

NEGOTIATING SUSTAINABILITY: INDONESIA'S COUNTER-NARRATIVE TO EUROPEAN UNION REGULATORY PRESSURE ON PALM OIL

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ABSTRACT

Previous studies have examined Indonesia's palm oil diplomacy and the development of the Indonesian Sustainable Palm Oil (ISPO) certification system. However, less attention has been paid to how Indonesia responds to European Union pressure on palm oil sustainability through discursive and institutional strategies. This article examines how #SawitBaik and ISPO operate together as counter-narrative strategies in responding to European Union regulatory pressure on palm oil sustainability. Using a qualitative case study based on document analysis, the study draws on materials covering ISPO from 2011 to 2026, #SawitBaik from 2019 to 2026, relevant European Union regulatory documents from 2018 onward and independent empirical studies. The analysis applies a relational understanding of counter-narrative and assesses the degree of correspondence between public representation, institutional response and observable evidence. The findings show that #SawitBaik works primarily through discursive reframing, emphasizing economic contribution, smallholder livelihoods, comparative land productivity and national interest. ISPO provides an institutional response through nationally governed sustainability standards and certification mechanisms. Yet, the empirical grounding of these counter-narratives varies across individual claims. Claims concerning palm oil's economic significance, comparative crop productivity and the existence of national sustainability governance receive relatively strong support. Claims related to smallholder welfare, social conditions and certification reach are more uneven. Other representations become predominantly rhetorical, particularly regarding broader environmental sustainability and harmonious relations between plantations and communities. The study contributes to counter-narrative analysis by showing how discursive negotiation and institutional adaptation can operate together even as they differ in their degree of empirical grounding.

Keywords: #SawitBaik; RED II; counter-narrative; Indonesia; palm oil

INTRODUCTION

Indonesia inhabits a central position in the global palm oil industry. In 2022, the country had approximately 16,83 million hectares of oil palm plantations which produced 46,73 million tonnes of crude palm oil and exported around 30,80 million tonnes valued at USD 39,28 billion (Hadi et al., 2024). It has also retained its position as the world's largest palm oil producer and remains a major supplier to the global vegetable oil market (Astari et al., 2025; Baka et al., 2024; Khatiwada et al., 2018; Rahmadian et al., 2026). This economic position has, henceforth, made palm oil an important part of Indonesian

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development and trade policy. Its expansion, however, has also sparked debate over Deforestation and its environmental consequences (Afrino, 2024; Ekaputri et al., 2025; Muldiana et al., 2026).

The environmental concerns behind this debate are well documented. For instance, Austin et al. (2019) found that large-scale oil palm plantations constituted a major direct driver of primary forest loss in Indonesia between 2001 and 2016. Other research has also linked plantation expansion with forest conversion and pressures on peatland ecosystems (Kinseng et al., 2022). In this case, social problems are also part of the controversy. Berenschot and Dhiaulhaq (2023), in their analysis of 150 conflicts between rural communities and palm oil companies, found that 68% remained unresolved. Ethnographic studies have likewise documented difficult problems in several oil palm zones (Li, 2018; Li & Semedi, 2021).

These disputes have acquired a regulatory dimension in Indonesia's relationship with the European Union. Directive (EU) 2018/2001, commonly known as the Renewable Energy Directive II (RED II), introduced requirements on renewable energy to address greenhouse gas emissions associated with indirect land-use change. Commission Delegated Regulation (EU) 2019/807 subsequently established criteria for identifying biofuel feedstocks that carry a high risk of indirect land-use change. Thus, palm oil became the principal commodity affected by this classification. The European Commission drew on evidence that a substantial share of palm oil expansion between 2008 and 2015 had occurred on land with high carbon stocks, supporting the designation of palm-based biofuel as high ILUC risk (Mitchell & Merriman, 2020). RED II then restricted the contribution of high-risk biofuels toward European renewable energy targets and provided for their gradual reduction.

For Indonesia, the impact of this classification extends to trade and market access. The high-ILUC-risk designation affects the regulatory conditions under which palm-based biofuel can qualify within the European renewable energy market. It therefore bears directly on export interests and on the treatment of a commodity of considerable economic and political importance in Indonesia. Moreover, government objections have addressed the evidence used in the European framework and the authority of external institutions to determine the sustainability status of Indonesian palm oil (Kinseng et al., 2022; Mitchell & Merriman, 2020). EU sustainability regulation, thus, became a source of regulatory and market-access pressure as well as a site of political contestation.

Indonesia has responded through several diplomatic, policy, and communication channels (Hutabarat, 2023; Kinseng et al., 2022; Rahmadian et al., 2026). This article focuses on two of them. #SawitBaik (#GoodPalm) is a public communication campaign that presents alternative interpretations of palm oil through economic, social and environmental claims. Otherwise, the Indonesian Sustainable Palm Oil certification system (ISPO) places sustainability commitments within a national regulatory and certification framework (Fahamsyah & Pramudya, 2017; Hadi et al., 2023; Limaho et al.,

2022; Rahmadian et al., 2026). To make it clear, the two instruments operate differently. #SawitBaik intervenes primarily in the representation of palm oil. Meanwhile, ISPO establishes a national institutional basis for defining and verifying sustainable production. They can, nevertheless, be examined within the same counter-narrative framework since both instruments are used to reposition Indonesia in relation to the external pressure on palm oil sustainability claims.

Previous research has examined important parts of this response separately. Choiruzzad (2019) shows how palm oil was constructed as a national interest through discursive processes that linked industry growth to broader public interests. Kinseng et al. (2022) further examine the Indonesia-EU dispute through environmental, trade, sovereignty and national dignity concerns. In contrast, Mitchell and Merriman (2020) focus on the legal implications of RED II and related measures under WTO rules. Next, Hutabarat (2023) situates vegetable oil within Indonesia's wider economic diplomacy, and Rahmadian et al. (2026) move closer to the present study by identifying persuasion, confrontation and hegemonization in Indonesia's palm oil diplomacy toward the EU.

Research on ISPO has also developed along a related line. Studies have examined it as a state-led sustainability regime. It traced both its institutional development and persistent implementation problems (Fahamsyah & Pramudya, 2017; Hadi et al., 2023, 2024; Hidayat et al., 2018). Other work has also addressed wider questions surrounding the sustainability of Indonesia's palm oil sector and the policy tensions that accompany its development (Hidayatno et al., 2025).

Together, this literature explains the construction of palm oil as a national interest, Indonesia's diplomatic resistance to European regulation and the development of national sustainability governance. Yet, the relationship between public communication and certification has received less direct attention. Examining them together makes it possible to see how Indonesia negotiates the representation of palm oil while also asserting authority over the institutional definition of sustainable production. Against this background, the article asks: How does Indonesia utilize #SawitBaik and ISPO as counter-narrative strategies in responding to European Union regulatory pressure on palm oil sustainability?

The analysis thus draws on the relational understanding of counter-narrative developed by Bamberg and Andrews (2004). Counter-narratives acquire meaning through their engagement with established interpretations of actors, events and responsibility. They may revise particular elements, reposition actors, or accept parts of an existing narrative while at the same time disputing others (Bamberg, 2004). This perspective fits the Indonesian case because sustainability itself remains part of domestic palm oil governance.

Contestation centers on the representation of Indonesian palm oil, the evidence used to evaluate it, the allocation of environmental responsibility, and the authority to set legitimate sustainability standards. For that reason, the article thus argues that #SawitBaik

and ISPO constitute complementary counter-narrative strategies at discursive and institutional levels. It further contributes to the literature by examining the empirical grounding of individual counter-narrative claims to understand the degree of correspondence between their representations and observable evidence or institutional practice.

METHODS

This study adopts a qualitative case study design (Yin, 2018) to examine Indonesia's response to European Union regulatory pressure on palm oil sustainability. The analysis treats #SawitBaik and ISPO as two response instruments within this broader case. #SawitBaik works primarily through public communication. Meanwhile, ISPO operates through nationally governed sustainability standards and certification. Bringing them into the same analytical design allows the study to examine how discursive representation and institutional response address the same external pressure through different mechanisms. The unit of analysis is the individual counter-narrative claim. This makes it possible to assess different claims within the same instrument separately according to their empirical and institutional grounding.

The study draws on documentary sources selected purposively for their relevance to the research question. The corpus covers the development of ISPO from its establishment in 2011 through 2026, the #SawitBaik campaign from its launch in 2019 through 2026, and the main European Union regulatory measures relevant to the palm oil dispute from 2018 onward. Earlier materials were included where they were needed to establish the institutional or political context of the instruments under examination.

Documents were retained when they directly addressed #SawitBaik, ISPO, EU sustainability regulation affecting palm oil, or independent evidence related to the main economic, environmental, social, and institutional claims identified in the analysis. Duplicate materials, unsupported commentary, sources with only indirect relevance, and documents without a clear connection to the claims under examination were excluded. Local and regional studies were included when they provided evidence relevant to a specific claim, with their geographical scope taken into account during interpretation.

Four groups of documents form the empirical basis of the study. The first includes official #SawitBaik materials such as campaign publications, government communications, social media content, infographics, videos, and related public information. These materials are used to identify how Indonesian palm oil is represented and which counter-claims are advanced through the campaign. The second group covers ISPO regulations, certification guidelines, government reports, implementation documents and related institutional materials, which provide evidence of how sustainability claims are translated into formal standards and regulatory arrangements. The third consists of European Union documents concerning RED II and indirect land-use change, together with relevant WTO and policy materials. These sources establish the regulatory claims and measures to which Indonesian responses are directed. The fourth

group comprises peer-reviewed research and credible independent institutional evidence on Deforestation, forest and land fires, smallholder certification, land governance, agrarian conflict, community participation and economic outcomes. These sources provide the basis for assessing the empirical grounding of claims identified in official communication and policy documents. Official and government materials are also used to establish what is claimed or institutionalized. Next, independent evidence is used to examine how far those claims correspond with observable conditions.

The analysis combines thematic identification with claim-level comparison (Ahmed et al., 2025; Braun & Clarke, 2006). Official campaign, regulatory and policy documents were first examined to identify recurring claims concerning economic contribution, smallholder livelihoods, environmental performance, regulatory fairness and national sustainability governance. Each claim was then compared with relevant institutional measures and independent empirical evidence. The analysis followed a consistent sequence linking the dominant sustainability claim, the Indonesian counter-claim, the response strategy, its institutional or policy basis, the available empirical evidence and the final classification.

Three operational classifications are applied to individual claims. Three classifications are applied. A substantive counter-narrative is identified when a claim has strong empirical grounding and/or recognizable institutional support. A partially substantive counter-narrative is identified when relevant empirical or institutional support exists despite the evidence revealing important variation, limitations or implementation gaps. A predominantly rhetorical counter-narrative is identified when the formulation of a claim extends beyond its empirical grounding, especially when a limited or conditional finding is generalized into a broader representation. The classifications, therefore, assess degrees of correspondence between representation and evidence. These categories are operational tools developed for this study and are separate from the conceptual categories proposed by Bamberg and Andrews (2004).

Nonetheless, this documentary design sets several boundaries on the analysis. The study does not infer the intentions of government officials or industry actors, measure audience reception of #SawitBaik, or estimate the campaign's causal effect on public opinion or international perceptions. Environmental, social, and certification outcomes are also not causally attributed to ISPO unless the available evidence supports such an inference. Regional and local studies are interpreted within the geographical limits of their research designs and are not treated as automatically representative of the Indonesian palm oil sector as a whole.

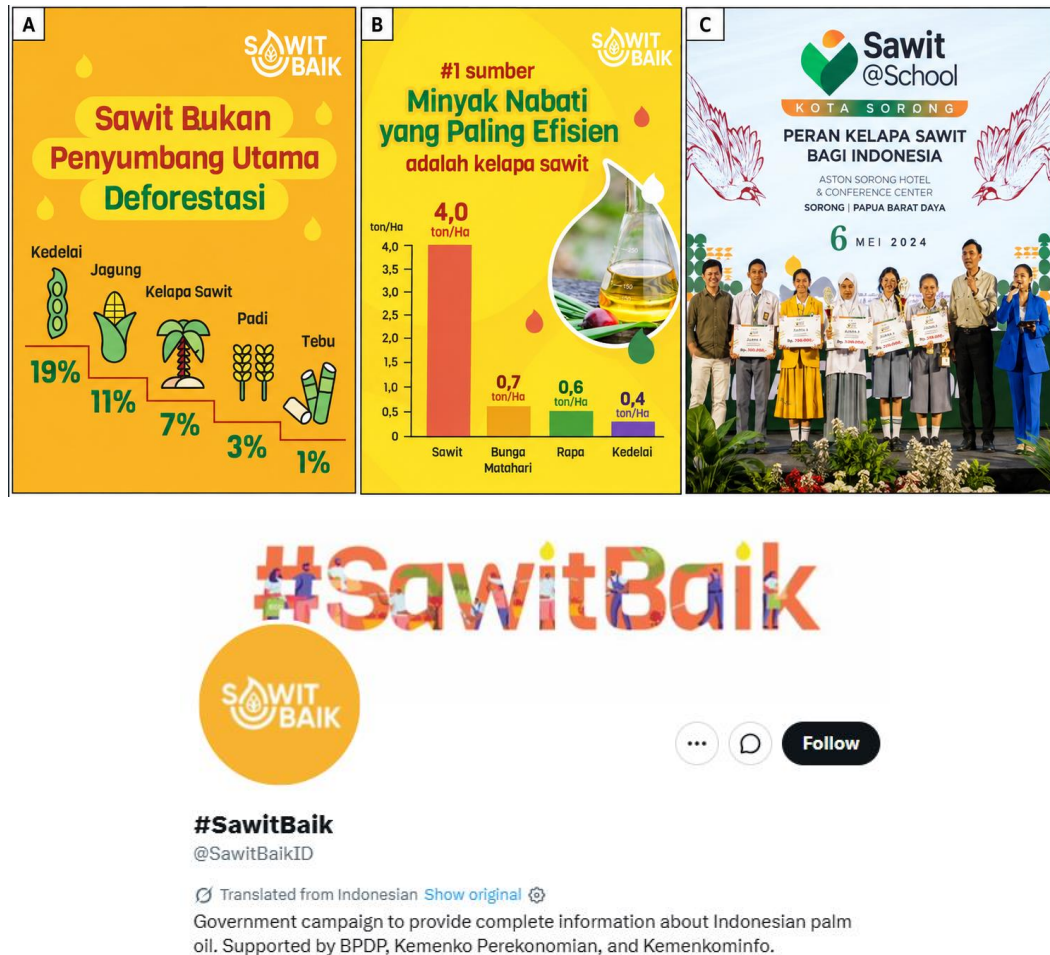
RESULTS AND DISCUSSION

#SawitBaik as a Discursive Counter-Narrative

The #SawitBaik campaign constructs an alternative interpretation of Indonesian palm oil by reorganizing several issues that have shaped international criticism of the commodity. Its communication emphasizes economic contribution, rural livelihoods,

environmental efficiency and the comparative treatment of palm oil in international regulation. These themes correspond with a wider discursive pattern in Indonesian palm oil politics. Within this setting, #SawitBaik functions as a discursive counter-narrative because it responds to existing sustainability criticisms by changing the interpretation of palm oil's economic, social and environmental position

Figure 1. Selected #SawitBaik Communication and Outreach Instruments 2019-2024



Source: Compiled by the authors from the archived @SawitBaikID campaign materials (2019) and BDPDKS (2024)

The campaign was implemented through identifiable communication instruments from its launch in September 2019 (see Figure 1). #SawitBaik was introduced alongside the Twitter account @SawitBaikID and an Influencer Meeting #SawitBaik in Jakarta involving representatives from the Ministry of Communication and Information, the Coordinating Ministry for Economic Affairs, political actors and social-media influencers (Katadata, 2019). The @SawitBaikID profile described the initiative as a national campaign supported by BDPDKS and the Coordinating Ministry for Economic Affairs that aimed to “provide comprehensive information about palm oil” (Swaragita, 2019). The campaign also states several objectives: responding to negative palm oil issues, disseminating positive information, increasing public support through social media, and

encouraging public participation (Katadata, 2019). As what Khairiza and Kusumasari's (2020) analysis of the #SawitBaik Twitter network confirms that state institutions, non-governmental organizations, news media and individual users participated in producing and circulating campaign messages.

Archived material from the @SawitBaikID Twitter account provides direct evidence of this communication strategy. It contains 27 posts from September 2019, many accompanied by campaign infographics carrying the #SawitBaik identity (see Figure 1 panel A and B). Several posts addressed environmental criticism directly. One challenged the representation of palm oil as a principal contributor to Deforestation. Another stated that oil palm used land more efficiently than other vegetable oil crops and reported a yield of approximately 4.0 tonnes of oil per hectare. Other posts argued that plantations could occupy previously degraded land, promoted B20 biodiesel as environmentally beneficial and discussed the water use and carbon absorption associated with oil palm. These messages thus assembled several propositions intended to present palm oil as productive, useful and compatible with environmental objectives.

The campaign also sought to connect palm oil with everyday economic and social life. Posts highlighted palm-derived ingredients in cooking oil, food products, cosmetics, cleaning products and clothing. Others promoted competitions such as #BicaraSawit and #CeritaSawit, inviting users to produce their own positive stories about palm oil. The account described #SawitBaik as a national campaign intended to provide the public with information about palm oil. These materials provide primary evidence that #SawitBaik operated through both the circulation of positive claims and efforts to encourage wider participation in their reproduction.

The campaign was also executed through outreach and education programs. In 2022, at the Fourth G20 Sherpa Meeting in Bali, BPD PKS set up a Sawit Baik promotional booth for international delegates and showcased some palm oil-derived products. They also distributed the *Mitos dan Fakta Sawit* booklets to address some of the negative impressions associated with palm oil (Badan Pengelola Dana Perkebunan Kelapa Sawit (BPD PKS), 2022). In 2023, BPD PKS launched the Palm Oil EduTalk and the Sawit @School programs for secondary school teachers and students, which highlighted various aspects of palm oil, including its economy, society, and the environment (Badan Pengelola Dana Perkebunan Kelapa Sawit (BPD PKS), 2023a). Similar to these programs targeted at university students, the GenSawit also included a Lomba Narasi #SawitBaik in which participants were required to make and disseminate positive narratives about palm oil (Badan Pengelola Dana Perkebunan Kelapa Sawit (BPD PKS), 2023b). A range of materials was used, including social media, manuals, exhibition materials, and programming. Positive representations of palm oil focused on rural economies and the environment.

This communication activity remained visible in 2024 (see Figure 1 panel C). In Sorong, BPD PKS organized Palm Oil Edu Talk and Sawit @School on 6-7 May for

approximately 300 teachers and students from 31 senior secondary schools (Badan Pengelola Dana Perkebunan Kelapa Sawit (BPDPKS), 2024b). The Sawit @School event included around 200 participants and combined a talk show with poster and essay competitions and an Olimpiade #SawitBaik. Social-media influencers also helped disseminate palm oil information through digital media. In July 2024, BPDPKS continued promoting palm oil at the Indonesia Maju Expo & Forum in Jakarta through displays of palm-derived products, institutional programs, and other educational materials (Badan Pengelola Dana Perkebunan Kelapa Sawit (BPDPKS), 2024a). Henceforth, these activities show that #SawitBaik evolved from an early social-media campaign into a broader communication approach using digital content, educational programs, and public exhibitions.

Based upon those glimpses of #SawitBaik campaign as counter-narrative strategies. Economic contribution forms one of the consistent elements of the campaign. #SawitBaik presents palm oil as a major source of foreign exchange, employment and income for communities in producing regions. This framing draws strength from the scale of the industry itself. Indonesia had approximately 16,83 million hectares of oil palm plantations in 2022, produced 46,73 million tonnes of crude palm oil, and exported 30,80 million tonnes with a value of USD 39,28 billion (Hadi et al., 2024). The sector also provides direct and indirect employment on a large scale (Hutabarat, 2023).

The campaign also places smallholders at the center of this economic narrative. Palm oil is represented as a source of household income and rural development. Thus, restrictions on the commodity are associated with possible consequences for communities that depend on the sector. As Choiruzzad (2019) identifies that the process of objectification through which the interests of palm oil businesses became connected with employment, development and broader public interests. In this framing, protection of the palm oil industry can be presented as protection of farmers and rural communities. #SawitBaik continues this connection by giving smallholder livelihoods a prominent place within the public defense of palm oil.

However, the distribution of these benefits is more uneven than the campaign's positive representation suggests. Plantation arrangements differ by region, company, and farmer type. Independent smallholders face challenges in several aspects. Corporate plantation systems have also generated disputes over land and compensation (Afrizal et al., 2024). Berenschot and Dhiaulhaq (2023) document how arrangements surrounding plantation expansion can weaken the position of rural communities. Economic benefits, hence, are substantial at the national level and are observable in many producing communities. Yet, these benefits are not shared equally among actors or locations.

Furthermore, environmental criticism is addressed through a different form of counter-narrative. #SawitBaik challenges representations that place palm oil at the center of Indonesian environmental degradation. Campaign-related narratives question the attribution of Deforestation to oil palm alone and emphasize that plantations may also

develop on previously cleared or degraded land. They further highlight the productivity of oil palm in comparison with soybean, rapeseed and sunflower (Rahmadian et al., 2026).

The comparative productivity argument has a strong factual basis. Oil palm produces considerably more vegetable oil per hectare than the principal temperate oil crops. Indonesian diplomatic narratives use this agronomic advantage to argue that an assessment of palm oil sustainability should consider the land requirements of alternative crops. The claim is, therefore, useful as a counter to evaluations based only on the total area occupied by palm plantations. It does not, however, determine whether particular plantation expansion has caused forest conversion or other environmental damage.

Table 1. drivers/factors causing nationwide Deforestation in Primary Natural Forests (2001-2016)

Driver / Factor Category	Deforested Area (Hectares)	Contribution to Deforestation (%)
Oil Palm Plantation (Large-scale)	2,080,978 ha	23%
Grassland / Shrubland	1,840,884 ha	20%
Small-scale Agriculture	1,361,784 ha	15%
Timber Plantation	1,261,028 ha	14%
Small-scale Mixed Plantation	662,418 ha	7%
Large-scale Plantation (<i>other/unspecified</i>)	616,208 ha	7%
Secondary Forest (<i>cleared then regrown</i>)	554,617 ha	6%
Logging Road	357,391 ha	4%
Mining	219,987 ha	2%
Other (<i>urban expansion, landslides, shoreline erosion</i>)	157,619 ha	2%
Fish Pond	71,717 ha	1%

Source: Austin et al. (2019)

Evidence on Deforestation also supports part of the campaign's reframing. Austin et al. (2019) demonstrate that Indonesian Deforestation has several direct drivers whose importance changes over time and between regions. Table 1 presents the contribution of the factors causing Deforestation in Indonesia. All of these factors contributed to forest loss during the period covered by their study. This finding, thus, supports an interpretation of Indonesian Deforestation as a multi-driver process. Attribution of national forest loss to palm oil alone, therefore, provides an incomplete account of the evidence.

Other environmental concerns add further qualifications. Oil palm expansion has been associated with biodiversity decline (Kinseng et al., 2022; Wulandari & Kusuma, 2024). Forest and land fires require similar care in attribution because fires arise from interactions among climatic conditions and different land users. Generalization across all oil palm production is, therefore, difficult. The available literature still shows that

sustainability claims have to account for environmental problems within plantation regions and for the historical relationship between agricultural expansion and land conversion. The environmental counter-narrative, henceforth, has an uneven empirical basis. Land-use efficiency is supported and the argument that Indonesian Deforestation has multiple causes is supported. However, wider claims concerning environmental friendliness require more limited wording.

Next up, #SawitBaik also places the environmental debate within a question of regulatory fairness. This part of the counter-narrative concerns the treatment of palm oil under European sustainability rules and the comparison between palm oil and competing vegetable oils. The EU's RED II and Delegated Regulation 2019/807 gave this argument a clear policy target. The delegated regulation established criteria for identifying biofuel feedstocks associated with a high risk of indirect land-use change, and palm oil became the principal commodity affected by the resulting classification. Indonesia responded by questioning the scientific basis of the criteria and their implications for market competition (Mitchell & Merriman, 2020).

This criticism has a legal and policy basis that deserves separate treatment from broader accusations of an anti-palm oil conspiracy. Mitchell and Merriman (2020) examined Indonesia's WTO claims and concluded that several aspects of the European measures raised serious questions under WTO rules. The study shows that Indonesia's objections to European regulation cannot be reduced to public relations language alone. Some objections concern identifiable questions of differential regulatory treatment and the design of trade measures intended to address environmental risks.

The counter-narrative becomes broader when European sustainability regulation is interpreted primarily as economic protectionism. Choiruzzad (2019) shows that the Indonesian palm oil discourse has long contained a delegitimizing element in which criticism of the industry is associated with foreign economic interests. Similar arguments appear in later government and industry communication, particularly through comparisons between palm oil and European-produced rapeseed or sunflower oil. Kinseng et al. (2022) also found that Indonesian government officials interpreted European measures through several frames, including environmental regulation and trade competition.

The available evidence, therefore, supports a distinction within the fairness narrative. Specific concerns about the regulatory design of RED II, the High-Risk ILUC methodology and differential effects on palm oil can be examined through legal and policy evidence. Broader assertions that environmental criticism originates mainly from European vegetable oil competitors have a weaker empirical foundation. Indonesian environmental organizations and international NGOs have also criticized other commodities and land-use practices, while many concerns surrounding palm oil are supported by independent environmental and social research. The fairness counter-narrative is strongest when it addresses identifiable regulatory differences and

comparative standards. Its explanatory strength becomes more limited when diverse environmental criticisms are treated as expressions of a single commercial interest.

That being said, the three clusters show that #SawitBaik functions clearly as a discursive counter-narrative. It invokes established criticism concerning environmental damage, social consequences and the sustainability of Indonesian palm oil, then reconstructs these issues through economic evidence, comparative environmental claims, regulatory fairness and national interest. The empirical strength of these counter-claims varies. Macroeconomic contribution and high land productivity have substantial support, while rural welfare claims show uneven outcomes. Environmental reframing is supported where it recognizes multiple causes of Deforestation and changes over time, however, broader claims of environmental harmlessness face contrary evidence. #SawitBaik, therefore, contains substantive and partially substantive elements within the same campaign. The degree to which particular claims become predominantly rhetorical depends on the distance between their public formulation and the empirical conditions examined in the subsequent part.

ISPO as an Institutional Counter-Narrative

The Indonesian Sustainable Palm Oil (ISPO) certification system represents the institutional side of Indonesia's counter-narrative response in order to negotiate the international sustainability standards. Whereas #SawitBaik works primarily through discursive measures, ISPO places sustainability within a national system of regulation. Its relevance to counter-narrative analysis lies in the way Indonesia accepts sustainability as a legitimate requirement. At the same time, it also retains national authority over the standards used to assess its palm oil sector. ISPO, therefore, enables Indonesia to negotiate external sustainability pressure through an institutional framework that defines sustainable production according to the domestic regulatory authority.

ISPO was established in 2011 through Minister of Agriculture Regulation No. 19/Permentan/OT.140/3/2011. Its emergence occurred during a period of growing international concern over Deforestation and social problems associated with Indonesian palm oil. Sustainability governance had also become increasingly influenced by transnational arrangements, especially the Roundtable on Sustainable Palm Oil. The establishment of ISPO, at that time, reflected tension between sustainability reform and national regulatory authority.

Fahamsyah and Pramudya (2017) describe ISPO as a mandatory sustainability system grounded in Indonesian law and connected with efforts to respond to international criticism of the palm oil sector. Choiruzzad et al. (2021) similarly argue that ISPO incorporated principles already circulating through transnational sustainability governance while placing their regulation within the authority of the Indonesian state. This dual character is important for understanding ISPO as a counter-narrative instrument. Indonesia did not reject the expectation that palm oil should meet environmental and social standards. It instead developed a national mechanism through

which sustainable palm oil could be defined, assessed and certified. The resulting institutional response, therefore, negotiated both the content of sustainability and the authority through which sustainability standards were governed.

Additional frameworks were developed under the Ministry of Agriculture Regulation No. 11/2015 and Presidential Regulation No. 44 of 2020. The current foundation is Presidential Regulation No. 16 of 2025 on the Indonesian Sustainable Palm Oil Certification System, which repealed Presidential Regulation No. 44 of 2020. The regulation defines ISPO as a system of oil palm plantations, oil palm downstream industries, and palm-based bioenergy industries that are sustainable based on Indonesian laws. The preamble also connects certification to the market, the sustainability of the palm oil supply chain, and evolving international laws.

Presidential Regulation No. 16 of 2025 also introduces ISPO certification for plantation business, oil palm downstream industries and palm-based bioenergy business. The principles of the assessment for the plantation business include adherence to legal and regulatory requirements, good plantation practices, management of the environment and natural resources and biodiversity, labor and social responsibility and community economic empowerment, transparency, and improvement. The principles for the downstream industries and bioenergy businesses include legal compliance, traceability and improvement.

The significance of these standards lies less in their administrative detail than in the political meaning attached to their existence. ISPO allows Indonesia to respond to international sustainability criticism through an institutional claim: that the country has established its own system for defining and verifying sustainable palm oil. In this sense, ISPO challenges representations of Indonesia as a producer state that lacks credible sustainability governance. Choiruzzad et al. (2021) describe this dynamic as a form of governance counter-rescaling, in which authority over sustainability is brought back into the national domain after being shaped increasingly by transnational arrangements such as the RSPO. ISPO, therefore, does not reject sustainability as a norm. It negotiates the assumption that legitimate sustainability standards must be defined primarily by external actors.

This institutional response also gives Indonesia a stronger basis for negotiating pressure from the European Union. The counter-narrative is no longer limited to disputing accusations or questioning the fairness of external regulation. Through ISPO, the government can point to a state-backed certification system as evidence that sustainability has already been incorporated into domestic governance. Presidential Regulation No. 16 of 2025 reinforces this position by defining ISPO across plantation, downstream and bioenergy activities and by linking the system to market acceptance, competitiveness, and international developments. The regulation, therefore, provides Indonesia with an institutional reference through which it can argue that sustainability is being addressed through national regulation, not merely imposed solely through external market standards.

This function is consistent with earlier interpretations of ISPO as both a sustainability mechanism and an assertion of national regulatory authority. Fahamsyah and Pramudya (2017) show that ISPO was closely connected with wider debates over international criticism and the legitimacy of sustainability certification. Choiruzzad et al. (2021) further demonstrate that the system developed within a tension between reformist efforts to improve palm oil governance and industry demands for greater protection against external pressure. This ambiguity is analytically important because it shows that ISPO performs two roles at the same time. It institutionalizes sustainability norms while also repositioning Indonesia as an actor capable of defining how those norms should be applied domestically.

Seen from this perspective, ISPO functions as a counter-narrative through institutionalization. The dominant sustainability narrative surrounding Indonesian palm oil often emphasizes Deforestation. It also pointed out several setbacks from the weak governance and insufficient control over production practices. ISPO responds by constructing an alternative institutional account in which the Indonesian state presents itself as regulator, standard-setter, and guarantor of sustainable production. The counter-narrative, therefore, operates through policy and communication. It seeks to shift the debate from whether Indonesia possesses sustainable governance to whether its nationally defined system should be recognized as a legitimate basis for assessing palm oil production.

Between Narrative and Practice: Empirical Grounding of Indonesia's Counter-Narrative

The counter-narratives constructed through #SawitBaik and ISPO become more analytically informative when their representations are compared with independently documented environmental, economic, social and institutional conditions. This comparison assesses their empirical grounding, understood here as the degree of correspondence between a counter-narrative claim and observable evidence or practice. The evidence reveals different levels of grounding across claims. Some representations correspond strongly with independent evidence, particularly those concerning palm oil's economic importance and comparative land productivity. Others have identifiable foundations but remain qualified by regional variation, implementation gaps, or contradictory conditions. A smaller group extends limited or conditional evidence into broader representations whose empirical grounding is considerably weaker.

For the environmental aspect, national evidence provides qualified support for Indonesia's environmental counter-narrative. Austin et al. (2019) found that large-scale oil palm plantations accounted for approximately 23% of primary natural forest deforestation between 2001 and 2016. Its annual contribution approached 40% around 2008 and 2009 before declining to below 15% during 2014 to 2016. Varkkey et al. (2018) also add an important qualification to the land-efficiency argument. Oil palm has high biological productivity but Indonesia's development trajectory historically relied heavily on expansion. In this sense, productivity gains did not necessarily produce land-saving

outcomes. The environmental counter-narrative is stronger when it makes specific claims about comparative yield and multiple drivers of Deforestation, yet broader claims of environmental sustainability receive weaker empirical support.

Evidence from plantation regions reinforces this distinction. Apresian et al. (2020) found that smallholders in Riau could experience higher incomes from oil palm while simultaneously reporting water scarcity, haze, forest and land fires, pollution and other environmental pressures. Fahadayna et al. (2023) show another aspect of this implementation gap in West Kalimantan, where indigenous Dayak communities possess environmental knowledge relevant to fire management but remain more involved in operational activities than in problem definition, policy formulation and evaluation. These studies show that environmental problems and governance limitations continue within regions where sustainability policies already operate. The persistence of these conditions weakens broad representations of sustainability that extend beyond the specific evidence supporting productivity or regulatory claims.

Next up, economic claims show stronger empirical correspondence. Palm oil remains a major source of production, exports, employment and rural economic activity (Hadi et al., 2024). Evidence from producing regions confirms that oil palm can improve household income. Apresian et al. (2020), based on interviews in eight villages in Riau, found that many smallholders associated palm oil cultivation with higher income and improved consumption opportunities. Similar benefits are identified in employment, village-level economic activity, and infrastructure development (Kinseng et al., 2022; Wulandari & Kusuma, 2024).

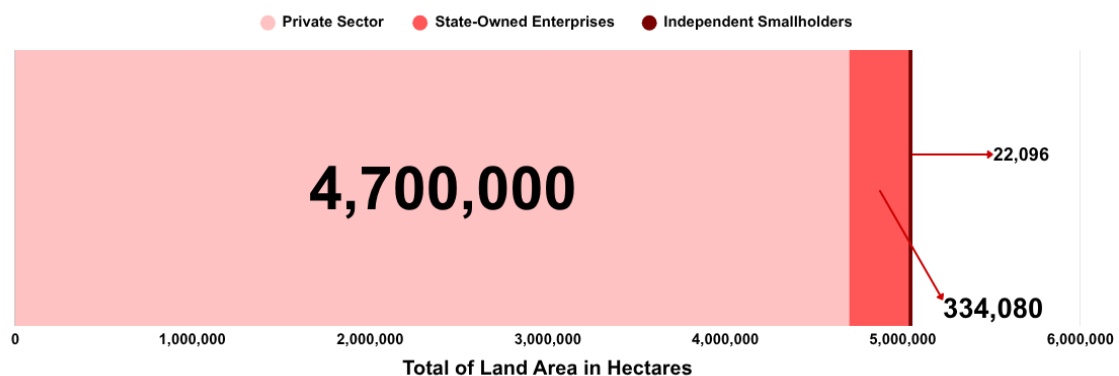
Nonetheless, the distribution of those benefits is considerably less uniform. Apresian et al. (2020) found large differences in smallholder income across villages depending on plantation arrangements and market access. Farmers also remained vulnerable to price shocks and unstable employment. Mandasari et al. (2022) identify low levels of empowerment and institutional capacity among independent smallholders in Riau, while Muchlis et al. (2025) and Sari et al. (2022) show how land documentation and certification costs affect the ability of farmers to participate in sustainability schemes. Berenschot and Dhiaulhaq (2023) and Li and Semedi (2021) further show that economic integration into plantation systems can coexist with weak bargaining positions or increased dependence on plantation employment and markets. The economic counter-narrative, therefore, has substantial empirical foundations, though claims of broadly shared smallholder prosperity require a deeper scrutiny.

In the social aspect, the correspondence is weaker in the area of social sustainability and land governance. Berenschot and Dhiaulhaq (2023) examined 150 conflicts between rural communities and palm oil companies across four major producing provinces and found that 102 cases, or 68%, remained unresolved. Moreover, Li's (Li, 2018) ethnographic research in West Kalimantan similarly shows how certification and formal regulation can operate within local political economies where informal transactions and

corporate influence limit regulatory effectiveness. Additionally, Drajat et al. (2025) identify another dimension of this problem through disputes over forest-area status and plantation licensing involving 192 corporations whose forest-release decisions had been revoked. These studies together show that formal compliance systems operate within a land-governance environment marked by persistent legal and institutional uncertainty.

Community participation presents a related gap. Fahadayna et al. (2023) find that Dayak communities in West Kalimantan, involvement remains limited in the stages where problems, policies, and evaluations are defined. Together with the land-conflict literature, this evidence places limits on counter-narrative claims that associate palm oil development broadly with social responsibility, community empowerment or harmonious plantation-community relations. The evidence supports more cautious claims where institutional mechanisms exist, meanwhile their grounding varies considerably across locations.

Figure 2. Certified ISPO area by producer category in 2023



Source: Rahmadian et al. (2026)

Moving onward on the ISPO institutional side, ISPO provides the evidence that Indonesia's sustainability response has moved into formal institutional practice. Earlier implementation, however, was highly uneven. Hadi et al. (2023) reported 621 ISPO certificates covering approximately 5,45 million hectares by January 2020, with certification concentrated among large private and state-owned plantations. Smallholder participation remained much lower. Moreover, Apresian et al. (2020) encountered only two certified smallholders across their eight Riau research villages, both of whom had received company assistance. Rahmadian et al. (2026) report that the disparity was still visible in 2023, with approximately 4,700,000 hectares of certified private plantations and 334,080 hectares under state-owned enterprises, compared with about 22,096 hectares managed by certified independent smallholders (see Figure 2). These figures demonstrate substantial institutional implementation within the corporate sector. However, it also documents the limited reach of the earlier system among independent farmers.

Henceforth, across these dimensions, the empirical record reveals a persistent variation in the degree to which political representations of sustainability are grounded in observable practice. Indonesia's counter-narrative contains clear substantive elements. Palm oil's economic importance is well established, its comparative land productivity is credible and ISPO provides a genuine national sustainability institution. However, the same level of correspondence is less evident in claims concerning broadly shared smallholder benefits, environmental performance and community relations. This uneven grounding is important for understanding the political role of #SawitBaik and ISPO. Their capacity to provide Indonesia with an alternative interpretation of palm oil and an institutional basis for negotiating external sustainability pressure is already observable. Yet, the broader sustainability representations attached to these strategies are less consistently grounded in the available environmental and social evidence.

Negotiating Sustainability through Narrative and Institutional Authority

#SawitBaik and ISPO operate as complementary counter-narrative strategies through different political mechanisms. #SawitBaik works primarily through discursive reframing. It reconstructs the interpretation of Indonesian palm oil. More or less, around the aspects of economic contribution, smallholder livelihoods, land productivity, regulatory fairness and national interest. On the other hand, ISPO performs an institutional function by placing sustainability within a nationally governed system of standards and certification. Together, these instruments allow Indonesia to negotiate sustainability pressure through both representation and regulation. #SawitBaik negotiate how Indonesian palm oil is interpreted also ISPO establishes the national institutional basis through which Indonesia presents its own approach to sustainable production.

This relationship reflects the relational character of counter-narrative described by Bamberg and Andrews (2004). Indonesia accepts sustainability as a legitimate concern and incorporates it into domestic regulation, at the same time, it negotiates particular interpretations of environmental responsibility and the authority of external actors to determine sustainability standards. Choiruzzad et al. (2021) capture a similar process in their analysis of ISPO as both an adoption of sustainability norms and an effort to return regulatory authority to the national domain.

#SawitBaik and ISPO, thus, do more than reject external criticism. They reposition Indonesia within the sustainability debate. Producers and smallholders are represented as contributors to national development; the state is positioned as an actor capable of defining, regulating and verifying sustainable palm oil. Counter-narrative, therefore, becomes a means of negotiating both the meaning of sustainability and the authority through which that meaning is institutionalized (Bamberg & Andrews, 2004; Choiruzzad et al., 2021).

However, the largest area of tension appears where valid claims and institutional measures coexist with uneven grounding. Smallholder welfare illustrates this pattern. Palm oil can raise household income while leaving farmers exposed to price volatility and

environmental costs (Apresian et al., 2020). Other studies identify continuing difficulties involving land documentation and access to incentives (Hadi et al., 2023, 2024; Mandasari et al., 2022; Muchlis et al., 2025; Sari, 2022). The livelihood narrative, therefore, has substantive foundations, although its broader political representation can obscure variation among smallholders. The same distinction applies to ISPO (Hadi et al., 2023; Rahmadian et al., 2026).

This variation becomes clearer when the findings are assessed through the three classifications developed in this study. A substantive counter-narrative appears where the central claim is supported by independent evidence or an identifiable institutional measure. A partially substantive appears where such support exists, although the claim is realized unevenly or only under particular conditions. A predominantly rhetorical claim emerges when the breadth of the representation extends considerably beyond the evidence available to sustain it.

Table 2. Classification of #SawitBaik and ISPO Counter-Narrative Claims

Instrument	Counter-narrative claim	Correspondence with empirical or institutional evidence	Classification
#SawitBaik	Palm oil makes a major contribution to Indonesia's economy	Large production, export earnings and wider economic significance are independently documented	Substantive
	Indonesian Deforestation has multiple drivers	National evidence identifies oil palm alongside timber plantations, small-scale agriculture, and other land-use drivers	Substantive
	Palm oil supports smallholder livelihoods and rural development	Income and local economic benefits are documented, although benefits vary across farmers, regions, and production arrangements	Partially Substantive
	European sustainability regulation treats palm oil unfairly	Specific legal and regulatory concerns have identifiable foundations, while broader claims that external criticism primarily reflects commercial competition have weaker support	Partially Substantive
	Indonesian palm oil can be represented broadly as environ-	Historical forest conversion and continuing environmental problems remain documented des-	Predominantly Rhetorical

	mentally sustainable	pitate credible productivity and multiple-driver arguments	
	Palm oil consistently produces harmonious and beneficial relations with surrounding communities	Economic opportunities coexist with documented land disputes, unequal bargaining positions and unresolved conflicts in several producing regions	Predominantly Rhetorical
ISPO	Indonesia possesses a national sustainability certification system	ISPO has a formal regulatory basis, certification standards, assessment mechanisms and substantial implementation among large plantations	Substantive
	National sustainability certification reaches the palm oil sector broadly, including independent smallholders	Formal inclusion is clear, while historical certification remains heavily concentrated among large producers and smallholder participation remains limited	Partially substantive

Source: Author's Analysis

The substantive category identifies claims whose representation corresponds strongly with independent evidence or identifiable institutional arrangements. Palm oil's macroeconomic contribution provides the clearest example because its production, export value and economic significance can be established independently of campaign communication. The argument that Indonesian Deforestation has multiple drivers also has substantial empirical grounding because national-level evidence identifies several land-use processes alongside oil palm. Comparative productivity provides another strongly grounded claim when it remains confined to oil yield per hectare. These examples show that a counter-narrative can introduce empirically defensible dimensions that qualify narrower representations of palm oil without requiring the analysis to treat the wider sustainability debate as resolved.

ISPO demonstrates a related form of substantive grounding at the institutional level. Its regulatory framework, certification standards and implementation record strongly support the representation that Indonesia possesses a national sustainability certification system. The degree of grounding changes when the representation is extended toward sector-wide reach. Certification among large plantation companies is well established, while independent smallholder participation remains much more limited. ISPO can therefore be classified as substantive when the claim concerns the existence of national sustainability governance and partially substantive when that institutional existence is

used to imply broad implementation across producer categories. The distinction separates institutional existence from institutional reach.

The partially substantive category captures claims with identifiable empirical foundations whose broader representation is qualified by variation or implementation gaps. Smallholder welfare illustrates this pattern. Palm oil generates income and economic opportunities in producing regions, yet the distribution of these benefits varies according to land ownership, market access, organizational capacity, price conditions and relationships with plantation companies. (Apresian et al., 2020; Berenschot & Dhiaulhaq, 2023). Regulatory fairness follows a similar pattern. Indonesia's objections to European sustainability regulation have identifiable legal and policy foundations, especially concerning differential treatment and regulatory design (Kinseng et al., 2022; Mitchell & Merriman, 2020). Their empirical grounding becomes weaker when these specific objections are generalized into a broader explanation that attributes international sustainability criticism primarily to commercial competition. Partial substantiveness therefore reflects a difference between the evidence supporting the core proposition and the broader representation constructed from it.

The predominantly rhetorical category becomes most visible through claim extension. Environmental communication provides the clearest example. Higher land productivity and the existence of multiple drivers of Deforestation are defensible empirical propositions. These findings provide insufficient grounding, however, for a broader representation of Indonesian palm oil as environmentally benign. Historical forest conversion and the expansion-oriented trajectory of Indonesian palm oil remain relevant to any wider sustainability assessment (Varkkey et al., 2018). A similar process appears when documented employment and income gains are extended into a generalized representation of harmonious plantation-community relations despite evidence of unresolved land disputes and unequal bargaining positions. (Berenschot & Dhiaulhaq, 2023; Li, 2018; Li & Semedi, 2021). The rhetorical quality, therefore, arises from the widening of a defensible proposition into a broader political representation whose evidentiary requirements are considerably greater.

Moreover, the findings also connect with earlier studies that have examined how palm oil became embedded in Indonesia's conception of national interest and how government actors have resisted external pressure through trade, diplomatic and sovereignty-based arguments (Choiruzzad, 2019; Kinseng et al., 2022). It also corresponds with Rahmadian et al. (2026), who show that Indonesian palm oil diplomacy combines persuasion, confrontation and broader narrative strategies when responding to international sustainability pressure. The present study adds a distinct dimension to this literature by showing that counter-narrative construction is carried through public discourse and institutional adaptation together. Indonesia's response, therefore, involves the negotiation of how sustainability is interpreted and who has the authority to define credible sustainability governance.

This interpretation also extends the discussion developed by Choiruzzad et al. (2021) on ISPO as an ambiguous form of governance that combines the adoption of sustainability norms with efforts to restore national regulatory authority. The findings of this study place that institutional tension within a broader counter-narrative process. ISPO provides Indonesia with an institutional basis for responding to claims that domestic palm oil governance is inadequate. Otherwise, #SawitBaik and wider public communication provide the discursive framing through which that institutional response acquires political meaning. The two instruments, therefore, reveal a connection that has received less direct attention in studies that examine diplomacy, national-interest construction or certification separately. A counter-narrative can be institutionalised through regulatory arrangements as well as articulated through language and public communication. This also extends Bamberg and Andrews' (2004) relational understanding of counter-narrative into a policy context where resistance occurs through both alternative interpretation and institution-building.

The findings also refine existing accounts of Indonesia's resistance to European palm oil regulation. Research by Kinseng et al. (2022) shows that Indonesian policymakers interpret the dispute through environmental, trade and sovereignty concerns, while Mitchell and Merriman (2020) demonstrate that questions of regulatory consistency and discrimination have also entered the legal dimension of the dispute. Rahmadian et al. (2026) further show how Indonesian actors strategically mobilize scientific arguments, comparisons between vegetable oils and claims of double standards. The present study confirms the importance of these strategies, while adding an assessment of their correspondence with environmental and institutional conditions. This shifts the analysis from identifying how Indonesia negotiates external pressure toward examining how far the claims used in those negotiations are supported by observable practices. Some parts of the counter-narrative have strong empirical foundations. Nonetheless, claims concerning broad environmental sustainability, uniformly positive smallholder outcomes and harmonious plantation-community relations are more conditional.

CONCLUSION

This article asked: How does Indonesia utilize #SawitBaik and ISPO as counter-narrative strategies in responding to European Union regulatory pressure on palm oil sustainability? It finds that the two instruments perform different but connected functions. #SawitBaik reframes palm oil through claims about its economic contribution and its other relatives. Moreover, ISPO gives sustainability a national institutional basis through standards and regulatory authority. Yet, the empirical grounding of these counter-narratives varies across individual claims. Palm oil's macroeconomic importance, comparative crop productivity and the existence of national sustainability governance through ISPO have relatively strong empirical or institutional support. Nonetheless, claims concerning smallholder benefits, certification reach and social conditions are partially substantive because their support is qualified by variation and implementation gaps. Other representations become predominantly rhetorical, particularly those

concerning general environmental sustainability and consistently harmonious plantation-community relations.

The analysis contributes to counter-narrative research by showing how political contestation can take institutional as well as discursive form. In the Indonesian palm oil case, representation, institutionalization and empirical grounding are closely connected: public narratives help define Indonesia's position and ISPO provides a nationally governed basis for asserting sustainability authority. The strength of this position, however, remains tied to observable conditions in environmental governance, smallholder inclusion and social relations. Lastly, since the study relies on documentary evidence, it does not assess government intentions, audience reception or the causal effects of #SawitBaik and ISPO on international perceptions. Further research could examine how these counter-narratives are received by domestic and international audiences and whether their discursive and institutional components affect the legitimacy, market acceptance and regulatory treatment of Indonesian palm oil

AUTHOR'S CONTRIBUTIONS

The *first author* contributed to the conceptualization of the study, formulation of the research problem, methodology, data collection, data processing and analysis, interpretation of the findings, preparation of the initial manuscript, validation, manuscript revision, and finalization. The *second author* contributed to validation, manuscript review and revision and finalization of the article.

AI USAGE STATEMENT

The authors used Grammarly to assist with English-language editing, grammar checking, and stylistic refinement during the preparation and revision of the manuscript. All substantive analysis, interpretation of the findings, argumentation, and final editorial decisions were undertaken and verified by the authors. The authors take full responsibility for the content and final version of the article.

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