*) This English version is an interpretation of the original Indonesian version. If there are any differences in words or sentences, please refer to the Indonesian version.

December 19, 2025

Mr. Rahmad Pribadi, President Director, PT Pupuk Indonesia

Mr. Eiji Hosoi, President & CEO, Toyo Engineering Corporation

Mr. Masahiro Okafuji, Chairman & Chief Executive Officer, ITOCHU Corporation

PETITION: Stop the Project Green Ammonia Initiative from Aceh (GAIA), which Extends Dependence on Fossil Energy, Employs False Solutions that Threaten Community and Environmental Safety, and Violates the Right to Information and Participation of Local Communities

The Indonesian Forum for the Environment (WALHI) submits this petition as a form of rejection of the Green Ammonia Initiative from Aceh (GAIA) Project. We demand that PT Pupuk Indonesia (Persero), together with its international partners ITOCHU Corporation and Toyo Engineering, immediately halt this project. The GAIA Project, which is promoted as an energy transition solution, in fact prolongs Indonesia's dependence on fossil fuels, poses serious threats to the safety of local communities, damages the environment, and violates the people's rights to information and participation guaranteed by law.

The involvement of ITOCHU and Toyo Engineering in the GAIA Project reinforces an initiative that is demonstrably still dependent on fossil energy. The claim that this project will produce green hydrogen cannot be substantiated, as the electricity used for the electrolysis process comes from the PLN Aceh grid, which to this day remains 98 percent fossil-fuel based. The Renewable Energy Certificate (REC) used as the basis for this claim is merely an administrative instrument that does not guarantee an actual supply of renewable energy. In addition, the existing ammonia plant continues to use grey hydrogen derived from fossil gas in its ammonia production process. Consequently, the product to be generated is merely hybrid ammonia, not the green ammonia as claimed. The involvement of these two Japanese companies, rather than being part of a just energy transition solution, instead contributes to greenwashing practices that mislead the public and contradict their global commitments to the Sustainable Development Goals (SDGs), the Paris Agreement, and Environmental, Social, and Governance (ESG) principles.

Moreover, the GAIA Project cannot be separated from PT Pupuk Iskandar Muda's (PIM) poor track record regarding community safety. Between 2010 and 2025, there were nine recorded incidents of ammonia leakage that affected approximately 2,000 residents with serious health symptoms, ranging from shortness of breath, nausea, and fainting, to intensive hospital care. The Assessment Report on the Impacts of PT PIM's Production in North Aceh and Lhokseumawe City prepared by WALHI Aceh reveals how the existing emergency system is severely inadequate: there are no evacuation procedures, the sirens used are confusing as they overlap with routine factory signals, and residents are forced to cope independently. Vulnerable groups such as

children, the elderly, and pregnant women face greater health risks without adequate protection. The company's Corporate Social Responsibility (CSR) programs have also proven ineffective, consisting mostly of symbolic assistance that fails to address root problems and even creates social inequality at the local level.

The economic impacts on coastal communities are also very real. Small-scale fishers have lost access to the shoreline due to the conversion of coastal areas into industrial zones, traditional beach-seine fishing has disappeared, and suspected marine pollution from the company's liquid waste has reduced fish catches. The loss of fish aggregating devices (rumpon) has increased the costs of going to sea, while the compensation provided by the company is disproportionate to the losses experienced. The economic growth generated by the company's presence is uneven, as not all residents gain employment opportunities at the factory or receive direct benefits from CSR programs. Community dependence on company assistance has increased, while at the same time there are potential economic losses caused by environmental impacts felt by other groups, particularly small-scale fishers.

What is even more concerning, as revealed in the Assessment Report on the Impacts of PT PIM's Production in North Aceh and Lhokseumawe City prepared by WALHI Aceh, is that the GAIA Project has been carried out without transparency and meaningful participation from communities living in the company's surrounding area, such as Tambon Tunong, Tambon Baroh, Paloh Gadeng, Blang Neleung Mameh, and Keude Krueng Geukueh villages in Dewantara Subdistrict, North Aceh Regency. To this day, residents in these villages have never received any official explanation regarding the GAIA development plan, even though they are the communities most vulnerable to the risks of ammonia leakage and other environmental impacts. The North Aceh local government has likewise not received official information, learning of the project plan only through media reports. In WALHI Aceh's interview with the Regional Development Planning Agency (BAPPEDA) of North Aceh Regency, representatives stated that they had not obtained sufficient knowledge regarding the green ammonia development plan at PT PIM's facilities. This clearly violates the principle of the right to information and meaningful participation, which should be the foundation of any development project with direct impacts on communities.

Legally, the implementation of the GAIA Project, which lacks transparency and participation, violates several provisions. Law No. 32 of 2009 on Environmental Protection and Management affirms that every person has the right to a good and healthy environment and the right to participate in environmental management (Article 65). This law also requires openness of information and public participation in every development process that impacts the environment. In addition, Law No. 14 of 2008 on Public Information Disclosure guarantees the right of the public to obtain information, including information regarding development projects that directly affect their lives. Furthermore, the principle of meaningful participation is also recognized in the Rio Declaration on Environment and Development (1992) and in Indonesia's commitment to the Paris Agreement (2015), which emphasize the importance of a just and inclusive energy transition. Violations of these rights show that the GAIA Project is not only technically and ecologically problematic, but also legally and ethically flawed.

Considering all these facts and legal grounds, we demand that PT Pupuk Indonesia, ITOCHU Corporation, and Toyo Engineering immediately halt the GAIA Project. We urge these companies to ensure that every project undertaken must respect the people's right to information and participation, and guarantee community safety as the highest priority. We believe that a genuine energy transition can only be realized through the principles of ecological justice, transparency, and active community participation. Without these, the GAIA Project is nothing more than a false solution that perpetuates inequality and threats to the environment and the lives of local communities.

Signatories,

- 1. National Executive of Wahana Lingkungan Hidup Indonesia (WALHI) / Friends Of The Earth Indonesia
- 2. Regional Executive of WALHI Aceh

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Attachment:

Laporan Assessment Dampak Produksi PT. PIM Di Aceh Utara Dan Kota Lhokseumawe/ Assessment Report of PT. PIM Production Impact in North Aceh and Lhokseumawe, by WALHI Aceh, November 2025 (Indonesian Language)