

29 July 2013

## **Greenomics Indonesia's response to the analysis by Steve Zwick, Managing Editor of Ecosystem Marketplace, on the Rimba Raya REDD Project**

- ✓ *Steve Zwick's analysis was based on an incorrect translation from Indonesian to English of a letter issued by a Director General at the Ministry of Forestry.*
  - ✓ *As a consequence, his analysis is fatally flawed from the legal perspective. Accordingly, Steve Zwick should withdraw his analysis and apologize to the public, the carbon market and Greenomics Indonesia.*
1. An analysis by Steve Zwick claims that a recent report by Greenomics Indonesia on the Rimba Raya Conservation Project (published on 4 July 2013) is misleading. This analysis (which was posted at [www.ecosystemmarketplace.com](http://www.ecosystemmarketplace.com) on 23 July 2013) clearly demands a response from Greenomics Indonesia. Why is a response necessary? **Because we need to explain to Steve Zwick, the public and the carbon market that the analysis by Steve Zwick that was based on the letter issued by the Director General of Forestry Planology on 6 May 2013 was incorrectly translated from Indonesian into English.** In addition, Steve Zwick's analysis also failed to take into account the most recent and up-to-date letters issued by two Directors General of the Ministry of Forestry clarifying the latest legal status of the Rimba Raya Conservation project. The two letters, dated 13 and 18 June 2013, were addressed to PT Rimba Raya Conservation.
  2. As Steve Zwick's analysis failed to use a correct translation of the letter of 6 May 2013 from the Director General of Forestry Planology and also failed to discuss the content of the two subsequent letters, its conclusions are misleading to the public and the carbon market, and **clearly demonstrate that Steve Zwick fails to comprehend the latest legal status of the Rimba Raya Conservation Project.**
  3. The authorized director at the Directorate General of Forestry Planology has confirmed to Greenomics Indonesia that the letter issued by the Director General of Forestry Planology on 6 May 2013 was never translated into English by the Directorate General of Forestry Planology. **This means that the translation used by Steve Zwick in support of his analysis was an unofficial translation. Even more worrying is the fact that the said letter was incorrectly translated. In the translation referred to by Steve Zwick, the phrase "the endorsed areas" should have read "the areas that could be considered". This mistake, according to the authorized director, has resulted in a fatal error in the legal purport of the letter of 6 May 2013 from the Director General.**

4. Greenomics Indonesia would therefore ask Steve Zwick to study the letter of 6 May 2013 from the Director General of Forestry Planology based on a legally correct translation, and simultaneously considering the two Directors General's letters (issued respectively on 13 and 18 June 2013) so as to make himself aware that his analysis is misleading. Steve Zwick needs to encourage Infinite-Earth to translate the letter of 6 May and to request copies of the two letters from the Directors General on the Rimba Raya Conservation Project. **As both letters are written in the Indonesian language, of course they will need to be correctly and accurately translated into English so that there is no repeat of the incorrect rendering from Indonesian to English of the letter from the Director General dated 6 May 2013.**
  
5. Through this response, Greenomics Indonesia would like to explain the substance of the letter of 6 May 2013 from the Director General of Forestry Planology, and the two Directors General's letters dated 13 and 18 June 2013 in the public interest and so that the carbon market is not misled by Steve Zwick's analysis.
  - In his analysis, Steve Zwick refers to the letter of 6 May 2013 from the Director General of Forestry Planology, Bambang Soepijanto. In detailing the proposed areas to be covered by the Rimba Raya ecosystem restoration plan, Steve Zwick should not omit to write that the said areas are in fact "areas to be considered" for inclusion in the ecosystem restoration plan of PT Rimba Raya Conservation. These areas extend to approximately 64,136 hectares. So, why is Steve Zwick's analysis misleading? **Because Steve Zwick used an incorrect translation of the letter of the Director General of Forestry Planology.** After using their incorrect translation, **Steve Zwick also fails to have regard to the subsequent letter issued by Director General Bambang Soepijanto on 18 June 2013**, which clarified the previous letter dated 6 May 2013, that is, the letter referred to by Steve Zwick.
  
  - In the letter of 18 June 2013, Director General Bambang Soepijanto stated that outside the area of approximately 36,331 hectares that had been approved by the Minister of Forestry, the other areas could be considered for ecosystem restoration under the Rimba Raya Conservation Project, but would first need to be processed in accordance with the applicable legislation. **That is, other than the approximately 36,331 hectares for which a license has already been granted, the remaining areas will still need to be officially processed.** This is what Steve Zwick has failed to understand.
  
  - Steve Zwick's analysis also failed to take account of the letter issued by the Ministry of Forestry's acting Director General of Forest Protection and Nature Conservation on 13 June 2013. This letter, which is addressed to the PT Rimba Raya Conservation, was issued in response to the press release titled **"World's Largest REDD Project, Rimba Raya, earns VCS Verification from SCS Global Services"**, which was published on 30 May 2013. **The letter clearly states that the proposed collaboration between the Tanjung Puting National Park Authority and PT Rimba Raya Conservation (PT RRC) cannot include exploitation activities in the form of carbon storage and/or absorption over an area of 18,642 hectares in the Tanjung Puting National Park.** The letter explained that the Rimba Raya Conservation Project can only accommodate exploitation activities in the form of carbon storage and/or absorption that have been granted a license by Minister of Forestry or an authorized official. **To this day, PT. RRC has not received any such license for exploitation activities in the form of carbon storage and/or absorption) in the Tanjung Puting National Park.**

6. Steve Zwick should note that the Greenomics Indonesia report published on 4 July 2013 was based on the most recent legal status of the Rimba Raya Conservation project, as described in the two Directors General's letters. It is certainly strange that the analysis by Steve Zwick, which fails to refer to these two letters, claims that the report by Greenomics Indonesia is misleading, **while in reality it is the analysis by Steve Zwick that is misleading as it fails to refer to the two letters, which taken together contain the most up-to-date description of the legal status of the Rimba Raya Conservation Project.**
7. And, most importantly, Steve Zwick needs to acknowledge to the public and carbon market that he used an incorrect English translation of the letter issued on 6 May 2013 by the Director General of Forestry Planology. **His analysis is unworthy of a professional and, accordingly, he needs to withdraw it as soon as possible and apologies to the public and carbon market. In addition, Steve Zwick needs to publicly apologize to Greenomics Indonesia.**
8. **In conclusion**, Greenomics Indonesia would suggest that Steve Zwick should obtain a correctly translated copy of the letter of 6 May 2013 from the Director General of Forestry Planology. In addition, he should also obtain copies of the two letters issued by the Directors General on 13 and 18 June 2013, and ensure that both are translated correctly into English, both substantively and legally. \*\*\*