scale protection alongside locally based and small-scale homestay-based sustainable tourism designed to bring benefits directly to local communities.17

The archipelago has also been repeatedly promoted by the Indonesian government as a tourism destination, including through visits by former President Joko Widodo and its inclusion in international tourism campaigns.18



A swimmer explores the waters surrounding Kawe Island, West Waigeo District, Raja Ampat (04/05/25). © Nita/Greenpeace

<sup>16</sup> See for example https://www.conservation.org/places/birds-head-seascape

https://www.stayrajaampat.com/about-stay-raja-ampat/
See for example https://www.instagram.com/wonderfulindonesia/p/DFCt1WBzduK/?hl=en&img\_index=1 and https://www.liputan6.com/ news/read/5712265/jejak-jokowi-saat-menjelajahi-puncak-raja-ampat?page=1

## **Tourism numbers and impact**

In 2024, a total of 33,247 people visited Raja Ampat, according to the local statistics agency, an increase of nearly 68% compared to the previous year. <sup>19</sup> In addition to this surge in tourism there has also been a steady growth in the local population. <sup>20</sup>

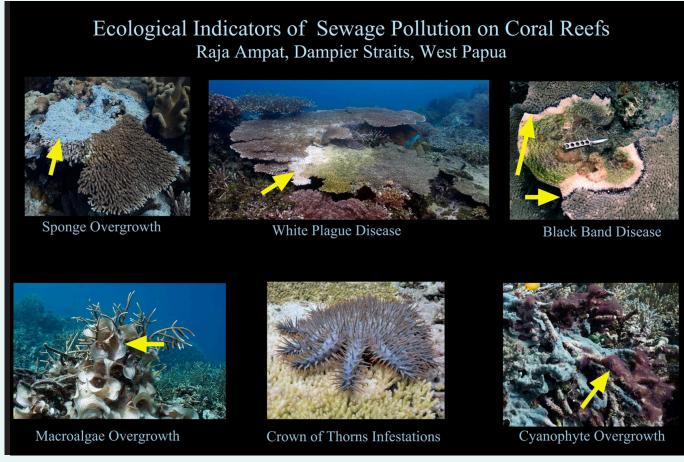


<sup>19</sup> https://www.instagram.com/bpsrajaampat/p/DFuITSgTBfe/?img\_index=3

<sup>20</sup> https://databoks.katadata.co.id/demografi/statistik/8710d9d3aa0c407/data-2024-jumlah-penduduk-kabupaten-raja-ampat-70-810-jiwa

The Indonesian Ministry of Tourism has recently indicated that it wants to further promote the archipelago to attract more overseas visitors, taking advantage of the increasing global recognition for Raja Ampat.<sup>21</sup> But although locally based ecotourism offers considerable potential to protect natural resources and to provide an economic benefit to local communities, care needs to be taken to prevent potential negative impacts on biodiversity and traditional livelihoods. In a remote region with no infrastructure to manage sewage or waste,<sup>22</sup> there is growing evidence that a rapidly increasing population is resulting in damage being

caused to corals and the marine ecosystem around Raja Ampat. Increasing amounts of plastic waste, untreated sewage and residues from washing and cleaning products end up in the sea, whether from liveaboard diving vessels, resorts, homestays or the local population across the archipelago. Scientists studying the area have expressed alarm at the increasingly apparent ecological impacts of sewage pollution on coral reefs in central Raja Ampat – including blooms of toxic cyanobacteria - and by a severe coral bleaching event that hit that area towards the end of 2024.



Slide from presentation by Biology Professor P D about impacts of sewage pollution in Raja Ampat (2024).

While local businesses, conservationists and tourism organisations in the area advocate for changes to improve waste and sewage management, another threat has emerged, one that has the potential to destroy biodiversity, traditional livelihoods and tourism in the area.

<sup>21</sup> https://en.antaranews.com/news/342018/indonesia-aims-to-attract-more-foreign-tourist-arrivals-to-raja-ampat

<sup>22</sup> https://www.stayrajaampat.com/ultimate-raja-ampat-guide/news/don-t-rubbish-raja-ampat/

<sup>23</sup> https://oceanographicmagazine.com/features/cyanobacteria-in-raja-ampat/

<sup>24</sup> ibid

<sup>25</sup> https://theseapeople.org/2024/12/18/coral-bleaching-raja-ampat/

# **Growth and impacts of nickel mining across Indonesia**

Raja Ampat has seen some limited nickel mining in past years, but increasing global demand for critical minerals has enticed a rush of new investors to enter Indonesia's nickel industry. This has driven a rapid expansion of nickel mining and processing across Eastern Indonesia, <sup>26</sup> including a push for new mining operations in Raja Ampat.



Nickel Mining on Kawe Island, Raja Ampat, (26/02/25). © Greenpeace

<sup>26</sup> See for example https://www.aseanbriefing.com/news/indonesias-nickel-downstreaming-policy-opportunities-and-challenges-for-investors/ and https://www.ft.com/content/0bbbe7c7-12a1-43ba-8bef-c5c546367a0e?utm

Indonesia holds the world's largest nickel reserves – estimated at approximately 55 million tons – and has become the world's largest nickel producer, accounting for 61% of the global nickel supply.<sup>27</sup> A ban on the export of nickel ore, instigated by former President Jokowi,<sup>28</sup> triggered a flood of investment in the domestic nickel processing industry, particularly from Chinese companies.<sup>29</sup> The processing industry focuses around two major refining locations, Morowali in Sulawesi and Weda Bay in Halmahera, North Maluku. Most nickel mining also takes place in Sulawesi and North Maluku,<sup>30</sup> but mining licences have spread across a wider area of Eastern Indonesia, especially Raja Ampat.

The Indonesian nickel industry has an extremely poor reputation, due to its impact on the environment and local community livelihoods, and because of poor health and safety standards and perceived lack of respect for workers' rights. 31,32

Its most visible environmental impact is on the tropical forests that sit atop nickel reserves – in recent years the nickel industry has become a major driver of deforestation. Turthermore the nickel industry has developed significant climate impacts, through construction of new 'captive' coal-fired power stations to meet the high energy demands of smelter complexes. According to a report by the Centre for Research on Energy and Clean Air and Global Energy Monitor, there were 117 captive coal-fired power plants operating in Indonesia in 2023, with a total capacity of 10.8GW. About three-quarters (8.2 GW) of this is dedicated to the metal industry, the vast majority of that being for the nickel industry.

<sup>27</sup> https://www.ft.com/content/0bbbe7c7-12a1-43ba-8bef-c5c546367a0e?utm

<sup>28</sup> https://www.nortonrosefulbright.com/en-gb/knowledge/publications/b571b094/indonesia-amends-regulation-on-nickel-export-to-boost-production-of-value-added-products

<sup>29</sup> See for example https://www.ft.com/content/0bbbe7c7-12a1-43ba-8bef-c5c546367a0e and https://www.bloomberg.com/news/articles/2022-12-15/chinese-companies-are-flocking-to-indonesia-for-its-nickel

<sup>30</sup> See for example https://www.mining-technology.com/marketdata/five-largest-nickel-mines-indonesia/

<sup>31</sup> See for example https://www.cell.com/one-earth/fulltext/S2590-3322(24)00534-7 and https://asiatimes.com/2024/09/indonesia-blood-nickel-risks-too-grave-to-ignore/#

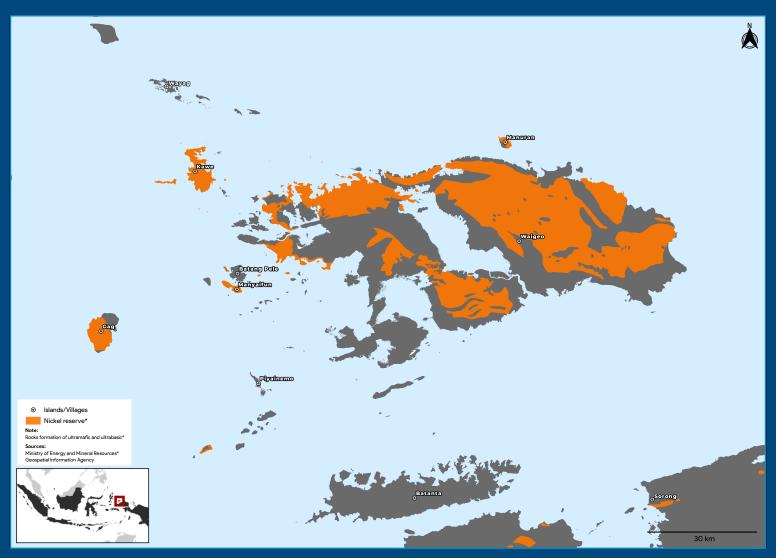
<sup>32</sup> https://www.business-humanrights.org/en/latest-news/commentary-recurring-nickel-smelter-explosions-in-indonesia-expose-flaws-in-govts-downstreaming-policy-that-prioritizes-economic-gain-over-workers-rights-safety/

<sup>33</sup> https://news.mongabay.com/2025/02/surge-in-legal-land-clearing-pushes-up-indonesia-deforestation-rate-in-2024/

<sup>34</sup> https://globalenergymonitor.org/press-release/metal-needed-for-the-renewable-energy-transition-is-processed-using-coal-power-and-indonesia-must-commit-to-a-new-path-forward/

<sup>35</sup> Page 5, Emerging Captive Coal Power: Dark Clouds on Indonesia's Clean Energy Horizon https://globalenergymonitor.org/wp-content/uploads/2023/09/CREA\_GEM\_Indonesia-Captive\_2023.pdf

## **Active nickel mining in Raja Ampat**



Map 2: Estimated Nickel Reserves across Raja Ampat.

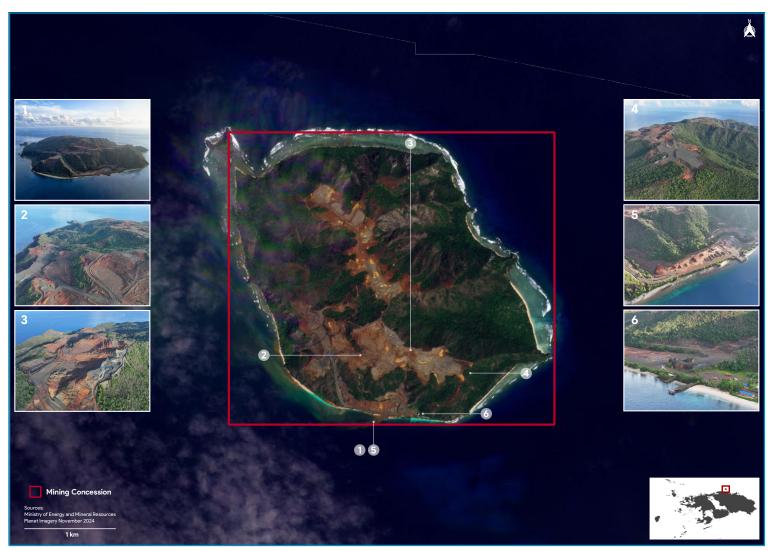
In common with several other areas in Eastern Indonesia, significant reserves of nickel have been identified in Raja Ampat, with distribution across a number of its islands including Kawe, Gag, Manuran, Batang Pele, Manyaifun, Nawan and Waigeo.<sup>36</sup>

There are now five active nickel mining licences in Raja Ampat, discussed below:



Evidence of Nickel mining on Gag Island, Raja Ampat (29/08/24). © Greenpeace

#### **Manuran Island**



Map 3. Manuran Island.

Manuran			
	Size of Island (ha)	751.07	
	Concession size (ha)	1,173	
- 200-	Deforestation to date (ha)	15637	
0	Classified as a Small Island by Indonesian government?	Yes	
	Within UNESCO Global Geopark boundaries?	Yes	
	Located within conservation area or protected forest?	No	
	Company Name	PT Anugerah Surya Pratama	
	Date mining started	Late 2006	
	Is mining currently taking place?	Unclear. There was activity on the site during 2024 and 2025 including construction of new buildings and presence of excavators.	

The longest-established nickel mine in Raja Ampat is located on Manuran Island, north of Waigeo, within the boundaries of the UNESCO Global Geopark. The concession holder is PT Anugerah Surya Pratama.

Based on data from company profiles, 60% of PT Anugerah Surya Pratama shares are owned by PT Wanxiang Nickel Indonesia, and the remaining 40% is owned by PT Anugerah Surya Mining.<sup>38</sup>

Mining started on the island as far back as 2006 but stopped again around 2014. After being mothballed for many years 2024 brought renewed signs of activity in the concession, which continued into the first half of 2025. The activity included repairs to roads and accommodation, although reports from local residents suggest that actual mining has not yet restarted.<sup>39</sup> On the 5th June 2025 Indonesian news outlet Tempo reported that the environment ministry has taken action to stop activity and has also taken action to suspend other mining in Raja Ampat.<sup>40</sup>

Mining on Manuran has previously triggered local community protests. <sup>41</sup> One local resident reportedly told *The Sydney Morning Herald* during a 2011 investigation that "the mining waste damaged the coastal areas and covered up the coral reefs." <sup>42</sup>

Analysis of satellite images of the area from 2024 by Greenpeace has identified a visible plume of runoffinduced turbidity in the seas around Manuran following rainfall.<sup>43</sup>

<sup>38</sup> Ownership data from company registry profiles analysed by Greenpeace from October 2024 - April 2025

<sup>39</sup> Greenpeace researchers spoke to local community members in May 2025.

<sup>40</sup> https://www.tempo.co/lingkungan/breaking-news-klh-segel-4-tambang-nikel-di-raja-ampat-1653175

<sup>41</sup> https://awasmifee.potager.org/index.html@p=463&lang=en

<sup>42</sup> https://www.smh.com.au/environment/sea-of-trouble-20110701-1gv49.html

<sup>43</sup> Planetscope scene from November 30th 2024 (Planet)

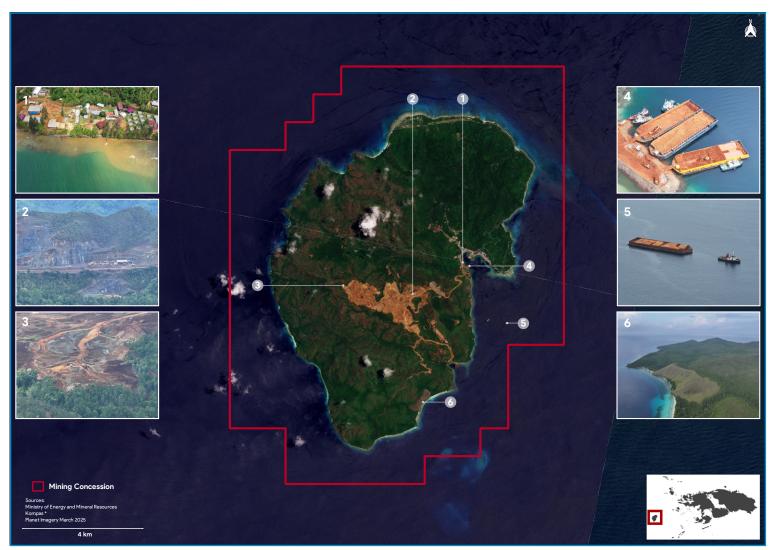


Planet Scope satellite image showing signs of rain water run off carrying sediment close to the former mining areas on Manuran Island, Raja Ampat (30/11/24).



Signs of previous mining on Manuran Island, Raja Ampat (27/08/24). © Sumaryanto Bronto/Greenpeace

#### **Gag Island**



Map 4. Gag island.

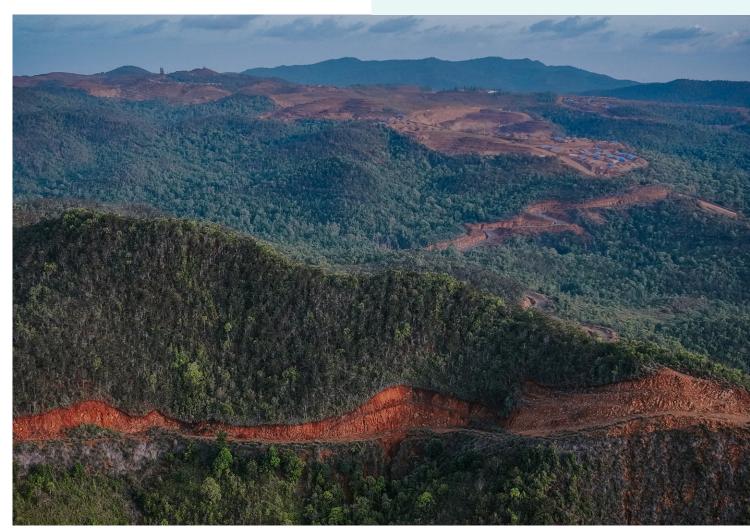
Gag		
	Size of Island (ha)	6,040
	Concession size (ha)	13,12644
-3/6-	Deforestation to date (ha)	30945
0	Classified as a Small Island?	Yes
	Within UNESCO Global Geopark boundaries?	No
	Located within conservation area or protected forest?	Yes, protected forest area (hutan lindung)
	Company Name	PT Gag Nickel
	Group Name	PT Aneka Tambang
	Date mining started	Late 2017
	Is mining currently taking place?	Yes

The licenced area is larger than the island.
 See 'Note on methodology' for full details of data sources and analysis undertaken. In a letter to Greenpeace dated 10th June PT Gag stated that from 2017 until May 2025 it had cleared 276.5 hectares of land and had also reclaimed 136.72 hectares after mining.

The second nickel mine to start operations in Raja Ampat is located on Gag Island. The mining concession was formerly owned by BHP Billiton, which pulled out in 2008 before having developed a mine, following campaigns against the project.<sup>46</sup> The current concession holder, PT Gag Nikel, is a subsidiary of PT Aneka Tambang Tbk (PT Antam), a company established by the Indonesian government. Publicly traded on both the Indonesian and Australian stock exchanges, the majority shareholder in PT Antam is the Government of Indonesia through PT Mineral Industri Indonesia (MIND ID), which is in turn 99% owned by Indonesia's newly established sovereign wealth fund Danantara. 47 Around 35% of PT Antam is publicly owned,48 with minority shareholders including the Norwegian Government Pension Fund.49

Gag Island sits outside of the UNESCO Global Geopark boundaries. The company claims to be in compliance with all relevant regulations and has recently highlighted its replanting efforts in areas previously mined, alongside its support for a turtle conservation project on the island.<sup>50</sup>

During a visit in May 2025, a Greenpeace team observed moored barges and tugboats, excavators, and a number of trucks going back and forth on winding hilly roads. While the island appeared green at first glance from sea level near the dock owned by PT Gag Nikel, drone footage from above clearly revealed the loss of forests.



Evidence of Nickel mining on Gag Island, Raja Ampat (May 2025). © Greenpeace

<sup>46</sup> https://www.downtoearth-indonesia.org/story/bhp-billiton-pulls-out-gag-nickel-project-west-papua

<sup>47</sup> AHU profile from April 2025, MIND ID is owned by PT Biro Klasifikasi Indonesia which is in turn 99% owned by Badan Pengelola Investasi Daya Anagata Nusantara (Danantara)

<sup>48</sup> https://antam.com/en/stock-information/ownership-structure-i

<sup>49</sup> https://www.nbim.no/en/investments/all-investments/#/2024/investments/equities/2469/Aneka%20Tambang%20Tbk

<sup>50</sup> See for example https://jubi.id/lingkungan/2025/pt-gag-nikel-klarifikasi-tuduhan-merusak-lingkungan-di-raja-ampat/. These issues were also raised by PT Gag in a letter to Greenpeace dated 10th June 2025.

Greenpeace mapping analysis indicates that since nickel mining began on the island there has been 309 hectares of deforestation to date. A 2022 Kompas article reported on residents' concerns that nickel mining was also having impacts on water quality and fish numbers in the area. "When it rains, the seawater turns red," reported one resident interviewed.<sup>51</sup>

Following increasing media attention on the issue of nickel mining in Raja Ampat, the mining minister Bahlil Lahadalia announced on June 5th 2025 that he had ordered PT Gag Nikel's mining operations to be temporarily suspended pending field checks.<sup>52</sup> He then made a short visit to Gag island on 7th June before announcing that his team had found no problems and saw no evidence of sedimentation in the water near operations.<sup>53</sup> Separately, Minister of Environment and Forestry Hanif Faisol also announced the suspension of operations of PT Gag Nikel and other active concessions in Raja Ampat and also suggested that licences might be cancelled.54 However, three days later he then said that although he was yet to make a field check himself, that "the level of pollution (in Raja Ampat) that is visible to the naked eye is not very serious."55

A coastal area on Gag island where discoloured seawater is clearly visible (06/06/21). © Kompas/ Ferganata Indra Riatmoko



<sup>51</sup> https://www.kompas.id/baca/english/2022/02/26/the-irony-of-mining-in-coral-reef-paradise. PT Gag in a letter to Greenpeace dated 10th June 2025 stated that it had constructed sedimentation ponds and a wastewater treatment plant and that its effluent emissions were within applicable water quality standards.

<sup>52</sup> https://www.cnbcindonesia.com/news/20250605151118-4-638905/pengumuman-tambang-nikel-di-raja-ampat-dihentikan-sementara

<sup>53</sup> https://www.dunia-energi.com/kunjungi-pulau-gag-raja-ampat-bahlil-dan-jajarannya-sebut-tidak-temukan-masalah-kegiatan-tambang-pt-gag-nikel/

<sup>54</sup> https://www.tempo.co/lingkungan/breaking-news-klh-segel-4-tambang-nikel-di-raja-ampat-1653175

<sup>55</sup> https://www.cnnindonesia.com/nasional/20250608144232-20-1237649/menteri-lh-klaim-pencemaran-tambang-di-raja-ampat-takterlalu-serius



Almost full loss of acropora reef scape close to Gag Island, Raja Ampat (12/04/25). © Wendy Mitchell/Greenpeace

#### **Politically Exposed Persons**

PT Gag Nikel's parent company, PT Antam, is one of a number of state-owned companies owned by a holding company, MIND ID, which is in turn 99% owned by Danantara.<sup>56</sup>

The Principal Commissioner of MIND ID is Fuad Bawazier, who was appointed to MIND ID in June 2024 after playing a prominent role during the Prabowo-Gibran presidential election campaign as Chair of the Expert Council of the national campaign team. <sup>57</sup> Grace Natalie Louisa, also a member of the Prabowo Gibran election campaign team, was likewise appointed to MIND ID as a commissioner. <sup>58</sup> Grace co-founded the

Indonesian Solidarity Party (PSI),<sup>59</sup> which is a member of the Prabowo government coalition.<sup>60</sup> MIND ID commissioners reportedly receive stipends worth billions of rupiah a year.<sup>61</sup>

Among the commissioners of PT Gag Nikel is Ahmad Fahrur Rozi, one of the current leaders of Nahdlatul Ulama, Indonesia's largest Muslim organisation. <sup>62</sup> Bambang Sunarwibowo, a retired police general and former principal secretary of the Indonesian Intelligence agency, BIN, is also a commissioner of PT Antam. <sup>63</sup>

<sup>56</sup> AHU profile from April 2025, MIND ID is owned by PT Biro Klasifikasi Indonesia which is in turn 99% owned by Badan Pengelola Investasi Daya Anagata Nusantara (DANANTARA)

<sup>57</sup> https://www.antaranews.com/berita/4146888/mind-id-tunjuk-fuad-bawazier-jadi-komut-grace-natalie-jadi-komisaris

<sup>58</sup> https://indonesiabusinesspost.com/2131/Politics/corporate-commissioner-posts-for-prabowo-gibran-election-winning-team-members 59 ibid

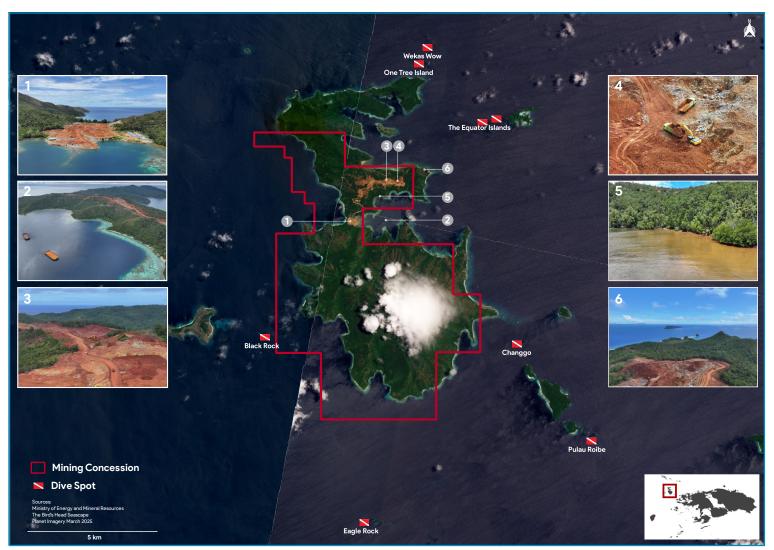
<sup>60</sup> https://www.thejakartapost.com/opinion/2024/10/28/analysis-prabowos-cabinet-too-big-to-fail.html

<sup>61</sup> https://www.kompas.id/baca/english/2024/06/13/en-intip-gaji-komisaris-ptpn-dan-mine-id-setahun-kantongi-miliaran-rupiah

<sup>62</sup> Information from AHU profiles held by Greenpeace (2024 and 2025) available on request. Role at PNBU: https://www.nu.or.id/nasional/susunan-lengkap-kepengurusan-pbnu-2022-2027-NnLZc

<sup>63</sup> https://go.kompas.com/read/2020/06/12/085522174/state-owned-enterprises-minister-appoints-intelligence-official-to-pt-antam-board

#### **Kawe Island**



Map 5. Kawe Island.

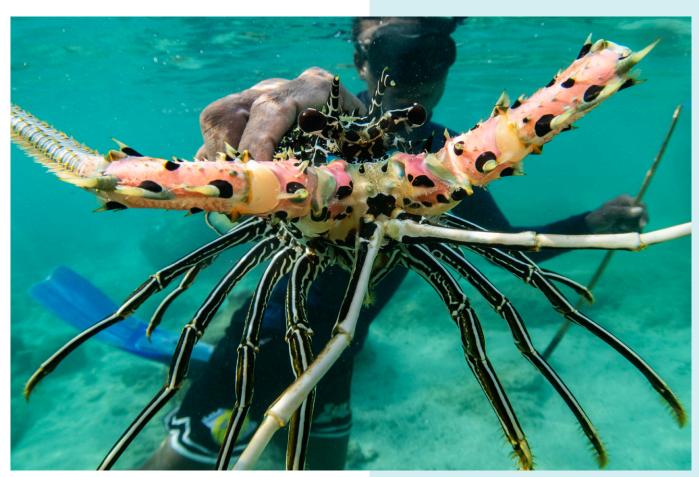
Kawe			
	Size of Island (ha)	4,561	
	Concession size (ha)	5,922 <sup>64</sup>	
- 200-	Deforestation to date (ha)	8565	
0	Classified as a Small Island?	Yes	
	Within UNESCO Global Geopark boundaries?	Yes	
	Located within conservation area or protected forest?	No	
	Company Name	PT Kawei Sejahtera Mining	
===	Date mining started	Commercial mining started in 2008 but stopped shortly afterwards. It restarted in 2023	
	Is mining currently taking place?	Yes	

<sup>The licenced area is larger than the island
See 'Note on methodology' for full details of data sources and analysis undertaken.</sup> 

The third company to begin mining in Raja Ampat, PT Kawei Sejahtera Mining (PT KSM), operates on the island of Kawe.

Mining on Kawe Island restarted in 2023, following earlier mining activity between 2008-2009. 66 The mining has led to conflicts within the local community, some of whom have found employment opportunities while others have struggled to maintain their traditional livelihoods. 67 In February and May 2025 Greenpeace staff met with a number of community members who reported that it was becoming more difficult to fish due to restricted access to a dock used by the nickel company and due to increased ocean sedimentation that they said was caused by mine activities.

Catching lobsters through traditional freediving (*molo*) is one livelihood activity that has reportedly been disrupted by increased sedimentation from mining. "When it rains like that, the waste comes down, the sea is all murky. If the waste goes down in the sea, what kind of catch are we going to get?" said M, a Kawe woman in Salio Village. During their visit in May, the Greenpeace team observed that seawater on the northeastern side of the island close to the shore was brown with turbid sediment. At least six excavators were visible – some of them in operation, digging up soil. The area visited was not far from Black Rock, one of Raja Ampat's famous dive sites.



Y, a resident of Salio, displays a lobster he caught (03/05/25).

© Nita/Greenpeace

<sup>66</sup> Greenpeace mapping analysis indicating deforestation taking place over this time period based on Landsat satellite imagery and the Nusantara Atlas. https://nusantara-atlas.org/

<sup>67</sup> Earlier conflicts reported by Indonesian media, see for example https://www.tempo.co/ekonomi/konflik-nikel-tanah-kawei-940109?in=1&n\_token=eyJ0eXAiOiJKV1QiLCJhbGciOiJIUzI1NiJ9.eyJ0b2tlbiI6ImE2OGYxYTMwMTIzNjFmY2VlYzhhMDI0ZjA5MDcwMTdlIn0. WHXVjxZS4FaBuKEDccaPvSHXqTeK5dhW\_R8E\_6buyEE. Ongoing conflicts also reported by Greenpeace teams in February and May 2025.

Kawe Island is well known for its rich marine biodiversity and a number of popular Raja Ampat dive sites, including 'Black Rock' and 'Equator'. A prominent Raja Ampat dive boat operator describes Kawe Island as "one of Raja Ampat's true gems... the absence of boats, land based resorts and homestays only adds to the serenity of these equatorial (literally) islands." 68



Nickel Mining on Kawe Island, Raja Ampat. In the background close to the smaller island is Equator Dive site (26/02/25). © Greenpeace

A five-year manta ray research study published in 2023 confirms the importance of Eagle Rock, an area close to mining operations in Kawe as "a crucial hub in the movement network of Raja Ampat's reef manta rays."<sup>69</sup>
A 2024 blog by Konservasi Indonesia/Conservation International highlighted the study and the importance of Eagle Rock to manta rays in the area. "We've long observed mantas feeding and cleaning at Eagle Rock, but we had no idea how important it was to them," said Mark Erdmann, a Conservation International marine biologist and study co-author. "We're very concerned about the

potential for nickel mining near Eagle Rock for two main reasons," Erdmann said. "Kawe is a mountainous island with steep terrain, and it rains a lot. If [mining companies] start open-pit mining on Kawe, every rain will produce muddy run-off that will flow straight into the ocean. And that will be disastrous for manta rays." He added "If Eagle Rock ceases to function as a primary spot for feeding and cleaning, it's likely to dramatically alter manta movement patterns in northern Raja Ampat, which could lead to declines in the health of the manta population."<sup>70</sup>

<sup>68</sup> https://www.mermaid-liveaboards.com/kawe/

<sup>69</sup> https://www.conservation.org/press-releases/2024/04/09/new-research-in-raja-ampat-reveals-vital-insights-into-protecting-vulnerable-reef-manta-rays

<sup>70</sup> https://www.conservation.org/blog/study-mining-could-disrupt-manta-superhighway



The Indonesian news outlet Tempo reported on 5th June 2025 that the environment ministry had suspended mining on Kawe, alongside other active mining operations in Raja Ampat.<sup>71</sup>

Manta Rays in Raja Ampat (12/01/20). © Paul Hilton/Greenpeace

#### **Politically Exposed Persons**

The CEO of PT Kawei Sejahtera Mining is Freddy Numberi, a former government minister under President Susilo Bambang Yudhoyono, who served as Minister for Maritime Affairs and also as Minister for Transportation. He also served as Governor of Papua Province from 1998 to 2000. The is a suspected associate of the Agung Sedayu group via PT Inti Agung Makmur, which has been reported by Indonesian media as holding the building rights certificates (HGB) linked to a highly controversial 30km sea barrier that was constructed close to the coast of Tangerang during 2024.

Nono Sampono, a retired Lieutenant General from the Indonesian navy and another suspected associate of the Agung Sedayu group,<sup>74</sup> is also present in the complex corporate ownership structure behind PT KSM. He is the President Director of PT Jaya Bangun Makmur, which owns 30% of PT KSM.<sup>75</sup> His name has also been linked to the Tangerang sea fence controversy by Indonesian media reporting.<sup>76</sup> He previously served as Deputy Chairman of the Regional Representative Council of the Republic of Indonesia from the Maluku Province delegation for the 2019-2024 period.

<sup>71</sup> https://www.tempo.co/lingkungan/breaking-news-klh-segel-4-tambang-nikel-di-raja-ampat-1653175

<sup>72</sup> https://id.wikipedia.org/wiki/Freddy\_Numberi

<sup>73</sup> His link to these companies and their link the Tangerang sea fence case has been widely reported in Indonesian media, see for example https://www.democrazy.id/2025/01/terkuak-kasus-pagar-laut-mantan-menteri.html and https://www.tempo.co/hukum/sosok-nono-sampono-dan-freddy-numberi-yang-diduga-miliki-sertifikat-hgb-pagar-laut-tangerang-1198509. Agung Sedayu group denied ownership of the sea fence - see for example:

https://ekonomi.bisnis.com/read/20250123/47/1834304/terkuak-pt-intan-agung-makmur-pemilik-shgb-di-pagar-laut-terafiliasi-aguan https://www.agungsedayu.com/en

<sup>75</sup> Information from AHU profiles held by Greenpeace and available on request.

<sup>76</sup> Identified as a Director of PT Cahaya Inti Sentosa, a company that owned building certificates in the case. https://www.tempo.co/hukum/sosok-nono-sampono-dan-freddy-numberi-yang-diduga-miliki-sertifikat-hgb-pagar-laut-tangerang-1198509. Agung Sedayu group denied ownership of the sea rence - see for example https://ekonomi.bisnis.com/read/20250123/47/1834304/terkuak-pt-intan-agung-makmur-pemilik-shgb-di-pagar-laut-terafiliasi-aguan

PT Jaya Bangun Makmur is in turn owned, via layers of other companies, by Sugianto Kusuma (Aguan) and 5 other members of his family.<sup>77</sup> Aguan is best known as the owner of the Agung Sedayu Group, one of the largest property developers in Indonesia. The group was also caught up in the controversy around the Tangerang Sea Fence controversy, through reporting by Indonesian media outlets in early 2025.<sup>78</sup>

In addition to the above, 40% of shares in PT KSM are owned by PT Dua Delapan Kawei, and a further 10% are owned by PT Rowan Sukses Investama. Arif Kurniawan is a director of both these companies. Arif Kurnawan has been approached as a witness by the Corruption Eradication Commission in an ongoing case related to corruption in the nickel mining sector in South East Sulawesi, where a former regent is suspected of receiving bribes in relation to the allocation of nickel licences.<sup>79</sup>



Sediment is clearly visible close to nickel mining operations on Kawe Island, Raja Ampat, discolouring the water in one of Indonesia's most biodiverse marine areas (04/05/25). © Alif R Nouddy Korua/Greenpeace

<sup>77</sup> Information obtained by Greenpeace from AHU profiles. More details available on request. The other family members are Susanto Kusumo (brother of Aguan), Steven Kusumo (nephew of Aguan/Susanto Kusumo's son), Alexander Halim Kusuma (son of Aguan), Richard Halim Kusuma (son of Aguan) and Luvena Katherine Halim (daughter of Aguan). The family connections to PT Jaya Bangun Makmur are via ownership of the following companies: PT Cahaya Bintang Sejahtera, PT Catur Kusuma Abadi Sejahtera, PT Alam Pusaka Jaya, PT Agung Sedayu and PT Sumber Kencana Graha

<sup>78</sup> See for example https://indonesiasentinel.com/5-key-figures-behind-illegal-sea-fence-tangerang-revealed/ Agung Sedayu group denied ownership of the sea fence - see for example: https://ekonomi.bisnis.com/read/20250123/47/1834304/terkuak-pt-intan-agung-makmur-pemilik-shgb-di-pagar-laut-terafiliasi-aguan

<sup>79</sup> https://www.antaranews.com/berita/1405526/kpk-panggil-satu-saksi-kasus-izin-pertambangan-konawe-utara

#### **Manyaifun and Batang Pele Islands**



Map 6. Manyaifun and Batang Pele Island.

Manyaifun and Batang Pele				
	Size of Islands (ha)	1,373		
	Concession size (ha)	2,19380		
- 200-	Deforestation to date (ha)	0		
0	Classified as Small Islands?	Yes		
	Within UNESCO Global Geopark boundaries?	Yes		
	Located within conservation area or protected forest?	Yes, protected forest area (hutan lindung)		
	Company Name	PT Mulia Raymond Perkasa		
	Is mining currently taking place?	No, but a base camp was established in March 2025.		



Diverse reef structure adjacent to Batang Pele (11/04/25). © Wendy Mitchell/Greenpeace

When a Greenpeace team visited Batang Pele Island in May 2025, they observed blue tents pitched among dense trees, and using a drone camera, a number of people could be seen seemingly guarding the area. In the middle of the camp, a pile of goods covered with tarpaulins were visible. The materials and people appeared to be there in preparation for nickel mining.



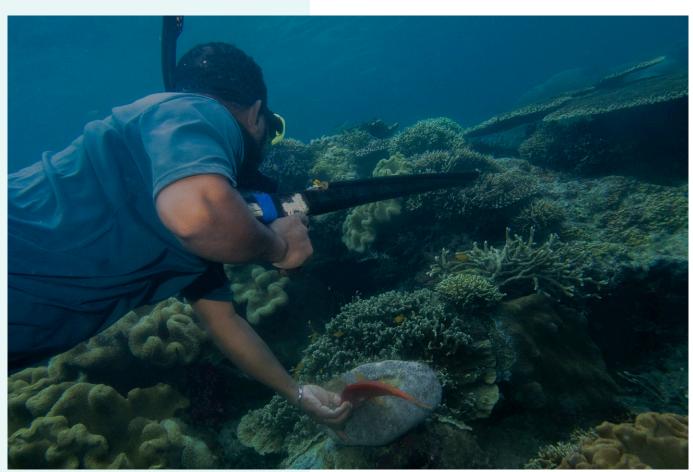
Drone footage shows suspected mining company activity on Batang Pele Island. Batang Pele is a tourism destination in Central Raja Ampat (06/05/2025). © Alif R Nouddy Korua/ Greenpeace

A mining licence covering most of both islands has been issued to PT Mulia Raymond Perkasa (MRP). In March 2025 local residents reported that the company had established a base camp and started to liaise with them about its mining plans, despite the fact that the licence is still subject to a legal process in Jakarta. According to Greenpeace mapping analysis, the exploration preparations appear to be located in an area that is classified as protected (Hutan Lindung) by the forests ministry. Until now PT MRP does not appear to have acquired a Forest Area Utilization Permit (PPKH) for the area.<sup>81</sup>

A now-expired mining licence over this area was previously held by PT Harita Multi Karya Mineral. It is not yet clear if the new licence-holder, PT MRP, is related to the Harita group. PT MRP sued the Ministry of Energy and Mineral Resources (hereafter the 'mining ministry') in relation to its licence and won at the Jakarta State Administrative Court (PTUN), the Court of Appeal, and the Supreme Court. Et mining ministry has now filed for a judicial review at the Supreme Court, and a decision on whether to grant a review was pending at the time of writing. Es

These two islands are located in a part of Raja Ampat that is popular with tourists. As well as a village in the vicinity of the concession area, Greenpeace has identified seven tourism homestays in the area close to the concession boundaries of PT MRP.<sup>84</sup>

A homestay owner spearfishing around Batang Pele Island, Raja Ampat (05/05/25). © Nita/Greenpeace



<sup>81</sup> Source: Ministry of Environment and Forestry, Jan 2025. 'Persetujuan Penggunaan Kawasan Hutan' https://geoportal.menlhk.go.id/server/rest/services/jbcdsabhx/PPKH\_AR\_50K/MapServer Last accessed in May 2025. MRP still does not have PPKH.

<sup>82</sup> See https://sipp.ptun-jakarta.go.id/case number 305/G/TF/2023/PTUN.JKT

<sup>83</sup> According to PTUN Jakarta records, the Director General of Mineral and Coal, Ministry of Energy and Mineral Resources filed a judicial review at the Supreme Court On March 4, 2025 with case number 305/G/TF/2023/PTUN.JKT

<sup>84</sup> Greenpeace mapping analysis

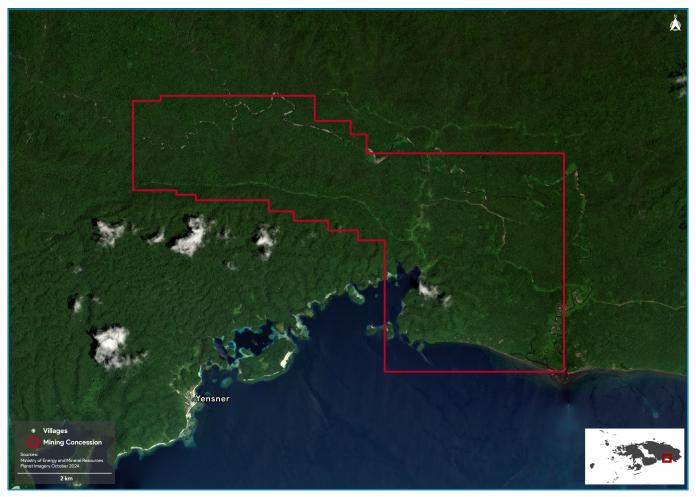
Members of the local community are actively campaigning against the arrival of PT MRP on the island. See Members of the Manyaifun Island community travel to nearby Batang Pele Island to gather sago, catch lobsters and fish, and to gather materials to build their small scale houses and homestays back on Manyaifun. In early May 2025, a Greenpeace team met with homestay owner L, who fishes for foreign guests who stay at his homestay. He employs freediving and spearfishing techniques, traditional methods that are considered environmentally friendly. "Nature provides

food, water, and oxygen. When there is a mine on Batang Pele, it will be very threatening, especially since I have a homestay business," he said. Another homestay owner, B, said that he believes that mining companies will not bring prosperity to the community, but instead make them suffer. "Community homestay owners protect the forests and coral reefs around Manyaifun and Batang Pele. We are very lucky because we have this nature from our ancestors. Our parents protect nature for us and we want to protect it for future generations."



Fringing reef and sea grasses at Manyaifun (11/04/25). © Wendy Mitchell/Greenpeace

#### Waigeo Island (PT Nurham)



Map 7. Part of Waigeo Island, with the concession boundary of PT Nurham.

Waigeo - PT Nurham			
	Size of Concession (ha)	3,000	
-300-	Deforestation to date (ha)	0	
0	Classified as a Small Island?	No	
	Within UNESCO Global Geopark boundaries?	Yes, half of the concession is located within Geopark boundaries	
	Located within conservation area or protected forest?	No	
00	Company Name	PT Nurham	
	Is mining currently taking place?	No.	

During the first quarter of 2025, a fifth mining licence became valid within Raja Ampat, on the island of Waigeo. PT Nurham had its licence reinstated following successful legal action in Jakarta against an earlier decision by the mining ministry to cancel it. The company won its administrative appeal case up to the level of the Supreme Court,<sup>86</sup> and there is no sign of a judicial review being filed by the government at the time of writing. There is also no sign of active mining in the concession at this time.

# Expired or cancelled licences that could be extended, reinstated or reissued

In addition to the above licences numerous other licences have been issued to companies in Raja Ampat over a period of nearly 20 years. Through various administrative changes and through a series of administrative reviews most of these licences have been cancelled by the national government through the mining ministry.<sup>87</sup> However, it is not uncommon for cancelled licences to be reinstated through a licence extension application, legal action, or for a new company to be issued a licence over a previously licensed area.

As of May 2025, in addition to the court process involving PT Mulia Raymond Perkasa, there are three other cancelled licences currently being contested in court - those issued to PT Anugerah Surva Pratama (for a concession on Waigeo), PT Waigeo Mineral Mining and PT Eka Kurnia Baru.88 A 2023 audit report into the nickel sector by the West Papua and Maluku Financial Supervision and Development Agency (Badan Pengawasan Keuangan dan Pembangunan - BPKP)89 categorised a number of other licences as either at the 'production' or 'operation' stage, providing an indication that these previously cancelled licences could also be republished.<sup>90</sup> The following table provides further information about these licences. All but one are located on the island of Waigeo, with the other licence covering Fam Islands, including Piaynemo.91

<sup>87</sup> The mining ministry established a licence review process in 2015 that has led to the cancellation of hundreds of company mining licences and the placing of numerous conditions on other licences that companies were required to meet in order to achieve a 'clean and clear' status that would allow their operations to begin or continue.

<sup>88</sup> Information accessed from PTUN website https://sipp.ptun-jakarta.go.id/. More information held on file and available on request.

<sup>89</sup> https://www.bpkp.go.id/id/wilayahUnitKerja/maluku-papua

<sup>90</sup> Pg 4, Laporan Hasil Audit Tujuan Tertentu Atas Tata Kelola Industri Tambang Nikel Tahun 2023, BPKP. Copy held on file by Greenpeace.

<sup>91</sup> According to local community members who met with Greenpeace researchers in February 2025 surveys were initially conducted in and around Fam Islands a decade ago.

Island	Concession size (ha)	Name of company	Within the UNESCO GeoPark boundaries?	Located within Protected Areas?	Sign of Reactivation?
Waigeo	9,500	Anugerah Surya Pratama	Partially	Yes. Conservation Forest/Konservasi Hutan (KH)	Court process in Jakarta. Company appears in 2023 BPKP audit report.
Waigeo	1,000	Waigeo Mineral Mining	No	No	Court process in Jakarta. Company appears in 2023 BPKP audit report.
Waigeo	2,257	Eka Kurnia Baru	No	No	Court process in Jakarta
Fam Islands	8,850	Anugerah Pertiwi Indotama	Yes	Yes, protected forest area (hutan lindung)	Company appears in 2023 BPKP audit report.
Waigeo	4,825	Anugerah Hasta Perkasa	No	No. Convertible production Forest	Company appears in 2023 BPKP audit report.
Waigeo	2,011	Bumi Waigeo Lestari Jaya	Partially	Yes. Conservation Forest/Konservasi Hutan (KH)	Company appears in 2023 BPKP audit report.
Waigeo	10,000	Alam Bumi Makmur	Partial overlap	Yes. Conservation Forest/Konservasi Hutan (KH)	Company appears in 2023 BPKP audit report.
Waigeo	10,340	Duta Karya Harita Tambang	Yes	Yes - Conservation Forest/Konservasi Hutan (KH)	No
Waigeo	10,000	Giri Delta Mining	Yes	Yes - Conservation Forest/Konservasi Hutan (KH)	No
Waigeo	3,525	Karunia Alam Waigeo	Yes	Yes - Conservation Forest/Konservasi Hutan (KH)	No
Waigeo	5,292	Pacific Nickel Mining	Yes	Yes - Conservation Forest/Konservasi Hutan (KH)	No

### Nickel and steel smelters in Sorong?



'There are a number of aspirations about mining in Papua, especially in Raja Ampat, they want a smelter there' Mining Minister Bahlil Lahadalia, June 3rd 2025<sup>92</sup>

Thick smoke rises from the chimney visible from outside the nickel factory owned by PT IWIP in Central Weda, Central Halmahera, North Maluku (14/08/24). © Mas Agung Wilis Yudha Baskoro/Greenpeace



Early in 2024 Indonesian media reported that an agreement had been reached between the local government and investors wishing to construct a nickel and steel smelter in Sorong. <sup>93</sup> It was due to break ground in June of that year. <sup>94</sup> The project was reportedly being developed in the Sorong Special Economic Zone and would be backed by two Chinese companies: PT Sheng Wei New Energy Technology, which would build the nickel smelter, and Beijing Jianlong Heavy Industry

Group, which would build the steel smelter. 95 Earlier reporting from 2022 suggested that PT Gag Nikel was also directly involved. 96

As of May 2025, there is no sign of construction work having started, presumably due in part to a recent fall in the nickel price and a reported shortage of nickel ore in Indonesia. However, the level of detail in the reported Sorong plan reinforces the extent of the threat from the nickel industry to the future of Raja Ampat.

<sup>92</sup> https://kumparan.com/kumparanbisnis/bahlil-bakal-panggil-pemilik-dan-evaluasi-pertambangan-nikel-di-raja-ampat-25C8eHXcLga

<sup>93</sup> https://indonesiabusinesspost.com/2252/investment-and-risk/chinese-investors-encouraged-to-build-nickel-smelter-steel-plant-in-sorong

<sup>94</sup> https://www.kompas.tv/regional/493734/juni-ini-smelter-nikel-akan-segera-dibangun-di-sorong-papua-barat-daya#

<sup>95</sup> https://asiatoday.id/read/investing-idr-75-trillion-2-chinese-companies-ready-to-build-nickel-and-steel-smelter-in-sorong

<sup>96</sup> https://nikel.co.id/2022/04/22/kepak-sayap-pt-gag-nikel-di-sektor-hulu-dan-hilir-nikel/

<sup>97</sup> https://www.mining.com/web/indonesias-nickel-boom-is-forcing-its-own-smelters-to-shut-down/

# The questionable legality of mining on small islands

Almost all of the existing licences, and many of the licences that could be reissued are located within the boundaries of the Raja Ampat Geopark. While the Geopark as a whole does not benefit from legal protection within Indonesia, large areas within it, both on land and at sea have been protected by the national government through conservation measures by the maritime and forests ministries. But this protection does not necessarily mean these areas are off limits to commercial mining operations.

Many of the potential or current nickel mining areas in Raja Ampat are located within the national forest estate (*kawasan hutan*). As shown in the Raja Ampat map (Map 1), much of the forest estate on islands such as Waigeo is designated as a nature reserve (*cagar alam* - indicated in dark green) and other areas, including Manyaifun and Batang Pele Islands, are designated as protected forests (*hutan lindung* - indicated in light green).

Controversially, it is possible for nickel mining companies to apply for Forest Area Utilization Permits (PPKH)<sup>98</sup> within nature reserves, allowing them to conduct mining operations in these areas as long as they carry out post-mining remediation. Protected forests (*hutan lindung*) however, remain off limits for open cast mining, the method used by nickel mining companies in Indonesia.<sup>99</sup> A heavily-criticised exception has been made for PT Gag Nikel, whose 1998 licence predated the 1999 Forestry Law that introduced this rule.<sup>100</sup>

In addition to restrictions that apply to officially designated protected areas, there are other regulations that should restrict commercial mining activities within Raja Ampat. Law No. 27 of 2007 on the Management of Coastal Areas and Small Islands defines a 'small island' as one of less than 2,000 square kilometres in area. 101 Four of the five active mining licences in Raja Ampat are on small islands under this definition. Law 27/2007 heavily restricts mining operations, stating that "in the utilization of coastal areas and small islands, every person is directly or indirectly prohibited from carrying out mineral mining in areas which, if technically and/or ecologically and/or socially and/or culturally, cause environmental damage and/or environmental pollution and/or harm the surrounding community."102 Based on this provision alone, all current mining operations should be terminated in Raja Ampat on the grounds of causing environmental damage.

<sup>98</sup> Forest Area Borrow and Use Permits (IPPKH) allowed for some classes of some classes of forest areas to be used for non--forest activities such as mining. Permits were issued for a time period under certain conditions, including the rehabilitation of the land after use. The permits were regulated under Government Regulation No. 105 of 2016, which amended Government Regulation No. 24 of 2010 on the use of Forest Areas. The IPPKH process has transitioned to the similarly named PPKH (Forest Area Utilization Permit) which is managed under Government Regulation No. 23 of 2021. The new process also allows for the use of protected forest areas by companies under similar conditions.

<sup>99</sup> Under clause 38(4) of the Forests Law No.41/1999, open cast mining is not permitted in protected forests (hutan lindung). This is the only method of mining considered viable for the nickel laterite type ore bodies found in Eastern Indonesia.

<sup>100</sup> This was done through a Presidential Decree in Lieu of a Law (Perpu No.1/2004) which created an exception for a list of 13 companies including PT Gag Nikel. A constitutional court challenge failed to overturn the exception. PT Gag Nikel's special permission was most recently restated in a 2023 Presidential Decree (Keppres No. 3 Tahun 2023). It was also confirmed by the company in a letter to Greenpeace dated 10th June 2025. Letter available on request.

<sup>101</sup> https://peraturan.go.id/id/uu-no-27-tahun-2007 The law has been updated twice, through UU 1/2014 and UU 6/2023, but the definition remains unchanged.

However, Law 27/2007 has been implemented differently in various follow up regulations and has not been consistently enforced by lawmakers and officials. A 2008 maritime ministry regulation appears to contradict the 2007 law, stating that mining on small islands is permitted under certain circumstances<sup>103</sup> whilst another maritime ministry regulation, this time from 2020, appears more clearly aligned with the 2007 law. Ministry for Maritime Affairs and Fisheries Regulation 53 of 2020 was referred to by officials from that ministry in a 2022 letter to the (then) Ministry of Forests and Environment which raised concerns about one of the Raja Ampat mining companies, PT KSM. The letter notes that "Based on the Attachment to the Regulation of the Minister of Marine Affairs and Fisheries Number 53 of 2020, Mineral and Coal Mining activities are activities that are not permitted to be carried out on small islands with an area of less than 100 km<sup>2</sup>." Greenpeace has not seen a reply from the forests ministry or any sign of further follow up from the maritime ministry.

Questions about the legality of PT KSM's operations do not appear to have been raised by the Acting Governor of Southwest Papua when he visited PT KSM alongside other local government officials in November 2024. Local media reported that during that visit his questions to the company were focused on its CSR commitments and on the need to hire staff from the local community and to bring local staff into management positions. <sup>104</sup>

Mining on small islands in Indonesia is taking place in a number of locations, yet major mining companies in Indonesia evidently remain concerned about the 2007 Law on Management of Coastal Areas and Small Islands. In 2023 PT Gema Kreasi Perdana, a subsidiary of Harita Group, challenged the law at the Constitutional Court. The challenge to the law was roundly rejected by the court in March 2024. 105



An aerial view of Wayag Islands, Raja Ampat (27/08/24). © Sumaryanto Bronto/Greenpeace

pembangunan-daerah

<sup>103</sup> Maritime Ministry Permen No 8 of 2008 states "Utilization of small islands and surrounding waters other than as referred to in paragraph (1) may be utilized for, among other things, mining, residential, industrial, plantation, transportation and port businesses." 104 https://sorongraya.inews.id/read/512706/pj-gubernur-tinjau-tambang-nikel-pt-kawei-sejahtera-mining-bahas-komitmen-untuk-

<sup>105</sup> https://www.tempo.co/hukum/mk-tolak-gugatan-pt-gema-kreasi-perdana-perusahaan-tambang-nikel-di-pulau-wawonii-75047

### Local rejection of mining licences

As a young person from Manyaifun, I am very afraid.
I am afraid that the mine will have a negative impact on us and our neighbouring villages."106

There is increasing alarm being expressed by local community members, tourism operators and conservationists about the expansion of nickel mining in Raja Ampat, driven by the recent arrival of PT MRP in the Central Raja Ampat region. A local community group has organised protests, <sup>107</sup> and the Raja Ampat Nature Protection Alliance (*Aliansi Jaga Alam Raja Ampat*) has petitioned local politicians to prevent PT MRP from starting mining operations. <sup>108</sup>

In addition, the Raja Ampat Local Homestay Association alongside the local Professional Diving Association, the local branch of the Indonesian Tourist Guides Association, and the local boat owners association wrote to Indonesia's Forests Minister, the district head, politicians and other officials early in 2025, asking for the activities of PT MRP to be stopped due to potential environmental impacts. <sup>109</sup> Concerns about the impact of nickel mining have also been expressed by the Indonesian Hotel and Restaurant Association. <sup>110</sup>



A number of Indigenous communities, environmental activists, and tourism stakeholders united under the Alliance to Protect Raja Ampat (ALJARA) and staged a peaceful protest at the Regional House of Representatives (DPRD) office of Raja Ampat Regency (26/05/20). © Samuel Moifilit/ Greenpeace

<sup>106</sup> R, a young man from Manyaifun Village who is part of the Raja Ampat Nature Protection Alliance, interviewed by Greenpeace in May 2025.

 $<sup>107\</sup> https://melanesia times.com/2025/03/12/masyarakat-adat-kawei-menolak-keras-aktivitas-tambang-di-batan-pelei-dan-manyai fuin/aktivitas-tambang-di-batan-pelei-dan-manyai fuin/aktivitas-tambang-dan-manyai fuin/aktivitas-tambang-dan-manyai fuin/aktivitas-tambang-dan-manyai fuin/aktivitas-tambang-dan-manyai fuin/aktivitas-tambang-dan-manyai fuin/aktivitas-tambang-dan-manyai fuin/aktivitas-tambang-dan-manyai fuin/aktivitas-tambang-dan-manyai fuin/aktivitas-tambang-dan-manyai fuin/aktivitas-dan-manyai fuin/aktivitas-dan-manyai fuin/aktivitas-dan-manyai fuin/aktivitas-dan-manyai fuin/aktivitas-dan-manyai fuin/aktivitas-dan-manyai fuin/aktivitas-dan-manyai fuin/aktivi$ 

 $<sup>108\</sup> https://www.rri.co.id/sorong/daerah/1416983/aliansi-jaga-alam-raja-ampat-sampaikan-petusi-tolak-tambang-di-pulau-batangpele$ 

<sup>109</sup> March 12th 2025 letter. Copy on file.

<sup>110</sup> https://www.thejakartapost.com/business/2024/11/13/hotel-industry-raises-concern-over-nickel-mine-raja-ampat.html

## Where does nickel from Raja Ampat go?



Aerial view of air pollution in PT IWIP factory area in Central Weda, Central Halmahera, North Maluku (13/08/24). © Mas Agung Wilis Yudha Baskoro/ Greenpeace

Nickel ore from the two active mines in Raja Ampat, PT Gag Nikel and PT KSM, is loaded onto barges and transported for processing at the Indonesia Weda Bay Industrial Park (IWIP) on the island of Halmahera in North Maluku. This huge industrial park houses a number of nickel and stainless steel processing facilities. From there nickel enters supply chains for products such as stainless steel and battery components for electric vehicles.

According to public disclosures from PT Gag Nikel's parent company PT Antam, the ore from PT Gag Nikel is processed by a subsidiary of PT Tsingshan at IWIP.<sup>112</sup> In February 2025 a Greenpeace research team tracked a barge carrying nickel ore from PT Gag Nikel to IWIP.<sup>113</sup>

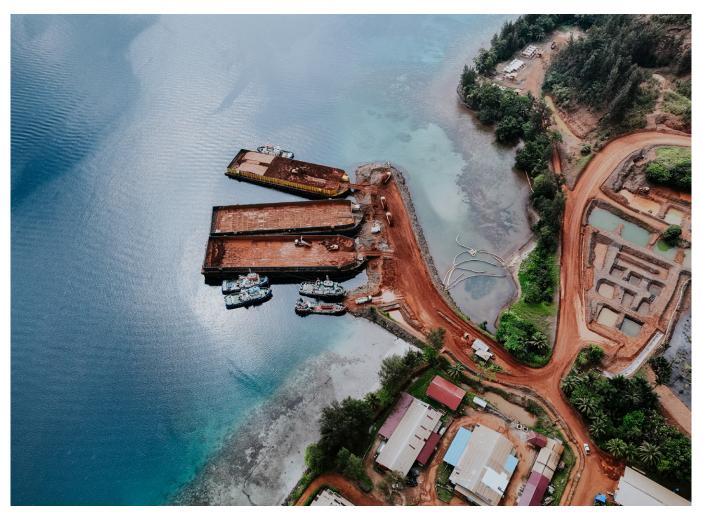
<sup>111</sup> https://iwip.co.id/en/home/

<sup>112</sup> https://www.antam.com/en/news-and-events/article/total-revenue-for-the-nine-months-period-in-2024-increase-40---antam-continues-to-improve-company-performance

<sup>113</sup> Further details available on request from Greenpeace.

According to PT KSM's Environmental Impact Assessment document, nickel ore mined at Kawe Island was to be sent to a smelter in Sulawesi. <sup>114</sup> However, when local media reported on a visit by the Governor of Southwest Papua province to PT KSM in October 2024 staff stated that nickel ore was being transported on a weekly basis to Halmahera Island's Weda Bay, a significantly shorter trip than to Sulawesi. <sup>115</sup> In February 2025 a Greenpeace field research team approached crew members of a barge transporting ore from PT Kawe and were also informed that ore was being transported to a smelter in Weda Bay.

PT Tsinghshan is one of the major shareholders in IWIP<sup>116</sup> and has also established a joint venture company, Youshan Nickel Indonesia, alongside Huayou group.<sup>117</sup> Youshan Nickel makes battery components for electric vehicles in Indonesia. PT Huayou also supplies nickel to battery supply chains linked to a number of major EV makers including Toyota, <sup>118</sup> Honda, <sup>119,120</sup> Nissan, <sup>121</sup> Hyundai, BMW, Mercedes, Tesla and BYD. <sup>122,123,124</sup> It is therefore possible that any of these vehicle supply chains could be linked to nickel ore coming from Raja Ampat, though a lack of supply chain transparency makes this impossible to confirm at this time.



Barges for transporting nickel ore at PT Gag Nickel (01/03/25). © Greenpeace

<sup>114</sup> Dokumen AMDAL PT KSM, page. I-64, copy held on file.

 $<sup>\</sup>textbf{115} \ \text{https://www.rri.co.id/investasi/1086053/pt-kawei-sejahtera-mining-penambang-nikel-raja-ampat-berkomitmen-bayar-pajak}$ 

<sup>116</sup> https://www.etsingshan.com/Col/Col72/Index.aspx

<sup>117</sup> https://iwip.co.id/en/youshan-nickel-indonesia-company/

<sup>118</sup> Bloomberg Terminal, accessed in May, 2025

<sup>119</sup> https://static.cninfo.com.cn/finalpage/2024-03-16/1219313047.PDF

<sup>120</sup> https://www.reuters.com/business/autos-transportation/chinas-catl-provide-ev-batteries-honda-starting-2024-2022-12-08/

<sup>121</sup> Bloomberg Terminal, accessed in May, 2025

<sup>122</sup> Unpublished report held on file by Greenpeace which updates previous publicly available information linking nickel supply chains to EV manufacturers. Previous studies showing these potential supply chain links include page 24, 'From Forests to EVs. Mighty Earth https://mightyearth.org/wp-content/uploads/2024/05/FromForeststoEVs.pdf and page 89-91, 'Nickel Unearthed' Climate Rights international https://cri.org/wp-content/uploads/2024/01/NICKEL\_UNEARTHED.pdf

<sup>123</sup> Bloomberg Terminal, accessed in May, 2025

<sup>124</sup> Huayou has presented companies/brands as its lead customers, https://huayouindonesia.com/en/global/

#### **Demands**

Nickel mining and processing has rapidly spread across Indonesia in recent years, bringing severe environmental impacts, land grabbing, labour rights violations, and health and safety concerns.

Greenpeace believes in a holistic and comprehensive approach to the sourcing and use of minerals such as nickel. Demand for mined nickel can be reduced through greater efficiency and the use of substitutes, while circular economy strategies—such as recycling and reuse—can provide viable alternatives to newly mined supply. This, in turn, eases the pressure to mine, creating space for stronger governance and environmental and social protection.

In the short term, it is essential that mining in Indonesia is stopped and prevented within areas that are already supposed to be legally protected, such as small islands or conservation areas on land and at sea. All nickel mining licences across Raja Ampat must therefore be immediately revoked as a matter of urgency by the Indonesian government, and no further licences should be issued. The smelters planned for Sorong must also be cancelled.

There are a number of other critical values that would mean areas must also be off-limits to mining. These include: areas with High Conservation Value (HCV)<sup>125</sup> such as threatened species habitat or High Carbon Stock (HCS),<sup>126</sup> significant natural ecosystems, and critical water bodies. Furthermore, areas where there are Indigenous Peoples living in voluntary isolation,<sup>127</sup> or where the Free, Prior and Informed Consent (FPIC) of Indigenous Peoples and local communities (IP&LC) has not been obtained.

<sup>125</sup> High Conservation Value Approach

<sup>126</sup> Aboveground Live Woody Biomass Density, https://data.globalforestwatch.org/datasets/gfw::aboveground-live-woody-biomass-density/about

<sup>127</sup> For example the Hongana Manyawa people on Halmahera Island, Indonesia. https://www.theguardian.com/world/2024/nov/26/uncontacted-hunter-gatherers-facing-threat-of-genocide-because-of-minerals-mining-claims-report

In the absence of timely government action, it is critical that supply chain actors, including battery producers, investigate their supply chains and clearly and publicly reject the supply of nickel and nickel ore that originates from any mines in Raja Ampat.

It is critical that EV manufacturers urgently strengthen their supply chain due diligence, increase transparency and act to ensure that any critical minerals purchased do not cause deforestation or loss of critical natural values, minimize carbon emissions and come from areas where the rights of local communities and indigenous communities are respected.

Finally, mining and ore processing companies must act responsibly, even if States lack the ability or willingness to protect and respect human rights and the environment. Companies must follow all local, national and international laws, prevent environmental harm, and be transparent about their operations, finance, beneficial ownership, human rights and social due diligence, and supply chain activities. Such measures are essential to prevent the harmful impacts of nickel mining in Indonesia.



A Greenpeace activist monitors nickel mining operations on Kawe Island, Raja Ampat (27/08/24). © Sumaryanto Bronto/Greenpeace

#### Note on methodology

Deforestation figures in this document are calculated by Greenpeace on the basis of a number of data sources by the Ministry of Forestry (Indonesia), Ministry of Maritime Affairs and Fisheries (Indonesia), Ministry of Energy and Mineral Resources (Indonesia), Geospatial Information Agency (Indonesia), Global Geopark Network, GLAD Lab University of Maryland and Planet Lab.

Deforestation refers to the clearance of areas of forest and other types of natural vegetation, including some that are endemic to islands of Raja Ampat. Some of the vegetation types threatened by nickel mining operations and infrastructure include vegetation that is adapted<sup>128</sup> to the ultrabasic soils in which the nickel deposits are found, including ultrabasic forest, <sup>129</sup> woodland<sup>130</sup> and scrublands.<sup>131,132</sup> Besides trees and woody shrubs this also includes palms, <sup>133</sup> orchids, <sup>134</sup> and grasslands, all of which not only prevent reef-damaging erosion but provide habitat for birds and animals.

Opportunity to comment letters were sent to companies with active nickel mining licences before the publication of this briefing. Only PT Gag Nikel replied, and relevant responses are included in footnotes in the text. The full letter is also available on request.

Names of community members have been replaced with initials for security reasons.



<sup>128</sup> A. van der Ent, A.J.M. Baker. M.M.J. van Balgooy, A. Tjoa, Ultramafic nickel laterites in Indonesia (Sulawesi, Halmahera): Mining, nickel hyperaccumulators and opportunities for phytomining, 2013

<sup>129</sup> R.E. Johnstone, The birds of Gag Island, Western Papuan islands, Indonesia, 2006

<sup>130</sup> Ryan Donnelly, Duncan Neville and Dr Peter J. Mous, Report on a rapid ecological assessment of the Raja Ampat Islands, Papua, Eastern Indonesia, 2003

<sup>131</sup> Takeuchi, Wayne N A community-level floristic reconnaissance of the Raja Ampat Islands in New Guinea, 2003

<sup>132</sup> Webb, Campbell, Vegetation of the Raja Ampat Islands, Papua, Indonesia, 2005

<sup>133</sup> Charlie D. Heatubun, Palms in the Nickel Island: An expedition to Gag Island, Western New Guinea 2014

<sup>134</sup> Didik Widyatmoko, Treasure Of The Four Kings: plant expeditions to the Raja Ampat Islands of West Papua, 2013



Sunset over Raja Ampat West Papua (28/08/24) © Sumaryanto Bronto/Greenpeace



Greenpeace activists with the iconic karst island formation of Piaynemo, Raja Ampat in the background (07/05/25). © Nita/Greenpeace

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