

PRE-FTA BRIEFING



Home to over 277 million citizens, Indonesia is the fourth most populous country in the world.



28% of EU imports are agricultural products, primarily made up of palm and coconut oil, coffee and other food products.



Indonesia is the world's largest producer of nickel, accounting for 40% of global supply.



EU-Indonesia

Basic trade figures

In 2022, the EU's share in Indonesia's total trade equalled 6%, making the EU Indonesia's sixth largest trading partner¹. The most imported Indonesian goods include agricultural products and raw materials including palm and coconut oil, timber, coffee, meats and vegetables, manufactured goods and machinery and transport equipment².

Indonesia is the world's largest producer of palm oil and nickel, with a global production share of 68% and 40% respectively. It is also the largest economic member of the Association of Southeast Asian Nations (ASEAN) and is one of the few ASEAN members still benefitting from the EU's Generalised Scheme of Preferences (GSP)³.

Political context for negotiations

In July 2016, Indonesia and the EU launched negotiations for a trade agreement known as the Comprehensive Economic Partnership Agreement (IEU-CEPA). Yet after more than eight years of negotiations, the pair still have a way to go before concluding the final text. The EU's environmental and climate objectives such as reducing the EU's contribution to global deforestation and the clean energy transition have caused friction, with both

trade partners having launched complaints at the World Trade Organisation (WTO) against the other regarding non-conform implementation of measures concerning trade in biodiesel and nickel ore.

Summary of sustainability in Indonesia

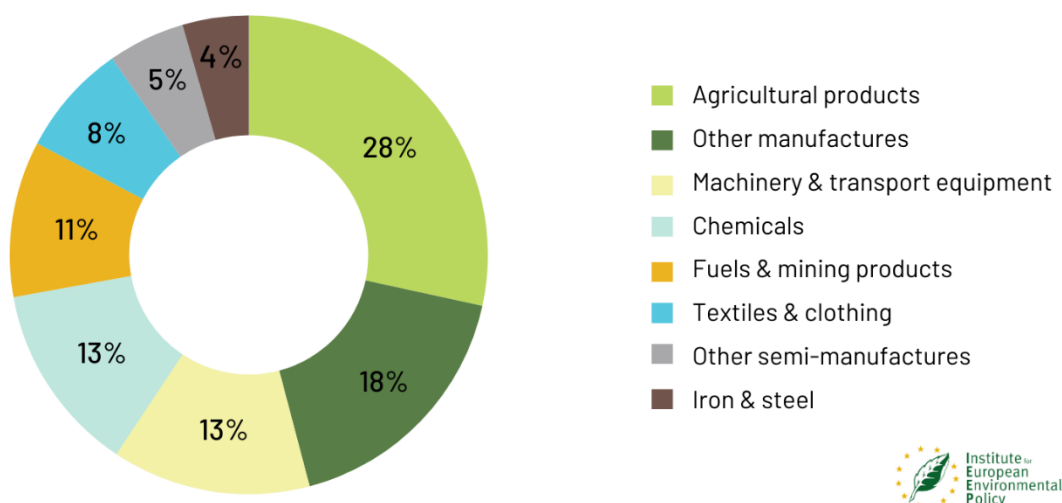
Industrial expansion and export of palm oil, metals and minerals, and fish products are drivers for Indonesia's main sustainability challenges. Since 2001, 30.8 million hectares of tree cover have been lost, with palm oil production driving 85% of deforestation. Despite efforts such as the FLEGT-VPA to combat illegal logging and a moratorium on new palm oil plantations, forest loss surged by 27% in 2023, fuelled by growing demand for nickel and wood pulp. In addition, mining activities are also responsible for water pollution and human rights abuses, including against Indigenous communities.

Overfishing in Indonesian waters has led to 75% of marine resources being fully exploited. Additionally, aquaculture expansion is driving mangrove destruction. Poor fisheries management and illegal, unreported, and unregulated (IUU) fishing worsen marine degradation. Together, these environmental challenges threaten biodiversity, fuel climate change, and harm local livelihoods.

What are the next steps?

- Include the Paris Agreement and the Global Biodiversity Framework as essential elements.
- Introduce articles on sustainable water management in the TSD and other sector-specific chapters.
- Propose higher standards for the mining sector (e.g., IRMA) in the Raw Materials Chapter.
- Establish a dialogue body focused on combatting commodity-driven deforestation, regularly including expert recommendations.
- Negotiate a roadmap with timebound targets to address sustainability challenges in Indonesia, linking to international agreements and conventions such as the Paris Agreement.

EU imports from Indonesia, average trade value from 2020 to 2023



Source: [DG Trade, European Commission \(2024\)](#)

Political context of the negotiations

In July 2007, the EU sought to improve its market access to the ASEAN market (made up of Brunei Darussalam, Myanmar, Cambodia, Indonesia, Laos, Malaysia, Philippines, Singapore, Thailand, and Vietnam) by launching a region-to-region trade negotiation. However, negotiations had difficulties advancing and were eventually suspended in December 2009 to make way for bilateral trade negotiations⁴. Since then, the EU has concluded bilateral free trade agreements (FTAs) with Singapore and Vietnam, with active negotiations ongoing with the Philippines, Thailand and Indonesia⁵.

Indonesia is the third largest emerging economy after China and India, making it the biggest member of the ASEAN, with a 35% share of ASEAN's gross domestic product (GDP)⁶, while being the fourth most populous country in the world with over 277 million inhabitants⁷. Though a regional trade agreement failed to materialise, the EU and Indonesia signed a Framework Agreement on Comprehensive Partnership and Cooperation on 9 November 2009, which came into force on 1 May 2014. This Partnership and Cooperation Agreement establishes a framework for political and sectoral dialogue and cooperation including on policy areas such as peace and security, justice, socioeconomic development and trade and investment⁸.

Looking to deepen economic relations, the EU and Indonesia agreed to negotiate a bilateral trade agreement in July 2016 named the Indonesia-EU Comprehensive Economic Partnership Agreement (IEU-CEPA). In 2023, the EU had a €7 billion trade in goods deficit with Indonesia, while it had a surplus for trade in services (€4.7 billion) and foreign direct investment (€17.7 billion) in 2022⁹. Moreover, the EU imports a relatively diversified group of Indonesian products, agricultural goods and raw materials (28%) including palm and coconut oil, timber, coffee, meats and vegetables, manufactured

goods (18%), machinery and transport equipment (13%), chemicals (13%), fuels and mining products (11%), and textiles and clothing (8%)¹⁰. Not surprisingly, a fair share of the Indonesian economy is reliant on the production of agricultural goods and raw materials.

In 2022, 68% of global palm oil fruit was produced by Indonesia¹¹ and it is also the world's largest producer of nickel, a high-demand mineral essential for the production of EV batteries, accounting for 40% of global supply¹². These figures begin to explain some reasons why the IEU-CEPA negotiations have been challenging, lasting over eight years with 19 rounds of negotiation, the latest taking place in July 2024¹³. Negotiators hope to conclude negotiations by June 2025, with both the new EU and Indonesian governments being keen to finalise the trade agreement.

A past of WTO disputes between the negotiating partners Global demand for nickel is estimated to increase by 4.2% in a 2050 Paris Agreement-aligned scenario¹⁴, along with the demand for other critical raw materials (CRMs) required for the clean energy transition, including bauxite, cobalt and copper. Recognising the current and future value of these CRMs, the Indonesian government implemented measures aiming to retain ownership over its domestic production capabilities. Unsurprisingly, the Indonesian government's implementation of export restrictions on nickel ore and a domestic processing requirement for nickel ore was challenged at the World Trade Organisation (WTO), with the EU requesting consultations with Indonesia in November 2019¹⁵.

As the matter could not be resolved during consultations, the EU requested the WTO's dispute settlement body to establish a Panel in 2021, which would issue its final report in November 2022. Indonesia argued that the export restrictions and domestic processing requirement were not inconsistent with GATT Article XI:1 and were also permitted under GATT's General Exceptions Article XX(d), i.e., the measures were necessary to secure compliance with laws or regulations which are not inconsistent with the provisions of the GATT. However, the Panel's final report found the Indonesian nickel measures to be inconsistent with Article XI:1 and stated insufficient evidence was presented for the measures to fall under the General Exceptions Article XX(d). In conclusion, the Panel recommended Indonesia bring its measures into conformity with the GATT¹⁶.

The pair had other WTO disputes concerning palm oil, one being the EU's anti-dumping measures on Indonesian biodiesel¹⁷ (made primarily from palm oil) which was formally launched in June 2014. Almost four years later in January 2018, the Panel delivered its final report affirming Indonesia's complaint that the EU incorrectly calculated the Indonesian biodiesel production cost and profit margin for determining the dumping margin thereby being inconsistent with the WTO Anti-Dumping Agreement. After appealing the decision, the EU eventually recalculated

the dumping margins, coming into compliance with the WTO rules on anti-dumping measures in September 2018.

Just over a year later in December 2019, Indonesia requested consultations at the WTO concerning the EU's Renewable Energy Directive Recast (RED II) which set targets to reduce the use of palm oil-based biodiesel with a high risk of indirect land-use change. Indonesia claimed the EU's measures created unnecessary trade barriers, lacked scientific justification, and were inconsistent with international standards¹⁸. In January 2025, the WTO Panel report concludes the EU's right to implement environmental measures such as RED II, though the report calls for specific adjustments to be made such as the criteria determining high ILUC-risk biofuels to be fully compliant with WTO rules¹⁹.

Adding another layer of tension surrounding this commodity and EU-Indonesia relations is the EU's Deforestation Regulation (EUDR) which aims to minimise the placement of products on the EU market that have contributed to global deforestation. As the main producer of palm oil and other commodities covered by this legislation (timber, coffee, cocoa), Indonesia has serious concerns that any benefits of the IEU-CEPA could be undercut by the application of the EUDR. Together with Malaysia, the world's second-largest producer of palm oil and fellow ASEAN member, the pair provided enough pushback against the roll-out of the EUDR, for the EU to establish a Joint Taskforce to implement the Regulation²⁰.

Sustainability challenges in Indonesia

Indonesia faces several significant sustainability challenges related to climate change and environmental degradation. The nation, comprising five main islands and over 17,000 smaller islands, is particularly affected by rising sea levels leading to the decision to move the country's capital from Jakarta – the world's fastest sinking megacity – to Nusantara²¹. Indonesia also deals with air, water and waste pollution exacerbated by coal dependency, plastics pollution paired with less stringent emissions and waste legislation²². This briefing focuses on three main trade-related sustainability challenges: commodity-driven deforestation, mining issues, and marine resource management.

Commodity-driven deforestation

Because of the endemic biodiversity housed in its wetlands, Indonesia is considered a mega-diverse country. Not only do Indonesian rainforests, peatlands and mangroves function as critical carbon sinks and habitats for over 17% of the world's wildlife and 220 species threatened with extinction, but they also support the livelihoods of over 40 million Indonesians, including fishers and smallholders²³.

Since 2001, Indonesian tree cover declined by 30.8 million hectares (Mha) or 19% of Indonesia's total tree cover. Primary forest loss made up 35% of total tree cover loss, equivalent to a 10.5 Mha loss in humid primary forests. The EU-Indonesia Forest Law Enforcement, Governance, and Trade Voluntary Partnership Agreement²⁴ (FLEGT-VPA),

which entered into force in May 2014, has been successful in combatting illegal timber logging and export, and saw Indonesia receive the first FLEGT license in the world. However, commodity-driven land conversion, which is not covered by the FLEGT-VPA²⁵, remains a primary driver for forest loss in Indonesia and accounted for 85% of deforestation since 2001, with palm oil production contributing the lion's share²⁶. Farms smaller than two hectares account for 89% of total farms in Indonesia with only about 10% of these smallholders producing palm oil²⁷.

Over the period 2017 to 2022, Indonesian deforestation rates slowed down considerably following a year of destructive forest fires in 2016 which prompted tougher government action on forest fire prevention, monitoring and peatland and mangrove restoration, followed by a moratorium on new palm oil plantations in 2018²⁸. However, despite recent progress, 2023 revealed a 27% uptick in primary forest loss, driven by expanding international demand for nickel²⁹ and wood pulp and paper³⁰. One issue with ensuring the long-term success of government ecosystem restoration initiatives heavily relies on the inclusion of smallholders and local communities to strike a balance between environmental and socio-economic objectives³¹.

The conservation of Indonesia's ecosystems is not only essential to preserving endemic biodiversity but also to tackling climate change. Indonesia is the sixth largest CO₂ emitter³², and rather than mitigating total CO₂ emissions, Indonesia's forestry and land use practices are a net contributor to its total emissions³³.

Mining and processing of raw minerals

The Indonesian mining sector is the country's second-largest producer of raw materials. Indonesia is the world's largest producer of nickel and a major producer of coal after China and India. In 2022, Indonesia's coal production rose by 20% to 687 million tonnes (Mt) and is expected to peak in 2023 at 725 Mt as both international demand from China and India and domestic demand for nickel processing capacity grows³⁴. The country also produces to a lesser extent bauxite, copper, gold and tin³⁵.

The industrial activities linked to the mining and processing of minerals are a significant contributor to greenhouse gas (GHG) emissions (especially due to coal-powered smelting plants) and environmental degradation through deforestation and industrial run-off polluting water, and soil with detrimental consequences for surrounding ecosystems and communities. In 2018, a quarter of Indonesian villages reported experiencing water pollution due to nearby mining activities³⁶.

The sector is also linked to several issues concerning human, labour and Indigenous Peoples' rights. The expansion of nickel mining is linked with multiple cases of failure to obtain free, prior, and informed consent (FPIC), land grabbing, unfair negotiation and compensation and intimidation³⁷.

Overexploitation of marine resources

Consisting of over 17,000 islands, Indonesia is the world's largest archipelagic country and houses the world's richest marine biodiversity. Not surprisingly, it is the world's second-largest producer of wild-captured fish, supplying a quarter of global fisheries demand³⁸. Production output of Indonesia's fisheries and aquaculture sectors has steadily grown, however, government policies put in place by then-President Joko Widodo to further develop the country's economic and investment opportunities have further increased pressure on the sectors, including rolling back regulations to protect marine resources.

Due to these pressures, Indonesia's fisheries production has slowed as 75% of Indonesia's marine resources are either fully exploited or subject to overfishing. Indonesia's aquaculture sector primarily produces shrimp however due to the required water and space; the sector's expansion is one of the main drivers of mangrove conversion³⁹.

The fisheries sector is dominated by small-scale fishers, making up 96% of the total fishing fleet leading to a concentration of fishing activities near coastal areas and conflicts over marine resources. Consequently, poor marine resource management and a lack of monitoring and data assessment tools have fuelled illegal, unreported and unregulated (IUU) fishing. In 2023, Indonesia ranked sixth in the worldwide IUU Fishing Risk Index for its increasing poor performance, up fourteen spots compared to 2021⁴⁰.

Reflections

Commodity-driven deforestation, overexploitation of marine resources and mining and processing of raw materials are some of the main sustainability challenges Indonesia faces linked to international trade. Though the EU has seen success with the implementation of the EU-Indonesia FLEGT-VPA in combatting illegal timber trade, land conversion for industrial expansion and protections for worker's and Indigenous Peoples' rights remains a sore issue for Indonesia's overall sustainability (see box below).

Waning protections for people and the environment

In 2020, the Indonesian government introduced the 2020 Mining Law Amendment and the Job Creation Law, also known as the Omnibus Law, to encourage investments in its mining sector⁴¹. In combination, these laws weaken worker protections and the rights and lands of Indigenous Peoples⁴². Moreover, the laws loosen regulations including relaxing environmental assessment requirements and permitting processes⁴³ and have done away with sustainability safeguards such as the requirement to maintain 30% of forest area within an island and the forest buffer zones around bodies of water⁴⁴.

Taken together, civil society organisations (CSOs) feared that these loosened regulations would advance resource extraction in the mining and palm oil sectors with negative impacts on forest cover and consequently climate change, for example

through the loss of carbon sequestration potential and disaster risk reduction from protected areas⁴⁵. As recently as November 2024, it has been reported that illegal palm oil plantations cropped up on satellite images of Indonesia's Rawa Singkil Wildlife Reserve, the production of which had made its way into the supply chains of major multinationals⁴⁶.

Consequently, the IEU-CEPA must acknowledge and provide protections to minimise negative trade-related spillovers. EU Trade and Sustainable Development (TSD) Chapters contain the articles on the linkages between trade and forestry/marine resources. As such, the IEU-CEPA TSD Chapter should match the ambitions of other recent FTAs such as EU-New Zealand including the Paris Agreement as an essential element of the agreement and strengthening dialogue and concrete cooperation on trade-related aspects of sustainable forest management and fishery/aquaculture policies and measures. Furthermore, the agreement should seek to integrate compliance with the Montreal-Kunming Global Biodiversity Framework (GBF), most importantly its 30x30 target and conservation and restoration of ecosystems⁴⁷. Moreover, despite articles on environmental protection being deferred to the TSD Chapter, there has yet to be an EU FTA which integrates an article on sustainable water use. Going forward the EU should seek to integrate the SDG targets on clean water (SDG6) and life below water (SDG14), and the UNFCCC's Climate Action Pathway milestones on water⁴⁸ to ensure progress on safeguarding clean drinking water and marine ecosystems.

Considering the challenging and prominent role of land conversion deforestation in Indonesia, the IEU-CEPA could establish a dedicated dialogue body aimed at promoting cooperation between the Parties to reduce deforestation. The dialogue members could evaluate progress made to minimising commodity-driven deforestation for example, in the palm oil and mining industries, including knowledge sharing on relevant bilateral policy instruments (e.g., EUDR and CRM Act), joint projects and initiatives. This dialogue should regularly invite experts from both academia and CSOs to share their findings and recommendations on how to halt deforestation and biodiversity loss driven by these industries.

Though higher standards and regulations for labour rights and environmental protection to prevent the exacerbation of trade-related impacts on humans and the environment are welcomed by CSOs. However, they remain doubtful that the inclusion of stronger commitments would bear fruits, as the enforceability of the TSD Chapter falls under a dispute settlement mechanism with minimal concrete outcomes⁴⁹. As a result, CSOs have turned their attention towards other chapters on investment, intellectual property rights, digital trade and other sector-specific chapters.

For instance, to address the sustainability issues linked to the mining sector, the IEU-CEPA's Energy and Raw Materials Chapter, which aims to establish market principles, de-risk access to energy transport infrastructure and harmonise standards⁵⁰, could feature additional articles incorporating environmental and labour standards from the Initiative for Responsible Mining Assurance (IRMA). This approach would be most favourable for

the enforceability of bilateral commitments. However, it is unlikely the IEU-CEPA would significantly differ from the EU's standard approach to drafting this Chapter.

Recommendations

- Include binding provisions to effectively implement the Paris Agreement and the Montreal-Kunming GBF, acknowledging the role of protected area conservation in combatting climate change impacts.
- Introduce articles on sustainable water management and wastewater treatment in the TSD Chapter and relevant sector-specific chapters (marine resources and mining).
- Address sustainability issues in the mining sector by including higher labour and environmental standards (e.g., following IRMA best practices), in addition to commitments to safeguard Indigenous Peoples' rights in the Energy and Raw Materials Chapter, subject to the agreement's dispute settlement mechanism.
- Establish a dedicated dialogue between the Parties on tackling commodity-driven deforestation, regularly including recommendations from experts in academia and CSOs.
- Negotiate a roadmap with timebound targets to address sustainability challenges in Indonesia, linking to international agreements and conventions where applicable.

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