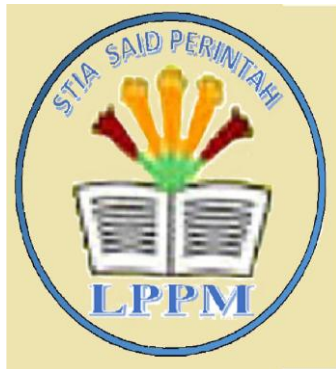


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**The Impact of EU's Black  
Campaign on the Export  
Volume of Indonesian CPO  
to EU in 2019-2023**

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**Abstract**

*This study examine the consequences of the EU's black campaign on the volume of Indonesia's crude palm oil (CPO) exports to the EU from 2019 to 2023. Using qualitative methods, it analyzes primary data from informants and secondary data from relevant documents. The findings reveal that the Black Campaign and the policies implemented by the EU have significantly contributed to a decline in Indonesia's CPO export volume towards the EU, caused by the damaging portrayal of Environmental issues that are not accurate and the hindrance of export growth caused by protective policies such as RED II. This research contributes to theories in international trade and offers insight for strengthening standardization and certification on of CPO in Indonesia. The implications of this study are critical for understanding the intersection of Environmental concerns and trade policies, for fairer practices in international trade that consider the realities faced by producing countries like Indonesia.*

**Keywords :** Black Campaign, CPO, Export Volume, RED II, Environmental Policy

## **Introduction**

The global demand for crude palm oil (CPO) continues to increase, driving Indonesia to expand its production. In 2023, global CPO demand is projected to reach 78.5 million tons, up from 75.3 million tons in 2022 (Kompas, 2023). Indonesia, as the world's largest CPO producer, generates approximately 50 million tons annually, with 30% allocated for domestic consumption and 70% for export, including to the European Union (EU). In 2022, Indonesia's CPO exports totaled 46.72 million tons, marking a slight decrease of 0.34% from 46.88 million tons in 2021. Meanwhile, domestic consumption rose from 18.42 million tons in 2021 to 20.96 million tons in 2022 (GAPKI, 2023). Indonesia dominates approximately 58.92% of the global CPO market, playing a crucial role in international trade (Cahyaningrum, 2023).

However, the EU's environmental campaigns and trade policies have significantly affected Indonesian CPO exports, raising concerns about fairness in global trade practices. The large-scale CPO trade and production in Indonesia, involving both domestic and foreign enterprises including European companies have been linked to environmental degradation, social issues, and labor rights violations. Key concerns include deforestation, habitat destruction, child labor, corruption, and human rights abuses, prompting the European Parliament to impose import restrictions on CPO and its derivatives. This decision was supported by 640 members of Parliament, with only 18 opposing and 28 abstaining (IGJ, 2018).

One of the EU's primary arguments is that oil palm cultivation in Indonesia contributes significantly to deforestation and carbon emissions, estimated at 90 tons of CO<sub>2</sub> per hectare annually. However, research contradicts this claim, indicating that Indonesia's palm oil emissions are only 25 tons of CO<sub>2</sub> per hectare per year (BPDPKS, 2020). In response to these concerns, the EU introduced the Renewable Energy Directive II (RED II) and the Delegated Regulation on Indirect Land-Use Change (DR ILUC), both of which were adopted on March 13, 2019, and took effect on June 10, 2019. These policies classify CPO as an unsustainable vegetable oil and aim to phase out its use by 2030, with the broader goal of achieving carbon neutrality by 2060 (Jakarta Post, 2023).

The implementation of RED II has placed considerable pressure on Indonesia's palm oil industry, which employs approximately 19 million workers (Kemenlu, 2019). Additionally, the EU Deforestation Regulation (EUDR) mandates that CPO exporters to the EU must provide evidence that their products are not linked to deforestation or human rights violations, with non-compliance subject to fines of at least 4% of the

company's annual revenue within the EU (Ziclegal, 2024). The EUDR is expected to have profound economic implications for Indonesia, particularly in the forestry and agriculture sectors. Given that CPO is a vital export commodity, failure to meet these requirements could adversely affect state revenues and smallholder farmers who lack sustainability certifications such as ISPO or RSPO. Notably, 40% of Indonesia's CPO production comes from smallholders with plantations under 50 hectares (RSPO, 2024).

The table below illustrates the declining trend in Indonesian CPO exports to the EU from 2019 to 2023 following the introduction of RED II and the enforcement of EUDR in 2023.

### Export Volume of Indonesia's CPO to the EU 2019-2023

European Union					
Year	2019	2020	2021	2022	2023
Net: 000 Ton					
Total	2.943,2	2.853,8	2.197,8	1.784	1.449,3

Source; Badan Pusat Statistik, (2024)

The data above highlights a notable decline in Indonesian CPO exports to key EU markets. In 2019, during heightened scrutiny of CPO and the initial implementation of RED II, exports stood at 2,943.2 thousand tons. This figure declined to 2,853.8 thousand tons in 2020, followed by a significant drop to 2,197.8 thousand tons in 2021. By 2022, exports had further reduced to 1,784 thousand tons. The most substantial decline occurred in 2023, when the implementation of EUDR led to a further decrease to 1,449.3 thousand tons, marking a significant reduction from 2019 levels.

Several previous studies have explored this issue. For instance, Anita, (2019) found that negative campaigns targeting CPO, or "Black Campaigns," significantly affected CPO prices and Indonesia's export volumes to the Netherlands, Spain, China, and India. Bhaskara (2020) noted that Indonesia responded with a "White Campaign" strategy to enhance the global perception of its CPO industry. Meanwhile, Purba, (2017) argued that despite the EU's efforts to reduce dependence on CPO through policy interventions, the reality is that CPO remains a crucial component of the global edible oil market due to its cost-effectiveness and high productivity.

This study differs from prior research by concentrating on the direct impact of the Black Campaign on Indonesia's CPO exports to the EU, rather than focusing on government response strategies. Additionally, it employs the Environmental Protection & Trade Theory to provide a unique analytical framework. Furthermore, this study

extends the timeline of analysis to the 2019-2023 period, incorporating the effects of policy implementation, whereas earlier studies primarily covered trends up to 2018.

## **Theoretical Framework and Research Hypothesis Development**

### **Black Campaign Theory**

A Black Campaign refers to a deliberate effort to tarnish an individual's or entity's reputation through the dissemination of negative information without clear evidence, ultimately influencing public perception and decision-making. Haboddin & Aziz, (2013) argue that such campaigns are often orchestrated by irresponsible external actors to impose accusations on their opponents for their own benefit. Similarly, Pureklolon, (2016) describes the Black Campaign as a strategic attempt to damage an individual's or group's image by spreading misleading information or unfounded allegations. The ultimate goal of such campaigns is to create a negative perception, triggering defensive reactions and potentially altering public interest or support.

In essence, a Black Campaign is characterized by elements of defamation, misinformation, and intentional image destruction. It operates by circulating unverified claims and superficial narratives, leading to public hesitation and shifts in perception. In the context of this study, the Black Campaign conducted by the European Union (EU) involves the dissemination of misleading information regarding Indonesia's crude palm oil (CPO) industry. This misinformation not only harms Indonesia's CPO industry image but also adversely impacts the volume of its exports to the EU market.

### **International Political Economy Theory**

In the field of international political economy, the market and the state are two interdependent components that cannot be separated. Policy interventions, including regulations on economic aspects such as international trade, are critical determinants of economic success and are difficult to achieve without political influence. Government economic policies and their interactions significantly shape both the volume and direction of global trade. Ironically, as international economic interdependence grows, the role of economic policy in trade relations becomes even more crucial.

A country's export and import policies have a substantial impact on international trade, as government regulations ultimately shape global trade patterns (Gilpin, 1987). This theory underscores the influence of political decisions, particularly trade protection

policies, which have contributed to the decline in Indonesia's crude palm oil (CPO) export volume to the European Union.

### **Environment Protection & Trade Theory**

In recent years, global warming and other environmental issues have played an increasingly significant role in trade discussions, adding complexity to the negotiation process. Butler argues that reaching multilateral agreements on environmental regulations is challenging due to differing national priorities and economic interests. Developing countries generally have lower environmental standards, whereas developed countries, having undergone industrialization, enforce stricter regulations. However, what is considered an optimal environmental standard in one country may not be suitable for another.

When a country imposes its environmental standards on others through tariff or non-tariff regulations, such actions are deemed illegal under international trade law. As environmental policies become more transnational in nature, they have the potential to reduce global trade flows (Frieden & Lake, 2003). This theoretical framework helps explain the challenges posed by EU environmental policies to Indonesia's crude palm oil (CPO) exports and global trade as a whole.

### **Method**

This study employs a qualitative approach, emphasizing the understanding, processing, and analysis of documents to explore their influence and interconnections (Bungin, 2003). The research aims to examine how the perception of crude palm oil (CPO) has evolved due to the EU Black Campaign, based on policies and data from the Indonesian Central Statistics Agency (BPS). Specifically, it investigates the impact of the EU Black Campaign and related policies on Indonesia's CPO exports to the EU between 2019 and 2023.

Primary data is collected through interviews with informants from the Free Trade Agreement (FTA) Bandung, conducted on December 23, 2024, at the FTA office. The sample is selected using a purposive sampling method, ensuring that participants are chosen based on their relevance to the research. Meanwhile, secondary data is obtained from various documents, including official reports, news articles, and publications.

Data analysis follows a content analysis approach to identify key themes in official documents, news, publications, and interviews. The process includes data reduction,

which involves selecting, summarizing, and focusing on relevant information, as outlined by Miles & Huberman, (1992). Additionally, a confirmability test is conducted to ensure the research findings remain accurate and objective.

## **Discussion of Research Results**

### **EU Black Campaign**

Indonesia refers to the European Union's (EU) policies and actions restricting crude palm oil (CPO) exports as a "Black Campaign." As the largest CPO supplier globally and the primary exporter to the EU, Indonesia plays a significant role in the international CPO market, controlling approximately 58.92% of global CPO exports. Around 70% of Indonesia's CPO production is allocated for exports, including shipments to the EU. Given its importance to the national economy, CPO is one of Indonesia's most valuable agricultural exports. According to the Indonesian Ministry of Trade, CPO exports reached approximately \$20.7 billion in 2020, making it one of the country's top export commodities (UkrAgroConsult, 2024).

The European Commission identifies the crude palm oil (CPO) industry as a major driver of deforestation in tropical regions, particularly in Southeast Asia. The conversion of forests into palm oil plantations has led to increased carbon emissions, habitat loss, and environmental degradation, contributing significantly to global climate change (EuropeanCommission, 2019). Additionally, the EU claims that agriculture is responsible for 50% of global deforestation, with the CPO industry being a primary contributor. This deforestation, which impacts carbon sequestration and exacerbates climate change, is particularly prevalent in tropical forest regions, including Indonesia, Malaysia, Congo, and South America (EuropeanParliament, 2022).

Contrary to the EU's claims, of the 239 million hectares of deforested land globally, only 6 million hectares are attributed to the CPO industry. Palm oil production accounts for just 2.5% of global deforestation, ranking fourth after soybeans and corn as a contributing factor (Suwarno, 2019). This data suggests a bias in the EU's categorization of CPO as the primary driver of deforestation while overlooking the impact of other agricultural commodities. Such claims not only challenge Indonesia's position as the world's largest CPO supplier but also pose a threat to its reputation in the global market, particularly within the EU.

In an EU parliamentary resolution on April 4, 2017, CPO was held responsible for rainforest destruction, with its large-scale industry development identified as a major

contributor to climate change and deforestation. The resolution was passed with 640 votes in favor, 18 against, and 28 abstentions. It stated that Indonesia and Malaysia account for 85–90% of global CPO production and claimed that deforestation in Indonesia continues to increase every five years. Additionally, the resolution emphasized the need for greater investment in sunflower oil production (EuropeanParliament, 2017). This indicates that the EU attributes deforestation and climate change to the expansion of Indonesia's CPO industry.

According to the World Resources Institute (WRI), Indonesia experienced a decline in deforestation from 2015 to 2016. Data from the Ministry of Environment and Forestry (KLHK) indicate that deforestation decreased by 630,000 hectares from an initial 1.1 million hectares (WRI, 2017). However, the EU's assessment of Indonesia's environmental regulations appears to be biased, as it disregards these improvements and presents an inaccurate portrayal of deforestation trends. While the EU claims that deforestation in Indonesia continues to increase, the data show a reduction of more than 50% from previous levels. This discrepancy was also highlighted by FTA Bandung expert staff, Ponirin Soegito, who noted that Indonesia was initially labeled as having a high deforestation rate, but the EU failed to acknowledge the country's actual progress in environmental conservation.

The EU claims that Indonesia is the world's third-largest CO<sub>2</sub> emitter, contributing to biodiversity loss (EuropeanCommission, 2013). However, data show Indonesia ranks sixth, while the EU is third, with emissions of 2.053 billion and 4.263 billion tons, respectively (DISLHK, 2018). Research by IPB and BPDPKS (2018–2020) found CPO industry emissions at 25 tons per hectare, contradicting the EU's claim of 90 tons (BPDPKS, 2020). Moreover, oil palm absorbs more CO<sub>2</sub> than sunflower plants, with Indonesia's emissions at 1.8 meters per ton, far lower than the EU's 7.5 (Alatas, 2015).

The evidence suggests that the EU is engaged in a black campaign against CPO. According to Black Campaign theory, such campaigns spread unverified and misleading information. The EU's claims regarding CPO's environmental impact lack clear proof and contradict factual data. As a result, Indonesia and its CPO industry face significant challenges due to these allegations, which have harmed their global reputation. FTA Bandung staff member, Ponirin Soegito, also emphasized that this black campaign has negatively affected the image of Indonesia's CPO industry.

## EU Policy

The economy requires government policies to function effectively. Environmental concerns often lead to political tensions, with the EU exacerbating this by introducing policies and resolutions that pressure Indonesia's CPO industry (EuropeanParliament, 2017). These policies reflect political interference, as economic policy is inherently linked to state intervention. Given the EU's role as a major market for Indonesian CPO, such regulations pose significant challenges. The EU aims to align its international economic policies with environmental protection. However, this study indicates that negative perceptions of CPO do not directly affect exports; rather, EU policies based on these perceptions create trade barriers.

These concerns have led the EU to issue new resolutions on CPO, including policies linking CPO to deforestation. The Renewable Energy Directive II (RED II) and its implementing regulation, DR ILUC, were approved on March 13, 2019, in Strasbourg and took effect on June 10, 2019. The EU considers CPO an unsustainable vegetable oil and aims to phase it out by 2030, with the expectation that Indonesia will achieve carbon neutrality by 2060 (Jakarta Post, 2023).

In the DR ILUC draft, the EU categorizes vegetable oils, including CPO, as high-risk and unsustainable. If unchallenged, this classification becomes a standard rule. The EU claims neutrality in its report through anti-prejudice procedures. Under RED II, biofuel feedstock is assessed based on renewable energy criteria, allowing the EU to continue importing biofuels as before. When implemented, RED II aligns biofuel regulations with the World Trade Organization (WTO) framework for international trade (EEAS, 2019).

These policies are discriminatory as they unfairly target CPO while overlooking other vegetable oils. The RED II text, based on 2000–2015 data, claims that the CPO industry is the primary driver of global deforestation, particularly in Indonesia (EuropeanCommission, 2019). However, research contradicts this claim, showing that CPO is not the largest cause of deforestation. Indonesia, as the world's leading CPO producer, has implemented various standardizations and a moratorium since 2015 to regulate palm oil expansion (JakartaGlobe, 2019). According to Mr. Ponirin, an expert at FTA Bandung, the EU's policy places an undue burden on Indonesia by labeling it as a high-deforestation country, leading to restrictive measures that hinder exports and increase compliance costs.

The EU's stance on CPO is influenced by political interests, as it seeks to promote the sales of soybean oil, sunflower oil, and canola, which are key agricultural products



of EU countries. Unlike CPO, these oils are not scrutinized for their role in deforestation, highlighting discriminatory efforts to boost EU vegetable oil production (SawitIndonesia, 2018). The RED II policy, issued in 2018, threatens the sustainability of Indonesia's CPO industry, reflecting protectionist behavior that favors less environmentally friendly alternatives. Its implementation affects 19 million Indonesian workers dependent on the palm oil sector (Kemenlu, 2019). Moreover, failing to meet EUDR standards could impact state revenue and smallholder welfare, as 40% of Indonesia's CPO production comes from smallholders managing plantations under 50 hectares (RSPO, 2024).

The finalized RED II regulation classifies CPO as a high-risk crop, restricting its use to 2019 levels due to concerns over indirect land use change and deforestation (EuropeanCommission, 2019). Under the EUDR, companies exporting CPO to the EU must submit due diligence statements verifying that their products are free from deforestation and human rights or environmental violations. Non-compliance carries penalties of at least 4% of the company's annual EU revenue (Ziclegal, 2024).

The Indonesian government has formally opposed the EU's policy, arguing that CPO is unfairly targeted while other biofuel crops, like soybeans from Europe and North America, face no similar restrictions. Indonesia claims this policy violates GATT and TBT agreements by discriminating against Indonesian CPO in favor of local agricultural products (WTO, 2019). FTA Bandung expert Mr. Ponirin asserts that the policy disregards Indonesia's ISPO and RSPO standards, prompting a WTO appeal for its inconsistency with free trade principles.

Indonesia relies heavily on palm oil from smallholders, and EU policies like RED II and EUDR, which impose strict standards, negatively impact its exports. Despite Indonesia's ISPO and RSPO standards, the EU questions their effectiveness and seeks to enforce its own. The key issue lies in differing environmental standards, with Indonesia highlighting the EU's history of deforestation during industrialization as unfair (CNN, 2018). FTA Bandung expert Mr. Ponirin argues that imposing EU standards on Indonesia is unjust. According to Butler's concept of Environmental Protection & Trade, optimal standards vary by country, and enforcing one nation's standards on another violates international trade rules (Frieden & Lake, 2003).

### **CPO Export Volume Decline**

The table below displays Indonesian CPO exports volume to the European Union after the implementation of the RED II and EUDR policies, from 2019 - 2023.

### Export Volume of Indonesia's CPO to the EU 2019-2023

European Union					
Year	2019	2020	2021	2022	2023
Net: 000 Ton					
Total	2.943,2	2.853,8	2.197,8	1.784	1.449,3

Source; Badan Pusat Statistik, (2024)

The data shows a significant decline in CPO exports volume to the EU. In 2019, when the CPO Black Campaign and RED II were implemented, exports reached 2,943.2 thousand tons. In 2020, they decreased to 2,853.8 thousand tons, and in 2021, they fell to 2,197.8 thousand tons. In 2022, exports dropped further to 1,784 thousand tons. By 2023, after the implementation of EUDR, exports reached only 1,449.3 thousand tons, a 50% decrease from 2019. This shows a significant year-on-year decline.

In contrast to the CPO export volume for the past 5 years before RED II and EUDR were implemented, the following is a statistical table of Indonesia's CPO export volume towards the EU region, since 2014 - 2018.

### Export Volume of Indonesia's CPO to the EU 2014 – 2018

European Union					
Year	2014	2015	2016	2017	2018
Net: 000 Ton					
Total	3.744,7	3.656,9	3.296,7	3.934,6	3.333

Source; Badan Pusat Statistik, (2024)

The data shows a decline in export volume towards the EU. In 2014, before the RED II policy, exports were 3,744.7 thousand tons, rising to 3,934.6 thousand tons in 2017. However, after the 2018 Black Campaign and RED II policy, exports dropped to 3,333 thousand tons. The decline became more significant after RED II and EUDR were implemented, with exports falling by 61% from 2017 (3,934.6 thousand tons) to 2023 (2,295.4 thousand tons).

This confirms that there was a massive drop in the export volume of Indonesia's CPO towards EU. This is related to the issuance and implementation of RED II and EUDR and then the emergence of the Black Campaign, this is related because the decline occurred in the period 2019 - 2023 where these things appeared and attacked the Indonesian CPO industry which ultimately burdened Indonesia in CPO trade to the region. This has created serious challenges for the Indonesian palm oil industry, bearing in mind that the EU is one of the main arena for Indonesian CPO exports.

## **Conclusion**

This study highlights the significant challenges faced by Indonesia's CPO industry due to the EU's "Black Campaign," which has negatively impacted export volumes. The EU has accused the Indonesian palm oil industry of being a major driver of deforestation and climate change; however, data indicate that CPO's contribution to global deforestation is relatively low compared to other crops such as soybeans and corn, which are staple commodities in EU countries. Policies such as RED II and EUDR are viewed as discriminatory, as they classify CPO as a high-risk commodity while exempting other vegetable oils from similar scrutiny. These restrictions threaten Indonesia's economy, particularly smallholders who rely heavily on palm oil production. Despite Indonesia's implementation of sustainability certifications like ISPO and RSPO, the EU remains skeptical and seeks to enforce its own environmental standards.

## **Recommendations**

To strengthen the position of Indonesian CPO in the international market, it is essential to enhance the credibility and global recognition of ISPO and RSPO. Strengthening trade diplomacy with the EU and engaging in multilateral negotiations to challenge discriminatory policies should be prioritized. Additionally, improving traceability systems and adopting stricter sustainability measures could help align Indonesia's CPO industry with international environmental expectations.

## **Research Limitation**

This study primarily relies on policy analysis and secondary data, which may not fully capture the perspectives of all stakeholders, including EU policymakers and consumers. Moreover, it focuses mainly on the Indonesian context without broader comparisons to other palm oil-producing countries facing similar challenges.

## **Recommendation for Future Research**

Future studies should investigate the impact of international environmental standardization on palm oil trade beyond Indonesia, incorporating a comparative analysis with other major producers. Additionally, further research should explore the effectiveness of ISPO and RSPO in meeting global sustainability standards and examine alternative markets for Indonesian CPO to reduce dependency on the EU.

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