

Recommendations and Requests

1. Government of Indonesia

We urge the Special Rapporteurs to call on the Government of Indonesia to

- Immediately suspend all further permitting processes related to the Dairi Prima Mineral project, ensuring no permits allowing harmful activities remain valid.
- Ensure that no new permits are issued for a project that cannot comply with human rights and environmental standards.
- Ensure that PT Dairi Prima Mineral undertakes full environmental and social remediation in affected areas, addressing existing harms caused by previous and ongoing operations.
- Strengthen regulatory oversight and environmental permitting processes to prevent high-risk projects from advancing without proper assessments and safeguards.
- Uphold its obligations to respect, protect, and fulfill human rights, including the duty to prevent exposure, and the rights to a clean, healthy, and sustainable environment, the right to Free, Prior and Informed Consent (FPIC), and the rights of human rights defenders, in line with Indonesia's commitments under international human rights law and the relevant UN mandates.
- Implement robust human rights and environmental due diligence across all extractive projects to prevent harm and ensure compliance with national and international standards.

2. Government of China

We urge the Special Rapporteurs to call on the Government of People's Republic of China to:

- Ensure that Chinese state-owned and affiliated enterprises operating abroad, including NFC companies China Reform Holdings Corporation, and CNIC, comply with Indonesian laws, relevant international agreements which China has signed, including **ICESCR**, international mining standards, Chinese policies on responsible overseas investment and Chinese standards on mining and tailings facilities.
- Engage the following regulatory and supervisory bodies to assess and act on the risks environmental and human rights posed by the Dairi Prima Mineral project, particularly the risks to Indigenous communities, women, and environmental defenders:
 - The National Development and Reform Commission (NDRC) and the Ministry of Commerce (MOFCOM), which approved NFC's investment in DPM.
 - The State-owned Assets Supervision and Administration Commission of the State Council (SASAC), which oversees centrally state-owned enterprises including CNMC, parent company of NFC, and China Reform Holdings Corporation, parent company of CNIC Corporation Limited.
- Revoke the approval of NFC's investment in the project and request China Reform Holdings Corporation and CNIC to withdraw financial support for the project, where non-compliance with Indonesian regulations, international standards, or Chinese policies are identified.

3. PT Dairi Prima Mineral, Bumi Resources Minerals, NFC,

We request that the Special Rapporteurs urge these companies to:

- Immediately cease any further activities related to the project as full compliance with Indonesian law and international human rights standards is not possible and the project must be abandoned.
- Disclose all environmental and social impact assessments and ensure genuine, transparent engagement with affected communities, including respecting FPIC.
- Conduct meaningful human rights due diligence in line with the **UNGPs**, the **OECD Guidelines for Multinational Enterprises**, and other relevant international standards.

4. Carren Holdings Corporation Limited and its parent companies China Reform Holdings Corporation & CNIC Corporation Limited

We ask that the Special Rapporteurs urge these entities, as the financiers of the project, to:

- Conduct enhanced human rights due diligence as per the **OHCHR guidance on the financial sector** and **UNGPs**, especially given the high-risk context and involvement of vulnerable communities.
- Reassess their investment and withdraw the funding for this project as it cannot align with human rights and environmental standards and must be abandoned.

5. Special Rapporteurs' Monitoring Role

We respectfully request the Special Rapporteurs to:

- Continue monitoring this case closely, including the actions of both governments, companies, and financial actors.
- Consider issuing a **public statement, urgent communication, or request for country visit**, in light of the project's systemic risks and potential for mass harm.
- Recognize this case as emblematic of broader trends in the region where corporate impunity and weak environmental governance threaten communities, ecosystems, and defenders.

