

bruno mansei fonds





For holistic reading on issues related to Forest Clearing Authorities (FCAs) in Papua New Guinea, this report is intended to be read in conjunction with FCA case studies published by Act Now.

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About RimbaWatch

RimbaWatch is an environmental think-tank conducting research and advocacy on climate-related issues in the Maritime Southeast Asian region.

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About the Bruno Manser Fonds

The Bruno Manser Fonds strives for the protection of the tropical rainforests and for the respect of the rights of the peoples of the rainforest in Malaysia and Papua New Guinea.

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About the Papua New Guinea Environmental Alliance (PNGEA)

The PNGEA provides a unified platform for Civil Society Organisations (CSOs) to raise their concerns and drive coordinated work and advocacy on environmental issues and sustainable livelihoods in Papua New Guinea.

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Executive Summary

Papua New Guinea (PNG) is a major exporter of tropical logs worldwide. This report investigates the role of Malaysian companies and individuals in large-scale forest clearance in PNG through the misuse of Forest Clearing Authorities (FCAs). Despite a 2023 moratorium on new FCA licences, widespread deforestation and human rights abuses persist.

At least 1.68 million hectares of rainforest are under threat from FCA licenses, an area equal to Sarawak's existing oil palm landbank, or equal to the size of Eswatini. Of these forests, 88% are classified as 'undisturbed forests', and their conversion will release a combined 277.35 million tCO2e. Additionally, 175,173 hectares within FCA areas can now be spatially classified as non-forest, representing an area twice the size of Singapore, indicating the scale of conversion occurring within licensed areas. Analysis reveals that 65 of 67 FCA licences are controlled by Malaysian-linked companies, covering 97% of all FCA licenses. Some of the 79 Malaysian-linked individuals identified have faced allegations of illegal logging, fraud, and other misconduct, and are connected to politically influential families and major Sarawak-based logging firms.

Case studies show a recurring pattern: FCA projects promise agriculture but focus primarily on timber extraction, often without delivering viable farming operations. These activities frequently occur on customary land without free, prior and informed consent (FPIC) of landowners, undermining Indigenous rights and livelihoods. Transparency remains poor, with key spatial and commodity data largely inaccessible.

Key recommendations call for urgent action by both the PNG and Malaysian governments, international agencies, financiers, and timber buyers.

- For PNG: Suspend round log exports from FCA areas pending an independent inquiry; extend the FCA moratorium; publish audit findings; establish a public register of timber operations; and pursue potential criminal violations with support from international enforcement bodies.
- For Malaysia: The Malaysian Anti-Corruption Commission should investigate whether companies obtained
 concessions through illicit means, breached laws, or engaged in tax and money-laundering offences. The
 Legal Affairs Division (BHEUU) should accelerate the operationalisation of the National Action Plan on Business
 and Human Rights, addressing overseas operations of Malaysian companies through a Supply Chain Act, with
 strong penalties for violations. Anti-SLAPP laws must be introduced to protect Indigenous defenders and civil
 society actors.
- For the financial sector: Regulators such as Bank Negara Malaysia and financial institutions to investigate
 whether financed entities violate anti-money laundering and tax regulations, and financial institutions should
 apply stringent No Deforestation, Peat, or Exploitation (NDPE) standards to future financing.

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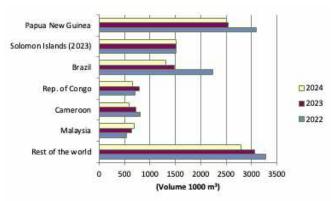
KEY TERMS

Key Abbreviations	
AG	Auditor General
Clear-felling	Complete removal of trees from a particular area.
Customary Land	Land owned under traditional laws by local communities.
Environmental Impact Assessment (EIA)	An evaluation process to assess the environmental implications of proposed projects.
FPIC	Free Prior Informed Consent
FCA	Forest Clearing Authority – A license issued for large-scale forest clearing tied to agricultural development.
PNG	Papua New Guinea
PNGFA	Papua New Guinea Forest Authority
MACC	Malaysian Anti-Corruption Commission
Special Agricultural and Business Lease (SABL)	A controversial land lease system for large-scale agricultural developments

Forestry in Papua New Guinea: The No. 1 tropical log exporter worldwide.

Papua New Guinea (PNG) is one of the planet's most vital biodiversity hotspots. Together with Indonesian-governed Papua, it forms the world's third-largest tropical rainforest, surpassed only by the Amazon and Congo Basin. Covering approximately 28.2 million hectares, PNG's rainforests represent a critical bastion of biodiversity and carbon storage. (CBD, n.d).

This unique forest is under threat. At least 2.9 million hectares—roughly 15% of PNG's rainforest—have already been degraded, and deforestation is ongoing (CBD, n.d.). In 2024, 2.5 million m³ of roundwood, representing 25% of the world's tropical round log exports, came from Papua New Guinea. Political measures such as the 2023 moratorium on new Forest Clearing Authorities (FCAs) licences had almost no impact on these staggering export volumes, which remained nearly unchanged from 2.54 million cubic meters in 2023. (ITTO, 2023-2024). It must be noted, however, that the figure of 2.5 million m³ for 2024, derived from the ITTO, is higher than the 1.89 million m³ figure on the PNGi database (PNGi, 2025). The hotspots of the current logging activities in PNG are the provinces of West and East New Britain and West Sepik (SGS, 2025: 31).



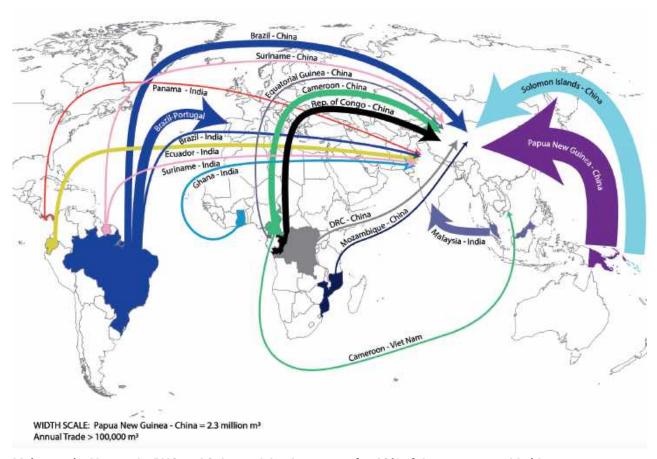
Major tropical log exporters worldwide (2022-2024)

Graphic reproduced from: International Tropical Timber Organization (ITTO), Biennial review and assessment of the world timber situation, 2023-2024, p. 12, 74-77. Figures for Solomon Islands are only for the year 2023 available. China is the country that benefits most from timber from Papua New Guinea. Ninety per cent of timber from PNG is exported to China, where it is processed and exported to other markets. (ITTO, 2025: 11).

This report reveals a widespread system of exploitation of PNG's timber resources by foreign companies. Most of these companies originate from Malaysia or have close ties to that country, particularly timber companies based in Sarawak, which are often organised as family businesses. Malaysian timber tycoons play a key role in the timber business in PNG as this report shows.

Starting their logging activities in PNG more than thirty years ago, Malaysian-linked companies turned the country into the world's largest exporter of tropical roundwood within a very short time. Since 2013, PNG has been the world's largest exporter of tropical timber (ITTO, 2015: 11), overtaking Malaysia, which had been the largest exporter for 30 years until only 10% of its primary forests remained.

In using the term 'Malaysia's timber colony', this report refers to the Malaysian business families who previously destroyed Malaysia's forests that are now acquiring land abroad, especially in Papua New Guinea, destroying rainforests and transferring profits to their home countries, while leaving behind ecological, social and economic damage. The report focuses in particular on FCAs, as they are a major cause of deforestation in PNG and are largely controlled by Malaysian families. There are serious doubts about the legality of FCAs, and several examples in this report clearly show that FCAs are not bringing about the claimed development in the region, but are primarily serving to promote deforestation.



Major tropical log trade. PNG and Solomon Islands account for 40% of the exports worldwide.

Map reproduced from: ITTO, International Tropical Timber Organization (ITTO), Blennial review and assessment of the world timber situation, 2023-2024, p. 11.

Forest Clearing Authorities: An Introduction

Logging in Papua New Guinea is regulated by the *Forestry Act of 1991* (amended in 1993, 1996, 2000, 2005, 2007 and 2010 [PNGFA, n.d]) and overseen by the PNG Forest Authority (PNGFA), which is responsible for issuing logging licenses across different concession categories (ActNow, 2023b).

The Forestry Act Act defines three categories of concessions. These are:

Forest Management Agreements (FMAs), which provide the PNGFA with long-term rights for forest management under a contract between customary landowners and the PNGFA, primarily for selective logging.

Timber Authorities (TAs), which are small-scale timber activities, defined as removal of less than 5,000 cubic meters of timber, clearance of less than 50 hectares of forest for land-use change, establishment of a roadline of less than 12.5km in length, or the removal of non-timber forest productions.

Forest Clearing Authorities (FCAs), introduced by an amendment in 2000, which is issued for:

"the purpose of large-scale conversion of natural forest to areas that are designated for agricultural or other landuse development projects in excess of 50 hectares".

The PNGFA (n.d [b]) defines two types of FCAs:

Agricultural FCAs, which are "to carry out a Large-Scale conversion of Forest to Agriculture or other Land-use Development where the amount of Proposed Clearance of Natural Forest is greater than 50 Hectares in total."

Road Construction FCAs, "to carry out a Large-Scale conversion of Forest to Road Development over an existing forested area where the Proposed Road will be greater than 12.5 kilometers in length."

The PNGFA stipulates three main requirements for applying for an FCA, which includes 1) a public hearing by the Department of Agriculture and Livestock, 2) an approved Environment Permit, and 3) Landowner consent through Form 267 of the Forestry Regulations 1998.

Forest Clearing Authorities and Special Agricultural and Business Leases

As the requirements under the PNGFA stipulate, a concrete intention to convert a forest area into an agricultural project is a key component of the FCA approval process. Upon its introduction into the Forestry Act in 2000, FCAs were granted to holders of Special Agricultural and Business Leases (SABLs), to provide a legal framework for the conversion of large forest areas into agricultural projects.

The concept of an SABL was introduced in the *Land Act 1996*. The SABL scheme allowed for customary landowners to lease land to the State, who would sublease it to a nominated group for agriculture development and management. In theory, under this scheme customary landowners would be provided with a title to enter into agricultural projects. However, the majority of SABL schemes involved direct subleases to private companies for 99-year leases without subsequent rights to customary landowners. Once provided with an SABL, companies could then apply for an FCA under the expectation that they would establish agricultural plantations on the cleared land (Act Now, 2023b)

After widespread documentation of fraudulent consent processes, environmental and human rights abuses in the SABL process, the Papua New Guinean government, in 2011, established a Commission of Inquiry (COI) into SABLs. Amongst other findings, this commission found that the vast majority of SABLs did not attain consent from customary landowners, only a minority of SABLs had valid FCAs, and 42 out of 46 SABLs were reported to require revocation because they were acquired without proper due diligence (COISABL, 2013). In 2013, the Commission recommended that all SABLs be cancelled. The COI reports were tabled in 2014 and the National Executive Council (NEC) recommended that the illegal SABLs be revoked and nullified, however, the NEC recommendation was not implemented by relevant authorities. As of 2022, only nine out of 75 leases had been cancelled (ActNow, 2022). Further, it has been reported that the PNGFA had continued to issue FCAs in SABLs as recently as 2014 (Act Now and War on Want, 2018: 22).

Forest Clearing Authorities Today

The issuance of FCAs is a major driver of deforestation and human rights violations in Papua New Guinea today. As of 2024, there are 24 still-active FCAs, and logs from FCAs account for 1/3rd of Papua New Guinea's log exports. In 2022 alone, more than 1 million cubic meters of logs were exported from FCAs (Act Now, 2022). In 2023, 39% of exported logs came from FCAs (SGS, 2024: 4).

Unsurprisingly, as there is significant overlap between SABLs and FCAs, similar governance, social and environmental problems have been documented for FCAs. A series of reports by ActNow PNG have established that numerous FCAs have failed to obtain free, prior, informed consent (FPIC) from local landowners and communities and have failed to produce credible agricultural plans or establish agricultural projects, allowing FCA holders to bypass logging restrictions.

Due to these concerns, in February 2023 the PNGFA announced a moratorium on issuing new FCA licenses for 12 months - a ban which still stood as of November 2024, pending a review of existing projects (Act Now, 2024).

The involvement of Malaysian business people and companies in the timber industry in Papua New Guinea has been well-documented since the 1990s. A 2022 report by ActNow PNG identified that only ten clusters of companies were responsible for 70% of round log exports from Papua New Guinea. Act Now identified that each of these groups were

"strongly linked to Malaysia, either through direct links to Sarawak-based logging and palm oil conglomerates or other Malaysian individuals and business interests".

Methodology

This comprehensive review aims to complement existing reports establishing the links between Malaysian business people and companies and deforestation in Papua New Guinea.

Due to the broad range of environmental issues related to the timber industry in Papua New Guinea, this review aims to limit its scope of analysis to large-scale forest conversion in Papua New Guinea. While the 2011 Commission recommended a cancellation of all SABLs, the cancellation process has been delayed and opaque, and the extent of overlap between active FCAs and SABLs is unknown. Therefore, instead of focusing on SABLs, the focus of this review is to study FCAs, as they remain a consistent indicator of forest conversion in Papua New Guinea.

This review exposes the links between Malaysian business people and companies and FCAs in Papua New Guinea. This review defines FCAs as the 67 licenses documented in the PNGi FCA database at publication date, including the Loani Bwanabwana FCA, which is not in the PNGi database.

To identify links between FCAs and Malaysia, this review analysed the individuals or entities with ownership (through shares) and directorship of every FCA license holder listed in the PNGi database. This review is conducted at both the parent company and contractor level. Data on ownership and directorship is derived from the PNGi database, or in some instances from external investigative reports. Once this data was collected, the Malaysian link between individuals with involvement in FCA license holders is established either through the existence of business or personal addresses of these individuals located in Malaysia, or other documents identifying the citizenship of these individuals as Malaysian. This data is further derived from the PNGi database where available, and external information from investigative reports, company registration documents, shareholder reports, news articles and other sources. Other individuals are classified as either 'Likely non-Malaysians' or 'Potentially Malaysian or linked to Malaysia'. The former is classified according to the presence of names which do not conventionally indicate the presence of Malay, Chinese, Indian or Orang Asal (Indigenous) ancestry, or are not commonly used names in Malaysia but are in Papua New Guinea, i.e Robiemon, Yalu and others. The latter is classified where there are no documents proving the link between the individual with Malaysia, but such individuals share surnames with other individuals verified as Malaysian. Any individuals not falling into the above three categories are classified as 'Unknown'.

The clustering of surnames was conducted based on the romanization of surnames as per PNGi-published documentation listed in Appendix 3 where it is assumed that traditional Chinese naming conventions, where the surname is first, has been uniformly rearranged to the last name in line with European 'first name-last name' conventions adopted by the PNG authorities. In cases where the surname does not appear last, links to family surnames are verified through secondary sources.

The results of this review are presented in a table establishing these connections at the license holder level. Further, an analysis is included presenting a list of Malaysians involved in FCAs and their connections with FCA-license holding companies. Additionally, a map identifying a conservative estimate of the Malaysian forest 'footprint' is provided, where geospatial data of FCAs could be obtained via desktop research, as described in Finding #1.



FCA Licenses Threaten Nearly Two Million Hectares of Rainforest

FCA Licenses Threaten Nearly Two Million Hectares of Rainforest

The PNGFA does not publish maps of FCA licenses. From the 67 known FCA licenses, there are 54 individual FCA concessions after overlaps are removed. Spatial data for 37 of these concessions could be identified, through a range of sources noted in Appendix 2, accounting for 68% of FCA licenses. The following findings must be interpreted accordingly.

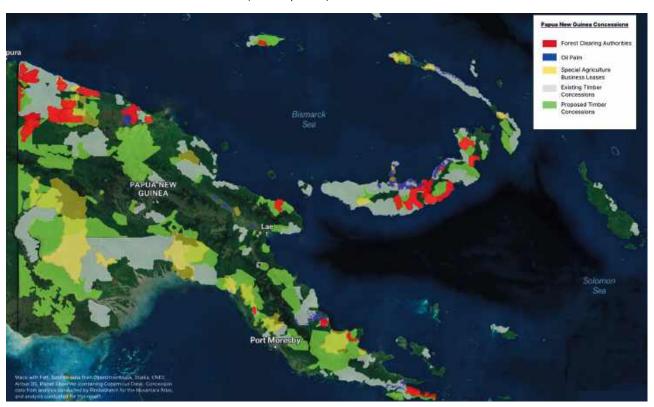
These 37 FCAs have a total area of 1,898,940 hectares. It must be noted that this is higher than the total licensed area as documented in the PNGi FCA database, which is 1,544,042ha.

Within these 37 boundaries, between 2020 and 2022, 21,506ha of tree cover loss within natural forest cover occurred, illustrating that FCAs are a significant driver of deforestation in the country.

Within the 1.89 million hectares of FCAs documented, 175,173 hectares comprise non-forest cover as of 1st January 2024, which includes clear-cut areas, agricultural areas and natural non-forest areas such as savannas and grasslands. Therefore 9% of FCAs already consist of non-forest areas, representing an area more than twice the size of Singapore.

The remaining 1,680,319 hectares of natural forest remain standing in FCA license areas. Therefore, 1.68 million hectares of forests in Papua New Guinea are under threat from deforestation from FCA licenses alone. This represents an area roughly equal to the size of Eswatini, and is larger than the size of East Timor. It is also equivalent to Sarawak's existing oil palm landbank.

Of these forests, 1.47 million hectares, or 88% of the total forest under threat, can be spatially classified as 'undisturbed' forests, indicating the strong ecological integrity of forests being targeted by FCA licensees. Further underlining this ecological integrity, the amount of greenhouse gases that is expected to be released from the conversion of this 1.68 million hectares of forest is 277.35 million tCO2e; this is more than 27 times Papua New Guinea's annual emissions at current rates (EDGAR, 2025).



Further information on how these calculations were conducted, and the geospatial data file for these concessions, can be found in the appendix.

There are significant gaps in information on what commodities are being proposed for planting in cleared FCA areas. Of the 67 FCA licenses, commodity data was unavailable for 49 licenses. For the 18 FCAs for which this data was available,

- six FCAs planned to grow a combination of cocoa and other commodities, including coffee, balsa and graze cattle.
- four FCAs planned to grow oil palm alone or a combination with other commodities such as rubber, rice and sago.
- two FCAs primary planned to graze cattle.
- two FCAs planned to grow rubber.
- one FCA planned only to grow cocoa.
- one FCA planned to grow rice and cocoa.
- one FCA planned to grow Kamarere, a fast-growing Eucalyptus species.
- one FCA planned to grow coconut, pepper and conduct open-cast gold mining operations.



97% of FCA Licenses Are Linked to Malaysia

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55 entities, both at the contractor and parent company level, are associated with FCA licenses. Each of these 55 entities, covering each of the 67 FCA licenses, were reviewed based on the methodology above.

Of these 55 entities, four do not appear to have any Malaysian influence whatsoever. These are TANGOY VIVAFOUNDER HOLDINGS LIMITED, which is a joint venture between a Papua New Guinean and mainland Chinese company, Panakol Limited, which appears to be locally owned and controlled, Pacific Green Forests and Jambo Trak, which appears to be linked to individuals from Papua New Guinea and Brunei.

Noting that some FCAs have, at different points, had different contractors (for example, FCA10-09 has had 4 contractors listed on the PNGi database), this analysis finds that 65 FCA licenses are, or have been at some point in time, held by entities that can be verified as under Malaysian influence. These links are demonstrated by data indicating these entities are subsidiaries of Malaysian companies, or that individuals who are shareholders or directors are either Malaysian nationals or have addresses in Malaysia. Therefore, 65 out of 67 FCA licenses are under Malaysian influence, comprising 97% of all FCA licenses.

The list of 67 licenses and the presence or absence of links to Malaysia are included in the table on the next page. Information on the contractor, exporter and parent company is from the PNGi FCA database, while information on the ownership and directorship is derived from company profiles from the PNGi website, or other secondary sources. For brevity, all these sources are listed in detail in Appendix 2.

Table 1: Links Between FCAs and Malaysia

Licence Number	Contractor/Exporter	Parent Company	Entity Analysed	Ownership	Directorship
01-02	ALLIED SUCCESS INTERNATIONAL (PNG) LIMITED	No parent	ALLIED SUCCESS INTERNATIONAL (PNG) LIMITED	Of the four shareholders of Allied Success International, two have addresses in Malaysia.	Of the four directors of Allied Success International, three have addresses in Malaysia.
03-02	ALBRIGHT LIMITED	WILLSMART INTERNATIONAL LIMITED	ALBRIGHT LIMITED and WILLSMART INTERNATIONAL LIMITED	Albright Limited's parent company is Willsmart International Limited. Willsmart International was acquired by Samling in 2012 (Samling, 2012).	Of the six directors of Albright Limited, two have addresses in Malaysia, and another is listed as a Malaysian national.
04-01	KULAWOOD LIMITED	ASET MERIAH PNG LIMITED	KULAWOOD LIMITED and ASET MERIAH PNG LIMITED	Sole shareholder of Kulawood is a Malaysian national.The sole shareholder of ASET MERIAH is a Malaysian national.	Out of the four directors, one is Malaysian. Out of three directors of ASET MERIAH three are Malaysian nationals.
04-03	Millennium Corporation	No parent	Millennium Corporation	No data	The sole director is Malaysian.
Loani FCA	Millennium Corporation	No parent	Millennium Corporation	No data	The sole director is Malaysian.
05-01	MATUFI (PNG) LIMITED	No parent	MATUFI (PNG) LIMITED	Out of three shareholders, two are Malaysian nationals.	Out of five directors, three are Malaysian.
05-03	ORO WOOD INDUSTRY LIMITED	No parent	ORO WOOD INDUSTRY LIMITED	Out of three shareholders, two have addresses in Malaysia, and another is a Malaysian national.	Out of six directors, one is a Malaysian national, and two have addresses in Malaysia.
05-04	NORTHERN FOREST PRODUCTS LIMITED	No parent	NORTHERN FOREST PRODUCTS LIMITED	Out of two shareholders, one has an address in Malaysia.	Out of five directors, one has an address in Malaysia.

05-05	MUSA CENTURY LIMITED	No parent	MUSA CENTURY LIMITED	50% of the company is owned by Deluxe Investments Limited, of which two of three directors are Malaysian nationals. 49% of the company is owned by a Malaysian national.	Out of the two directors, both are Malaysian nationals.
05-06	ORO WOOD INDUSTRY LIMITED	No parent	ORO WOOD INDUSTRY LIMITED	Out of three shareholders, two have addresses in Malaysia, and another is a Malaysian national.	Out of six directors, one is a Malaysian national, and two have addresses in Malaysia.
05-06	NORTHERN FOREST PRODUCTS LIMITED	No parent	NORTHERN FOREST PRODUCTS LIMITED	Out of two shareholders, one has an address in Malaysia.	Out of five directors, one has an address in Malaysia.
10-01	SAMAS LIMITED	BRILLIANT INVESTMENT LIMITED	BRILLIANT INVESTMENT LIMITED and SAMAS LIMITED	For Brilliant Investment, of two shareholders, one is a Malaysian national.For SAMAS Limited, one of two shareholders has an address in Malaysia.	For Brilliant Investment, of five directors, two are Malaysian nationals. For SAMAS Limited, two of four directors are Malaysians and one has an address in Malaysia.
10-01	MEKAR HARVEST (PNG) LIMITED	BRILLIANT INVESTMENT LIMITED and MEKAR (PNG) LIMITED	BRILLIANT INVESTMENT LIMITED and MEKAR HARVEST (PNG) LIMITED	For Brilliant Investment, of two shareholders, one is a Malaysian national. For MEKAR HARVEST, one of two shareholders are Malaysian.For MEKAR (PNG) Limited, 6 of 8 shareholders have addresses in Malaysia and one is a Malaysian.	For Brilliant Investment, of five directors, two are Malaysian nationals. For MEKAR HARVEST, three of four directors are Malaysian.For MEKAR (PNG) Limited, 6 of 8 shareholders have addresses in Malaysia and one is a Malaysian.
10-03	BEWANI FOREST PRODUCTS LTD	TOP LEAP HOLDINGS LIMITED	BEWANI FOREST PRODUCTS LTD and TOP LEAP HOLDINGS	For BEWANI, of five shareholders, three are Malaysian nationals, and two have addresses in Malaysia For TOP LEAP, no documents could be accessed.	For BEWANI, of six directors, three are Malaysian nationals, and two have addresses in Malaysia.

10-04	JAMBO TRAK LIMITED	PACIFIC GREEN FOREST LIMITED	PACIFIC GREEN FOREST LIMITED AND JAMBO TRAK LIMITED	For PACIFIC GREEN FOREST LIMITED, all three shareholders are from Brunei.	For PACIFIC GREEN FOREST LIMITED, of six directors, one is Malaysian, the rest are from Brunei and Papua New Guinea.
10-05	PACIFIC GREEN FOREST LIMITED	No parent	PACIFIC GREEN FOREST LIMITED	Links cannot be ascertained	Links cannot be ascertained
10-07	GLOBAL ELITE LIMITED	No parent	GLOBAL ELITE LIMITED	The sole shareholder is a Malaysian national.	Out of two directors, one is a Malaysian national.
10-09	PJ PLANTATIONS LIMITED	No parent	PJ PLANTATIONS LIMITED	Out of four shareholders, two have addresses in Malaysia.	Out of three directors, two have addresses in Malaysia.
10-09	PINA KIPA RURAL FARMERS LIMITED	PJ PLANTATIONS LIMITED	PJ PLANTATIONS LIMITED and PINA KIPA RURAL FARMERS LIMITED	For PJ PLANTATIONS, of four shareholders, two have addresses in Malaysia. PINA KIPA RURAL FARMERS LIMITED'S sole shareholder is a PNG national	For PJ PLANTATIONS, out of three directors, two have addresses in Malaysia. PINA KIPA RURAL FARMERS LIMITED'S sole director is a PNG national
10-09	SUNLAND LIMITED	No parent	SUNLAND LIMITED	Out of two shareholders, one is Malaysian.	Links cannot be ascertained.
10-09	TANGOY VIVAFOUNDER HOLDINGS LIMITED	No parent	TANGOY VIVAFOUNDER HOLDINGS LIMITED	This is a joint venture between a local and Chinese company.	No data.
10-10	GLOBAL ELITE LIMITED	No parent	GLOBAL ELITE LIMITED	The sole shareholder is a Malaysian national.	Out of two directors, one is a Malaysian national.
10-10	SUMMIT AGRICULTURE LIMITED	No parent	SUMMIT AGRICULTURE LIMITED	All three shareholders are Malaysian nationals.	Out of three directors, two are Malaysian nationals.
10-11	VANIMO JAYA LIMITED	No parent	VANIMO JAYA LIMITED	The largest shareholder is a Malaysian	No data
10-13	CONTINENTAL ALLIANCE LIMITED	No parent	CONTINENTAL ALLIANCE LIMITED	Both shareholders are Malaysian.	Both directors are Malaysian.

10-14	EMO HOLDINGS LTD	No parent	EMO HOLDINGS LTD	The sole shareholder has an address in Malaysia	Out of three directors, one has an address in Malaysia.
11-01	WEWAK AGRICULTURE DEVELOPMENT LTD	GK AGRICULTURE SDN BHD	GK AGRICULTURE SDN BHD and WEWAK AGRICULTURE DEVELOPMENT LT	GK Agriculture is a Malaysian-registered business	GK Agriculture is a Malaysian-registered businessAll three directors of WEWAK AGRICULTURE DEVELOPMENT LTare Malaysian.
11-01	SUMMIT AGRICULTURE LIMITED	No parent	SUMMIT AGRICULTURE LIMITED	All three shareholders are Malaysian nationals.	Out of three directors, two are Malaysian nationals.
11-02	STAR AVENUE LIMITED	BRILLIANT INVESTMENT LIMITED	BRILLIANT INVESTMENT LIMITED and STAR AVENUE LIMITED	For Brilliant Investment, of two shareholders, one is a Malaysian national.	For Brilliant Investment, of five directors, two are Malaysian nationals. For Star Avenue Limited, the nationality of both directors could not be ascertained.
11-03	SUMMIT AGRICULTURE LIMITED	No parent	SUMMIT AGRICULTURE LIMITED	All three shareholders are Malaysian nationals.	Out of three directors, two are Malaysian nationals.
11-04	SUMMIT AGRICULTURE LIMITED	No parent	SUMMIT AGRICULTURE LIMITED	All three shareholders are Malaysian nationals.	Out of three directors, two are Malaysian nationals.
11-05	CONTINENTAL ALLIANCE LIMITED	No parent	CONTINENTAL ALLIANCE LIMITED	Links cannot be ascertained	Links cannot be ascertained
11-05	GLOBAL ELITE LIMITED	No parent	GLOBAL ELITE LIMITED	The sole shareholder is a Malaysian national.	Out of two directors, one is a Malaysian national.
11-07	MATRIX DEVELOPMENT LIMITED	No parent	MATRIX DEVELOPMENT LIMITED	Out of two shareholders, one is a Malaysian national.	Out of two directors, one is a Malaysian national.
13-02	LUCKY 99 (PNG) LIMITED	No parent	LUCKY 99 (PNG) LIMITED	An Act Now report lists LUCKY 99 Limited as Malaysian-owned.	An Act Now report lists LUCKY 99 Limited as Malaysian-owned.

13-02	LUCKY LOGGING LIMITED	LUCKY 99 (PNG) LIMITED	LUCKY 99 (PNG) LIMITED and LUCKY LOGGING LIMITED	An Act Now report lists LUCKY 99 Limited as Malaysian-owned.For Lucky Logging Limited, of two shareholders, one is a Malaysian national.	An Act Now report lists LUCKY 99 Limited as Malaysianowned.For Lucky Logging Limited, of two directors, one is a Malaysian national.
13-03	WASU RESOURCE LIMITED	LUCKY LOGGING LIMITED	LUCKY LOGGING LIMITED and WASU RESOURCE LIMITED	For Lucky Logging Limited, of two shareholders, one is a Malaysian national.For Wasu Resource Limited, of two shareholders, one is presumably a PNG national, and the nationality of the other was not ascertained.	For Lucky Logging Limited, of two directors, one is a Malaysian national.For Wasu Resource Limited, two are presumably PNG nationals and the nationality of the other was not ascertained.
14-01	WESTENDERS LIMITED	KK CONNECTIONS LIMITED	KK CONNECTIONS LIMITED and WESTENDERS	Out of three shareholders, two are Malaysian nationals.Of six shareholders of Westenders, two are Malaysians.	No data. Of six directors of Westenders, two are Malaysians.
14-02	MILTON LIMITED	ASET MERIAH PNG LIMITED	ASET MERIAH PNG LIMITED and MILTON LIMITED	The sole shareholder of ASET MERIAH is a Malaysian national.For MILTON, one of three shareholders is Malaysian.	Out of three directors, three are Malaysian nationals for ASET MERIAHFOR MILTON, one of six directors is Malaysian.
14-03	MILTON LIMITED	ASET MERIAH PNG LIMITED	ASET MERIAH PNG LIMITED and MILTON LIMITED	The sole shareholder is a Malaysian national for ASET MERIAH.	Out of three directors, three are Malaysian nationals for ASET MERIAH
14-04	NOBLE INVESTMENTS LIMITED	VANIMO JAYA LIMITED	VANIMO JAYA LIMITED and NOBLE INVESTMENTS	The largest shareholder of VANIMO JAYA is a MalaysianAll three shareholders of NOBLE INVESTMENTS are Malaysian	No dataThree of five directors of NOBLE INVESTMENTS are Malaysian
15-01	TZEN NIUGINI LIMITED	CAKARA ALAM (PNG) LTD.	CAKARA ALAM (PNG) LTD. and TZEN NIUGINI	Cakara Alam is owned by CA Investments Limited, registered in Malaysia.TZEN NIGUINI's sole shareholder is Malaysian.	Both directors of Cakara Alam are Malaysian.Of TZEN NIGUINI's 11 directors, one is Malaysian and 7 have addresses in Malaysia.

15-02	TZEN NIUGINI LIMITED	CAKARA ALAM (PNG) LTD.	CAKARA ALAM (PNG) LTD. and TZEN NIUGINI	Cakara Alam is owned by CA Investments Limited, registered in Malaysia.TZEN NIGUINI's sole shareholder is Malaysian.	Both directors of Cakara Alam are Malaysian.Of TZEN NIGUINI's 11 directors, one is Malaysian and 7 have addresses in Malaysia.
15-03	TZEN NIUGINI LIMITED	CAKARA ALAM (PNG) LTD.	CAKARA ALAM (PNG) LTD. and TZEN NIUGINI	Cakara Alam is owned by CA Investments Limited, registered in Malaysia.TZEN NIGUINI's sole shareholder is Malaysian.	Both directors of Cakara Alam are Malaysian.Of TZEN NIGUINI'S 11 directors, one is Malaysian and 7 have addresses in Malaysia.
15-03	TZEN PLANTATION LIMITED	CAKARA ALAM (PNG) LTD.	CAKARA ALAM (PNG) LTD. and TZEN PLANTATION LIMITED	Cakara Alam is owned by CA Investments Limited, registered in Malaysia.	Both directors of Cakara Alam are Malaysian.Of six directors, three are Malaysian for TZEN Plantation.
15-04	KK CONNECTIONS LIMITED	KERAWARA LIMITED	KK CONNECTIONS LIMITED and KERAWARA	For KK Connections, of three shareholders, two are Malaysian nationals.	No data. For KERAWARA, of 15 directors, 4 have addresses in Malaysia
15-05	TIAN SUYN LIMITED	No parent	TIAN SUYN LIMITED	Both shareholders are Malaysian.	No data
15-07	GILFORD LIMITED	RIMBUNAN HIJAU (PNG) LIMITED	RIMBUNAN HIJAU (PNG) LIMITED	Rimbunan Hijau is a Malaysian company.	Rimbunan Hijau is a Malaysian company.
15-09	KK CONNECTIONS LIMITED	KERAWARA LIMITED	KK CONNECTIONS LIMITED	Out of three shareholders, two are Malaysian nationals.	No data.
15-09	K L CONNECTIONS LIMITED	KK CONNECTIONS LIMITED	KK CONNECTIONS LIMITED	Out of three shareholders, two are Malaysian nationals.	No data.

15-10	LALOANI NO. 8 LIMITED	KK CONNECTIONS LIMITED	KK CONNECTIONS LIMITED and LALOANI NO. 8 LIMITED	For KK Connections of three shareholders, two are Malaysian nationals. For LALOANI NO.8, one of five shareholders are Malaysian.	No data for KK ConnectionsFor LALOANI NO.8, 2 of 7 directors are Malaysian.
15-11	KK CONNECTIONS LIMITED	No parent	KK CONNECTIONS LIMITED	Out of three shareholders, two are Malaysian nationals.	No data.
15-13	WESTENDERS LIMITED	KK CONNECTIONS LIMITED	KK CONNECTIONS LIMITED	Out of three shareholders, two are Malaysian nationals.	No data.
15-13	PL CONNECTION LIMITED	No parent	PL CONNECTION LIMITED	Out of three shareholders, two have addresses in Malaysia and one is a Malaysian national.	Of its six directors, four share the same address in Malaysia, and one is Malaysian.
15-14	PANAKOL LIMITED	No parent	PANAKOL LIMITED	Links cannot be ascertained.	Links cannot be ascertained.
15-14	KK CONNECTIONS LIMITED	No parent	KK CONNECTIONS LIMITED	Out of three shareholders, two are Malaysian nationals.	No data.
15-16	K L CONNECTIONS LIMITED	KK CONNECTIONS LIMITED	KK CONNECTIONS LIMITED	Out of three shareholders, two are Malaysian nationals.	No data.
15-17	GREENPOINT LIMITED	No parent	GREENPOINT LIMITED	Out of two shareholders, both are Malaysian nationals.	Out of two directors, both are Malaysian nationals.
15-18	MEKAR (PNG) LIMITED	VANIMO JAYA LIMITED	VANIMO JAYA LIMITED	The largest shareholder is a Malaysian	No data
15-21	KK CONNECTIONS LIMITED	No parent	KK CONNECTIONS LIMITED	Out of three shareholders, two are Malaysian nationals.	No data.
15-22	KK CONNECTIONS LIMITED	No parent	KK CONNECTIONS LIMITED	Out of three shareholders, two are Malaysian nationals.	No data.

16-02	TUTUMAN DEVELOPMENT LTD	MANTORRAS PNG LIMITED	TUTUMAN DEVELOPMENT LTD	According to Global Witness (2017: 32), Tutuman Development is Malaysian owned. Mantorras's shareholders are Malaysian.	No data.
16-02	JOINLAND PNG LIMITED	No parent	JOINLAND PNG LIMITED	According to Global Witness, Joinland PNG Limited is Malaysian owned.	No data
16-03	MILLIONPLUS CORPORATION LIMITED	TUTUMAN DEVELOPMENT LTD	TUTUMAN DEVELOPMENT LTD	According to Global Witness, Tutuman Development is Malaysian owned. Millionplus's shareholders are Malaysian.	No data.
16-04	ISLANDS FOREST LIMITED	No parent	ISLANDS FOREST LIMITED	Out of five shareholders, one has an address in Malaysia, and another is Malaysian.	Out of five directors, three have addresses in Malaysia.
18-01	MAXLAND (PNG) LIMITED	JOINLAND PNG LIMITED	JOINLAND PNG LIMITED	According to Global Witness, Joinland PNG Limited is Malaysian owned.	No data
18-01	MAXLAND (PNG) LIMITED	TUTUMAN DEVELOPMENT LTD	TUTUMAN DEVELOPMENT LTD and MAXLAND	According to Global Witness, Tutuman Development is Malaysian owned. Of Maxland's three shareholders, all are Malaysian	No data.Of Maxland's 7 directors, 4 are Malaysian and 1 has an address in Malaysia.
N/A (Loani- Bwanabwana)	Millennium Corporation	N/A	Millenium Corporation	No data	The sole director is Malaysian.



79 Malaysians, Some Controversial, Involved in FCA Licenses

79 Malaysians, Many Controversial, Involved in FCA Licenses

This analysis analysed the details of 190 individuals involved in the 55 reviewed entities. Of these 190 individuals, 79 individuals can be demonstrably linked to Malaysia, with these links identified through investment records, registration records, news articles or any other source listed in Appendix 2. Meanwhile, an additional 49 are classified as likely not Malaysian, 52 individuals are categorised as likely to be Malaysian or linked to Malaysia due to surnames similar to other individuals identified as Malaysian, and 11 are classified as nationality unknown, as explained in the Methodology section above. The list of individuals associated with the 55 entities is displayed below. This list is derived from company profiles on the PNGi website, and for brevity all sources are detailed in Appendix 2.

Table 2: Individuals Associated with FCA Licensees

('Malaysians' in Green, 'Potentially Malaysian or Linked to Malaysia' in Black, 'Likely Non-Malaysians' in Red, 'Unknown' in Blue)

Entity	Shareholders	Directors
ALLIED SUCCESS INTERNATIONAL (PNG) LIMITED	Tuong Hui Wong Yik Long Wong Wou Wei PAO Junxiong Li	Sing Nang Wong Piew Seng Ngu Wou Wei PAO
ALBRIGHT LIMITED	• N/A	Theam Hock Chew Kian Liam Wong Ait Lim Wong Lee Ung WONG Sie Kion LAU Yick Kwang LEE
STAR AVENUE LIMITED	• N/A	Ming Yong YU Chung Chung Ting
PINA KIPA RURAL FARMERS LIMITED	Bernard Hiawani	Bernard Hiawani
JAMBO TRAK LIMITED	Kong Ping Lim Kwang Ing Lim Pow Lim	Kong Ping Lim Kwang Ing Lim Jack Goh Nassain Nakakus Pow Lim William Garey
MEKAR HARVEST PNG LIMITED	Ing Kee Wong King Shou Yein	Ing Kee Wong King Shou Yein Tiong Kheng Hii Tiong Kuoh Hii
SAMAS LIMITED	Ing Kee Wong Ing Chang Ngui	Hin Siong Yong Tu Sang Yong Ing Kee Wong Ing Chang Ngui

WASU RESOURCE LIMITED	Edna Yalu Jonathan Hul Hung Lau	Dorothy Hans Edna Yalu Jonathan Hul Hung Lau
WEWAK AGRICULTURE DEVELOPMENT LTD	Lau Hui Teck Nyi Then Chiong Ming Ting	• N/A
WILLSMART INTERNATIONAL LIMITED	N/A, owned by Samling (Samling, 2012)	• N/A
GILFORD LTD	Daniel Teck Hsin LING Tzong bin Hii	Su Chiu LU James SZE YUAN LAU Ching Hieng HO Faye DIATAU Grace Rose SOLIEN
KULAWOOD LIMITED	Leonard Ng Chow Leung Joseph Ken	Leonard Ng Chow Leung James Yandu WANJIK Joseph Scott KEN Simon Peter TOMIYAVAU
MATUFI (PNG) LIMITED	Leonard Ng Chow Leung Huong Mieng Ding Jelawai Anak Dingon Sing Yung CHIENG	Leonard Ng Chow Leung Huong Mieng Ding Jelawai Anak Dingon Sing Yung CHIENG Tiew Wei TING
ORO WOOD INDUSTRY LIMITED	Yih Wei Hwong You Soon Hwong Yih Siang Hwong	Yih Wei Hwong You Soon Hwong Yih Siang Hwong Jacob Kairi Swee Hock Lim
NORTHERN FOREST PRODUCTS LIMITED	Eii Sing Hii Daniel Shing Hii	Eii Sing Hii Daniel Shing Hii Guy Robiemon Chiong Hieng Tiew
MUSA CENTURY LIMITED	Vui Can Lim Vui Seng Lim Kem San Go	Ait Lim Wong Vui Can Lim Vui Seng Lim Kem San Go
BRILLIANT INVESTMENT LIMITED	Chung Ching Ting Ming Yong Yu	Chung Ching Ting Lucas Sii Ming Ling Ming Yong Yu Neng Lee Ling Toripe Koava
BEWANI FOREST PRODUCTS	Eng Seong Goh Kong Fatt Yap Mat Zin Bin Mat Akir Kim Tee Tee Lip Hian Tee	Eng Seong Goh Kong Fatt Yap Mat Zin Bin Mat Akir Kim Tee Tee Lip Hian Tee
PACIFIC GREEN FOREST LIMITED	Kong Ping Lim Lee Man Yung	Kong Ping Lim Lee Man Yung

GLOBAL ELITE LIMITED	Chiong Ming Ting	• N/A
PJ PLANTATIONS LIMITED	Joni DJOHARSJAH Kai Tong Kong Chee Choon Wong Shi Qing Yang	Joni DJOHARSJAH Kai Tong Kong Chee Choon Wong
SUNLAND LIMITED	Daniel Teck Hsin Ling	• N/A
TANGOY VIVAFOUNDER HOLDINGS LIMITED	Albert MUTUMAP Baomin LU Jeffrey NOMBEN Jerry KEMOT Mu LI Wenling LI Yipeng HUANG Zhiwen CHEN	Albert MUTUMAP Baomin LU Jeffrey NOMBEN Jerry KEMOT Mu LI Wenling LI Yipeng HUANG Zhiwen CHEN
SUMMIT AGRICULTURE LIMITED	Lau Hui Teck Chiong Ming Ting Nyi Then	Lau Hui Teck Chiong Ming Ting Nyi Then
VANIMO JAYA LIMITED	Ngie Yung Lau	• N/A
CONTINENTAL ALLIANCE LIMITED	Dasmand Wei Ming WONG Hieng Ming Wong	Dasmand Wei Ming WONG Hieng Ming Wong
EMO HOLDINGS LTD	Chai Hai Lee	Chai Hai Lee Elizah Koju Hock Lye Khoo
GK AGRICULTURE SDN BHD	N/A, Malaysian-owned	• N/A
MATRIX DEVELOPMENT LIMITED	Lau Hui Teck Dasmand Wei Ming WONG	Lau Hui Teck Dasmand Wei Ming WONG
LUCKY 99 (PNG) LIMITED	Absalom Haiyo Brendah Haiyo Edna Yalu Seng Lau	Absalom Haiyo Brendah Haiyo Edna Yalu Seng Lau
LUCKY LOGGING LIMITED	Lau Woo Edna Yalu	Lau Woo Edna Yalu
KK CONNECTIONS LIMITED	Han Hook See Kuok Tiang Ling	• N/A

ASET MERIAH PNG LIMITED	Huong Mieng Ding Jelawai Anak Dingon	Huong Mieng Ding Jelawai Anak Dingon Koh Woo Ling
CAKARA ALAM (PNG) LTD.	• N/A	Chan Char Lee Ee Fei Lee
TIAN SUYN LIMITED	Han Hook See Kuok Tiang Ling	• N/A
LALOANI NO. 8 LIMITED	Han Hook SEE Jiangfeng ZHANG Kuok Tiang LING Mary AISA Ray Chee Keong CHEONG	Han Hook SEE Jiangfeng ZHANG Kuok Tiang LING Mary AISA Naomi PHILIP Ray Chee Keong CHEONG Sylvia Jane TSIKULA
Mekar PNG Limited	Sing Yung CHIENG's Ngie Yung LAU Ngie Hung LAU Nai Yiing Ling Mee Kiong TIONG Hoe Yieng Tiong Hieng Huong HII Ambrose Tiong Hong LAU	Sing Yung CHIENG's Ngie Yung LAU Ngie Hung LAU Nai Yiing Ling Mee Kiong TIONG Hoe Yieng Tiong Hieng Huong HII Ambrose Tiong Hong LAU
Noble Investments Limited	Ding Kuong Tiong Wang Ping KO Ngie Yung LAU	Toripe KOAVA Wang Ping KO Lung Chuang TANG Ngie Yung LAU Tiw Tuh KUO
WESTENDERS LTD	Chung Kui Law Han Hook See Jiangfeng Zhang Ka Tai Lee Kuok Tiang Ling Nassain Kurai Nakikus	Chung Kui Law Han Hook See Jiangfeng Zhang Ka Tai Lee Kuok Tiang Ling Nassain Kurai Nakikus
Milton Limited	James Yandu Wanjik Joseph Ken Leonard Chow Leung Ng Moses Ngui Siew Ling Wong Simon Peter Tomiyavau	Joseph Ken Moses Ngui Leonard Chow Leung Ng
RIMBUNAN HIJAU (PNG) LIMITED	Hiew King TIONG Ik King TIONG Thai King TIONG Thomas Bruce GALL	Hugh CHALMERS Jeffrey Robert DICKENS Stephen Peter David LEWIN Timothy John GLENN Matthew MAY Yung King TIONG James LAU SZE YUAN Thomas Bruce GALL William Dare ROCHAIX Kiew Chiong TIONG Thai King TIONG Ivan Su Chiu Lu Chiong Ong TIONG

PL CONNECTION LIMITED	Ling Pau PauLing Lee LeeDana Ling Foong	 Ling Pau Pau Ling Lee Lee Dana Ling Foong Dennis Lu Jing LING Lu Siong Ling
PANAKOL LIMITED	Julius SAKAIN Leo ARAPKI Alfred TOKADIK Anton PRUGI Blasius TOPOR Felix TAKUN George ARIQINI James KAREKSES John MAIAP Kevin WOREBAI Patrick TAVANGA	Julius SAKAIN Leo ARAPKI Alfred TOKADIK Anton PRUGI Blasius TOPOR Felix TAKUN George ARIQINI James KAREKSES John MAIAP Kevin WOREBAI Patrick TAVANGA
GREENPOINT LIMITED	Francis Chu Kuang CHENG Huong Jiaw CHENG	Francis Chu Kuang CHENG Huong Jiaw CHENG
TUTUMAN DEVELOPMENT LTD	N/A, Malaysian-owned	• N/A
MAXLAND PNG LIMITED	Kie Yee Ling Kuok Poh Ling Nyuk Foh Lim San U Lee Syn Vun Chok Ting Ping Lau Yew Mee Hii	Kie Yee Ling Tiing Siu Hah Yew Mee Hii
JOINLAND PNG LIMITED	Kie Yee Ling Tiing Siu Hah	Kie Yee Ling Tiing Siu Hah Ting Ping Lau Wee Tak Ling
KERAWARA LIMITED	Beryl Howard Henry Ephraim Cristopher John Coady Peter Koh Woo LING James Hwong You CHUAANG Yiu Wei HWONG You Hu HWONG You Soon HWONG Bin Lopidi GENOL Boon Shin KOK Kee Hui LIIM Tung Leh LING Kong Fah CHONG Ray CHEONG William GAREY Lim Kok TIANG	Lim Kok Thieng
ISLANDS FOREST LIMITED	Kie Yee Ling Tiing Siu Hah Wei Chong Ong Hii Yew Mee Grace Ong	Kie Yee Ling Ting Ping Lau Wee Tak Ling
MILLENIUM CORPORATION	• N/A	Pak Cheng Wong

TZEN NIUGINI LIMITED	Eng Kwee Tan	Eng Kwee Tan Ann Lie LIM Chai Beng LIM Chan Char LEE Doreen KOVE Ee Fei LEE Kim Yih CHIA Koh Woo LING Pik Ying SIA Ronnie Hai Liang LIM Soon Foo LIM
TZEN PLANTATION LIMITED	• N/A	Ee Fei LEE Kiat Keong LEW Koh Woo LING Lea Ping ONG Ronnie Hai Liang LIM Soon Foo LIM
TOP LEAP HOLDINGS	• N/A	• N/A
MILLIONPLUS CORPORATION LIMITED	Kie Yii LING Tiing Siu HAH	Kie Yii LING Tiing Siu HAH Ting Ping Lau Wee Tak LING
MANTORRAS PNG LIMITED	Kie Yii LING Tiing Siu HAH	Kie Yii LING Tiing Siu HAH Ting Ping Lau Wee Tak LING

It is understood that some of these 79 identified Malaysians have courted controversy in the past:

- At least five individuals have experienced trouble with the Papua New Guinea Government Authorities, such as
 Eii Sing Hii and Lau Woo, who have been accused of illegal logging, Kem Sang Go who faced fraud charges,
 Leonard Ng Chow Leung who had a work permit cancelled in 2018 and Koh Loo Wing who was deported from
 the country (Jawanews, 2003; EIA, 2005; The National, 2018; PNG Bulletin, 2021; Ian Molly KMC, n.d)
- Four of these Malaysians were mentioned in the Panama Papers: Chung Ching Ting, Ting Chiong Ming, Lau Hui Teck and Nyi Then (ICIJ n.d, a-d). Additionally, companies associated with Ting Chiong Ming have been linked to land grabs and human rights abuses, as is described in Findings #4 and #5 (Act Now, 2023c).
- At least three individuals are, or were once, active in Sarawak's political scene: Ting Ping Lau, a councilor at the Padawan Municipal Council, Piew Seng Ngu, a Dato' Sri who was once President of the Sarawak Chinese Federation and Tiong Kuoh HII, a former senator (SUPP news, 2016; NST, 2017; SR, 2019)
- Three individuals are prominent Sarawakian business people, such as Dennis Lu Jing Ling, who is also a
 director at Shin Yang, Ling Pau Pau, a non-executive director at Sarawak Oil Palms Berhad and Tiing Siu Hah.
 Tiing Siu Hah is another Dato' Sri who was the founder of Joinland, was linked to a land corruption scandal in
 Sabah, and at time of publication is under investigation from the Malaysian Anti-Corruption Commission
 (MACC) for money laundering allegations (Shin Yang, 2024; SOP, n.d.; MACC 2025).



Association with Sarawakian Timber Dynasties

Association with Sarawakian Timber Dynasties

Within this list of individuals, the presence of surnames which could be associated with prominent Sarawakian timber dynasties, including at least four timber tycoons of Sarawak's "big six" (Rimbunan Hijau, WTK, Samling, KTS, Shin Yang and Ta Ann) (WWF, 2014), are significant:

- Five individuals have the Hii surname, associated with the Asia Plywood group (BMF, 2011; SR 2012).
- Eight individuals have the Lau surname, associated with the KTS group (one of the "big 6") (The Edge, 2017).
- 12 individuals have the Ling surname, associated with the Shin Yang group (one of the "big 6") (Shin Yang, n.d).
- Nine individuals have the Tiong surname, associated with Rimbunan Hijau (one of the "big 6")(BMF, 2011; The Edge, 2017; SR2020).
- Ten individuals have the Wong surname, associated with the WTK group (one of the "big 6") (BMF, 2011; Act Now 2023; SR 2020).

In all, according to this analysis, 44 individuals could be associated with Sarawakian timber dynasties that have extensive logging activities across the world, comprising 31% of verified and potential Malaysians involved with FCA licenses. However, this 31% control 40 FCAs, accounting for 60% of the total number of FCAs, and, these 40 FCAs cover a combined area of 1.2 million hectares, comprising 79% of the total FCA size by area according to PNGi figures.

Additionally, beyond the 'big six', these individuals are also linked to Papua New Guinea-specific timber dynasties. Ting Chiong Ming, who has a registered address in Sarawak (ICIJ, n.d(b)), is the direct, or indirect, principal shareholder in over 40 separate legal entities under the 'Giant Kingdom' group (Act Now, 2023c: 6). This includes companies named in this report for involvement in FCAs, including Summit Agriculture (FCA10-10, 11-01, 11-03 and 11-04), Wewak Agriculture (FCA11-01) and Global Elite (FCA10-07, FCA10-10, FCA11-05), covering an area of at least 494,080 hectares; larger than the entire district of Miri, Sarawak. The Giant Kingdom group is involved in FCAs such as the Wammy FCA, which, as described in Finding #5, is associated with violence and physical harm against local communities, gun violence, and other forms of police intimidation paid for by Global Elite (Act Now, 2023c: 26).

¹Refer to methodology section for further information. Information presented in this section is indicative and should be used with caution.



Significant Human Rights Abuses Have Arisen In These FCAs

Significant Human Rights Abuses Have Arisen In These FCAs

FCA licenses are widely associated with human rights abuses, including non-recognition of customary land rights, police intimidation and violence, along with environmental damage. Some of these have been documented in a four-part series investigating FCAs by Act Now, focusing on five projects.

The Wasu Cattle Farm Project

The FCA for the Wasu Cattle Farm project in Morobe was awarded in 2019, and the parent company of the contractor is the Malaysian-owned Lucky Logging Limited. According to the Act Now report (2024b), landowner representatives interviewed had reported no visible signs of agricultural or cattle activities in the Wasu FCA project area (Act Now 2024b: 12-14). Satellite images indicate that the logging pattern aligns more with selective commercial logging, characteristic of a Forest Management Authority (FMA)-authorized project, rather than the extensive land clearing typical of agricultural development, calling the legality of the FCA into question (Act Now 2024b: 15).

Furthermore, Act Now recorded substantial evidence that not all landowners have given their consent to the project. Their on-ground investigation found that two landowning clans in the area have raised objections, stating they were not adequately consulted before the FCA was issued. One of these groups, the Nzera clan, is currently engaged in a formal land mediation process and has expressed significant concerns over a logging license being granted on their land before ownership was fully established (Act Now 2024b: 11-14).

The Mengen Integrated Agricultural Project

The FCA for the Mengen Integrated Agricultural Project was awarded to a subsidiary of KK Connections, a Malaysian-owned company. Act Now found that forestry activities within the FCA seem to be primarily focused on extracting high-value timber, rather than conversion for proposed agricultural development, which is not allowed under the FCA license.

The report (Act Now, 2024c) further finds that, while some customary landowners signed consent agreements, opposition from multiple landowner groups has been well-documented, through letters of objection that had been sent to authorities. The project also impacts areas of international environmental importance, including the Nakanai Karst, which is on the Tentative World Heritage List (Act Now, 2024c: 17). Additionally, Act Now found evidence suggesting that police have been involved in intimidation through suppression of dissent and pressuring of landowners on behalf of logging companies, raising further concerns (Act Now, 2024c: 17).

The Wammy Rural Development Project

The FCA for the Wammy Rural Development Project was issued to Global Elite Limited, a Malaysian-owned company. Similar to the other FCAs, only selective logging had been observed in this FCA. The Act Now and Jubilee Australia report (2023) finds evidence that, potentially, the majority of customary landowners did not consent to the project, with issues arising such as inadequate consultation and reports that individuals had signed consent forms on behalf of community members (Act Now and Jubilee Australia, 2023: 8-9). Further, the report documents violence against local communities, including that landowners opposing logging companies were threatened with guns and locked in a shipping container for up to one week. The report cites an ABC News investigation which found that Global Elite had brought police officers to the site and paid for their food and accommodation. One landowner interviewed for the investigation stated that police had broken his jaw, teeth and mouth (Act Now and Jubilee Australia, 2023: 14-15).

The Loani Bwanabwana FCA

The Loani Bwanabwana FCA was awarded in 2024 to Millennium Corporation, a company with a Malaysian director. Act Now (2024) reported strong indications that the FCA did not receive free prior informed consent from customary landowners, with the verification forms submitted as part of the FCA application indicating that one out of seven clans on Sideia Island gave their approval, and on Basilaki Island only three out of 12 clans (ActNow 2024: 3-4). Further, the report finds that the wrong paperwork was used to verify consent, that signatures were not witnessed by the correct official, and the public hearing was conducted at the Provincial capital and not within local communities.

Wanigela Tree Plantation FCA

The Wanigela Tree Plantation FCA was first granted in 2017. Since then, communities have maintained that they were never properly consulted, their land rights never verified, and no informed agreement was reached. When landowners, supported by the provincial governor, challenged the 2017 FCA in court, the permit was cancelled in 2018. Yet, only five months later, in July 2019, the PNG Forest Authority reissued a new FCA for the same area to the same company, Northern Forest Products Limited, without addressing these consent issues (Act Now and Jubilee Australia, 2025: 5-6).

The project's operations have also failed to comply with the legal framework intended to safeguard both communities and the environment. Rather than carrying out block-by-block land clearing followed by agricultural development, as FCA rules require, the company engaged in extensive selective logging over a wide area, including outside the designated boundaries. This pattern, combined with repeated breaches of export permits has reinforced the perception that the "tree plantation" is simply a cover for industrial-scale logging. Compounding the harm is the lack of any tangible agricultural or plantation development. Years after logging began, there is no evidence of seedling nurseries, tree planting, or other promised agricultural activity (Act Now and Jubilee Australia, 2025: 11).

Environmental consequences have been severe for local communities, with local elders reporting that logging has polluted coastal waters where people bathe, and has eroded cultural and spiritual connections to the land, diminishing the inheritance they can pass to future generations. Despite these impacts, there has been little to no effective monitoring by government agencies (Act Now and Jubilee Australia, 2025: 12).

The company's apparent lack of secure land tenure further undermines legal rights, casting doubt on the legitimacy of its operations. Although the project's environmental permit was suspended in 2021 over concerns about illegal logging and environmental damage, it was reinstated in 2022 without clear explanation. Landowners' legal efforts to challenge the decision have continued to be delayed by procedural obstacles (Act Now and Jubilee Australia, 2025: 12).



Conclusions and recommendations

This review examined the involvement of Malaysian companies and individuals in Forest Clearance Authorities (FCAs) in Papua New Guinea (PNG). FCAs are permits issued under PNG's Forestry Act to facilitate large-scale forest conversion for agricultural or infrastructure projects. However, they have been widely criticized for facilitating illegal logging and human rights abuses, which continue despite a 2023 moratorium on new FCA licenses.

This review found that at least 1.68 million hectares of rainforest are under threat from FCA licenses, an area equal to the size of Eswatini and larger than East Timor. Of these forests, 88% are classified as 'undisturbed forests', and their conversion could release a combined 277.35 million tCO2e.

65 of 67 FCA licenses are controlled by Malaysian-linked companies, accounting for 97% of total FCA licenses, of which many have faced legal issues, including allegations of illegal logging and fraud. Some are linked to politically influential families and major logging companies in Sarawak, Malaysia and/or are involved in the Panama Papers scandal.

Case studies of FCAs reveal a recurring pattern: projects receive FCA approval with promises of agriculture, but primarily focus on timber extraction, often with little evidence of completed or viable farming activities. These operations frequently occur on customary land without proper consent, undermining landowner rights and community livelihoods. Further, spatial data on FCAs is difficult to access, and information on which commodities are planned for FCA projects is unavailable, leading to transparency issues. However, for the FCAs for which this data is available, there is no predominant commodity, and oil palm, rubber, cocoa, cattle and fast-growing timber species were all present in plans.

Demands to the Government of Papua New Guinea:

- The Government to suspend logging operations and log exports from all FCA areas until an independent, transparent and public inquiry into the legality of the licences and on-site operations has been completed and identified steps to rectify any abuses have been implemented.
- The PNGFA to extend the moratorium on issuing new FCA licences until the above independent inquiry has been conducted and any recommendations have been implemented.
- The PNGFA to publish the findings of any already completed audits of FCA projects.
- The PNGFA to publish detailed maps of all FCA concessions licensed since 2006 and copies of the FCA permits and agriculture plans.
- The PNG police fraud squad, UNODC and Interpol to identify any criminal laws that may have been broken in the submission and approval of FCA applications and the removal of timber without the informed consent of forest owners.
- The Investment Promotion Authority to publicly disclose the beneficial ownership of all Malaysian and other foreign owned companies operating in PNG.
- The relevant agencies in PNG to immediately spearhead anti-SLAPP (Strategic Lawsuit Against Public Participation) legislation to protect Indigenous defenders, NGOs and activists from corporate intimidation and silencing.
- PNG natural resource legislation must be amended to give paramount consideration to the protection and recognition of the rights of customary landowners in any resource development in PNG.

Demands to the Government of Malaysia

- The Malaysian Anti-Corruption Commission (MACC) to open an investigation into the conduct of Malaysian companies in PNG, including:
 - Engaging the relevant PNG enforcement agencies to assist in an investigation, under the Mutual Assistance in Criminal Matters Act 2002;
 - · Assessing whether companies obtained concessions through illegal methods;
 - Assessing whether companies adhered to Malaysian law, including crimes committed abroad regarded as serious offences under the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001, in their business activities;
 - Assessing whether any evasion of Malaysian tax and anti-money laundering regulations, including the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001, are occurring.
 - Publication of the outcome of the investigation.
- The Legal Affairs Division (BHEUU) to prioritise the operationalisation of the National Action Plan on Business and Human Rights (NAPBHR), including:
 - Accelerating the development of a Supply Chain Act, which would include provisions to compel Malaysian companies to adhere to United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), FPIC and associated Community Protocols in their overseas activities, as identified as a priority action in the NAPBHR;
 - The establishment of a robust, independent human rights monitoring and complaint system is in place which protects whistleblowers, including a Federal Ombudsman to handle complaints made against the public service, and a Human Rights Tribunal to empower enforcement activity against other actors, such as businesses;
 - Penalties for contravening such legislation, including fines tied to the nature of violation and revocation of permits.
- The Government of Malaysia needs to immediately spearhead anti-SLAPP (Strategic Lawsuit Against Public Participation) legislation to protect Indigenous defenders, NGOs and activists from corporate intimidation and silencing
- Financial regulators Bank Negara Malaysia and the Securities Commission to:
 - Establish a financing blacklist for companies involved in such violations of such BHEUU legislation as proposed above.
 - Open an investigation into the potential complicity of financial institutions in breaches of anti-money laundering and tax evasion regulations in relation to any financing or financial services support of Malaysian companies operating in extractive industries in PNG.

Demands to the Private Sector

- Overseas timber buyers to ensure any unprocessed logs, sawn timber and timber products purchased from PNG are independently verified as coming from a valid, legally approved and sustainably managed source.
- All financial institutions, including commercial banks and development banks, that maintain a presence in Papua New Guinea and Malaysia, to:
 - Identify and review financed entities operating in Papua New Guinea, ensuring that customers are fully compliant with anti-money laundering and tax regulations, and entity-level No Deforestation, Peat or Exploitation (NDPE) policies.
 - For future financing, institutions should place additional levels of due diligence to any Malaysian companies operating in extractive industries in Papua New Guinea, ensure that all financing adheres to No Deforestation, Peat or Exploitation (NDPE) principles, that the directors and shareholders of financed companies are not involved in breaches of in breaches of anti-money laundering and tax regulations or any other aspects of Malaysian or Papua New Guinean law, and that financed activities are aligned with the Paris Agreement and international consensus such as from the International Panel on Climate Change (IPCC).

Demands to International Aid Agencies

- The diplomatic community and aid agencies to:
 - Support the PNG government to implement the above inquiry into all existing FCA licences and implement the inquiry recommendations, and;
 - Assist the PNGFA to establish a public register of all timber harvesting operations as provided under S.103A of the Forestry Act 1991.



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Appendices

Appendix 1: Sources of Commodity Data

Note: Some data on commodities was derived from presentation slides from the 54th Annual Survey Congress, held between 12-14 September 2022, hosted by the East New Britain Provincial Administration Division of Lands and Physical Planning, available at this link: https://www.quickclose.com.au/ENB_Lands.pdf.

FCA Name	Commodity	FCA License Number	Source of Commodity Data
Begere	N/A	'01-02	No
Abeda	N/A	'03-02	No
Woodlark Integrated Project	Coconut, pepper, acacia, open- cast gold mining	'04-01	https://pngicentral.org/reports/wo odlark-island-logging-scam-part- 3-kulawood-limited/
Tufi Wanegela	N/A	'05-01	No
Ifane (Block 1 and 2)	N/A	'05-03	No
Wanigela and/or Wanigela Tree Plantation	N/A	05-04	https://www.land-links.org/wp- content/uploads/2022/09/SLOA- Geospatial-Companion-PNG- 2022-9-6-508.pdf
Lower Musa Agro	N/A	'05-05	No
lfane	N/A	'05-06	No
Semon Cattle Farm	Cattle	13-02	No
Wasu Cattle Farm	Cattle	13-03	No

Yuke	N/A	11-07	No
Meander May Valley	N/A	11-05	No
Angoram (Marienberg Hills)	N/A	11-02	No
Wewak Turubu	N/A	11-01	https://pngiforests.org/document/ wewak-turubu-fca-11-03-map
Angoram Integrated FCA	N/A	11-04	No
Gweinif Wagasu	N/A	10-10	No
Wagana Wagasu Large scale	N/A	10-13	No
Aitape East	N/A	10-01	https://www.land-links.org/wp- content/uploads/2022/09/SLOA- Geospatial-Companion-PNG- 2022-9-6-508.pdf
Wammy	Oil palm and rubber	10-07	https://png-forests.s3-eu-west- 1.amazonaws.com/forests/d2a64c 47d88d251ad202bc3d3a2bb71129 15fee76d09d2cbf19a4db15335208 1/d2a64c47d88d251ad202bc3d3a 2bb7112915fee76d09d2cbf19a4db 153352081.pdf
Bewani	Oil palm	10-03	https://pngforests.com/wp- content/uploads/2014/02/stained- trade_global_witness_310717_lores _pages.pdf

Schotchaio / Schotiacho	N/A	10-04	No
Walsa	N/A	10-05	No
Idam-Saiwi Inter Agri Proj	Rice, oil palm, sago	10-09	No
Moile Integrated Agriculture Project	N/A	10-14	No
Pohowa	Rubber	18-01	https://news.mongabay.com/2019/ 12/deforestation-for-potential- rubber-plantation-raises- concerns-in-png/
East West Patpatar	N/A	16-04	No
Central New Hanover	Rubber, cocoa, coconut, and Calophyllum	16-02	https://pngforests.com/wp- content/uploads/2014/02/stained- trade_global_witness_310717_lores _pages.pdf
Konoagil	N/A	16-03	No
Toriu Headwaters	Cocoa and Cattle	15-04	https://www.ecosoul.io/wp- content/uploads/2021/09/NIHT- VCS-Project-Description-v1.55.pdf
Makolkol	N/A	15-09	No
Dengnenge 'A' Int. Agric Project	Cocoa and Cattle	15-10	No

Dengnenge B Agro Forestry	Cocoa	15-16	No
Lote Kamlang	N/A	15-18	No
Utnari Land Agro-Forestry	Cocoa, Balsa, Kamarere	15-21	No
Illi Wawas Roadline	Oil palm	15-01	https://www.earthqualizer.org/new s-and-publications/update-on-oil- palm-expansion-in-papua-new- guinea
lli Wawas Masarau	Oil palm	15-02	No
lli Wawas Standalone	Oil palm	15-03	No
Sigite-Mukus	Oil palm	15-07	https://archive.org/details/Sigite- mukusIntegratedRuralDevelopmen tProjectEis2006/page/n49/mode/2 up
Suikol	Cocoa and Coffee	15-13	https://openjicareport.jica.go.jp/pd f/12150314_07.pdf
Taraiwara (Ext) Agro Reforestation	N/A	15-14	No
Inland Lassul Baining	N/A	15-11	https://www.land-links.org/wp- content/uploads/2022/09/SLOA- Geospatial-Companion-PNG- 2022-9-6-508.pdf
Mengen Integrated	Kamarere	15-22	https://pngiforests.org/document/ a-new-forest-grab-the-mengen- integrated-agriculture-project

Lolobao (Island)	N/A	'14-01	No
Pakalua Agri. Forestry	N/A	'14-02	No
Morevona-Agro Forestry	N/A	'14-03	No
Agulu Reserve	N/A	'14-04	No
Ania Integrated Agri	Rice, Cocoa, Balsa, Kamarere	'15-17	No
Suikol Makolkol	Cocoa and Coffee	'15-05	https://openjicareport.jica.go.jp/pd f/12150314_07.pdf (Could not be geolocated)
Loani Bwanabwana Integrated Agro-Forestry Project	Cocoa, Balsa, Rice and others.	N/A	https://actnowpng.org/sites/defaul t/files/publications/Loani%20FCA% 20Briefing%20Paper_0.pdf

Appendix 2: Sources of Spatial Data

FCA Name	FCA License Number	Source
Abeda	'03-02	Timber Concession Map, PNGFA (2025)
Agulu Reserve	14-04	Timber Concession Map, PNGFA (2025)
Aitape East	′10-01	https://www.land-links.org/wp- content/uploads/2022/09/SLOA-Geospatial- Companion-PNG-2022-9-6-508.pdf
Aitape West	′10-11	Timber Concession Map, PNGFA (2025)
Angoram (Marienberg Hills)	′11-02	Timber Concession Map, PNGFA (2025)
Angoram Intergrated FCA	′11-04	Timber Concession Map, PNGFA (2025)
Ania Integrated Agri	'15-17	Timber Concession Map, PNGFA (2025)
Begere	′01-02	Timber Concession Map, PNGFA (2025)
Bewani	′10-03	https://pngforests.com/wp- content/uploads/2014/02/stained- trade_global_witness_310717_lores_pages.pdf
Central New Hanover	′16-02	Timber Concession Map, PNGFA (2025)
Dengnenge 'A' Int. Agric Project	'15-10	N/A
Dengnenge B Agro Forestry	′15-16	N/A
East West Patpatar	′16-04	N/A
Gweinif Wagasu	′10-10	Timber Concession Map, PNGFA (2025)
Ifane (Block 1)	'05-03	Timber Concession Map, PNGFA (2025)
Idam-Saiwi Inter Agri Proj	'10-09	Timber Concession Map, PNGFA (2025)
Ifane (Block 2)	'05-06	Timber Concession Map, PNGFA (2025)
Illi Standalone	'15-03	Timber Concession Map, PNGFA (2025)
Illi Wawas (Masarau)	'15-02	Timber Concession Map, PNGFA (2025)

′15-01	Timber Concession Map, PNGFA (2025)
'15-11	https://www.land-links.org/wp- content/uploads/2022/09/SLOA-Geospatial- Companion-PNG-2022-9-6-508.pdf
′16-03	N/A
	Timber Concession Map, PNGFA (2025)
'14-01	N/A
′15-18	N/A
'05-05	N/A
′15-09	N/A
′11-05	N/A
′15-22	https://pngiforests.org/document/a-new-forest- grab-the-mengen-integrated-agriculture-project
′10-14	Timber Concession Map, PNGFA (2025)
14-03	Timber Concession Map, PNGFA (2025)
'14-02	N/A
′18-01	https://news.mongabay.com/2019/12/deforestati on-for-potential-rubber-plantation-raises- concerns-in-png/
'10-04	Timber Concession Map, PNGFA (2025)
′13-02	Timber Concession Map, PNGFA (2025)
′15-07	Timber Concession Map, PNGFA (2025)
'15-13	https://openjicareport.jica.go.jp/pdf/12150314_0 7.pdf
	'15-11 '16-03 '14-01 '15-18 '05-05 '15-09 '11-05 '15-22 '10-14 '14-03 '14-02 '18-01 '10-04 '13-02 '15-07

Suikol Makolkol	15-05	N/A
Taraiwara (Ext) Agro Reforestation	'15-14	N/A
Toriu Headwaters	'15-04	https://www.ecosoul.io/wp- content/uploads/2021/09/NIHT-VCS-Project- Description-v1.55.pdf
Tufi Wanigela	'05-01	https://www.ecosoul.io/wp- content/uploads/2021/09/NIHT-VCS-Project- Description-v1.55.pdf
Utnari Land Agro-Forestry	'15-21	Timber Concession Map, PNGFA (2025)
Wagana Wagasu Large scale	′10-13	Timber Concession Map, PNGFA (2025)
Walsa	′10-05	Timber Concession Map, PNGFA (2025)
Wammy	′10-07	https://png-forests.s3-eu-west- 1.amazonaws.com/forests/d2a64c47d88d251ad 202bc3d3a2bb7112915fee76d09d2cbf19a4db15 3352081/d2a64c47d88d251ad202bc3d3a2bb71 12915fee76d09d2cbf19a4db153352081.pdf
Wanigela Tree Plantation	'05-06	Act Now!
Wasu (Cattle Farm)	'13-03	Timber Concession Map, PNGFA (2025)
Wewak Turubu Large Scale Integrated Agriculture Project	¹¹¹⁻⁰³	https://pngiforests.org/document/wewak- turubu-fca-11-03-map
Woodlark Integrated Project	'04-01	https://pngicentral.org/reports/woodlark-island- logging-scam-part-3-kulawood-limited/
Yuke	'11-07	N/A

Appendix 3: Raw Data: Shareholders, Directorship and Secretaries

 $A vailable\ at:\ https://docs.google.com/document/d/1iVdOj9PAPzdtTq-D70SoOn1w_csOOKp0VqEltU0YFcs/edit?\ usp=sharing$

Appendix 4: Raw Data: Individuals

Available at:

 $https://docs.google.com/document/d/1a8uCghi2NBW9isksYCbVWCiYvBw_vuteUhZzWmBSFvA/edit?usp=sharing$

Appendix 5: Calculating FCA Extent, Forest Cover and Tree Cover Loss

This analysis is based on the following assumptions and definitions:

- 1. This analysis defines forests by adopting the FAO's FRA 2025 'Naturally Regenerating Forest' definition: "Forest predominantly composed of trees established through natural regeneration", including "i) forests for which it is not possible to distinguish whether planted or naturally regenerated; ii) forests with a mix of naturally regenerated tree species and planted/seeded trees, and where the naturally regenerated trees are expected to constitute the major part of the growing stock at stand maturity; iii) Includes coppice from trees originally established through natural regeneration and iv) Includes naturally regenerated trees of introduced species."
- 2. This analysis adopts the Vancutsem et al., 2024 forest cover dataset from the EU's Tropical Moist Forest (TMF) cover tool, developed to support the implementation of the EU Deforestation Regulation (EUDR). Subforest cover classifications, such as the extent of undisturbed, degraded and non-forest areas, are adopted from this dataset. The dataset, which identifies and classifies tree cover outside of non-natural forest uses, is adopted as it reflects 'Naturally Regenerating Forest' criteria (EU Science Hub, 2025).
- 3. This analysis adopts Hansen et al. Tree Cover Loss datasets and the Noone et al (2022) dataset on vulnerable carbon to define expected GHG releases from conversion events.
- 4. All areas within concession boundaries which meet the Vancutsem et al., 2024 criteria for undisturbed and degraded forest are assumed to be under threat from conversion, as data on areas set aside for conservation, and other non-conversion uses are not known.
- 5. It must be noted that due to continued limitations in data availability, the findings of this report must be taken as estimates produced within the confines of the methodology adopted.

Where possible, concession boundaries are imported directly from existing datasets. If unavailable, maps are digitized to convert them from 2D images into shapefiles. To digitize maps of concessions, these are georeferenced on Google Earth Pro while referencing forest reserve boundaries, geographical features (l.e rivers), or other other features (i.e boundaries of monoculture plantations). Once digitized, concessions are then traced following their outer boundary, as a .1 point line. It must be noted that the accuracy of concession boundaries are dependent on the resolution of the image used, and the data presented here is an estimate only.

The calculations for this chapter were conducted on ArcGIS Pro 2.9, installed with a patch to fix existing bugs in the software. This methodology may be applicable with other Geographic Information Systems (GIS) such as QGIS, however the details below are based solely on calculations performed with ArcGIS Pro.

Upon downloading the relevant data, the "Extract by Mask" raster tool and "Mosaic to New Raster" tool were applied to isolate and merge the data within Malaysia's administrative boundaries. This process generated a comprehensive layer representing the state of forests within Malaysian territory, categorized as [Undisturbed, Degraded, and Other] (Vancutsem et al., 2024). To integrate the concession boundaries data obtained from RimbaWatch into the analysis, the Keyhole Markup Language (KML) format of the concession boundaries (see Appendix II) was converted into a layer file using the tool available in ArcGIS Pro. Further, classification of the polygons and lines in the concession dataset was conducted based on their respective attributes, such as timber plantations, palm oil areas, and settlements, utilizing the reclassify tool. This step enabled the differentiation of different types of concessions within the dataset. Subsequently, the forest classification layer was overlaid onto the RimbaWatch dataset using the "Extract by Mask" tool. In this operation, the forest classification data served as the input data, and the RimbaWatch dataset functioned as the boundary, yielding forest classification information within the defined concession boundaries. The attribute tables from the new layers provide data for the number of cells for each type of forest cover.

The layer properties of the raster data, available for each layer, provide the necessary information for this calculation. Specifically, the Raster Spatial Reference and Extent provided the necessary values for cell length (x) and cell width, which were instrumental in calculating the size of each cell. The cell length was squared to determine the cell size in square meters (m2), and this value was then converted to hectares (ha) by dividing it by 10,000. The formula for calculating the cell size (ha) is as follows:

Cell size (ha) =
$$\frac{x^2}{10000}$$

After obtaining the cell size, the attribute table of each layer was processed to extract pertinent information related to relevant values and the corresponding number of pixels for each row. The total area for each row in the attribute table was then determined by multiplying the number of cells by the previously calculated hectare value.

Total area (ha) = Number of cells Cell size (ha)

Finally, the total value in a given area is determined by multiplying the total area (ha) by the corresponding value specific to that region.

The FCA licene boundaries are available for download at this link: https://drive.google.com/file/d/14xlfqVxP23oZBpBShVMHKPKkfwz_HMWZ/view?usp=drive_link.

