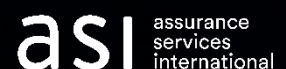




RISK INFORMATION  
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# Indonesia - Rubber Stakeholder consultation report

*May 2026*



## Assessment description

SCOPE	
Geographical scope	Indonesia – whole country
Commodity or product	Natural rubber
Other scoping element, if any	N/A
DETAILS	
Period of development for the initial draft (prior to consultation)	November 2025 – January 2026
Rationale for development	First pilot for the RIA indicators and methodology. Lack of existing detailed assessment coupled with strong shared interest for the commodity among RIA Members.
Language(s)	English
DEVELOPERS	
RIA Members involved in development	Preferred by Nature Support from FSC
Expert outreach, if applicable	In the period of December 2025-January 2026, 5 experts/stakeholders were consulted. Additional expert interviews are planned in February 2026.

## Consultation details

The consultation for rubber production in Indonesia was conducted between February 12<sup>th</sup> 2026 and March 31<sup>st</sup> 2026.

The draft was subject to stakeholder consultation for a period of 48 days.

Announcements of the consultation were sent out via:

- The RIA LinkedIn account
- LinkedIn accounts of RIA Members
- GPSNR newsletter
- Direct emails sent to stakeholders identified during the risk assessment development process

The consultation announcement materials included information on how to participate in the consultation. The announcement informed stakeholders that the assessment and accompanying documents were available and accessible by requesting the consultation package through an online form or directly from Preferred by Nature.

All comments received were analysed and evaluated for relevance and reliability (on the basis of being well justified and using evidence), and responses to all comments were formulated by Preferred by Nature.

## Stakeholder overview

We received comments from 2 stakeholders, representing:

- Environmental interest (0)
- Social interest (0)
- Economic interest (1)
- Other (1)

## Comments received


Comments have been organised by topic and have been listed below. Where comments were identical or nearly identical, covering the same topic and points, they have been merged. Only comments applicable to the risk assessment findings or process have been included below.



Topic	Stakeholder feedback	RIA response
<b>GENERAL / CROSS-CUTTING FEEDBACK</b>		
General comments	<p>The risk assessment document is comprehensive and covers legal, environmental, social, and governance aspects. However, several sections still require strengthening, particularly:</p> <ul style="list-style-type: none"> <li>• Use more up-to-date national references, particularly regarding deforestation, rubber market dynamics, and national policies.</li> <li>• Addition of quantitative data (land area, number of farmers, conversion rates, production trends).</li> <li>• Clarity of data limitations (data gaps and limitations) to ensure readers understand the context and potential biases of the information.</li> <li>• Harmonization of technical terms across chapters, such as the definitions of "conversion," "degradation," and "HCV," to ensure consistency across all sections.</li> <li>• In-depth exploration of the context of smallholder farmers, who dominate the Indonesian rubber sector.</li> </ul> <p>Suggestions for improving the visualization of the RIA system (dashboard):</p> <ul style="list-style-type: none"> <li>• Add color indicators for risk levels (Low–Medium–High).</li> <li>• A filter feature per province is crucial, given the diverse context of rubber in Indonesia.</li> <li>• Display data sources interactively (tooltips). Multi-year trend charts for deforestation, production, and rubber prices to help users better understand risk dynamics.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Use more up-to-date national references.</b> We have used the most up-to-date references currently available; however, some risk assessments are currently difficult to find references for, partly due to the lack of references on these topics.</li> <li>• <b>Data (land area, number of farmers, conversion rates, production trends).</b> We have supplemented some of the data from references on these topics.</li> <li>• As a pilot, this risk assessment utilizes various references from news, research, journals, and other sources. We have conducted direct interviews with several stakeholders across sectors.</li> <li>• <b>Harmonization of technical terms.</b> We have supplemented various definitions in our advanced analysis of each indicator, as well as our concern for smallholder farmers who dominate the Indonesian rubber sector.</li> <li>• <b>Color indicators for risk levels.</b> Thank you, we will consider this in the visualization.</li> <li>• <b>Filter feature per province.</b> Although our analysis is conducted by province and major Indonesian islands, the scope of our risk assessment is Indonesia.</li> </ul>

Topic	Stakeholder feedback	RIA response
		<ul style="list-style-type: none"> <li>• <b>Multi-year trend charts for deforestation, production, and rubber prices.</b> As a pilot project, this Indonesian rubber risk assessment does not include this.</li> </ul>
General comments	<p>Overall it looks like the risk assessment was quite too focused on regulatory and compliance aspects whilst economic risks were very limited notably on the future of natural rubber cultivation existence in Indonesia. Such situations including: conversion of rubber farm into oil palm, absence of local financing, limited technical assistance to improve the standard, non conformity of seedlings resulted to low productivity, etc.</p> <p>Throughout the indicators, I did not see the following:</p> <ul style="list-style-type: none"> <li>• Risk of signification reduction of natural rubber volume in Indonesia as farmers continue to convert their farm into other commodities mainly oil palm. This has been a popular sights throughout Sumatra and recently Kalimantan that for sure would impacting largely the future of natural rubber production in Indonesia and yet, there seems to be no concerns raised at national level about this critical risk and ultimately pose a question to the future of this commodity in Indonesia.</li> <li>• Government agenda on B-50: while this will increase the pressure for forest to be converted for oil palm, this will also validate the ongoing conversion of rubber farms into oil palm plantations.</li> <li>• Pest and disease issues, in particular the leaf fall disease. For the past 5 (five) years, Indonesia has been one of the most impacted country in Southeast Asia on leaf fall disease. There are only few independent studies about this disease in Indonesia and no known consolidated effort in particular lead by Government to address the issue and to provide assistance for the mitigation to the rubber farmers.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Declining rubber area &amp; conversion to oil palm.</b> The assessment explicitly recognizes the ongoing shift from rubber to oil palm in Sumatra and Kalimantan as a major structural risk to future rubber supply.</li> <li>• <b>Policy drivers (e.g., B-50).</b> We included some cases of oil palm legal conversion as indirect drivers for land conversion and reinforcing commodity switching.</li> <li>• <b>Pest and disease (leaf fall).</b> The analysis will incorporate leaf fall disease as a critical production risk, noting limited coordinated response and its impact on declining yields.</li> <li>• <b>Long supply chain &amp; price vulnerability.</b> We highlighted the multi-layered trading system (5–7 intermediaries) that weakens farmer bargaining power and reduces farm-gate prices.</li> <li>• <b>Reduced government support.</b> The shift in public support (e.g., subsidies, training) away from rubber toward oil palm will be included as a factor increasing smallholder vulnerability.</li> <li>• <b>Limited financing access.</b> The absence of accessible financing schemes for smallholders is reflected as a constraint to replanting and productivity improvement.</li> </ul>


Topic	Stakeholder feedback	RIA response
	<p>Consequently, rubber production from Indonesia continues to decline significantly.</p> <ul style="list-style-type: none"> <li>• Long chain of supplier, sometimes up to 5-7 middlemen before reaching factory continuously put rubber farmers at vulnerable position where they received the lowest amount/price per kg for their production.</li> <li>• The allocated support for smallholder rubber farmers (fertilizer, sapling, and technical assistance/training) usually given by Dinas Perkebunan is no longer available in some provinces as the priority shift solely toward one particular commodity which oil palm, this will increase the severity of non favorable situation for the smallholder rubber farmers</li> <li>• The absence of incentive including local financing scheme for smallholder farmers</li> <li>• Aging rubber trees, non conformity of rubber saplings, and less interest from young people to stay in natural rubber cultivation</li> <li>• Difficulty to find worker to tap the rubber trees due to unattractive payment and poor working conditions</li> <li>• Rubber research in Indonesia is underutilized and underfinanced, consequently unable to actively engage or pursue the efforts to address issues e.g. pest and disease affecting the rubber yield, better practices of natural rubber cultivation, etc.</li> <li>• Absence of government's political will and support in almost all aspects, putting risk to the sustainability of Indonesia's natural rubber</li> </ul> <p>In addition to the above list, to also consider including the Geopolitic issue that may pose risk to the commodity. For example the most</p>	<ul style="list-style-type: none"> <li>• <b>Aging trees &amp; low-quality planting material.</b> We will include risks related to aging plantations, non-certified seedlings, and declining interest among younger generations.</li> <li>• <b>Labour constraints.</b> Difficulty in finding tappers due to low wages and poor working conditions already incorporated as an operational risk.</li> <li>• <b>Weak research &amp; innovation support.</b> The limited capacity and funding for rubber research will be noted as a barrier to addressing sector challenges (e.g., disease, productivity).</li> <li>• <b>Limited policy prioritization.</b> The assessment acknowledged the perceived lack of strong political and institutional support for the rubber sector as a cross-cutting risk.</li> </ul>

Topic	Stakeholder feedback	RIA response
	recent development on the USA/Israel – Iran war in which resulted in e.g increased risk of fertilizer scarcity/ increased price for fertilizer.	
 <b>1. LAND RIGHTS AND THIRD PARTIES' RIGHTS</b>		
Land tenure and management rights	<p>Risks related to the security of smallholder tenure rights are still not described in detail. Additional analysis is needed regarding:</p> <ul style="list-style-type: none"> <li>• overlapping land status (state forest vs. community plantations), rubber from customary forests, APL (Land Use Area), and the position of social forestry.</li> <li>• examples of legal ownership documents for each source (as appropriate), especially for APL.</li> <li>• a tenurial conflict map based on data from the Ministry of Environment and Forestry/ATR-BPN.</li> <li>• variations in risk between provinces (e.g., Sumatra vs. Kalimantan).</li> <li>• strengthening analysis of small-scale tenurial conflicts at the village level, which are often undocumented in formal sources.</li> <li>• Regulation: Regulation of the Minister of Environment and Forestry Number 9, 2021, Social Forestry Management</li> </ul>	<ul style="list-style-type: none"> <li>• Tenure risks for smallholders have been considered in the assessment, including overlaps between state forest, APL, customary land, and social forestry schemes, which create challenges in verifying clear and uncontested land status. We have added the analysis of the overlapping land status in indicator 1.1.1</li> <li>• Examples of land ownership documents (particularly in APL) have been considered, including formal titles (e.g., SHM) and semi-formal/local documents (e.g., SKT, girik, village letters). However, these vary in legal strength and are not always fully verifiable, meaning documentation does not necessarily ensure clear or uncontested ownership.</li> <li>• A tenure conflict map based on KLHK/ATR-BPN data has been considered; however, available datasets mainly capture formal or large-scale disputes and may not fully represent smaller or informal conflicts on the ground, indicating potential underrepresentation of actual tenure issues.</li> <li>• Variations in tenure risk have been considered, with higher and more complex conflicts in Sumatra due to population pressure and long-term land use, while in</li> </ul>

Topic	Stakeholder feedback	RIA response
		<p>Kalimantan risks are more linked to large-scale concessions and overlaps with community land, reflecting differing regional dynamics</p> <ul style="list-style-type: none"> <li>• Small-scale tenure conflicts at the village level have been considered, including boundary disputes, overlapping claims, and inheritance issues.</li> <li>• We have added the the Regulation of the Minister of Environment and Forestry Number 9 of 2021, Social Forestry Management.</li> </ul>
Permits, planning and protection from illegal activities	<ul style="list-style-type: none"> <li>• It is recommended to add an explanation regarding the licensing process for small-scale plantations, which is often undocumented.</li> <li>• What about harvesting permits for rubber in Indonesia? For example, Decree of the Director General of Plantations Number:</li> <li>• 105/KPTS/PI.400/2/2018, 2018, Guidelines for Issuing Plantation Business Registration Certificates for Cultivation (STD-B).</li> <li>• Illegal activities such as logging, unauthorized use of forest areas, and tapping in conservation areas need to be substantiated with field data or government reports.</li> <li>• Environmental license: Law of the Republic of Indonesia Number 32 of 2009 concerning Environmental Protection and Management, Articles 34-35</li> </ul>	<ul style="list-style-type: none"> <li>• The licensing process for small-scale plantations has been considered. Formally, it includes land tenure documentation (e.g., SKT, girik, or land certificates) followed by registration through STD-B or, in certain cases, social forestry schemes. However, in practice, many smallholders stop at local administrative recognition without completing formal registration</li> <li>• Harvesting permits for rubber have been considered. Based on Director General of Estate Crops Decree No. 105/2018, there is no separate permit specifically for harvesting; it is treated as part of cultivation activities.</li> <li>• Illegal activities have been considered based on official reports from the Ministry of Environment and Forestry, which indicate ongoing issues such as unauthorized land use, encroachment into forest areas, and unpermitted resource extraction.</li> </ul>



Topic	Stakeholder feedback	RIA response
		<ul style="list-style-type: none"> <li>Agreed. It has been considered for the following reference : Environmental license: Law of the Republic of Indonesia Number 32 of 2009 concerning Environmental Protection and Management, Articles 34-35.</li> </ul>
Rights of third parties	<ul style="list-style-type: none"> <li>Social relations between farmers, landowners, and local indigenous groups need to be deepened.</li> <li>The risk of disputes over village boundaries and land access should not be ignored, as they frequently occur on smallholder plantations.</li> <li>Differentiate between the legality of smallholder land and medium- to large-scale plantations, as the risks involved are different.</li> </ul>	<ul style="list-style-type: none"> <li>Social relations have been considered as a key factor influencing tenure. Interactions between smallholders, landowners, and customary communities often rely on informal agreements and local recognition, which may be socially legitimate but not formally documented, creating gaps in legal verification.</li> <li>Boundary and land access disputes have been considered, particularly in smallholder contexts where such conflicts are relatively common. These are often resolved through informal or customary mechanisms and are rarely documented, limiting their visibility in official data despite their relevance to tenure risk.</li> <li>The assessment already differentiates legality between smallholders and medium-to-large plantations. Larger plantations operate under formal licensing systems with defined boundaries, while smallholder tenure is more fragmented, informally documented, and based on local recognition, resulting in higher variability and lower levels of formal verification.</li> </ul>

Topic	Stakeholder feedback	RIA response
 <b>2. MANAGEMENT ACTIVITIES AND ENVIRONMENTAL PROTECTION</b>		
Management activities	<p>It is unclear why smallholders still categorized as non-negligible for the criteria of “management activities are legally conducted” when it is already mentioned that they are not legally required to have such planning/managament document. There is no legal compliance breached/violated here and for aspects explained it is sounds more like sustainability risk.</p> <p>Community garden management is highly diverse and not yet fully understood. A mapping of general management practices and their risks is needed.</p> <p>What about the SPPL requirement for land areas less than 25 hectares?</p>	<p>The non-negligible rating reflects <i>verification gaps</i>, not legal violations. Limited documentation and variability in tenure, land use, and registration (e.g., STD-B) make compliance difficult to consistently verify.</p> <p>Smallholder practices are diverse and often undocumented. Although SPPL applies to low-risk activities, it is inconsistently implemented, resulting in limited compliance documentation.</p>
Infrastructure associated with management activities	<ul style="list-style-type: none"> <li>Additional data regarding the availability of production roads, latex warehouses, and crumb rubber factories can help understand logistics risks.</li> </ul>	<ul style="list-style-type: none"> <li>This assessment is limited to rubber plantation activities, excluding post-harvest.</li> </ul>
Waste resulting from management activities	<ul style="list-style-type: none"> <li>Analysis of liquid waste and chemical use requires additional sources from:</li> <li>Local universities (IPB, UGM),</li> <li>Ministry of Environment and Forestry reports regarding river pollution in rubber production areas.</li> </ul>	<ul style="list-style-type: none"> <li>This assessment is limited to rubber plantation activities, excluding post-harvest.</li> </ul>
Pollution resulting from management activities	<p>Pollution risks from coagulation processes, latex chemicals, and transportation activities need to be analyzed in more detail.</p>	<p>This assessment is limited to rubber plantation activities, excluding post-harvest.</p>
Water resources	<p>Information regarding pressure on water sources in rubber areas (South Sumatra, Jambi, West Kalimantan) needs to be strengthened with data from the Ministry of Environment.</p>	<p>We have tried to complete the data from the Ministry of Environment, but the data presented to the public is very limited.</p>

Topic	Stakeholder feedback	RIA response
Soil	<ul style="list-style-type: none"> <li>The risk level for erosion, land cover change, and soil degradation due to unsustainable cultivation practices needs to be added.</li> <li>Management of sloping areas, peat areas, and related regulations</li> </ul>	Risks related to erosion, land cover change, and soil degradation have been considered, particularly in sloping and peatland areas. While regulations and guidelines exist for soil and water management, implementation among smallholders remains uneven, leading to variable compliance and potential environmental risks.
Chemicals	The use of pesticides and fertilizers by smallholder farmers needs to be explained, including exposure risks and management.	Smallholder use of pesticides and fertilizers has been considered. Practices are generally low to moderate intensity but lack standardization, often relying on experience rather than formal guidance. This can lead to inconsistent applications, limited PPE use, and risks of exposure and environmental impact.
Use of burning or fire for land preparation and waste management	Burning for land preparation is still practiced in some areas. Further analysis of the prohibition policy and its level of compliance is needed.	Open burning is prohibited under Indonesian law; however, official data from KLHK show that fires linked to land clearing still occur at significant scale, particularly in Sumatra and Kalimantan. This indicates that compliance remains inconsistent, reflecting a gap between regulation and field practices.
Invasive species and GMOs	The invasive risk of certain plant species and the absence of GMOs in rubber need to be emphasized as low-risk but still relevant contexts.	Yes, I agree. we have completed the statement in question.




### 3. ECOSYSTEM CONVERSION, DEGRADATION AND HCV PROTECTION


Conversion of forests and other ecosystems	<ul style="list-style-type: none"> <li>Data integration from Global Forest Watch, the Ministry of Environment and Forestry (KLHK), the Deforestation Map, and GPSNR 2025 data is needed to strengthen conversion assessments.</li> </ul>	<ul style="list-style-type: none"> <li>The assessment has already incorporated data and insights from Global Forest Watch, KLHK, and national deforestation datasets through literature review and open-source references</li> </ul>
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Topic	Stakeholder feedback	RIA response
	<ul style="list-style-type: none"> <li>• Explain conversion for smallholder plantation expansion versus large corporate expansion.</li> <li>• The distinction between legal and illegal conversion needs to be emphasized.</li> </ul>	<ul style="list-style-type: none"> <li>• The document already distinguishes conversion dynamics between smallholders and large-scale plantations. Smallholder expansion typically occurs within APL areas, is incremental and informal, and often relies on weak or incomplete tenure, making legality difficult to verify. In contrast, large-scale plantations operate under formal systems such as HGU permits and spatial planning compliance, providing clearer legal standing.</li> <li>• The document already distinguishes between legal and illegal conversion within Indonesia's regulatory framework. Legal conversion refers to land-use change following formal procedures (e.g., approved forest release and permits), while illegal conversion involves clearing without valid authorization or within designated forest areas.</li> </ul>
Degradation of forests and other ecosystems	The risk of degradation from illegal tapping practices in forest areas needs to be added.	The assessment already highlights that environmental degradation is driven by weak oversight and informal practices, particularly in smallholder contexts.
High conversation values	<ul style="list-style-type: none"> <li>• Each of HCV values from 1 – 6 was described and assessed in detail for the risk, however the references listed in the excel file only limited to Indonesia's regulations, no mentioning of any HCV module as reference. Though there are some alignments between HCV and regulations, it will be more suitable to assess the risk using the HCV module/ approach and in specific for smallholders, to adjust the</li> </ul>	<ul style="list-style-type: none"> <li>• The HCV framework (HCV 1–6) has already been embedded in the assessment, particularly in structuring risk components, identifying sensitive areas, and defining mitigation measures. We have aligned the risk assessment narrative with the HCV approach, particularly adapting it to the smallholder context as</li> </ul>

Topic	Stakeholder feedback	RIA response
	<p>assessment following the HCV module intended for smallholder farmers.</p> <ul style="list-style-type: none"> <li>• The document needs to map areas that have the potential to contain HCV in rubber production areas and potential interactions with farmers.</li> <li>• HCV descriptions should include examples of areas with relevant HCV values for rubber (e.g., South Sumatra, Jambi, West Kalimantan).</li> </ul>	<p>suggested in indicator 3.3.1, also put the HCV Guidance as reference.</p> <ul style="list-style-type: none"> <li>• The assessment has already incorporated a landscape-level approach using spatial screening tools (e.g., datasets from Global Forest Watch and World Wide Fund for Nature) to identify areas with potential HCV presence. The explanation of the specific indicator mapped the provinces that have the potential interaction with farmers such as Kalimantan &amp; South Sumatera (see indicator 3.3.2)</li> <li>• The assessment already includes contextual explanations and empirical evidence from key rubber-producing regions such as Sumatra and Kalimantan, including cases of habitat fragmentation and human–wildlife conflict. These examples reflect relevant HCV values in practice. Already put in the 3.3.3 and added the reference in the West Kalimantan site-specific (<a href="https://doi.org/10.1007/s10457-007-9037-x">https://doi.org/10.1007/s10457-007-9037-x</a>)</li> </ul>



Topic	Stakeholder feedback	RIA response
	<b>4. HUMAN RIGHTS</b>	
	<p>Human rights in all aspects of operations and activities</p> <ul style="list-style-type: none"> <li>The analysis should highlight the vulnerability of smallholder farmers and informal workers in the supply chain.</li> <li>It is recommended to include specific references to the risks of vulnerable groups such as female tappers, day laborers, and domestic migrants.</li> </ul>	<ul style="list-style-type: none"> <li>The assessment has already highlighted the vulnerability of smallholders and informal workers, particularly in smallholder-dominated rubber systems characterized by informal labour arrangements, reliance on family labour, and limited regulatory oversight.</li> <li>The assessment has already incorporated risks affecting vulnerable groups, including female tappers, casual/day labourers, and informal workers, based on international and academic references such as the International Labour Organization and Food and Agriculture Organization. We have added the risk assessment in indicator 4.2.1 specifically about migrant worker</li> </ul>
Modern slavery	<p>The risk is low, but still needs to be mentioned from the perspective of migrant workers who may work in processing plants.</p>	<p>This aspect has been considered within the broader labour risk analysis, supported by evidence from the International Labour Organization and the Walk Free Foundation, which highlight potential vulnerabilities related to migrant and informal workers. See indicator 4.2.1 about migrant workers referred to OECD Due Diligence Guidance for Responsible Business Conduct (2018). In addition, this assessment is limited to rubber plantation activities, excluding post-harvest.</p>

Topic	Stakeholder feedback	RIA response
Child labour	The risk of child labor on smallholder plantations remains high nationally. It is recommended that references be included in this report, including ILO/UNICEF or academic research, LIPI, or NGO research.	The assessment has already incorporated evidence from international organizations (e.g., the International Labour Organization) and academic studies, supported by national statistics (BPS) and field findings. These sources consistently show that, despite a strong legal framework, child labour risks remain present, particularly in smallholder and informal rubber plantation settings, as reflected in the current risk analysis.
 <b>5. LABOUR RIGHTS</b>		
Health and safety	The risks of injury from using a tapping knife, night work, and exposure to chemicals need to be added.	We have conducted a risk analysis on this criteria "Facilities and activities are safe and support worker's health", described in more detail in the indicator risk assessment.
Workers' rights related to recruitment and contracting	<ul style="list-style-type: none"> <li>Many informal workers lack legal contracts. The risks need to be clarified.</li> <li>Law of the Republic of Indonesia Number 13 of 2003 concerning Manpower, Articles 50 and 54</li> </ul>	<ul style="list-style-type: none"> <li>Covered in the report</li> <li>Republic of Indonesia Law Number 13 of 2003 concerning Manpower has become a reference in risk assessments regarding labor contracts.</li> </ul>
Workers' pay	<ul style="list-style-type: none"> <li>Wage rates are often below the minimum wage standard. Comparisons between regions could be added.</li> <li>Law of the Republic of Indonesia Number 13 of 2003 concerning Manpower, Article 77</li> </ul>	<ul style="list-style-type: none"> <li>Republic of Indonesia Law Number 13 of 2003 concerning Manpower has become a reference in risk assessments regarding minimum wage rates, as well as other references from news, research, and journals.</li> </ul>
Working hours and rest time	The tappers' working hours tend to be long and are often carried out from night to early morning.	This is also raised as a concern in the risk assessment.
Freedom of Association, Right to Organise and Right to Collective Bargaining	There is a need for discussion regarding the relatively low level of labor organization in crumb rubber factories.	Yes, the level of labor organization in the crumb rubber factory has become our concern in conducting this risk analysis, several references are the basis for the assessment.

Topic	Stakeholder feedback	RIA response
Equal opportunities and no discrimination	The risk of gender discrimination in wiretapping work can be added.	This is also raised as a concern in the risk assessment.
 <b>6. ECONOMIC AND TRADE CONDITIONS</b>		
Corruption, fraud and conflict of interest	<p>The risk of illegal levies, weight manipulation, and non-transparent trade systems needs to be strengthened.</p> <p>The risk of corruption and unofficial levies can be strengthened using data from the Corruption Eradication Commission (KPK), TI Indonesia, or plantation sector reports.</p>	This is also raised as a concern in the risk assessment.
Taxes, fees and royalties	Non-compliance with tax payments by small and medium-sized actors needs to be further examined.	This is also raised as a concern in the risk assessment.
Trade and transport of products	<ul style="list-style-type: none"> <li>The risk of low traceability and informal cross-border transactions at the farmer level needs to be a focus, given their impact on due diligence.</li> <li>The Indonesian rubber sector, dominated by smallholder farmers and involving multiple layers of intermediaries, highlights traceability as an area requiring capacity and system strengthening.</li> </ul>	This is also raised as a concern in the risk assessment.





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The **Risk Information Alliance (RIA)** is a collaboration of organisations working together to address the growing complexity of corporate due diligence and responsible business practices. By pooling resources, funding, and expertise, RIA facilitates the joint production of credible, high-quality, and up-to-date risk data across commodities, sectors, and geographies.

Through the development of a shared methodology, indicators, and a blueprint for a risk data storage platform, RIA enables its members to share and access risk data efficiently and cost-effectively. This collaboration supports better-informed sourcing decisions, stronger sustainability investments, and more consistent due diligence outcomes.

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