

Mega-Project with Mega-Impact: Unchecked Development Threatens Komodo National Park

WALHI and Sunspirit for Justice and Peace

Inscribed as a national park in 1980, the Komodo National Park (KNP) is a conservation area located in the West Manggarai District, East Nusa Tenggara Province, has had three fundamental meanings. First, this area is the last remaining natural habitat for the endangered *Varanus komodoensis* species, in which the Komodo and Rinca Island are the two islands with the highest population of Komodo dragons. Second, in addition to its critical in-situ conservation value, the national park is home to local and Indigenous communities, who derive their culture and livelihoods from the land. Lastly, the KNP is the epicentre of Indonesian tourism in the eyes of the world. However, its high biodiversity value is driving unsustainable development impacts in East Nusa Tenggara (NTT).

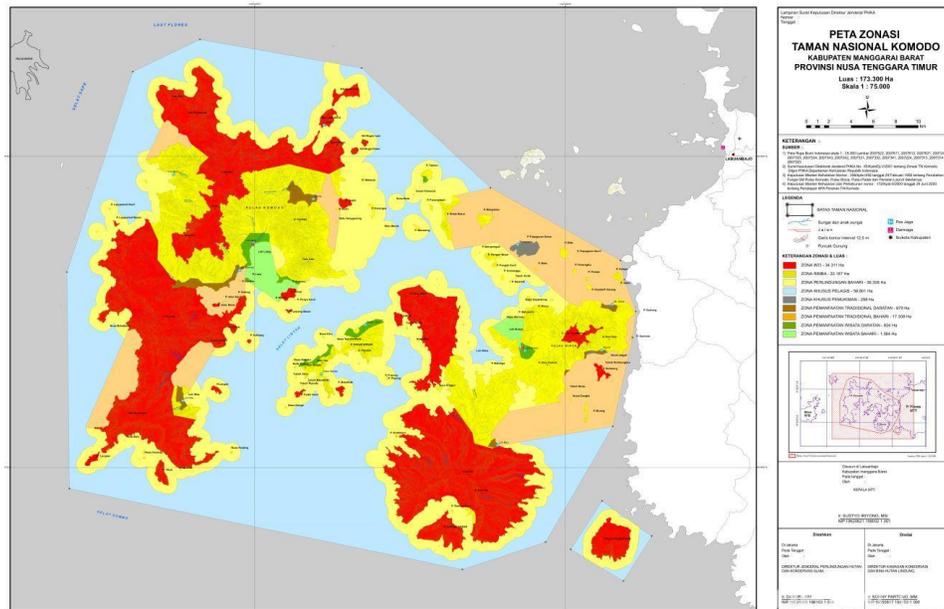


Figure 1. Map Komodo National Park Area. Photo: Sunspirit for Justice and Peace

The government has now introduced private companies to invest in the KNP area. The Ministry of Environment and Forestry (KLHK) has issued a number of concessions for private companies to build exclusive resorts on the KNP area. This then raised several questions on how the government is prioritizing conservation, and whether natural conservation will be pawned in the name of investments.

Investments Inside Komodo National Park

The investment in KNP was opened in conjunction with the Government's policy to change the status of the KNP area to a National Strategic area (KSN) through Government Regulation No. 26 of 2008 concerning the National Spatial Planning (RTRWN). In 2011, the Government issued Government Regulation No. 50 of 2011 concerning the National Tourism Development Master Plan 2010-2025. Through this regulation KNP is listed as one of the 88 National Tourism Strategic Areas (KSPN). At the same time with the designation of KNP as a National Tourism Strategic Area, the Government issued Government Regulation No. 36 of 2010 concerning Natural Tourism Enterprises in Wildlife Sanctuaries, National Parks, Grand Forest Parks and Natural Tourism Parks. This regulation was later revealed in the Minister of Forestry Regulation Number P.48/Menhut-II/2010 concerning Natural Tourism Enterprises in Wildlife Sanctuaries, National Parks, Grand Forest Parks and Natural Tourism Parks. These two regulatory products offer a new investment model for the private sector through the Nature Tourism Concession Permit (IPPA) which consists of the Natural Tourism Facilities Concession Permit (IUPSWA) and the Nature Tourism Service Concession Permit (IUPJWA). Under this regulation, KLHK allow private companies to invest in KNP.

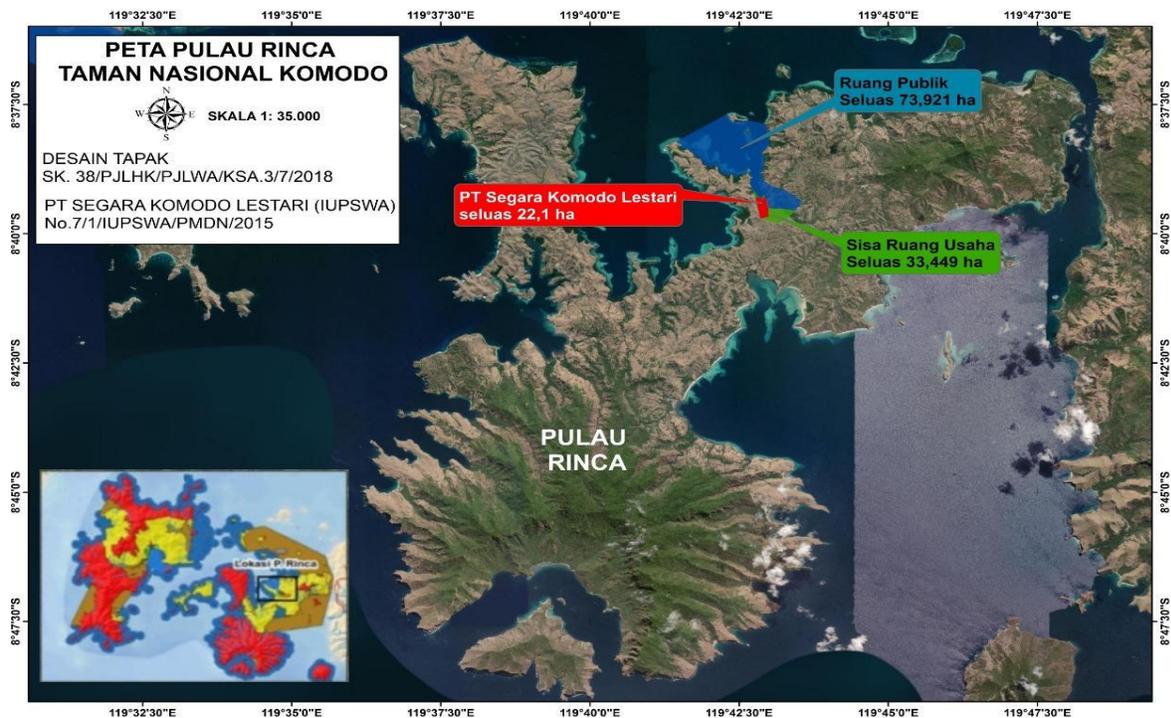


Figure 2. Concession of PT SKL Rinca Island. Photo: Sunspirit for Justice and Peace.

PT. Segara Komodo Lestari (SKL) was the first company to receive IPPA, receiving IUPSWA¹ for an area of 22.1 ha on Rinca Island. PT SKL has a 55-year license, with five-year assessments, and an average yearly investment worth of 2-4 billion dollars. David Makes, the chairman of the Ministry of Tourism and Creative Economy's National Ecotourism Acceleration Team, is a shareholder of PT SKL. To date, the company has not started the development because of widespread opposition. However, the development of Geopark for mass tourism in Rinca island by the Indonesian government proceeds and is nearly complete despite UNESCO's warnings. According to local sources, many of the trees that housed the little Komodo dragon in Loh Buaya² have been cut down for the construction of elevated decks and other infrastructure.³



Figure 3. The development of an elevated-deck for mass tourism by the Indonesian government in Loh Buaya, Rinca island. Photo: Local community

¹ Concession permits No.7/1/IUPSWA/PMDN/2013

² Loh Buaya is a resort developed by BTNK for Komodo observations on Rinca Island, the second largest island with the second largest population of Komodo dragons after Komodo island.

³ To avoid cannibalism by adult Komodo dragons and to protect themselves, little Komodo dragons have a habit of climbing trees.



Figure 4. The development progress of Geopark on Rinca island taken from satellite imagery in December 2021. Photo: Google Earth accessed by WALHI

Meanwhile, in 2014 the government granted IUPSWA to PT. Komodo Wildlife Ecotourism (KWE) on Padar Island and Komodo Island which covers 274.81 ha (19.6% of Padar Island area) and 154.6 Ha (3.8% of Komodo Island area). Interestingly, KWE's concession on Padar Island was preceded by a zoning review policy, the conversion of the jungle zone of Padar into a utilization zone. In 2012 the KLHK converted 303.9 ha of land on Padar Island into land tourism utilization zone⁴. Like PT SKL, PT KWE has not started to build either on Padar or Komodo Island since it's still under strict monitoring from public. Furthermore, the Government has also issued permits twice for PT Synergindo Niagatama (PT SN) to invest in Tatawa Island. In 2014, PT SN was granted permit on an area of 6,490 ha. In 2018, the government altered the site design of the utilization zone on Tatawa Island⁵. In April 2020, the government reissued PT SN's permits covering an area 15.32 ha of the overall commercial space.

⁴ Decree of the Ministry of the Forestry No. SK No. SK.21/IV-SET/2012 concerning Zoning of Komodo National Park dated 24 February 2012. Based on the site design, this utilization zone is divided into 275 ha for business space and 28.9 ha for public tourism space

⁵ Decree of the Director of Utilization of Conservation Forest Environmental Services No: SK. 38/PJLHK/PJLWA/KSA.3/7/2018. This change to the site plan reduces public space to only 3,447 ha while increasing business space to 17,497 ha.

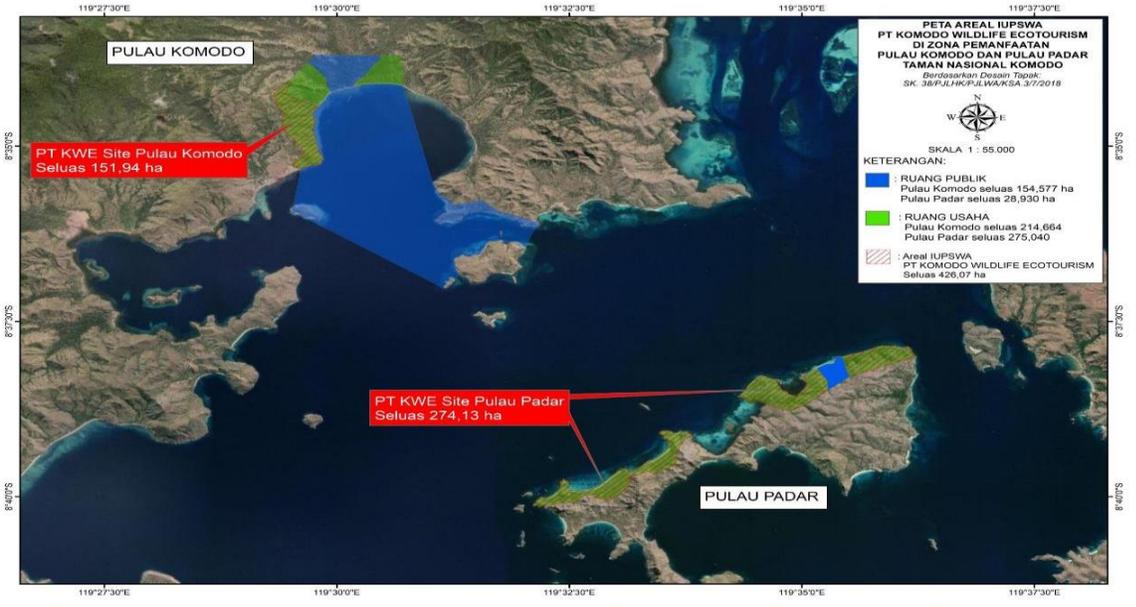


Figure 5. Concession of PT KWE in Komodo and Padar island. Photo: Sunspirit for Justice and Peace

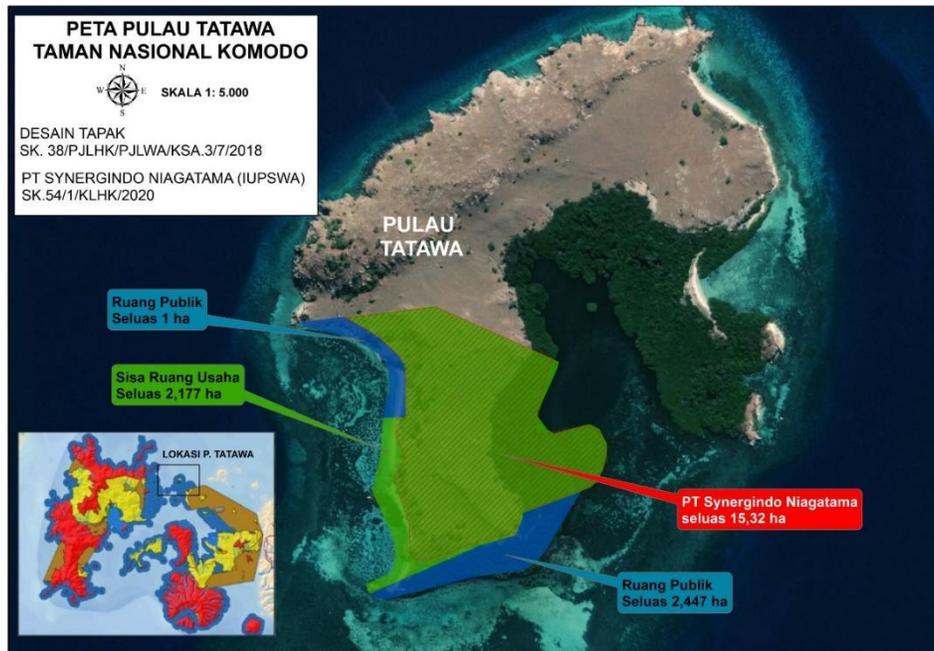


Figure 6. Concession of PT Synergindo Niagatama in Tatawa Island. Photo: Sunspirit for Justice and Peace

Based on the above, we can infer two conclusions. First, the ongoing development planning in the KNP region claims to have followed the existing regulations. However, the process is legitimized by producing a number of regulations to smooth path for investments inside KNP. The legitimacy of KNP's management and planning cannot be viewed only from the fulfillment of legal aspects, but also consider the legitimacy of indigenous people and communities who are on the receiving end of the impacts of the development. To date, information related to investments within the region are not fully conveyed to the people living within the region. Second, companies that have received permits play a huge role in the national oligarchic circle by taking advantage of their power to annex Indonesia's natural resources and obtain capital means.

Poor Surveillance and Management of Komodo National Park

The Komodo National Park Office (BTNK) is in charge of conservation planning and management, and oversees KNP. Unfortunately, the tasks have yet to be implemented to the maximum. While KNP attracts a large number of visitors each year, highlighting Indonesia's natural beauty in both land and sea life, the number of local and foreign tourists visiting KNP has increased since the potential of both land and marine tourism was established in 2013. The substantial revenue generated by tourist visits, on the other hand, is not commensurate with the work required to manage conservation and minimize harm in KNP.

This is seen from the condition of coral reefs which have deteriorated sharply in recent years, which is a shame considering that the beauty of these clear coral reefs is one of the main tourist attractions in KNP. As tourism spots flourish and tourist numbers increase, these coral reefs are slowly suffering from damage which is apparent from the state of shattered coral and murky sea water ⁶. One of the main causes of these damages are tour ship activities without proper equipment like mooring buoys when anchoring into sea, resulting their anchors being thrown carelessly into the reefs. In addition, coral bleaching adds to coral damage. BTNK has attempted coral transplantation in a number of locations, including Pink Beach and Tempe Island. These efforts, however, will be ineffective unless they are accompanied by adequate mitigating measures. At present, there have been several cases of galaxy coral thefts within the KNP area.

⁶ Based on WALHI's investigation held on November 9-10, 2021 at several dive points such as Pink Beach on Komodo Island, Long Beach on Padar Island, and Tatawa Island.



Figure 7. Damaged Coral Reefs in Pink Beach, Komodo Island. Photo: WALHI

Another source of concern is the purported feeding of Komodo dragons, which, according to local reports, is still going on today. One of the Komodo dragon conservation activities conducted by BTNK since the KNP's inception has been feeding the Komodo dragons in Banung Gulung⁷. This practice was eventually stopped in 1994 after it was realized that it was altering the behavior of Komodo dragons and inhibiting their natural hunting instincts. Although the BTNK has made it illegal to feed Komodo dragons in the wild, the BTNK continues to perform this practice in Loh Liang⁸. Another thing is the wildfires that often occur within the area in recent years. Since 2018, there have been at least four incidents of wildfire⁹. The most recent incident took place on 02 November 2021 in Loh Serai, Rinca Island, in which the cause of the fire has yet to be known until today. Given these existing problems, the BTNK patrol is more focused on withdrawing admission tickets into the park instead of actually correcting these alarming conditions¹⁰.

⁷Banung Gulung used to be a place for Komodo feeding situated far inside the jungle, in Loh Liang, Komodo island.

⁸According to local sources, the feeding is still carried around in Loh Liang, though no longer done on a large scale, Komodo dragon feeding with goat and fish still continues to be carried out in Hutan Asam (Waterhollow) and Oasis restaurant for tourism-related reasons.

⁹Tirto <https://tirto.id/benarkah-kebakaran-taman-nasional-komodo-lantaran-faktor-alam-glxE> accessed on Dec 15, 2021.

¹⁰Based on WALHI's investigation held on 09 November 2021.



Figure 8. The fire that struck Loh Seraj, Rinca island, November 2021. Photo: WALHI

Potential Ecological and Social Impact

During the 44th World Heritage Committee session held in Fuzhou in 2021, UNESCO provided a number of recommendations related to the region's management, one of which was to stop its ongoing development. However, the Indonesian government rebutted by stating that development was already underway under the existing regulations and did not interfere with the OUV (Outstanding Universal Value) in the area. Apart from the denial, the development that's being designed to meet the grand scale of tourism management in KNP and its surrounding areas will create ecological and social impacts, as well as affect the OUV that's presently under KNP. Companies that invest in the area by developing such as villas, restaurants, and other public places within KNP will only damage its natural environment and pose huge risks towards the sustainability of both flora and fauna ecosystems, be it land or sea. As an example, the Komodo dragons' habitat will be disturbed as the animal is a solitary¹¹ being. Besides that, the ecosystem's

¹¹ Komodo dragons are solitary creatures that tend to stay away from crowds and need sufficient isolation space. The animals are only coming together during their mating seasons.

natural cycles and chains will be damaged. The wild atmosphere will become rowdy due to the ongoing development, causing potential soil and air pollution.

In addition, corporate dominance over strategic points in the KNP region has the potential to eliminate indigenous communities' source of income. Right now, the zoning system has narrowed their living space. Another concern is the super-premium tourism scheme being developed on Komodo Island. The community views this 'super premium' scheme as something that will introduce other 'super premium' features, such as super premium souvenirs, food, which only further displace local workers there.

Another thing to note is the position of NTT as an island province. In April 2021, NTT was hit by the Seroja cyclone, which destroyed homes and caused destruction of infrastructure worth trillions in value due to landslides and storms. KNP's position as an archipelago bears the same vulnerability towards climate change conditions. The government should prioritize mitigation efforts and optimize conservation in KNP rather than encourage investments that have the potential to exacerbate climate conditions.

Recommendations towards the Indonesian Government

1. To not only evaluate¹² but also revoke all business concession permits that have been granted to private companies and stop the licensing process for other companies.
2. Follow UNESCO's recommendation on WHC draft decision 44 COM 7B.93 to stop ongoing projects within the KNP and conduct a new Environmental Impact Analysis (AMDAL) for plans to build tourism and conservation facilities within the KNP region and ensure infrastructures are designed in accordance with the principles of conservation and management of World Heritage Sites.
3. Improve coherent conservation programs for both land and sea areas for short and long-term periods and work together with communities within and around the area as well as position them as active practitioners of conservation and community-based tourism.
4. Control the pace of the tourism industry by policies such as visit quotas to prevent mass tourism from endangering conservation efforts and cultural integrity.

¹² On January 06, 2022, the Indonesian government issued Decree on Licenses Revocation# that revokes more than 2000 mining concessions and 192 forestry permits. In the Decree, the government also evaluates 106 company concessions. Two of those evaluated companies are PT SKL and PT KWE that have been granted business concessions in the KNP.

Recommendations towards UNESCO, IUCN

1. Urge the Indonesian government to optimize conservation efforts that not only protect wildlife but also protect the lives of local and indigenous people living in the region.
2. Request the state party to stop all development projects for investment interests that could potentially damage the Komodo dragons' natural habitat as well as the living areas of local and indigenous communities.
3. Ensure the Indonesian government carries out a world heritage convention to protect the Komodo National Park's function as a conservation area.
4. Request the State Party of Indonesia to submit to them, according to § 172 of the Operational Guidelines to the WH Convention, any plans for projects in or near KNP in order to allow UNESCO/IUCN an assessment whether these projects, if implemented, would adversely affect the Outstanding Universal Value of the property.
5. Request the State Party of Indonesia to invite a UNESCO/IUCN Reactive Monitoring Mission with a view to establish whether the property should be inscribed in the World Heritage in Danger list.