Counter-Frames and Sovereignty Games in Sustainability Politics

Policy Interactions between Indonesia and the European Union (EU) over the First and Revised EU Renewable Energy Directive

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Abstract

Indonesia is the biggest palm oil producing country in the world and its palm oil sector has become a significant contributor to the country's economic growth. However, the sustainability standard of palm oil sparks many controversies, one of them coming from the European Union (EU) Renewable Energy Directive (RED). In the revised EU RED, palm oil is categorised as a crop with having a high indirect land-use change risk. Moreover, the directives that were drafted and agreed upon by EU member states has a cross-territorial effects that does not only affect its member states, but also other actors in the market, including Indonesia. Therefore, this research explains about the interactions between Indonesia and the EU and aims to answer the questions of why and how Indonesian government responded to the first and revised EU RED. A media framing analysis of 104 news article samples published from 2008-2019 was conducted to identify the counter-framing of the Indonesian government on the EU RED. On top of that, 22 interviews with Indonesian government officials and other actors were conducted to provide answers on this question. This research argues that the policy interactions between Indonesia and the EU exists because Indonesia and the EU are trading partners. Next to this, the research has been able to identify counter-frames from Indonesian government that discursively challenge the EU RED. Finally, the research results show that Indonesia plays the sovereignty games to challenge EU's claim on the sustainability standard of palm oil and to influence the trade access to the EU's market.

Keywords: palm oil, EU RED, policy interactions, counter frames, sovereignty games

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List of Abbreviations

ASEAN   : Association of Southeast Asian Nation

CPOPC   : Council of Palm Oil Producing Countries

DG   : Directorate General

DSB   : Dispute Settlement Body

EU RED   : European Union Renewable Energy Directives

FoKSBI   : *Forum Kelapa Sawit Berkelanjutan Indonesia*/ Forum of Sustainable Palm Oil

GAPKI   : *Gabungan Pengusaha Kelapa Sawit Indonesia*/ Indonesian Palm Oil Producers Association

IEU-CEPA   : Comprehensive Economic Partnership Agreement between Indonesia and the European Union

ILUC   : Indirect Land-use Change

Inpres   : *Instruksi Presiden*/Presidential Instruction

ISPO   : Indonesian Sustainable Palm Oil

KBRI   : *Kedutaan Besar Republik Indonesia*/ Embassy of the Republic of Indonesia

MEP   : Member of Parliament

Nawacita   : Nine priority development programs proposed by President Joko Widodo

Perpres   : *Peraturan Presiden*/ Presidential Regulation

PIR Scheme   : *Perkebunan Inti Rakyat*/ Nucleus Estate and Smallholder Scheme

PTPN   : *Perseroan Terbatas Perkebunan Nusantara*/ State-owned Plantation Companies

RANKSB   : *Rencana Aksi Nasional Kelapa Sawit Berkelanjutan*/ Sustainable Palm Oil National Action Plan

RSPO   : Roundtable on Sustainable Palm Oil

WTO   : World Trade Organisation

1. Introduction

Indonesia's palm oil industry has become a significant contributor to the country's economic growth. Indonesia is the biggest palm oil-exporting country on the international level, contributing 2.46% to its GDP in 2017 (The Jakarta Globe, 2019a). However, Indonesia's palm oil sector is often associated with the cause of several environmental and social disadvantages, such as deforestation, labour exploitation, social conflict, and uncontrolled land conversion. The Indonesian government was also criticised for its inability to regulate the industry when slash and burn practices in palm oil plantations became the significant causes of haze pollution in Indonesia and its neighbouring countries (Nguitragool, 2011). The sustainability level of palm oil sparks many controversies, one of them coming from the European Union (EU) revised Renewable Energy Directive (RED).

The RED aims to increase renewable energy use and to lower the world's greenhouse gas emissions. The first RED entered into force in 2009, where EU member states targeted that at least 10% of their transport fuels would come from renewable sources by 2020 (European Parliament, 2009). Then, the European Commission proposed the plan to have a new directive to regulate the renewable energy use in 2012 (European Commission, 2014). After years of legislative process, on 14 June 2018, the European Commission, the European Parliament and the member states of the EU reached an agreement on the revised Renewable Energy Directive. It was set a new binding target of 32% renewable energy use for its member states (EEAS, 2018a). The revised directive entered into force in December 2018 (European Commission, n.d.). One of the requirements of renewable energy is that the biofuel sources should have low Indirect Land-use Change (ILUC) risks (Lendle & Schaus, 2010). High ILUC risks have become one of the reasons to include palm oil as an unsustainable crop for biofuel's base (European Commission, 2019a).

However, as palm oil is a global commodity that is traded among countries, the directive that was drafted and agreed upon by EU member states did not only affect its member states, but also other actors in the market, including Indonesia. The average export of Indonesia's palm oil by its country destinations in 2009-2018 are India (28.1%), EU (19.7%), and China (14%)[1]. Thus, the EU is the second-largest importer of Indonesia's palm oil (see Figure 1). The directive triggered responses from the Indonesian government. In responding to the first RED, Indonesian government officials made public statements to defend its palm oil sector. One of those statement was made by Former Deputy of Indonesian Minister of Agriculture Bayu Krisnamurthi. He stated that the EU had no proper understanding of the benefits of palm oil for the people of Indonesia, as the sector could absorb millions of workers in the industry (Kompas, 2010). Meanwhile, the revised RED sparked even more controversy in Indonesia. The government of Indonesia showed stronger reactions to the sustainability requirements of the revised EU RED than the first one (Hegarty, 2018).

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[1] The percentages cover the export of palm oil (crude and processed) and palm oil kernel (crude and processed), excluding biodiesel and oleochemical
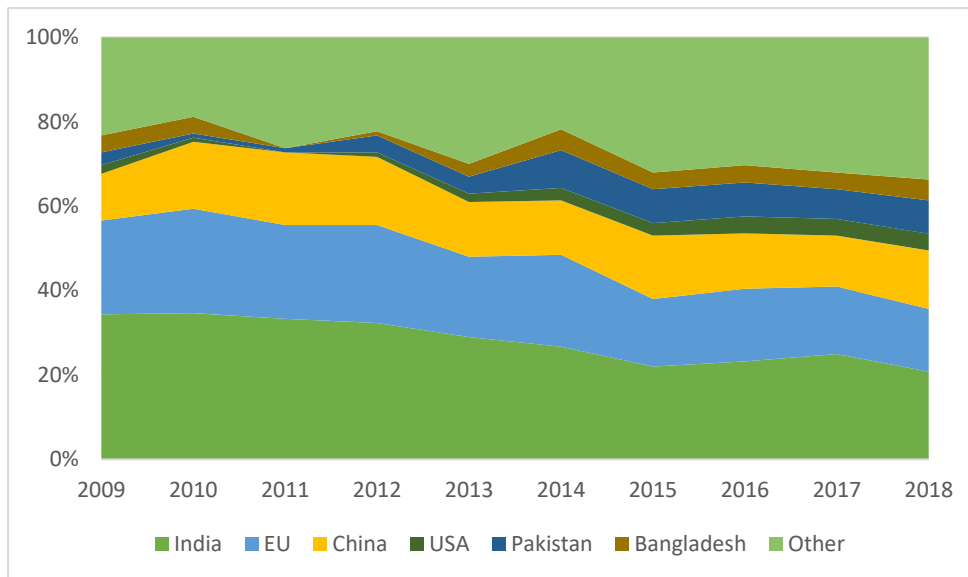
Figure 1. Indonesia Palm Oil Export by Country Destination (PASPI, 2019)

Palm oil is one of the main commodities of Indonesia and makes a significant contribution to Indonesia's economic growth and labour absorption. Meanwhile, EU claims that palm oil-based biofuel has a high ILUC risk and has a significant negative impact on greenhouse emissions (EEAS, 2018b). The EU regards the revised EU RED as one of the ambitious political agreements that regulates the use of renewable energy to support the more sustainable development and fight climate changes (European Commission, 2018). Thus, Indonesia and the EU have different views on the sustainability level of palm oil.

With the issuance of the renewable energy directive, every EU member state is required to follow the monitoring and reporting scheme to evaluate their target of renewable energy use (Scarlat et al., 2015). However, the directives also impact non-EU countries. This is because the EU cannot fully provide for its biofuel domestically, forcing them to import several crops as biofuel sources. Thus, the directive has impacted the global market, including Indonesia, as there is a trade interdependence on biofuel sources between the EU and the producing countries (Banse et al., 2010). Indonesia, as a sovereign state, has the power and authority to regulate its domestic trade. However, in the context of international trade, the revised RED has become a challenge for Indonesia to interact and negotiate with the EU and other involved actors regarding the sustainability standard of its palm oil industry.

Wider Debate on Palm Oil

Due to the globalised market of palm oil, private actors have acquired a key role in governing the international trade, for example through the establishment of private certification schemes to determine the sustainability standard of a commodity (Foley & McCay, 2014). The establishment of a global public-private partnerships have been created with the purpose to achieve sustainable development through rule-setting by private actors (Hospes, 2014). Regarding the governance of palm oil, the Roundtable on Sustainable Palm Oil (RSPO) as a private certification scheme was established in 2004 (Cattau et al., 2016). The establishment of the RSPO and other voluntary sustainability standards are often explained and justified the

incapability of states in sustainable governing of commodities. However, several studies show that the roles of states in governing the global value chain has been criticised. Mayer and Phillips (2017) argue that states are the architects of governance in the global value chain, instead of being absent. They further argue that states have played a key role in promoting private regulatory regimes and creating policies that support the value chain.

The RSPO also covers the certification of palm oil for fuels. It adjusted its certification scheme to achieve recognition from the EU (Larsen et al., 2014). However, Indonesia established the Indonesian Sustainable Palm Oil (ISPO) system as a mandatory certification to challenge the RSPO. At the same time, the EU developed a methodology to assess the ILUC risk in the revised EU RED. Palm oil has been categorised as a crop with a high ILUC risk in the Delegated Act of the revised EU RED. Thus, the EU has power in determining the methodology to assess the ILUC risk and creating a sustainability standard for palm oil.

To conclude, previous studies focussed on claims of authority that were being made between private and public actors on governing sustainable commodities. However, there is an emerging rivalry between Indonesia and the EU in governing sustainability standards of palm oil as a crop-based biofuel. Thus, this research focuses on studying the increasing roles of state actors in the governance of sustainable commodities. More specifically, by studying the interactions between Indonesia and the EU over the EU RED, this research draws attention to the responses of state actors to influence the process of governing the sustainability of palm oil outside its territorial boundaries.

1.1 Research Objectives

This research has several objectives. Firstly, it aims to describe the policy interactions between Indonesia and the EU on the first and revised EU RED. Secondly, this research analyses the roles of states in governing the sustainability of palm oil with sovereignty games and counter-frames as lenses to analyse these roles. With this analysis, this research attempts to contribute to existing literature about sovereignty games and counter-frames. Thirdly, this research aims to contribute to the existing debate about sustainability politics in the palm oil industry. Lastly, by understanding the interactions between Indonesia and the EU on the first and revised EU RED, this study attempts to provide insights about how policy dialogues between Indonesia and the EU can be strengthened.

1.2 Research Questions

The EU RED introduced a new standard of sustainability regarding palm oil as a crop-based biofuel. Although Indonesia is not a member state of the EU, due to the existence of trading interactions between both state actors, there are clear implications for Indonesia. Indonesia thus feels challenged by the new EU RED and gave strong responses to the EU RED.

To understand the responses of Indonesia over the EU RED, a main research question has been formulated:

Why and how have Indonesian public authorities responded to the EU RED I and RED II?

To structure the answer to this research question, four sub-research questions have been formulated:

1. What actors and knowledge were involved in the drafting of the EU RED I and RED II?

2. What did Indonesian public authorities perceive as the consequences of the EU RED I and RED II for Indonesia's palm oil industry?

3. In what ways have the Indonesian public authorities tried to influence the drafting process of the RED I and RED II?

4. How did the Indonesian government manoeuvre in planning Indonesia's palm oil trade after the revised RED?

To answer the above-mentioned research questions, several different theoretical frameworks have been used, namely: policy interactions, counter-frames, and sovereignty games. These frameworks will be further discussed in Chapter 2.

1.3 Structure

In order to answer the research question, this thesis report is structured as follows. The first chapter introduces the background of the problem, research objectives, and research questions. The second chapter consists of the elaboration on a conceptual framework that is used to analyse the data collected during the fieldwork. In this chapter, the concepts of counter-frame, sovereignty games, and policy interactions will be introduced and operationalised. The third chapter introduces the methodology of the research. It aims to elaborate on the data-collection and data-interpretation method. Then, the next chapter provides an elaboration of the fieldwork findings. The first part of this chapter presents the background information regarding the governance of Indonesia's palm oil, EU RED, and the policy interactions between Indonesian and European Union over the EU RED. Then, in the second part of this chapter, the findings of Indonesia's counter-frames on the EU RED will be discussed. Moreover, sovereignty games on Indonesia's responses over the EU RED will be elaborated in this chapter. This part will focus on two arenas: the domestic arena and the international arena. In the fifth chapter, the reflections on the research findings will be discussed. Lastly, the final chapter provides a conclusion of this research.

2. Theoretical Framework

In this chapter the concepts of policy interactions, counter-frames, and sovereignty games are introduced and operationalised to fit this research. These concepts are a tool to analyse the Indonesian government's responses to influences over the first and revised EU RED.

2.1 Policy Interactions

Environmental policies are often influenced by global economic interdependence. Due to global interdependence, environmental policies can have extra-territorial impacts beyond the borders of the country where the policy was formulated. This is because of different actors at the domestic and international level involved in a value chain. Thus, decisions made or policies created in a country can affect the whole value chain, including parts of the value chain that are outside the country (Hospes et al., 2016).

Sorrell (2003) defines the situation where the operation of one policy has an implication on the operation of another as policy interactions. The framework of policy interactions has been used in several academic studies to illustrate different policies that were interacting (see Oikonomou & Jepma, 2008; Smith & Sorrell, 2001). Several academic studies used this framework to illustrate the interactions of different policy instruments in the context of the policy mix, where there are interactions and trade-offs among different policy instruments (Rogge & Reichardt, 2013).

The application of this framework emphasises on the typology of policy interactions. The typology consists of a target group, a sector, and a site of policy interactions. Firstly, a target group in a policy interaction is defined as a collection of economic actors that are influenced by a policy. Secondly, the sector of a policy is distinguished based on its interaction, which could be internal and external interaction. Internal interaction is when two or more policies interact in the same policy sector (e.g., interaction between several environmental policies) and external interaction is when two or more policies interact in different policy sectors (e.g., interaction between environmental and trade policies). The framework also elaborates on horizontal and vertical policy interactions. A horizontal level of policy interaction happens when the policies are from the same level of governance, and the vertical level of policy interaction is defined as the interaction of policies from different levels of governance (Sorrell et al., 2003).

The type of policy interactions is divided into several categories, such as direct, indirect, and trading interactions. Direct interaction is defined as the situation where the target groups directly affected by the policies. Secondly, indirect interaction is when there are two policies and the target group is directly affected by one policy and indirectly affected by the second (or vice versa). Thirdly, trading interaction is when policies influence one another because of commodity trading.

Policy interactions' typology can be used to elaborate and compare different interacting policies. However, this framework also has limitations. It lacks an understanding of actors and their discursive and other power tools to influence policy interactions. Thus, the counter-frames

and sovereignty games frameworks are used in this research to analyse the actors and their powers.

To conclude, the concept of policy interactions, developed by Sorrell (2003), emphasises on seeing the implications of one policy to the implementation of other policy. These interactions among policies resulted from the deepening of global economic interdependence. In this research, the concept of policy interactions will not be used only to study interactions among policies, but it will also consider studying the cross-border interactions of different actors in the policy-making arena.

2.2 Counter-Frames

Framing is a process of developing a conceptualisation of an issue or a tool to reorient people's way of thinking about the issue (Chong & Druckman, 2018). Thus, an issue can be constructed to have multiple perspectives and values. A policy that involves various actors will have different and potentially conflicting frames at the same time. Moreover, framing can lead to counter-framing by other actors that have different interests (Candel et al., 2014). According to Chong and Druckman (2011), a counter-frame is defined as "a frame that opposes an earlier effective frame." Three elements of counter-frames are highlighted: first, a counter-frame comes after the initial frame. Second, a counter-frame promotes a different view to the initial frame. Third, the counter-frame has affected perceptions and opinions on the issue. Counter-frames could influence the initial framing to be adjusted or it could lead to yet another counter-frame (Anderson, 2018; Chong & Druckman, 2011).

In this research, the concept of counter-frames will be used to provide insights on how Indonesia perceives different actors and knowledge involved in the policy-making of the first and revised EU RED. Secondly, this concept will be used to see how Indonesia discursively challenged several framings on Indonesia's palm oil industry as a biofuel source. Thirdly, as the process of framing can influence the process of negotiation (Dewulf et al., 2009), this concept will be applied to understand how Indonesia influenced the drafting process of the first and revised RED.

2.3 Sovereignty Games

The traditional understanding of sovereignty is defined as a notion used by states to maintain authority within their territory. However, sovereignty could be conceived as a game to understand how an actor constructs the notion of sovereignty to protect its autonomy and enhance its influence on the international scene (Adler-Nissen & Gammeltoft-Hansen, 2008). In facing the deepening of market integration and economic interdependence, sovereignty becomes a tool for states to reassert power and control. This research highlights the sovereignty games played by states in governing economic matters and international trade, including the governing of global commodities. According to Adler-Nissen (2008), sovereignty games consists of three components, which are players, rules, and moves. These components will be used to identify which actors, in which rules of the game, and how they manoeuvre to claim authority over an issue.

There are two dimensions of a move that can be played by an actor to understand the manoeuvres of sovereignty games: horizontal and vertical sovereignty games. Firstly, a horizontal sovereignty game is defined as "conceptual stretching of sovereignty to cover activities outside the national territory (Adler-Nissen & Gammeltoft-Hansen, 2008)." There is the rising of transnational governance, the transnational market, and global political institutions in governing global matter. Thus, the use of sovereignty is not only limited to states' national territory because the states can stretch their authority outside of its jurisdiction. Secondly, vertical sovereignty is the manoeuvres to pass authority at a different level. Finally, to understand how actors use of sovereignty, this study highlights how sovereignty is used and being played out in legal and political practices (Adler-Nissen & Gammeltoft-Hansen, 2008; Dermawan & Hospes, 2018).

2.4 Operationalisation of Conceptual Framework

This section operationalises a different framework for analysing the interactions between Indonesia and the EU over the EU RED. Firstly, the concept of policy interactions is used to illustrate the interactions of the first and revised EU RED with Indonesia's palm oil-related policies. To illustrate the interactions, this research analyses the interactions based on the target group, the sector, and site of the interactions. Then, to be applicable in this research, the research uses the concepts of counter-frames and sovereignty games as lenses to analyse the aspects of actors' power and the extra-territorial interactions among actors.

The framework of counter-frames is used to analyse how Indonesian government officials responded discursively to the EU. This research studies the counter-frames produced by Indonesian government officials to respond to and influence the initial frames constructed by the EU in the first and revised EU RED. Besides studying the responses from the Indonesian government, the study has identified the actors engaged in the identified counter-frames.

Indonesia and the EU acknowledge each other as sovereign actors. However, the first and revised EU RED have implications outside the EU's territorial sovereign borders. Thus, this research studies how both Indonesia and the EU conceive sovereignty in their interactions. Then, the sovereignty games concept is used to see the mechanisms and strategy of manoeuvres by the state actors in the extra-territorial interactions. The concept of sovereignty games is operationalised by elaborating on the three components of the sovereignty games, which are moves, players, and rules. Then, this research argues that Indonesia used both horizontal and vertical moves while transforming the rules to influence the EU RED.

To understand the interactions between Indonesia and the EU, two arenas were distinguished: the domestic and the international arena. The domestic arena consists of different Indonesian government institutions that have different authorities to create responses to the first and revised EU RED. In the domestic arena, Indonesian government institutions played sovereignty games to claims mandate to respond to the EU RED. They played the games under the rule of Indonesian laws that regulate their mandates.

At the international arena, Indonesia used its power to interact with the EU directly, or indirectly influenced the EU RED through its interactions with various state actors or

international institutions. The main aim of playing in this arena was to create influence over the EU RED and the international acceptance of Indonesia's palm oil sustainability standards. The games involved actors from the government of Indonesia and international institutions, such as the Association of Southeast Asia Nations (ASEAN), EU, or World Trade Organizations (WTO). Regarding the rules in the international arena, policymaking often takes place within the institutional void (Hajer, 2003). The institutional void is defined as the situation where there are no generally accepted rules and norms in a policy-making situation. Hajer (2003) further argues that policy is created through deliberation to get a favourable solution for certain issues.
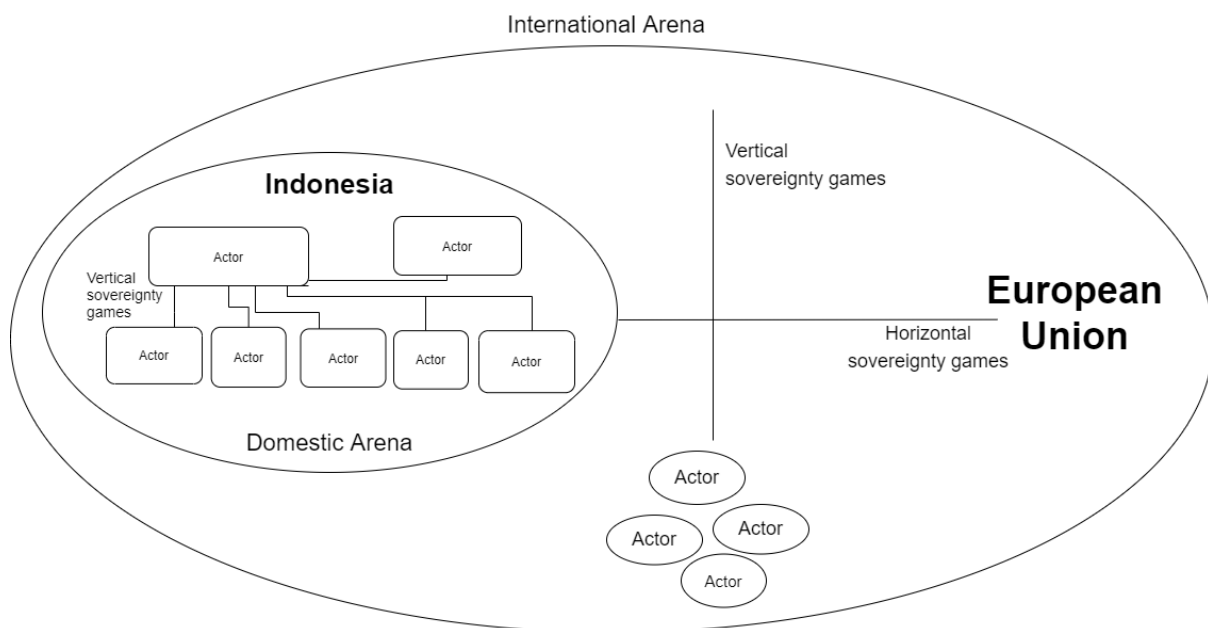
Figure 2. Conceptualisation of Sovereignty Games Played by Indonesia in the Policy Interactions over the first and revised EU RED

3. Methodology

This chapter explains the research methodology. This chapter also explains the data collection research methods, namely in-depth interviews, media framing analysis and policy document analysis, are discussed.

3.1 Character of the Research

The basis of this research is a case study of Indonesia's government responses over the first and revised EU RED. The research uses the qualitative methods and techniques. Using qualitative research is suitable for this case since there are several advantages to study policies with a qualitative research method. Firstly, it can provide insights into the policymaking process. Secondly, by using qualitative research design and techniques, this study can analyse how the policies are being implemented in a large and complex field. Thirdly, studying the policy case study using a qualitative research design can capture the political and organisational context from where the policy emerges (Molloy, 2013).

The data for this research consists of primary and secondary data. These data were obtained through three different methods: 1) media analysis on a selection of news articles, 2) in-depth interviews, and 3) document analysis. The primary data were collected from the interviews with relevant officials and the secondary data consists of news articles, academic peer-reviewed articles, and official documents. To obtain the primary data for this study, the researcher conducted eight weeks of fieldwork. The fieldwork was conducted in Indonesia (Jakarta and Bogor) and Brussels. Jakarta was chosen because that is where the headquarters of the Ministerial Offices are. However, because some of the respondents reside in Bogor, some of the interviews have also taken place there. Brussels is one of the fieldwork locations because it is the centre of the European Union.

In addition, the researcher attended a public discussion on Indonesia's palm oil development. The discussion was organised by the Indonesian Embassy in The Hague and hosted by Indonesian Students Association in Wageningen in November 2019. The keynote speaker of this discussion was a delegate from Indonesia's Ministry of Foreign Affairs that involved in the issue. This opportunity proved to be fruitful because the content from different speeches and presentations, informal conversation with the speakers, presentation materials, informal conversations with the speakers and the committee from the Indonesian Embassy, and the discussion between the speakers and audiences during the question and answer sessions provides additional information to this research.

After the data-collection phase, the data was interpreted by carefully considering policy context in order to reconstruct Indonesia's responses during the first and revised EU RED. The researcher applied triangulation to increase the validity of this research. Triangulation is a technique of using more than one approach to research. When the same conclusion is reached from different approaches, it will lead to greater confidence on the validity of the conclusion (Summer & Tribe, 2008). This technique is important to assess the positions and interests of different sources of data. In this research, triangulation was applied by having the selected data

from different methods (in-depth interview, media framing analysis, and policy document analysis) and sources of data (different interviewees and documents).

3.2 Data Collection Method

Three different methods have been used to collect data: in-depth interviews, media framing analysis, and policy document analysis. A media framing analysis was conducted first, followed by the in-depth interviews and documents analysis. The in-depth interviews and policy documents analysis were conducted parallelly.

3.2.1 In-depth interviews

The researcher conducted several in-depth interviews with relevant actors involved in this case. These interviews were used to get more insight into the strategies and behind-the-scene processes of the government of Indonesia in influencing the first and revised EU RED. Then, the counter-frames, i.e. Indonesia's perception on the EU RED, were captured from the in-depth interviews. This will be elaborated on later in this section.

Semi-structured interviews were conducted, where the interviews were in the form of conversational style. Before conducting an interview, a questions plan has been created (see Appendix 2 for the researcher's list of question plan). In semi-structured interviews, there was a need to prepare for developing the questions from the interviewee's responses (O'leary, 2004). Thus, the advantage of this approach is the flexibility to develop some follow-up questions.

Purposive and snowball sampling were used in choosing the respondents. The purposive sampling was done to identify the key Ministries involved in responding to the EU RED. The selection of relevant respondents was done by contacting people that are familiar with palm oil or EU RED issue or have access to the ministries' offices. Then, the respondent was snowballed from the previous informants. Some respondents' contact details were obtained from exploring the network of the previous respondents. Unfortunately, it was not possible to get respondents from all the involved ministries due to complex bureaucratic procedures, long response time, and unclear authority within a ministry.

The interviews were conducted with relevant key actors in Jakarta, Bogor, and Brussels. All respondents were involved in the responses of the government of Indonesia over the EU RED. The respondents were involved directly either in the lobby, negotiation, and meeting about the EU RED. Some respondents were also involved in technical issues. Furthermore, to maintain confidentiality, all respondents have been anonymised. None of their names and positions in their institutions are mentioned in this report (See Appendix 1).

During the fieldwork, 22 interviews were conducted. The fieldwork in Indonesia (Jakarta and Bogor) was conducted from 26 August 2019 – 2 October 2019. During this time, 18 interviews were conducted. Two interviews were conducted in Brussels on 24 October 2019. The interviews with Indonesian government officials were conducted in their offices. From all meetings with respondents, there were four meetings where two respondents were interviewed at once because they work in the same department. Besides face-to-face interviews, one

interview with an official working at the Indonesian Embassy in Brussels was done via WhatsApp Call, and one interview with an expert from PASPI was conducted through e-mail correspondence. It was not possible to conduct face-to-face interviews with these two respondents because they were temporarily out of the city.

The respondents with a public authority's background play an important role in their ministries and involved in the interactions of Indonesia with the EU over EU RED. Besides the respondents that consist of public authorities from several Indonesian ministries, the interviews were also conducted with EU officials, researchers, and officials from the Indonesian Embassy.

Table 1. List of Organisations and Number of Respondents

Organisations	Number of Respondents
Indonesian government officials	10
Indonesian Embassy (KBRI) in Brussels and the Netherlands	3
EU officials	2
Palm Oil Experts/Researchers	4
Council of Palm Oil Producing Countries (CPOPC)	2
Indonesian Palm Oil Producers Association (GAPKI)	1
Total	22

The following techniques were used to interpret the data collected from the interviews. Firstly, all interview records were transcribed upon its availability. Five respondents refused to be recorded. As the recordings are not available, the data from these interviews were based on the interview notes. There were two respondents that did not want to be quoted in this report. Thus, the collected information from these two respondents became background information to be asked and followed up with another respondent.

All interviews were conducted in the Indonesian language, except for the interviews with the EU officials, these were conducted in English. The interview transcripts were written in the original languages of the interviews. All direct quotes used in this report are thus translated from Indonesian to English by the researcher. Secondly, the transcripts were coded according to the relevant research question, conceptual framework, and issues. The reconstruction of issues was also made from the coded transcripts.

Capturing the counter-frames from the interviews

This research was able to capture counter-frames from the in-depth interviews. Among 22 respondents, there were 13 respondents from Indonesian government officials. From the interviews, it can be seen how these respondents perceived the first and revised EU RED. To capture the counter-frames, the transcripts of the interviews were coded based on the framing devices (explicit statements). After finding the framing devices, the researcher carefully read the article to find the reasoning devices. The occurrences of the counter-frames were counted

once in every interview transcript (see Appendix 5). Finally, the same steps for coding the transcripts of the interviews were also conducted in coding the newspaper articles.

3.2.2 Media framing analysis

Media framing analysis was used to unpack the counter-framing used by the Indonesian government. During the data collection process, the selection of news articles was analysed with inductive framing analysis. The main result of inductive framing analysis is the frame package, defined as elements in a message that becomes the indicator of the frame (Van Gorp & Van der Goot, 2012). Each frame package consists of framing devices and reasoning devices. According to Van Gorp and Van der Groot (2012), framing devices are the elements in a message that show the indicators of the frame, such as vocabulary or catchphrases. While reasoning devices are indicators of what is conceived as problems. According to Candel et al., (2014), the difference between framing devices and reasoning devices is that "framing devices are directly visible in a text whereas reasoning devices can lie hidden behind the formal wording."

The news articles were retrieved from the news articles published in Antara News and The Jakarta Post. Both news portals were chose based on the ownership, where Antara News is a national news agency organized as a state-owned enterprise and The Jakarta Post is the largest English-written independent newspaper. Both news portals have a website to access their news archives. Antara News has an Indonesian and English website, the selection of news articles for this research were collected from the Indonesian website. It is because the Indonesian website has more published news than the English website, while the English website published the translated version of the Indonesian news articles.

The researcher selected January 2008-July 2019 as the period for the published year of the documents. The choice of the period was related to the issuance of the first and revised RED. During this period, both news portals published the news related to the first and revised RED. The article selection for this research was based on the constructed keywords in the search engine of those two news portals. The researcher used the keywords of "palm oil" ("*kelapa sawit*" in Indonesian) and "RED" (or "Renewable Energy Directive"), and only news articles that contain both keywords were included. Then, the articles were limited by only considering the news that discussed palm oil as biofuel and EU RED-related news to become the samples. Opinion, commentary, photos and video news archives from both newspaper outlets were excluded from this research. In the end, 104 articles from both newspaper outlets were collected as the sample for this study. The sample consists of 70 of the news articles from Antara News and 34 news articles from The Jakarta Post.

Then, coding process was conducted with a coding program, Atlas.ti. During the coding process, several steps were conducted. Firstly, the researcher focused on finding framing devices (explicit statements). Key concepts (e.g. "black campaign" and "discrimination") and verbal devices (combination of words) such as "to protect the market" were used to code. After finding the framing devices, the researcher carefully read the article to find the reasoning devices.
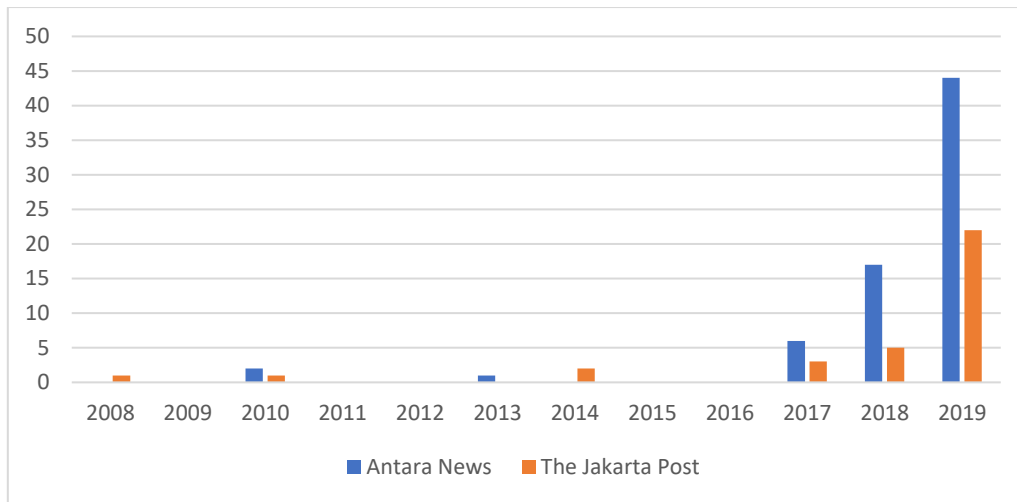
Figure 3. Number of News Articles Published in Antara News and The Jakarta Post

After those steps, total occurrences of the counter-frames were counted. The researcher counted once if there was a frame or actor occurred in an article. Then, the frame matrix and frame packages were created after determining the framing devices and reasoning devices (see Table 2). The frame packages will be further discussed in Chapter 4.2.

Table 2. Frame Matrix

Frame packages: The title of the frame packages		
Framing devices	**Key concept**	Specific words that actors repeatedly use in their argument
	Verbal devices/metaphors	Combination of words/figure of speech used in the frame to strengthen the argument
Reasoning devices	**Problem definition**	The problem reflects in the frame
	Cause	The reason that this frame exists on the existing problem
	Solution/prospective for action	The ways put in the frame package that can solve the problem
	Non-solution	The ways put in the frame package which cannot be a solution

Source: adapted from Candel et al (2014)

Actor's engagement in creating counter-frames

Besides capturing the counter-frames, the media framing analysis was conducted to capture the actor's engagement in the counter-frames. The aim of doing this step is to know which ministries have more involvement in creating counter-frames than the other. After collecting all counter-frames, the news articles were coded based on the engaged stakeholders (ministries or agencies). Then, the researcher counted one stakeholder once in a news article (see Appendix 6) and presented which government agencies have more involvement in creating a frame.

3.2.3 Document analysis

The collected data from document analysis is considered as the secondary data. Most collected documents were available for public, such as the first and the revised EU RED, impact assessment of EU RED, and several Indonesian government policy documents. Several documents, such as government letters, diplomatic notes and presentation files for internal meetings, were collected by the researcher from requesting to the officials during the interviews.

During the fieldwork, the researcher also collected minutes of the meeting of several EU debates in the EU Parliament. The European Direct Contact Center was contacted and provided the researcher a website to access these documents. However, some minutes of meetings are written in the language of the speakers. Thus, Google Translate was used to study these documents.

After collecting these documents, the researcher highlighted the passages in the document that provides an answer to the research questions (O'leary, 2004). The aims of doing policy document analysis are, firstly, to provide insights about the policy interactions between the EU and Indonesia over the EU RED. Secondly, this method aims to see the actors and knowledge involved in the policymaking of the directives.

3.3 Summary of Research Design

Research Method	Data collection	Type of data	Data analysis	Research Question
In-depth interviews	Interviews with relevant respondents from Indonesia and the EU.	Interview notes	1. Qualitative analysis of the interviews 2. Coding the interview transcripts with Atlas t.i for collecting the counter-frames	SRQ2 – The perceived consequences of EU RED I and RED II SRQ3 – The ways Indonesian public authorities responded to influence the drafting of EU RED I and RED II SRQ4 –The plan from the Indonesian government on its palm oil industry after the EU RED
Media framing analysis with inductive framing analysis	Selection of palm oil and EU RED related news based on several criteria	News article	1. Download the documents from the database and read the documents 2. Use Atlas.ti. to code the documents 3. Identify the frame package 4. Fill in the frame matrix 5. Collect the stakeholder's involvement in counter-framing	SRQ2 – The perceived consequences of EU RED I and RED II SRQ3 – The ways Indonesian public authorities responded to influence the drafting of EU RED I and RED II
Policy document analysis with a qualitative method	Relevant policy documents (press release, diplomatic notes, official letters, presentation files) from the EU and Indonesia authorities that have relations with RED and Indonesia's palm oil	Policy documents	Qualitative analysis of the documents	SRQ1 – The actors and knowledge involved in the drafting process of EU RED I and RED II SRQ2 – The perceived consequences of EU RED I and RED II

4. Results and Analysis

4.1 Policy Interactions between Indonesia and EU over the EU RED

This section aims to explain the policy interactions between Indonesia and the EU over the EU RED. Firstly, Indonesia's governance of palm oil will be explained. This explanation aims to elaborate on how the global market has influenced the Indonesian state and its policies on the palm oil sector. Secondly, it explains palm oil trade relations between Indonesia and the EU. This explanation aims to portray the interdependence between Indonesia and the EU in palm oil trade that lead to the interactions of Indonesian policies and government actors with the directives. Then, this section explains the first and revised EU RED and how the interactions of the Indonesian government in influencing the drafting process of the revised EU RED. Finally, the interactions between Indonesia and the EU over the EU RED will be explained using the concept of policy interactions as a tool of analysis.

4.1.1 Indonesia's Governance of Palm Oil

This section provides an overview of Indonesia's palm oil governance, highlighting how it is affected by interactions with the global market. Then, it provides an explanation of how the emergence of private certification interact with Indonesian palm oil-related policies and government authorities. Finally, several Indonesia's policies will be discussed. It aims to show that these policies were created because of a changing focus of international policy context towards environmental protections.

4.1.1.1 Historical Development of Palm Oil in Indonesia

Indonesia's palm oil sector started to grow massively for the first time in the 1960s, during the period of President Suharto, due to a decrease in the rubber price—Indonesia's main crop at that time. Thus, palm oil was perceived as an alternative commodity to create profit for the state. Palm oil plantations were established in areas that were former rubber plantations. As a replacement for rubber, the production of palm oil was supported by the government to maintain the economy of Indonesia during that time (Giacomin, 2018).

During this period, direct investment of palm oil was organised through the establishment of State-owned Plantation Companies (PTPN). Plantations increased from covering 84,640 hectares in 1969 to 176,408 hectares in 1979. The first plantations were mainly located in Sumatra. Then the government expanded the plantation area to Kalimantan and Papua in the late 1980s (Casson, 2000). The palm oil was planted in both state-owned and private-owned plantations. With the expansion of the plantation area and the establishment of PTPN, the production of palm oil increased.

The existence of smallholders also increased during this time through the government-initiated Nucleus Estate and Smallholder Scheme (PIR). Under the PIR Scheme, private developers prepared plots of land for smallholders living near the company's areas (Obidzinski et al., 2012; Pramudya et al., 2017). The government of Indonesia encouraged more involvement from

private sectors during this period. Within the PIR scheme, companies are obliged to buy the fresh fruit bunches harvested by smallholders. The government also provided access to credit to establish a new plantation for smallholders.

Many things changed in Indonesia during the Asia financial crisis of 1997 and the downfall of President Suharto, including in the palm oil sector. During 1997-1988, many palm oil companies have submitted negative financial reports. Moreover, the country's political and economic instability caused a lack of investment in the palm oil sector. During the era of President Suharto, the government was centralised. The downfall of the Suharto era led to reform of the government system, including a decentralisation of the government system and examinations of the conglomerate in the forestry sector that involved in the corruption cases (Casson, 2000).

After the end of President Suharto's regime in 1998, Indonesia began its decentralisation phase in 1999. During this time, local governments had the authority over land and resource management. Several laws regulated the revenue sharing of natural resources among different levels of government, except estate crops. The revenues from palm oil were for district government and were not subjected to be shared with the central government. Many district heads approved palm oil plantation permits because the industry's profitability for them. With the ease of getting plantation permit, many areas of oil palm plantation were in the forest area and were established through illegal burning (Naylor et al., 2019). Palm oil plantations were continuously expanded, making Indonesia the largest palm oil producers and the top exporters of crude palm oil (CPO) in the world since 2008, surpassing Malaysia (Mukherjee & Sovacool, 2014; Naylor et al., 2019).

In the case of governing Indonesia's palm oil sector, the changing global policies affected the national policy of Indonesia. The Reducing Emissions from Deforestation and Forest Degradation (REDD) Scheme was discussed at the UN during the presidency of Susilo Bambang Yudhoyono in 2008. Indonesia was involved in the REDD Scheme. During this period, Indonesia created several policies to promote more sustainable palm oil. For instance, in May 2010, the president issued a policy to develop an palm oil plantations on degraded land instead of forest or peatland (Gingold et al., 2012). He also introduced One Map Policy and a national certification scheme for palm oil, called the Indonesian Sustainable Palm Oil (ISPO).

Indonesia has issued several policies to support foreign investment in palm oil sectors (Lamers et al., 2011). At the time of this study, palm oil is still an important sector for Indonesia. It is regarded as one of the strategic commodities under the government of President Joko Widodo (2014-2024). According to the Ministry of Agriculture, palm oil is a strategic commodity because it has the highest export value among the non-oil and gas sector commodities. Palm oil sector also provides jobs and welfare for Indonesian people (Delima et al., 2015). In 2018, the president imposed a Presidential Instruction on the moratorium of palm oil plantation (Inpres No.8/2018). This regulation restricts the new expansion of oil palm plantation and aims to evaluate the existing plantations permit.

To conclude, Indonesia's palm oil sector has developed and expanded rapidly in the last decade (see Figure 4). The inclusion of palm oil on Indonesia's policy agenda has always had a strong

focus on economic profitability and trade issues. However, recently and with the issuance of several environmentally related policies, it can be seen that sustainability is starting to gain attention as well.
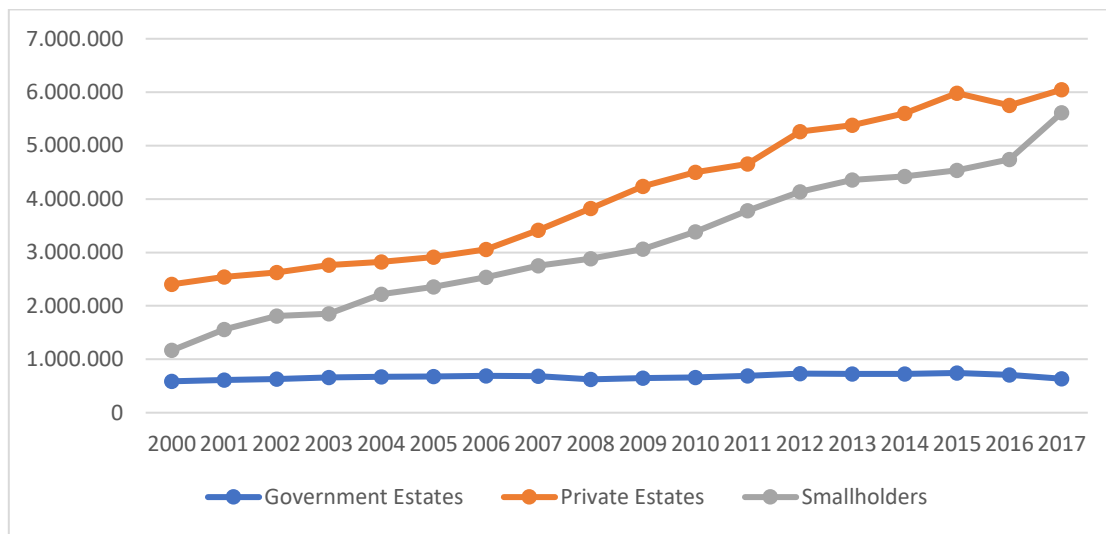
Figure 4. Area of Indonesian Oil Palm Plantations by Category of Producers in hectares, 2000-2017 (Statistics Indonesia, 2017)

4.1.1.2 The Emergence of Private Governance on Palm Oil

The idea of private regulatory was established under the influence of neo-liberal ideas, where the market mechanism has the power to provide goods and services and to replace the state in governing the trading system (Foley & McCay, 2014). With the rising of economic interdependence, a product that is produced in one country can be exported and bought by consumers in other countries. It makes the management of several commodities go beyond the boundaries of a nation-state (Bartley, 2014). Besides the blurring boundaries, the emergence of private governance of the commodities is caused by the perception that the state is often seen incapable to address the sustainability aspects in governing their commodities.

The RSPO is a voluntary sustainability certification scheme for palm oil. The RSPO consists of several principles and criteria, and the certification involves auditing from a third party. This certification scheme excludes government from being a member and from taking part in the decision-making on the sustainability criteria (Schouten & Glasbergen, 2011). The companies certified themselves with a private certification to be accepted in the global market without the involvement of the states. This means that the sovereignty of a state is no longer seen as absolute. Thus, states may feel threatened because the private certification scheme influences their national sovereignty. However, Indonesia could not fully neglect the emergence of the RSPO, because the global market accepted this certification. The neglect of the RSPO will worsen the international image of Indonesia's palm oil regarding the sustainability.

The RSPO emerged as a new actor in the governance of palm oil, and it interacts with the policies and actors in Indonesia. The RSPO influenced the arrangement of the Indonesian state in regulating its palm oil sector. According to Wijaya & Glasbergen (2016), there were shifting responses of the Indonesian government towards the RSPO from 2004-2014. They argue that

Indonesia's responses towards the emergence of the RSPO can be divided into roughly three phases: leaving the decision to the producers, working together with RSPO, and establishing an alternative to the RSPO. During the early phases of the introduction of the RSPO, the Indonesian state left it up to the producer whether they wanted to be involved with the RSPO or not. As Indonesia is the largest palm oil producer in the world, the involvement of private companies in Indonesia marked the success of RSPO certification.

Then, the RSPO established Indonesia's liaison office in 2006. The main aims of the establishment were to influence more acceptance of the RSPO by establishing relations with relevant partners in Indonesia, including the government. During this time, the government of Indonesia was being involved in the RSPO activities, such as by the establishment of a Memorandum of Understanding between the Ministry of Agriculture and the RSPO to support the sustainability of palm oil plantation. The RSPO and the government of Indonesia also worked together in creating the Indonesian Smallholder Working Group in 2007 (Hospes, 2014). This working group aimed to introduce the principles and criteria of RSPO certification among smallholders. There were several challenges for the smallholders to get the certification, such as the level of knowledge on sustainable agricultural practices and the farmer's financial condition. Thus, this working group aimed to increase the number of smallholders adapting to the certification standards (Brandi et al., 2015). In this period, the Indonesian government showed its involvement in the RSPO.

However, the collaboration of Indonesia in the RSPO did not last long. In 2011, Indonesia issued a decree through the Ministry of Agriculture to establish the Indonesian Sustainable Palm Oil (ISPO). With the establishment of the ISPO, the Indonesia Palm Oil Association (GAPKI) perceived the RSPO as an European initiative instead of a global partnership and so they withdrew their membership (Hospes & Kentin, 2014). The association allows its member to be in the RSPO but require them to be ISPO-certified (Wijaya & Glasbergen, 2016). The ISPO is a legally binding certification for palm oil producers in Indonesia. Some argue that the ISPO has been established because, despite companies having RSPO certifications, the negative image of Indonesia's palm oil did not cease to exist (Interview 9).

4.1.1.3 Indonesia's Government Regulation on Palm Oil

This section focuses on several government regulations in Indonesia related to palm oil. The national policies of Indonesia developed from focusing on the expansion of palm oil production to policies that regulate the sustainable production of palm oil. Seeing from the historical development of the palm oil sector in Indonesia, several factors influenced Indonesia's policy-making processes, such as global policy trends on environmental protection and the emergence of the RSPO.

There are several types of regulations in Indonesia issued by different governing bodies, ranging from the national level (issued by the president or the ministerial level) to the local level (issued by provincial or city/regency level). In this report, the focuses are only put to the national level's regulation.

ISPO

The ISPO was established in 2011 through the Ministry of Agriculture Decree. The ISPO aims to be an alternative to the RSPO (Wijaya & Glasbergen, 2016). Under this Ministerial Decree, the ISPO is implemented by the ISPO Commission (Hospes, 2014). The Commission was established by the Ministry of Agriculture to advise the Ministry regarding the development of palm oil, including the preparation for Indonesia's sustainability standard. The ISPO is a mandatory certification for palm oil companies, and it is a voluntary certification for early-phase smallholders.

The ISPO has several principles, which are: 1. Compliance with legal business permits, 2. The implementation of plantation management based on Good Agricultural Practices, 3. Protecting primary forest and peatland, 4. Conducting and monitoring environmental management (e.g., protecting biodiversity, waste management, and fire prevention and mitigation), 5. Showing responsibility towards employees, 6. Contributing to social and economic empowerment of society, 7. Commitment to continuous improvements in sustainable palm oil production (Hidayat et al., 2018). Smallholders need to comply with four of seven principles, which are: 1. Compliance with the legality of land 2. Implementation of Good Agricultural Practices 3. Conducting and monitoring environmental management and 4. Commitment to continuous improvements in sustainable palm oil production (Ministry of Agriculture, 2015).

The government of Indonesia planned to require all smallholders to be ISPO certified by 2019. This regulation was supposed to be issued under a Presidential Regulation (Perpres). This plan has been discussed since 2016. However, there were many challenges to implement the certification to the million smallholders in Indonesia (Sawit Indonesia, 2019). Access to knowledge and the financial situation of smallholders has become one of the challenges for the Indonesian government to imply the mandatory certification. For instance, to comply with the principle of legality of the land, they need to bear the costs to have a Registration for Plantation Cultivation (STDB). With a million of smallholders spread over in Indonesia, the mandatory ISPO certification is difficult to be implemented. This is because if the Presidential Regulation were to be issued, stronger sanctions will be implemented, such as revoking plantation permit (Interview 8).

Another challenge for the government of Indonesia is the legitimacy of the ISPO. For example, the ISPO is mandated to the ISPO Commission under the Decree of the Ministry of Agriculture. However, there are many overlapping regulations between different ministries and difficulties in handling the horizontal coordination (Hidayat et al., 2018). ISPO certification is also not well-accepted in the global market. To enter the European market, producers must have RSPO certification. Thus, having the ISPO certification will not broaden the access to the global market for the producers (Hutabarat & Binawidya, 2017).

Moratorium of Peatland

Indonesia is the fourth largest country that has peatland areas, and these areas are suitable for palm oil plantation when lands are drained (Varkkey, 2013). As the demand for palm oil is rising, it has caused the massive conversion of peatland areas into palm oil plantations. Most of the conversion was done in unsustainable ways. The slash and burn practice, for instance, is

a common way to clear the land, because it is a cheap method to prepare the land for planting. However, this method has caused massive forest burning in Indonesia and haze crises in Southeast Asia.

The government of Indonesia issued several policies regarding peatland management. Peatland conversion and issuance of new permits are suspended through the Presidential Instruction (Inpres) No. 10/2011, No. 6/2013, and No. 8/2015 on the Moratorium of Granting of New Licences and Improvement of Governance of Natural Primary Forest and Peatland (Uda et al., 2018). Inpres No. 8/2015 ended on 13 May 2017 and it was extended through Inpres No. 6/2017. The authorities involved in this regulation are the Ministry of Environment and Forestry, the Ministry of Agriculture, the Peatlands Restoration Agency, the Ministry of Home Affairs, the Geospatial Information Agency, the Ministry of Agrarian and Spatial Planning, and the Ministry of Public Works and Public Housing, and local governments (BAPPENAS, 2017; Uda et al., 2018).

Besides imposing a moratorium on peatlands conversion, Indonesia issued the moratorium on palm oil plantation permits through Inpres No. 8/2018. This moratorium aims to resolve the overlapping claim over the forest and palm oil plantation areas. This Presidential Instruction has several agendas, which are: 1. To postpone the issuance of forest release applications, during the three years of the implementation of this moratorium, 2. To review all the permits that have been issued, 3. To follow up the reviews with two options – return the land as forest area or imposing fines for violations, and 4. To focus on productivity improvement efforts instead of land expansion (Saputra & Saif, 2018). However, to implement the moratorium, challenges like overlapping regulations, lack of collaboration among ministries, and technical support for the local government still exist (Sawit Watch, 2018).

RAN KSB

The Forum of Sustainable Palm Oil (FoKSBI) was established in 2014. The UNDP signed the establishment of this forum with Indonesia's Ministry of Agriculture. This forum establishment aims to draft a Sustainable Palm Oil National Action Plan (RANKSB) and monitor the implementation of this national plan (BAPPENAS, 2019b; FoKSBI, n.d.). RANKSB was initiated by the FoKSBI in 2018.

Funding for the implementation of this program from the state budget, regional budgets, BPDPKS, and palm oil companies. This forum consists of many stakeholders, such as relevant ministries and agencies. Private sector actors in the palm oil business are also involved in the FoKSBI, including associations such as GAPKI and APSKINDO. The FoKSBI also invited several international organisations and non-governmental organisations (NGOs), such as WWF and Conservation International. The involvement of different stakeholders aims to enhance cooperation and collaboration in accelerating the development of sustainable palm oil (BAPPENAS, 2019b; FoKSBI, 2017). The RANKSB was planned to be implemented in provinces where palm oil is massively planted.
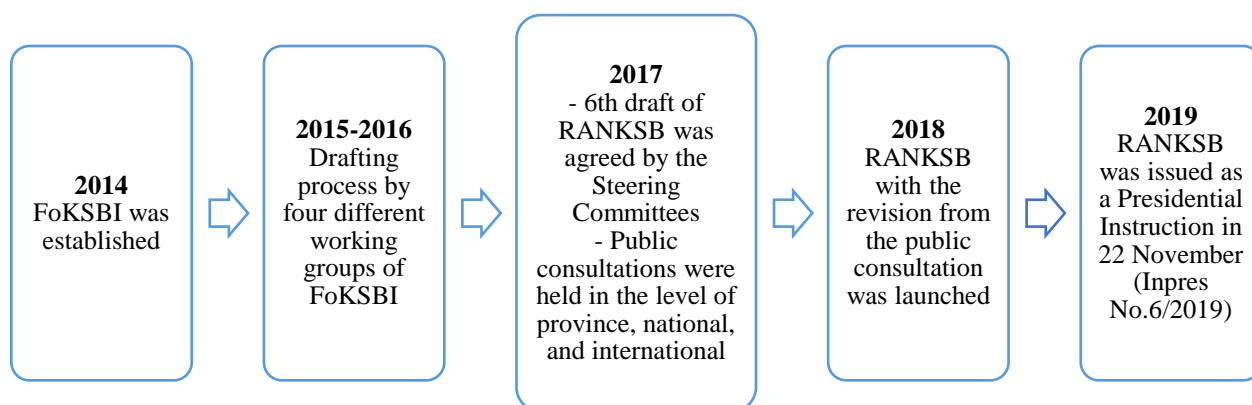
Figure 5. Timeline of RANKSB (BAPPENAS, 2019b)

This forum was then divided into different working groups, each group being responsible for drafting different program and monitoring the implementation process (BAPPENAS, 2019b). Each working group was involved in different programs that would function as a reference for actions to address sustainable palm oil development (see Figure 6). After the drafting and consultation process of RANKSB, the government established a national team to implement and monitor the RANKSB during 2019-2024. The national team consists of relevant ministries and agencies. This team is led by the Coordinating Minister of Economic Affairs, with the Deputy of Food and Agriculture as the secretary of the team (BAPPENAS, 2019a). To ensure a strong legal power, the final products of the RANKSB is in the form of Presidential Instruction.

Working Group 1: Strengthening Data, Coordination, and Infrastructure	1. Development of a database for palm oil growers to support and manage plantation estates well 2. Increase awareness/dissemination of various regulations for palm oil growers and other stakeholders at the provincial and district levels 3. Increase synergy between government agencies concerning the palm oil industry 4. Infrastructure development to improve the quality of the palm oil industry 5. Support for improving law enforcement in the palm oil industry
Working Group 2: Improving Smallholder Capacities	1. Increase capability, build the capacity of farmers to use certified seeds according to government regulations 2. Increased training for farmers on good agricultural practices 3. Increase access to funding for plant rejuvenation for farmers 4. Formation and strengthening of institutional smallholders 5. Revitalisation of Plantation Counselling
Working Group 3: Environmental Management and Monitoring	1. Increased efforts to conserve biodiversity and plantation landscapes 2. Reduction of greenhouse gas emissions due to forest and land fires 3. Waste management in improving environmental hygiene and health issues quicker

Working Group 4: Governance and Conflict Handling	1. Implement One Map Policy for resolving land conflicts 2. Realisation of the development of community palm oil plantations 3. Accelerate handling of land disputes
Working Group 5: Implementation of ISPO Certification and Access to Market of Palm Oil Products	1. ISPO awareness-raising for national stakeholders 2. Accelerate the implementation of ISPO certification for companies and smallholders 3. Acceptance of ISPO by international stakeholders

Figure 6. Working Group and Programs of RANKSB

4.1.2 Indonesia and EU Palm Oil Trade

Indonesia exports its product to several countries. One of the importing markets of Indonesia's palm oil is the EU. In this research, the focus will be on the trade of palm oil as a biofuel-base between Indonesia and the EU. Based on the EU Report, the bloc's consumption of biofuels in 2016 consisted of 80% biodiesel, where 64% of biodiesel consumption produced in the EU. The remaining 36% was imported (see Table 3) (European Commission, 2019b). Thus, there were a large percentage of the EU's crop-based biofuel comes from outside of the EU. As biofuel sources for the EU are traded globally, any change of policy within the member states of the EU will have an impact on their trading partner of the EU, such as Indonesia.

Table 3. EU Biofuel Consumption

EU's home-produced biofuel base	1. Rapeseed (38%) 2. Used cooking oil (13%) 3. Animal fat (8%) 4. Tall oil (2.5%)
EU's imported biofuel base	1. Palm oil (19.6%) from Indonesia (13.3%) and Malaysia (6.3%) 2. Rapeseed (6.1%) mainly from Australia (2.6%), Ukraine (1.8%), and Canada (1.2%) 3. Used cooking oil (4.8%) from various countries outside the EU 4. Soybean (4.3%) mainly from US (1.5%) and Brazil (1.5%)

Source: European Commission, 2019b

According to the study conducted by PASPI (2019), Indonesia's net trade with the EU fluctuates but shows a positive trend. The export of palm oil to the EU has been the main cause for Indonesia's trade surplus since 2011. Viewing the trade balance without including the export of palm oil shows a decrease of the trade surplus. In 2011 and 2018, the trade balance even shows deficit trends if palm oil exports are excluded from the balance. Thus, the palm oil export implies changing the trade balance between Indonesia and the EU.
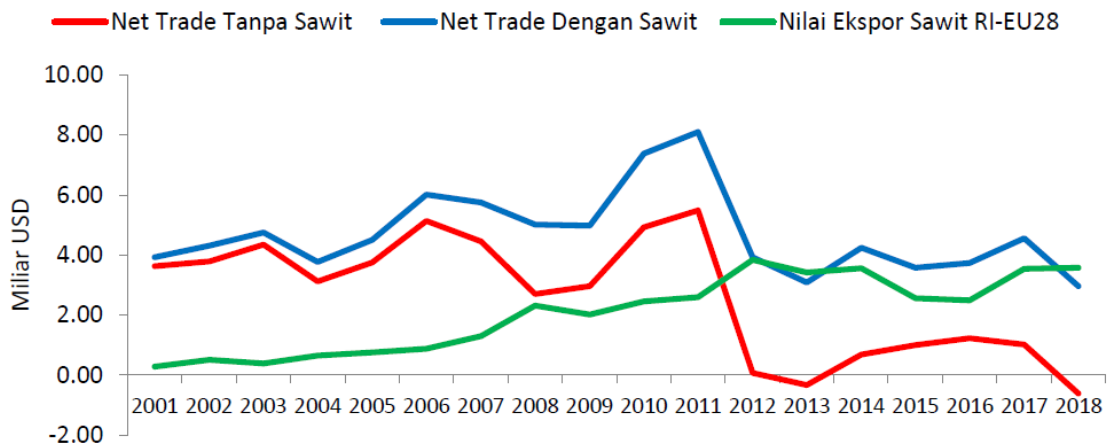
Figure 7. The Contribution of Palm Oil towards Indonesia's Export to the EU (PASPI, 2019)
(Net Trade Tanpa Sawit = Net Trade without Palm Oil, Net Trade Dengan Sawit = Net Trade with Palm Oil,
Nilai Ekspor Sawit RI-EU 28 = Export Value of Palm Oil Indonesia – EU 28, Milliar USD = Billion USD)

4.1.3 EU Renewable Energy Directives

The EU has been developing its renewable energy policies since the 1980s. The first phase of cooperation between the member states was research and development of new energy alternatives because of the oil crisis in the 1970s. The EU put the issue of renewable energy on its policy agenda by including it in the 1986 revision of the community objectives (Hildingsson et al., 2012). The EU continued to develop a policy framework on renewable energy when the bloc issued the Directive 2001/77/EC. This directive set a target of 21% of renewable energy for electricity. After the issuance of this directive, the EU issued the Directive 2003/30/EC where they targeted 5.75% on the use of biofuel or other renewable fuels for transport. This directive on renewable energy aimed to replace the use of diesel and petrol for transport and electricity purposes (European Commission, 2003). The issuance of this directive was a form of commitment from the EU to the prevention of climate change (European Commission, 2003).

Shortly after, the EU proposed to increase the percentage of renewable energy shares among its member states. The Directive 2009/28/EC (RED I) entered into forces, with a target of at least 10% of transport fuels to come from renewable energy by 2020. This 10% target was created to achieve the EU's objective on reducing greenhouse gas (GHG) emissions (Sharman & Holmes, 2010). In the first RED, the EU achieved a compromise to allow member states to trade renewable energy surpluses among each other by having joint projects (Hildingsson et al., 2012). In 2017, the total share of renewable energy in the EU had reached 17.52% (European Commission, 2019b).

The drafting processes of these directives were coordinated by the Directorate General of Energy (DG Energy). DG Energy has the mandate to collect information, coordinate the consultations, and produce a policy document. Throughout the process of policy design, the DG Energy invited other relevant stakeholders besides the EU member states, such as producer associations, non-governmental environmental organisations, and countries where bioenergy

is an important issue (Albrecht et al., 2017). These actors contributed to the drafting process of the directives through negotiations, direct lobbying, public hearing, or consultations.

Based on the first RED, the use of biofuels was counted as a renewable energy use target. However, environmental NGOs criticised the sustainability of biofuels during the implementation of the first EU RED. The crop-based for biofuels often come from agricultural production that have a risk of expansion on the forest or wetlands area. The use of crop-based biofuel to fulfil the renewable energy target can have negative impacts on the environment. Thus, the policy was criticised as a policy that eradicates the negative impact inside the EU but causing new problems outside the EU. It is argued that the reduced GHG emission within the EU has caused the increasing emission in the crop-based biofuel producing countries. Especially in the less developed countries where they have less strict regulations on climate change. The demand of biofuel on the international market caused an increase in land-conversion to produce palm oil, making palm oil the fastest-growing vegetable oils in the world (Lamers et al., 2011; Murnaghan, 2017). In order to respond to these critiques, it is argued that the first RED prioritises the second generation of biofuels, instead of the first generations (e.g. biodiesel and bioethanol) (Hildingsson et al., 2012).

In 2015 the revised EU RED was proposed to address the indirect land-use change (ILUC) risk in the production of crop-based biofuel. The revised directive was made to strengthen the reinforcement of bioenergy uses and third-party auditing (European Commission, 2019b). Besides aims to achieve 32% of renewable energy use targets by 2030, the revised EU RED introduced a new approach to measuring the ILUC risk. In the legislative text of the EU RED, the share of biofuels produced from food and feed crops cannot not exceed 7%. It has to gradually decrease to 0% until 31 December 2030, unless they are certified to have low ILUC risk (Article 26, 2018/2001/EC).

In the EU's legislation process, the European Council and European Parliament act as the co-legislators. An agreement can be reached during the first, second, or third readings of the European Commission's proposal (Rasmussen, 2005). The first and revised EU RED's legislative process stopped after the Parliament's first reading of the first proposal, where the Council accepted the Commission's proposal with the amendments from the European Parliament. Before reaching into the final legislative text, the Parliament proposed an amendment on phasing out palm oil by adding a new clause in the recital section and Article 7 (European Parliament, 2018a). According to the Minutes of Meeting of the debate in the Parliament on 15 January 2018, several Member of Parliaments (MEP) were in favour of the total exclusion of palm oil from crop-based biofuel because the productions of palm oil led to deforestation (European Parliament, 2018b).

However, the plan on phasing out palm oil has been rejected in the middle of 2018 by the European Commission. The rejection was because from a trade policy perspective, a ban would burden several EU member states' ongoing trade relations with Indonesia and Malaysia (Darmawan, 2019; Hegarty, 2018). The final adopted amendment only emphasised on the maximum 7% contribution on high-risk ILUC crop-based biofuel towards renewable energy targets and did not mention specifically phasing out palm oil. After issuing the revised EU RED, the European Commission adopted the Delegated Act on 13 March 2019. The Delegated

Act consists of a report on the expansion status of the crop worldwide and determines the criteria for: 1. Determining the high ILUC-risk crops based on the expansion of the production area and 2. Certifying low ILUC-risk biofuels, bioliquids and biomass fuels.
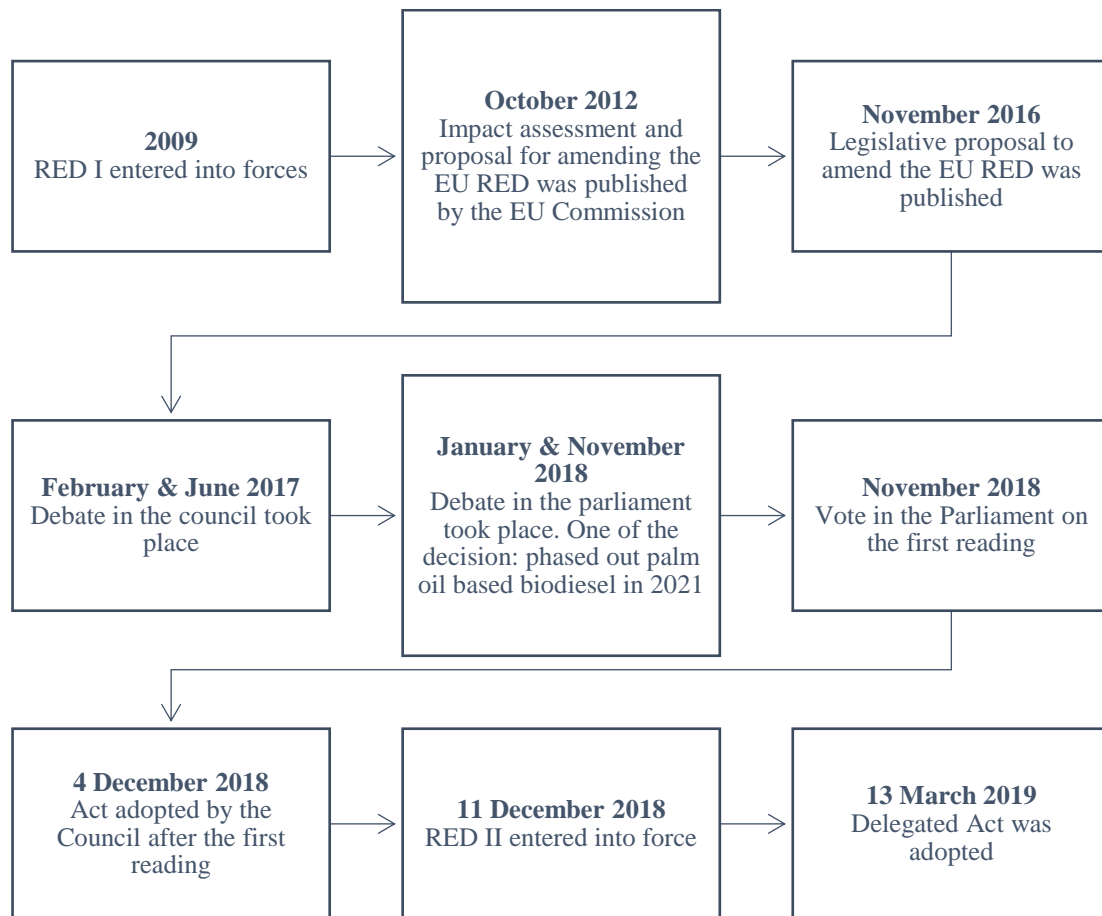
Figure 8. Timeline of EU RED (European Parliament, 2019)

Delegated Act Supplementing the EU RED II

The Delegated Act of the revised EU RED was adopted to implement the criteria in assessing the ILUC risk. In the context of crop-based biofuel production, ILUC refers to the conversion of forest, wetlands, or peatland areas that are changed into agriculture land to fulfil the demand for crop-based biofuel. The use of biofuel as a renewable energy aims to reduce emissions from using fossil fuels. However, this aim will not be achieved if the production of the biofuel has a high ILUC risk. In that case changes in land areas that have a high carbon stock may increase the release of GHG emissions stored in the trees and soils. Thus, high ILUC risk biofuels are fuels that are produced in a forest area that has a high carbon stock, in the EU or abroad.

Under the revised EU RED, the crop-based biofuels categorised as having a high-risk ILUC will not be taken into account when calculating the national shares of renewable energy and the share of renewable energy in transport (European Commission, 2019c). In the Delegated Act, it is explained that a crop is categorised having a high ILUC risk if: 1. The global production area of the crop has increased by more than 1% and 100,000 hectares after 2008. 2.

More than 10% of the expansion has taken place on land with a high-carbon stock. The EU has categorised the crops' ILUC risks and it is written on the annexe of the Delegated Act.

A biofuel use will be counted as renewable energy if the crop-based biofuel complies with the low ILUC risk criteria. During the first half of 2020, the Commission planned to prepare regulations on the implementation of this sustainability standard and started the process of recognition towards voluntary certification schemes. At the time of this study, the EU listed the approved schemes that consist of 14 voluntary certification schemes and one national biofuel sustainability schemes, including the RSPO-RED. (European Commission, 2019d).

4.1.4 Indonesia's Involvement in the Revised EU RED

The first and revised EU RED are regulations that were made for the EU member states. However, the directives have implications for Indonesia because Indonesia is a trading partner of the EU and moreover has become the EU's main exporter of palm oil for biofuel (Interview 3). The first EU RED subsidises the use of renewable fuels for transport, such as palm oil-based biofuel. It increases the demand for Indonesia's palm oil from the EU member states (Hegarty, 2018). Thus, the older directive benefits certain actors, including Indonesia.

This section traces involvement of Indonesia in the decision-making process of the revised EU RED.

In the legislative-making process of the revised EU RED, the EU conducted public consultations with relevant stakeholders, including the palm oil producing countries. Before the issuance of the revised directive, the EU approached several stakeholders, including the government of Indonesia. However, Indonesia was not involved as one of the panel members (Interview 19; Interview 21). Unfortunately, this study has not been able to clearly identify the reasons for Indonesia's non-involvement at the panel. It could have to do with the lengthy government bureaucracy process and limited resources of data to share with the EU. It could also be perceived as an expression of disagreement from Indonesia with the EU's standard to determine the ILUC risk in the revised EU RED (Interview 18).

The EU also held several stakeholder consultations. The EU invited Indonesian palm oil producing companies' representatives in November 2018, and another consultation was held in March 2019 where the representative of the Indonesian Embassy in Brussels attended this meeting. The meeting in March 2019 was attended not only by Indonesia but also by other producing countries. During that meeting, the representatives of the Indonesian government already raised their opinions and objections (Interview 20).

Looking at the non-involvement of the Indonesian government in the drafting process of the revised EU RED, Indonesia lost its opportunity to influence the decision-making of the revised directive. Furthermore, the date of the consultations arranged by the EU were very close to the dates of adoption of the revised EU RED and the date of the delegated act's issuance.[2] In principle, the EU has been transparent in the drafting process by inviting Indonesia as one of

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[2] The consultation that involved the producing companies was held in November 2018, while the EU RED II entered into force on 11 December 2018. Then, the consultation that was attended by the representatives of Indonesian government was held in the same month as the issuance of the Delegated Act.

the stakeholders. However, Indonesia's responses were late because the consultation dates were very close to the date of adoption (Interview 13). The Indonesian's representative of the consultation also perceived that the delegates were only given a limited time to speak on the meeting (Interview 20). It put Indonesia in a difficult position to influence the drafting process of the revised EU RED. Furthermore, because the EU RED is a policy for the EU member states and Indonesia is not a member of the EU, it was a challenge for the Indonesian Embassy in Brussels to take part in the negotiation and lobbying process. It would be different and easier, for example, to raise an objection towards ASEAN or the UN, where Indonesia is a member and pays for the funding contributions (Interview 20). Finally, issues of trust also have become a concern for the Embassies in interacting with its EU counterparts. Thus, the Indonesian government should be able to prove the actual implementation of sustainable palm oil in Indonesia and provide data to support the position of Indonesia (Interview 20).

In the decision-making process of the revised EU RED, the plan to phase out palm oil has been discussed in the level of MEP. However, in the final legislative text, there is no single text in the directives mentioning on the ban of palm oil and the EU stated that every vegetable get the same measures (EEAS, 2019). From the debate in the EU Parliament until the Delegated Act was issued (late 2017-early 2019), the Indonesian government had strong reactions towards the EU. As argued and discussed previously, this is because palm oil is the main exporting commodity for Indonesia. According to the Delegated Act of the EU RED II, the EU will regularly review the directive. A review will be conducted to discuss the scientific basis and evidence on the crop expansion and the factors justifying the smallholders' provisions. The nearest review will be held in June 2021. Because the revised EU RED and its Delegated Act have been issued, the government of Indonesia is looking forward to the review of the directive in 2021.

4.1.5 Analysis of Policy Interactions between Indonesia and the EU

The emergence of a global setting that more emphasises on the environmental protection has influenced Indonesia in governing its palm oil. Examples are the previously discussed UN-REDD, the emergence of the RSPO, and the EU RED. Policies that are created by indirectly related actors, such as the first and revised EU RED, have influenced Indonesia in implementing its palm oil-related policies.

This section explains the interactions of the EU RED with Indonesia's palm oil-related policies, using the concept of policy interactions as a tool of analysis. In Section 4.1, it has been explained that Indonesia and the EU is a trading partner in palm oil commodities. The EU is an important palm oil export destination for Indonesia. In this case, palm oil trading as a crop-based biofuel for the EU becomes the main reason behind Indonesia's strong responses towards the EU.

Policy interactions are defined as the situation where the operation of one policy has implications on other policies (Sorrell et al., 2003). The first EU RED opened the opportunity of using palm oil-based biofuel as a renewable energy source. Thus, it became an opportunity for Indonesia to fulfil the CPO demand of the EU market. Indonesia also encouraged investment from foreign countries in its palm oil sectors. Then, the revision of the EU RED has

influenced Indonesia's palm oil-related policies. The Indonesian government strengthened the implementation of policies that regulate the sustainability of its palm oil sector. For instance, during period of time when the revised EU RED was being discussed in the MEP level (2018) until it was issued in 2019, Indonesian government authorities accelerated the legalisation process of RANKSB to become a Presidential Instruction and issued a B30 biofuel policy to replace its B20 target (see Chapter 4.2.1). Thus, the first and revised EU RED have influenced the palm oil-related policies in Indonesia.

The concept of policy interactions emphasises three components; target group, sector and site. Firstly, the target group of the first and revised EU RED are the member states of the EU. The EU lawmakers created the first and revised EU RED and it is a legally binding policies for the EU's member states. However, the policy interactions happened outside the territory where the policies were made and implemented. The first and revised EU RED have cross-border implications for Indonesia because Indonesia has a trading interaction with the EU. Secondly, regarding the sector of policy interactions between Indonesia and the EU they have different perspectives on the directives. The first and revised EU RED are policies that regulate the use of renewable energy for the EU member states.

Meanwhile, Indonesia perceived that the EU RED influenced Indonesia's palm oil export. The EU is one of the main importers of Indonesia's palm oil and therefore a limitation on palm oil-based biofuel in the EU will influence the export of Indonesia's palm oil. Thirdly, the site of this policy interactions happened at the horizontal level, where the policies were made from the same level of governance.

To understand the policy interactions, this study considers it crucial to focus on studying the policy actors and the institutional settings besides understanding the interactions among policies. Regarding the EU RED, Indonesia is not in the main decision-making structure of the EU. However, Indonesia has tried to influence the policy-making process because Indonesia is an exporting country of palm oil. During the stakeholder consultations, Indonesia interacted formally with the EU. As a non-member state, Indonesia had to interact with different actors in different forums to be able to influence the EU RED, especially the revised one. These interactions will be further discussed in the chapter about sovereignty games (see Chapter 4.3).

4.2 Counter-Framing the EU RED

This section aims to give insights on the perception of Indonesia's government on the EU RED. The identified counter-frames will be elaborated in this section. The counter-frames were collected from the analysis of selected news article samples and interviews with Indonesian government officials. From the identified frames packages, this study analysed the reasoning and framing devices of each counter-frame. The insights on the frames' reasoning and framing devices are then summarised in the frame packages tables (see Table 3; Table 4; Table 5).

The news article samples were retrieved from The Jakarta Post and Antara News from January 2008 - June 2019. From 104 articles analysed, three counter-frames were identified and will be discussed. The three counter-frames captured from the media sampling analysis are: 1) EU RED is a trade barrier to Indonesia's palm oil, 2) palm oil contributes to SDGs in eradicating poverty, 3) the method to assess the ILUC risk in the revised EU RED is not valid (see Figure 9). Based on the collected sample, there were only nine articles published before 2017. Meanwhile, the number of articles discussing palm oil and EU RED increased significantly from 2017 onwards. It can thus be seen, the Indonesian government has become more reactive over the revised EU RED comparing to the first one.
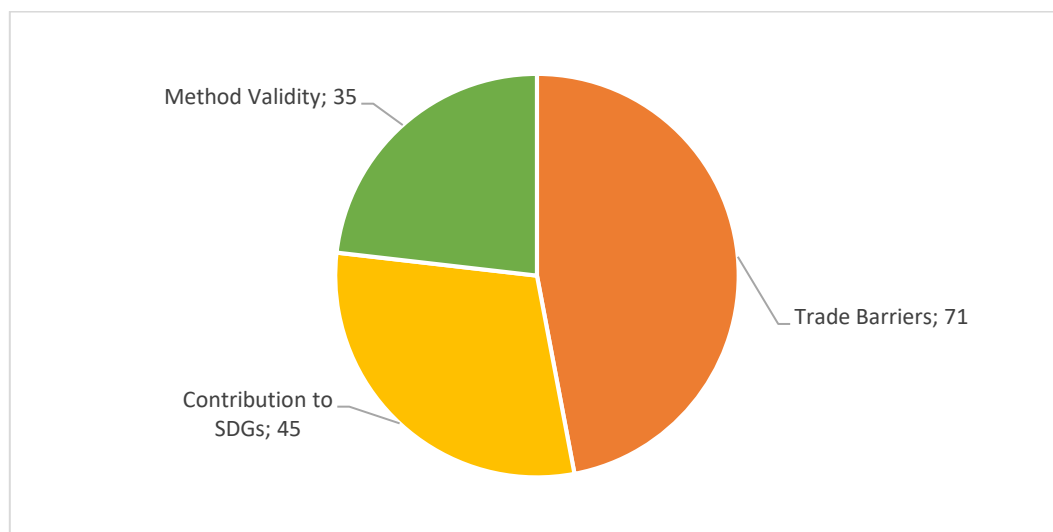
Figure 9. Total Occurrence of Counter-Frames in 104 Articles

Besides collecting the counter-frames from the selection of news articles, this section elaborates on the frames captured from the interview analysis. The counter-frames were captured from 13 respondents working as government officials. The counter-frames that were collected from the interviews focused on the perception of Indonesian government officials towards the revised EU RED. From the interview analysis, four counter-frames were collected, where three of them are the same as the counter-frames found in the media framing analysis. One counter-frame that sees RED II as "another selling of certification" was found in the interviews only (see Figure 10). Finally, media framing analysis was done to identify the engaged actors in the counter-frames.
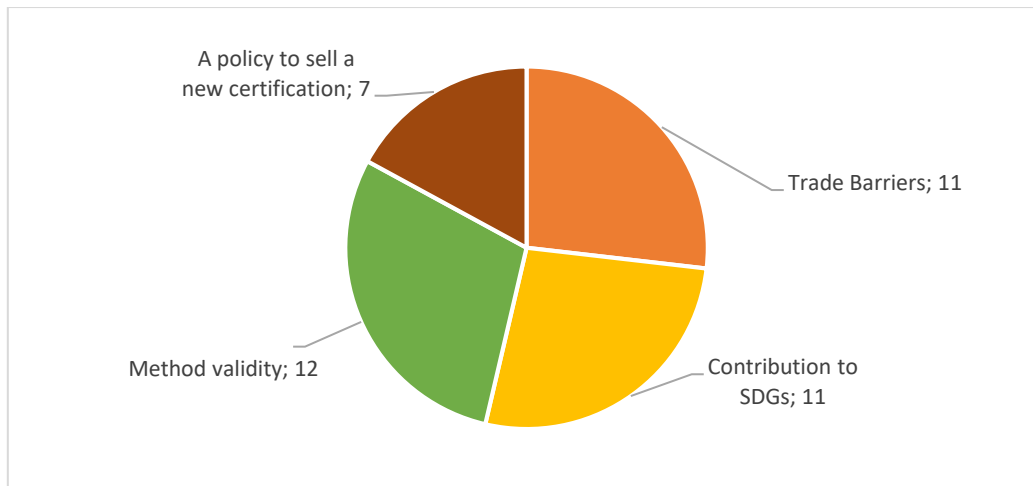
Figure 10. Total Occurrence of Counter-Frames in 13 Interviews

4.2.1 Counter-Frame 1: EU RED is a trade barrier to Indonesia's palm oil

Media framing analysis

The first identified counter-frame is Indonesia perceived that the EU RED as a trade barrier to Indonesia's palm to enter the EU's market. It occurred in 71 of 104 collected articles. It is the most occurred frame in the news articles samples. In the collected samples, the frame packages occurred most during 2017-2019. Meanwhile, there is only one news article in 2008 consisted of this frame. It was The Jakarta Post who published a news article on 19 September 2008, stating that the Indonesian Minister of Agriculture Anton Apriantono lobbied at the EU Parliament in Brussels against a policy that would limit the import of palm oil. This article wrote a statement from the minister, which was "*The EU was influenced by negative campaigns from non-governmental organizations (NGOs). We feel it's not about environmental issues; it's about trade*".

Then, during 2017-2019, the counter-frames of Indonesia are visible in the way Indonesian government address the revised EU RED as a black campaign and a policy that will hamper Indonesia's export to the EU countries. Articles often published statements of Indonesian government officials. On 7 December 2017, Antara News published a statement from a member of the House of Representatives: "*The palm oil regulation is a black campaign directed to Indonesia as the biggest palm oil exporter to the European countries. He (a member of House of Representatives) stressed that the black campaign is a business competition aiming to exclude palm oil as a biofuel source, and that it violates fair trade.*"

In several articles, the revised EU RED is mentioned as a discriminatory policy. Antara News, for example, has several headlines quite literally containing this counter-frame: "*Gapki supports government to oppose the EU's discriminatory policy on palm oil*" and "*Luhut: Indonesia will counter the EU's discrimination to Palm Oil*". Thus, the strong responses from the Indonesian government is seen from the news articles sample. Several other reactive responses are stated declaring trade wars or threatening to exit Paris Agreement (The Jakarta Post, 28 March 2019).

Interview analysis

This counter-frame occurred in 11 of 13 interviews. The Indonesian government finds that with the issuance of the revised EU RED, EU member states will not choose palm oil as a base of biofuel (Interview 1). It is because the palm oil is categorised with high ILUC risk in the revised EU RED. Thus, if EU member states are using a high ILUC risk crop, it will not be considered in the counting of renewable energy targets. The officials perceived that palm oil received an unfair treatment in the revised EU RED, compared to other vegetable oils. Also, the revised EU RED is perceived as protectionism for EU's homegrown vegetable oils (e.g. rapeseed and sunflower) (Interview 1; Interview 6). Thus, the revised EU RED is perceived as a policy to phase out palm oil in the EU market (Interview 6; Interview 4).

The revised EU RED was perceived not only as a trade barrier of Indonesia's palm oil to the EU's market but also worsened the image of Indonesia's palm oil (Interview 9). The government of Indonesia concerns that the EU has a significant role in determining the sustainability standard at the international level. Thus, the EU RED can influence the sustainability standard of palm oil and affects palm oil trade in other countries' market.

From the media framing analysis, several counter-frames emerged and expressed some form of threat from Indonesia to the EU. However, during the interviews, Indonesian government officials avoided a language of retaliation, such as trade wars (Interview 5). It was expressed that the trade value of Indonesia's import of EU commodities or products (e.g. dairy products, planes, or alcohol products) is not as big as Indonesia's palm oil export to the EU market (Interview 18).

Promoting palm oil-based biofuel use in the domestic market has become one of the solutions. The government wants domestic demand of palm oil can absorb the supply of domestic CPO's production (Interview 6). The regulation of using B20 (a diesel mixes with 20% biodiesel) was issued through the Ministerial Regulation (Permen) No. 41/2018. Through this regulation, the government wanted to reduce the crude oil import that caused the trade deficit to Indonesia (The Jakarta Post, 2018b). During the Presidential speech in August 2019, President Joko Widodo addressed the target to use B30 biodiesel mix by January 2020 and B50 by the end of 2020. He also addressed the plan to target widespread B100 use in Indonesia (Kompas, 2019). This plan was caused by the low price of global CPO and the pressure from the revised EU RED (The Jakarta Globe, 2019b). The government, through the Ministry of Agriculture, had successfully run the test for B100 fuel-based vehicles in 2019. The ministry also began to discuss the possibility for mass-production of B100 fuel with state-owned enterprises and private companies (The Jakarta Post, 2019). However, the lack of readiness of the industry to use and produce B100 fuel has become an obstacle for the government to implement the plan (Interview 4).

Table 4. Counter-Frame 1: EU RED II is a Trade Barrier to Indonesia's Palm Oil

Framing devices	Key concept	Black campaign, discrimination, protectionism
	Verbal devices/metaphors	**"They (EU) don't want their products to lose to ours**, so we are being ambushed

		from all directions using all kinds of instruments" (The Jakarta Post, 29 July 2019) "European countries were **using environmental issues as non-tariff barriers** for incoming palm oil products in order **to protect their rapeseed oil producers**" (The Jakarta Post, 23 February 2017) "At MEP level, the EU is against palm oil. We see that there are **many rapeseed and sunflower farmers** in the constituent of the European Parliament." (Interview 6)
Reasoning devices	**Problem definition**	Indonesia perceives that the EU RED II will hamper Indonesia's palm oil export to the EU
	Cause	The revised EU RED limit the use of palm oil-based biofuel among EU member states
	Solution/prospective for action	Strengthening diplomacy, filing a lawsuit to the WTO, increase the absorption of palm oil consumption in the country
	Non-solution	Trade retaliation, threatening to exit the Paris Agreement

4.2.2 Counter-Frame 2: Palm oil contributes to SDGs in eradicating poverty

Media framing analysis

The second frame package is seen in 45 of 104 articles and mostly appeared during 2017-2019. It captured the perception of the Indonesian government in seeing the palm oil sector as a contributor to achieving SDGs, especially in eradicating poverty in Indonesia. In 2014, the frame was identified in one news article. It is written that the Indonesian government wants the EU to ease the regulation on palm oil import for the sake of the prosperity of Indonesian farmers. Meanwhile, the other frames occurred during the discussion of the revised EU RED (2017-2019).

The Jakarta Post reported the ASEAN Meeting attended by the Head of Delegation Vice Foreign Minister AM Fachir in one of its articles. It is written in the article that "*He (Vice Minister) presented data about the contribution of the palm oil sector to the country's economy as well as the SDGs, a universal call to eradicate poverty and protect the environment. He explained that palm oil contributed to 12 of the 17 SDGs set by the United Nations, such as poverty eradication, eliminating starvation and ensuring the affordability of clean energy*". According to this frame package, the palm oil sector involved 3.7 million workers, of which 2 million of them are smallholder farmers. On 24 April 2019, The Jakarta Post captured a statement from the Indonesia Palm Oil Labor Union Network (Japbusi)'s Executive Secretary.

He stated that the EU only thinks about deforestation without thinking about the smallholders that will suffer because of the revised EU RED.

Interview analysis

The second counter-frame was captured in 11 of 13 interviews. These government officials portrayed that the revised EU RED only focuses on environmental issues, without taking into account the smallholder welfare (Interview 3). This frame aims to counter the revised EU RED's sustainability standard of palm oil and deforestation issues addressed by the EU. One of the respondents stated, "*If the EU claimed Indonesia has a high deforestation number, we see that palm oil is not the main contributor. Human development contributed the most on deforestation, such as the development of a new city, the establishment of new districts areas.*" (Interview 3)

Indonesian government officials often elaborated on the productivity of palm oil and how the smallholders are depending on this sector. Thus, the Indonesian government perceived that the smallholders relying on the palm oil sector would be disadvantaged by the issuance of the revised EU RED. Besides discussing smallholder, the officials linked this frame with the compared productivity yield of palm oil and other vegetable oils that are produced in the EU (e.g. rapeseed, sunflower). Based on this frame, palm oil is seen as a productive plant that has a high yield of production.

The Indonesian government counter the deforestation issues by exposing smallholders' economic condition and did not address the deforestation issues (Interview 8). Countering the deforestation frame and environmental issues by highlighting positive effects of the palm oil industry (such as contributing to the SDGs in general and eradicating poverty more specifically) has the loopholes and creates an ambiguous framing[3].

Table 5. Counter-Frame 2: Palm Oil Contributes to SDGs in Eradicating Poverty

	Key concept	Economic growth, the productivity of palm oil, smallholders
Framing devices	**Verbal devices/metaphors**	"This industry employs 19 million people and has **lifted so many of them out of poverty,** so what the EU is aiming for is no joke for us" (The Jakarta Post, 17 April 2019) "The EU's plan will **affect the lives of around 20 million farmers**, both directly and indirectly. Therefore, we took some action against it." (Antara News, 8 April 2019) "Palm oil is a **productive plant** and it increases welfare for the smallholders" (Interview 9)

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[3] Ambiguous frames are defined as a solution when there are limited information or uncertainties in addressing to the frame (Dekker, 2017).

Reasoning devices	**Problem definition**	Palm oil contributes to Indonesia's economy, and Indonesia claims that palm oil has reduced the level of poverty of Indonesia's smallholder farmers
	Cause	When the EU stated that palm oil is not a sustainable crop-base for biofuel, Indonesia perceived that the palm oil sector is the main contributor to the nation's economic growth. Thus, Indonesia perceived that palm oil helps Indonesia to achieve the SDGs
	Solution/prospective for action	Promoting the sustainability level of palm oil production in Indonesia
	Non-solution	Emphasising the welfare issue without obscuring the environmental/deforestation issue

4.2.3 Counter-Frame 3: The methodology to assess the ILUC risk in the revised EU RED is not valid

Media framing analysis

The last frame package is about the method validity in the revised EU RED. This frame has the least occurrence in newspaper articles, where it can be seen in 35 of 104 articles. The government of Indonesia perceives that the EU does not take into account several improvements made by Indonesia in the palm oil sector, such as the lower level of deforestation since the issuance of the peatland moratoriums. On 28 March 2019, The Jakarta Post published a news article that stated that Indonesia "*faced EU pressure over palm oil despite the government declaring a moratorium on permits for new estates*". Indonesian government officials argued that they had made various efforts and improvement in the palm oil industry after 2015, including ISPO, RANKSB, a moratorium on the issuance of new permits to clear rain forests and peatland, and the moratorium on palm oil plantations (see 4.1.1.3). Thus, Indonesia and the EU have different perspectives on EU's methodology to assess ILUC risks and palm oil sustainability standards.

Interview Analysis

This frame package appeared in 12 of 13 interviews. This counter-frame has the most appearance in the interviews. The Indonesian government perceives that the methodology in assessing the crops with a high ILUC risk is not relevant (Interview 17). The Indonesian government argued that the current method to assess the ILUC risk would give an advantage to the EU home-produced vegetable oils, especially rapeseed. In addition, the Indonesian side questioned the reason behind the base year to assess the ILUC risk, which is starting from 2008 (Interview 1; Interview 6; Interview 9). Indonesian government officials elaborated on several policy improvements in palm sectors that the EU did not consider. One of the respondents

stated that the Indonesian government has strengthened the law in plantation sectors. He further elaborated that many district-officials were jailed because of corruption in land concession (Interview 1).

Table 6. Counter-Frame 3: The Methodology to Assess the ILUC Risk in the Revised EU RED is not Valid

Framing devices	**Key concept**	ILUC assessment, several policies of Indonesia towards its palm oil sector: a moratorium on new permits, ISPO certification, One Map Policy.
	Verbal devices/metaphors	"The **ISPO** is one of Indonesia's ways to achieve the Sustainable Development Goals (SDGs). **That is what (the EU) does not see.**" (The Jakarta Post, 19 January 2018) "The **criteria (of EU RED) are only targeting palm oil and deforestation**, without taking into account other environmental problems related with other crop productions, such as rapeseed" (Antara News, 28 February 2019) "**Why did the EU choose 2008-2015 as their baseline?** If we talk about Indonesia's context, during that time our palm oil exports to the EU were high" (Interview 6)
Reasoning devices	**Problem definition**	Indonesia disagrees with the revised EU RED and believes that the EU uses an inaccurate method to assess the ILUC risk
	Cause	Indonesia argues that the base year of ILUC assessment is not accurate, and that the EU did not consider Indonesia's policy improvement.
	Solution/prospective for action	Indonesia gathers data to show the improvements made in the palm oil sector. Indonesia plans to join the review of the EU RED in 2021.
	Non-solution	Further criticising the methodology of the EU RED

4.2.4 Counter-Frame 4: EU RED II is a policy of selling another certification scheme

Interview analysis

This frame was only found in the interviews and not in the newspaper. It occurred in 7 of 13 interviews. The officials regarded the revised EU RED as a form of "*selling another certification scheme*". The respondents stated that the EU had decided on several certifications are able to show compliance towards the sustainability standard and that Indonesia's palm oil companies tried to comply with RSPO criteria. However, Indonesia's palm oil has always been a target for the EU even though palm oil producers have been certified. In this frame, the

Indonesian government perceived that the ISPO is not widely accepted in the EU because the EU regards the ISPO as an "*Indonesia's perspective*" on sustainable certification (Interview 4). This frame also portrayed that the Indonesian government officials perceived that the EU always sparked controversies on the sustainability standard of palm oil. Indonesia sees that the EU keeps raising different issues to criticise this commodity (Interview 13).

Table 7. Counter Frame 4: EU RED II is a Policy to Sell Another Certification Scheme

	Key concept	RSPO, sustainable certification
Framing devices	**Verbal devices/metaphors**	"It is (EU RED) a form of **selling another certification**" (Interview 4) "**The attack on palm oil will never end**. The EU keeps criticising from environment, human rights, health. **When many producers have been certified by RSPO now they raised the issues of deforestation**." (Interview 13)
Reasoning devices	**Problem definition**	Indonesia perceives that the EU sparks controversies on sustainability standard of palm oil.
	Cause	Indonesia perceives that when more producers are RSPO-certified, the EU addressed the issues of deforestation.
	Solution/prospective for action	Collaborating with the EU to discuss a possible certification scheme. Increase the acceptability and strengthening ISPO.
	Non-solution	Further blaming the EU without addressing their critics

4.2.5 Involvement of Indonesian Government Officials in the Counter-Frames

Besides capturing the counter-frames, the study also considered the involvement of policy actors that created or engaged with the existing frames. The research only captured the actor's engagement in the newspaper's counter-framing.

Indonesia's national government consists of different ministries and agencies, and they coordinated to respond to the EU RED. The Ministry of Foreign Affairs appeared most in the counter-frames. The foreign minister and other senior-level officials from this Ministry involved in delivering statements during the bilateral and multilateral meetings of Indonesia with other countries. The Ministry of Foreign Affairs was also involved in the negotiation process of the revised EU RED. Then, the Coordinating Ministry of Economic Affairs as the chief coordinator on palm oil issues had the second-most involvement in the collected frame packages. Thirdly, the Coordinating Ministry of Maritime Affairs contributed 11 appearances

in the news articles sample. In the collected samples, the involvement of the Ministry was captured through the statements that were delivered by its minister.

Counter-frames were identified from the statements of government officials from different ministries and agencies. The level of engagement of a ministry or agency in a frame is related to the amount of authority they are given in handling the issues.
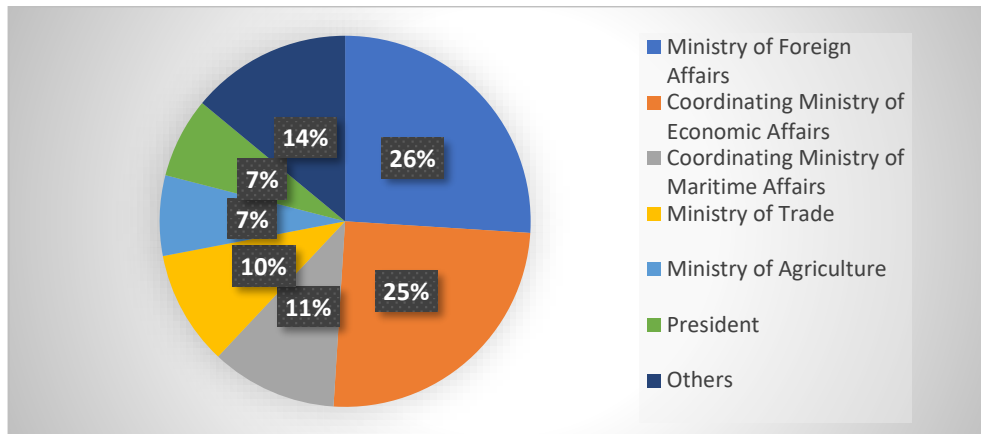

Figure 11. Involvement of Ministries/Agencies in Counter-framing the EU RED (in the newspaper articles)

4.3 Sovereignty Games of the Indonesian Government to Respond to the EU RED

This section describes the responses of the Indonesian government on the EU RED. The responses will be divided based on the different arenas, namely the domestic and the international arena.

4.3.1 Domestic Arena

The domestic arena is defined as an arena within Indonesian national territory where several different ministries and agencies interacted to create responses to the revised EU RED. This section aims to portray the claims of authority to respond to the EU RED. This section elaborates on the ministries and agencies that were involved in responding to the EU RED.

4.3.1.1 Indonesian Government Coordination on Palm Oil Issues

The government of Indonesia consists of different ministries and agencies, coordinating to create responses over the EU RED. At the national level, the executive branch consists of the president and its ministries. The president has the power to instruct his cabinet. During President Joko Widodo's first term (2014-2019), the cabinet consisted of 34 ministries, including the coordinating ministries and its ministries (Perpres No. 7/2015). The coordinating ministries function as the coordinator of several ministries that have been grouped together based on sectoral reasons. This study elaborates on the coordination that took place at the national level during President Joko Widodo's first term only. It is because several ministries' functions and nomenclature changed in President Joko Widodo's second term (2019-2024).

With regards to the palm oil sector, the Coordinating Ministry of Economic Affairs is the coordinator of several ministries. Three ministries have a significant portion of mandate in governing palm oil: 1. Ministry of Agriculture (governing palm oil as commodity), 2. Ministry of Environment and Forestry (overseeing the status of forest land), 3. Ministry of Agrarian Affairs and Spatial Planning (having the authority to issue cultivation rights permits/HGU) (Public discussion with Kemlu, 2019).

According to Perpres No.5/2006, several ministries are responsible for Indonesia's biofuel policy, such as the Coordinating Ministry of Economic Affairs, the Ministry of Energy and Natural Resources, and the Ministry of Agriculture. The Coordinating Ministry has the responsibility to coordinate the preparation and implementation of biofuel use. The Ministry of Energy and Natural Resources has the authority to regulate the implementation of biofuel use and the authority to encourage the industry in the energy sector to shift to biofuel. The Ministry of Agriculture is responsible for preparing the crop for biofuel productions.

4.3.1.4 Indonesian Government Coordination on EU RED Issues

Reflecting on the counter-frames collected in this research (see Chapter 4.2), the composition of the ministries that were involved in responding to the EU RED is different from the ministry that was given the mandate to oversee palm oil. In formulating a response to the EU RED, Indonesia focused on the economic-related ministries. As discussed previously, this is because

the government of Indonesia perceived that the EU RED is a trade and economic issue (Interview 1). Following this reasoning, it makes sense that ministries that focus on conservation and environment, such as the Ministry of Environment and Forestry, were less vocal in giving statements compared to the ministries mentioned above.

As discussed previously in the engagement of actors in creating counter-frames over the EU RED, some ministries were engaged more than others in giving public statements (see Chapter 4.2.5). The Ministry of Foreign Affairs, The Coordinating Ministry of Economic Affairs, and The Coordinating Ministry of Maritime Affairs have the most appearance in the newspaper articles. Then, there are different Directorate-General or smaller units responsible for handling the issues of palm oil or EU RED in each ministry. For example, the Deputy of Food and Agriculture is the deputy in charge of palm oil issues in the Coordinating Ministry of Economic Affairs. However, the Deputy of International Economic Cooperation is also involved in the palm oil issues regarding the EU RED. It is because the government regards the EU RED as being within the scope of international economic cooperation (Interview 1).

There are several ministries under the coordination of the Coordinating Ministries of Economic Affairs. This includes the Ministry of Agriculture that oversees palm oil as a plantation commodity and the Ministry of Trade that oversees international trade. However, the Coordinating Ministry of Maritime Affairs was also involved in responding to the EU RED. The Coordinating Minister Luhut Pandjaitan made several public statements addressing palm oil and the EU RED. The Minister was also involved in leading the delegations of the revised EU RED's negotiation team to Brussels and other European countries. The Coordinating Ministry of Maritime Affairs oversees the Ministry of Energy and Natural Resources. The appointment of this Coordinating Ministry to lead the high-level delegations to EU countries were direct instructions from the president (Interview 4). However, it is not clear whether the involvement of the Coordinating Minister in this issue was because it oversees the energy-related ministry. In this case, the Coordinating Ministry of Maritime Affairs has performed a vertical move. It can be seen from the ministry's move, that it tried to shift its power to be able to respond to the revised EU RED. Thus, there are two coordinating ministries involved in responding to the revised EU RED. However, the centre of coordination for other ministries lies with the Coordinating Minister of Economic Affairs (Interview 4; Interview 19; Interview 20).

Responding to the EU RED required interactions on the international level. The Ministry of Foreign Affairs is responsible for international politics and negotiations. Indonesia started to include palm oil in the ministry's diplomatic agenda in the late 2000s. The ministry conducted economic diplomacy by promoting palm oil and involved when there is raising tension in international relations regarding palm oil issues. As palm oil is included on the state's diplomatic agenda, the Ministry of Foreign Affairs has a more significant mandate in the palm oil sector. Foreign Minister Retno Marsudi mentioned "Palm Oil Diplomacy" as the Ministry's agenda during the Annual Foreign Minister Speech in 2018 (Kemlu, 2019a). This ministry was responsible for several activities to promote sustainable of palm oil and to include palm oil issues in the discussions in several international forums. This ministry was also involved in sending delegations to other countries, lobbying the stakeholders and campaigning to the

international community about palm oil. However, oftentimes officials from the Ministry of Foreign Affairs can only participate to a certain extent in technical discussions on palm oil. This is where the Ministry of Agriculture can step in by providing support in international negotiations (Interview 18; Interview 4).

Reflecting on this case, internal communication and unclear authorities between ministries were challenges for Indonesia. However, in the coordination process of responding to the revised EU RED between 2017-2019, the responses and coordination among ministries were more consolidated and structured (Interview 1; Choiruzzad, 2019).

4.3.2 International Arena

This section will discuss interactions of Indonesia with actors from outside its sovereign territory. Indonesia stretched its power to influence the revised EU RED and issues of sustainability regarding palm oil. This section consists of the explanations about the moves of the Indonesian government in the international arena to respond to the EU RED.

4.3.3.1 Palm Oil Diplomacy

During the first term of President Joko Widodo's presidency, he set nine development programs (Nawacita), with one of them focusing on Indonesia's foreign policies. This focus was mandated to the Ministry of Foreign Affairs. One of the foreign policy agendas was strengthening economic diplomacy (Fitriani & Panduwinata, 2018). Economic diplomacy was set as an agenda to promote investment opportunities in Indonesia abroad and support Indonesia's trade expansion (Kemlu, 2019a). Economic diplomacy is defined as the activities conducted by state actors to influence cross-border economic activities and to reduce the trade barriers with non-state actors (Moons & van Bergeijk, 2017).

Palm oil is included in Indonesia's foreign policy agenda because it is seen as a strategic commodity that has a significant contribution to Indonesia's economy. Foreign Minister Retno Marsudi addressed palm oil diplomacy in her annual press statement in 2019 (Kemlu, 2019a). The inclusion of palm oil diplomacy as a policy agenda showed the importance of palm oil in Indonesia's diplomatic agenda.

Regarding palm oil diplomacy, Indonesian government officials also used second-track diplomacy such as creating an online campaign to promote palm oil or conducting discussions with Indonesians living abroad. In conducting the second-track diplomacy, the government emphasises on informal interaction that aims to include more people and influence public opinion (Wehrenfennig, 2008; Public Discussions with Kemlu, 2019)

Expanding the palm oil market to the non-traditional markets was another target. In responding to the revised EU RED, the Indonesian government stated that they plan to replace the EU market with African countries. However, with the current trade relations, it will be difficult to replace the EU's market with countries in Africa. To export palm oil to the non-traditional market, Indonesia needs to create a comprehensive trade agreement and making these require long processes of negotiation. Currently, Indonesia only has a trade agreement with countries, instead of multilateral trade agreement. Meanwhile, palm oil producers expected that the

government would conduct trade negotiations with the African Union or create a multilateral trade agreement with African countries (Interview 11)**.**

In the case of responding to the revised EU RED, the Ministry of Foreign Affairs' Policy Analysis and Development Agency reported that the Ministry conducted several activities in 2018, such as sending delegations to promote the sustainability of palm oil in European countries. The main objective of these activities is "*to promote the sustainability standards of Indonesia's palm oil which have always been a problem criticised by countries in Europe*" (Kemlu, 2018). Thus, the Indonesian government has used palm oil diplomacy to address the EU's claim on palm oil sustainability.

Indonesia stretched its influence to promote the sustainability standard of palm oil and to influence the EU RED at the international level. The following sections elaborate on Indonesia's moves to respond to the revised EU RED. It will be organised based on the actor with whom the Indonesian state interacted. The moves of Indonesia were conducted in bilateral and multilateral settings. These moves were not only in formal negotiation settings, but also in the form of informal lobby and negotiations.

4.3.3.2 Indonesia and EU bilateral relations

The issuance of the revised RED led to Indonesia's strong responses to the directives. Indonesia's reaction has caused a change of dynamic in the international relations between Indonesia and the EU.

The Indonesian government interacted with different EU actors to respond and influence the revised EU RED. The Embassy of Indonesia in Brussels, as the front line of the Indonesian government in EU territory, has done several actions to respond to the revised EU RED. Before the adoption of the revised EU RED, the Embassy of Indonesia in Brussels set up several meetings with relevant EU counterparts, such as officials from the EU Parliament and EU Commissions. The meetings were conducted as an informal lobbying process on the revised EU RED. The meetings also aimed for Indonesia to inform how Indonesian state perceived the revised EU RED. The Embassy in Brussels also attended consultation meetings conducted by the EU (Interview 20).

After the adoption of the revised EU RED, the Embassy in Brussels did not have the opportunity for formal negotiations with the EU. However, in responding to the revised EU RED, the Embassy in Brussels initiated to—together with other Indonesian Embassies in the EU—come up with a demarche. Each embassy sent diplomatic notes to relevant government offices in their respective countries to inform their disagreement towards the policies. In these diplomatic notes, a clarification of Indonesia's current palm oil sustainability is given along with an explanation of Indonesia's concerns about the revised directive (Interview 19). The Indonesian Embassies also consolidated with the embassies of other palm oil-producing countries in the European countries (e.g. Malaysian Embassies in European countries) (Interview 20). Although structurally Indonesian Embassies in foreign countries fall under the authority of the Foreign Ministry, they are often required to respond to situations directly without instructions from Jakarta. This is especially the case when a situation has the potential

to influence Indonesia's economic or diplomatic interest. It was done to shorten the bureaucratic process (Interview 20).

Besides direct interactions with government stakeholders in the European countries, the embassies were also facilitating official visits from Indonesia. Indonesia has sent several delegations (including the visit of high-level officials) to Brussels and other EU countries, with the missions related to the revised EU RED. These delegations promoted Indonesia's palm oil sustainability. For example, before the issuance of the revised EU RED, the Coordinating Minister of Maritime Affairs visited the Vatican to seek support. This visit was part of a campaign to change European's perception of palm oil (The Jakarta Post, 2018a).

The Indonesian Embassy in Brussels also organised a multi-stakeholder event in December 2018. This event was attended by the Deputy of Food and Agriculture of the Coordinating Ministry of Economic Affairs. She discussed about sustainable palm oil with biofuel-related stakeholders in Brussels (Interview 20). There were also Indonesian delegations who went to Amsterdam and Frankfurt to promote ISPO in December 2018 (Kemlu, 2018). In April 2019, Coordinating Minister of Economic Affairs Darmin Nasution also visited Brussels to have a dialogue with EU Parliament committee member on Environment Alberto Cirio (Tempo, 2019). Then, the Embassies also monitor the palm oil issues outside the scope of the EU RED. For instance, when local private companies were regarded to negatively campaign on palm oil, the Embassy in The Hague sent letter to the companies to make their objection known or to ask for clarification from the companies. Several Indonesian embassies in European countries are also actively approaching ASEAN Member States embassies to discuss palm oil issues (Interview 20) or non-state stakeholders such as European Palm Oil Association (EPOA) (Interview 19).

Although Indonesia has responded with some language of threat over the revised EU RED, the overall diplomatic relations between Indonesia and the EU are still running (Interview 5). Indonesia has tried to influence the revised directive through the Comprehensive Economic Partnership Agreement between Indonesia and the EU (IEU-CEPA). At the time of this study, Indonesia tried to include palm oil and its market access under the chapter of discussion about trade and sustainability issues (Interview 1; Interview 2; Interview 3). From the Indonesian government, The DG of International Trade Negotiation of Indonesian Ministry of Trade is the responsible unit for the IEU-CEPA negotiations (Kemendag, 2019a). The 8th round of the IEU-CEPA was held in Jakarta on 17-21 June 2019, and Director General of International Trade Negotiation Imam Pambagyo led Indonesia's delegation. Between the negotiations, both parties held a special session on palm oil. In this session, the EU conveyed the development of the EU RED Delegated Act and Indonesia addressed the development of strengthening the ISPO (Kemendag, 2019a). The 9th round of the IEU-CEPA negotiation was conducted on 2 – 6 December 2019 in Brussels. Indonesia's head of delegations was the vice trade minister. He emphasised to the EU counterpart that palm oil is a part of the negotiation. He further stated that there are two working groups discussing palm oil issues in IEU-CEPA. The Working Group of Trade discussed the topic of liberalisation on the tariff in goods. Then, the topic of the sustainability of palm oil was discussed by the Working Group of Trade and Sustainability (Kemendag, 2019b).

Indonesia's moves attempt to influence the EU RED can be identified as horizontal moves. Indonesia used its state instruments, such as their Embassies in the European countries, to directly influence the government of the EU and its member states. They also used the IEU-CEPA as a strategy to have their interests on the negotiation table. However, these horizontal moves were not without obstacles, as the Indonesian embassies in foreign countries often faced lengthy bureaucratic coordination process with Jakarta (Interview 20).

4.3.3.3 ASEAN

The Association of Southeast Asian Nations (ASEAN) was established on 8 August 1967. Two important aims of ASEAN are to promote and maintain regional stability, and to accelerate economic development in the region through cooperation. Indonesia has a significant influence in the region as it is one of the ASEAN founding fathers, has the largest population and has one of the fastest growing economies in the region.

Four ASEAN member states, namely Indonesia, Malaysia, Vietnam and Thailand, are intensifying their crop-based biofuel production. Malaysia is also the second-biggest palm oil producer. Together with Indonesia, Malaysia has been vocal in protesting the revision of the EU RED (Ng, 2019). The moves of Indonesia with ASEAN can be identified as vertical moves. Indonesia has quite a lot of power among ASEAN member states. Thus, Indonesia used regional diplomatic ties as an avenue to influence the revised EU RED.

In January 2019, ASEAN and EU agreed on the establishment of the Joint Working Group on Palm Oil. This inter-bloc working group was a starting point to recognise the sustainability efforts in managing palm oil. At the time of this study, the EU has drafted the Terms of Reference and it was sent back from Jakarta after being reviewed by ASEAN member states (Interview 20). However, seeing from the lengthy bureaucratic process and the strong environmental concerns in the EU, it could be challenging to achieve the resolution (Ng, 2019).

4.3.3.4 CPOPC

The Council of Palm Oil Producing Countries (CPOPC) was established by Malaysia and Indonesia in 2015 as a platform to promote palm oil and liberalise trade barriers. This council is used by Indonesia to build an alliance, with Malaysia and other producing countries, and to promote its interest in palm oil issues. Creating a new alliance at the international level can be categorised as a horizontal move, because Indonesia stretched its power as the biggest palm oil-producing countries in the alliance. It is being said that Honduras has signed up to become a member and that Nigeria and Papua New Guinea are planning to (Bernama, 2019). Starting from June 2019, this council is chaired by Malaysia and co-chaired by Indonesia. Both Indonesia and Malaysia interacted through CPOPC to respond to the revised EU RED.

CPOPC perceived that the revised EU RED is a policy to exclude the palm oil from the European market (Kemlu, 2019b). They claim that the revised EU RED was issued to protect the EU's vegetable oils, such as rapeseed. The institution also perceived that many issues should be discussed between palm oil-producing countries and the EU, such as the sustainability standards of palm oil and the certification schemes (Interview 15). CPOPC facilitated ministerial meetings for its member states and observers. The first ministerial

meeting was in April 2017, attended by the Indonesian Coordinating Minister Darmin Nasution and the Malaysia Plantation Industries and Commodities Minister Datuk Seri Mah Siew Keong. The meeting resulted in the decision to send a ministerial mission to the EU. In April 2019, the CPOPC had a Joint Mission in Brussels.

The delegations consisted of officials from Indonesia and Malaysia, and Colombia as an observing country. Sending a delegation to Brussels aimed to build a dialogue with the EU, and to express the disagreement on the revised EU RED and its Delegated Act. The second Ministerial Meeting was held in November 2019. This meeting addressed the roles of CPOPC to include more collaboration with other international stakeholders that can benefit the palm oil-producing countries. From the meeting came the conclusion that palm oil producing countries were to increase technical capacity and smallholder productivity. Another reason why the CPOPC invited the producing countries was to defend palm oil from protectionism and restrictive measures by the WTO (CPOPC, 2019). Indonesia and Malaysia attended this meeting as member states. It was also attended by other producing countries such as Honduras, Papua New Guinea, Colombia, Thailand, Ghana, Nigeria, and Brazil. Indonesia's representative for this meeting was the new Coordinating Minister of Economic Affairs Airlangga Hartanto.

4.3.3.5 WTO

Indonesia has been a member of the WTO since 1995 and one of the members of the General Agreement on Tariff and Trade (GATT) since 1950 (WTO, n.d.). Regarding the historical relations between Indonesia and the EU in the WTO, Indonesia submitted a complaint in 2014 to the Dispute Settlement Body (DSB). At that time, Indonesia challenged the EU's regulation on import tariffs for Indonesia's and Argentina's biofuel. It turned into a lawsuit that Indonesia has won.

Because of the issuance of the revised EU RED, several Indonesian government officials released official statements informing the public about the plan to go to the WTO DSB. Then, the Indonesian government submitted a complaint to WTO Technical Barriers to Trade Committee meeting in June 2019. According to a speech transcript of Indonesia's delegation at the WTO Technical Barrier to Trade meeting, the government of Indonesia addressed its concern related to ILUC assessment. In that meeting, the Indonesian delegation stated that the revised EU RED, which removes competition between imported and homegrown vegetable oils, is a discriminatory and protectionist act.

On 9 December 2019, Indonesia has submitted an official request for consultations to the EU regarding the revised EU RED. On 16 December 2019, this request for consultation was already circulated among WTO member states. The WTO's request for consultation is a platform to discuss problems between member states and to find a solution without proceeding to the litigation process. However, if after 60 days still no agreement is reached, Indonesia as the complainant can request a judicial process to the EU (WTO, 2019).

4.3.3 Analysis of Indonesia's Move to Respond EU RED

The concept of sovereignty games is used as a lens to analyse Indonesia's move. Referring to the concept's definition by Adler-Nissen & Gammeltoft-Hansen (2008), sovereignty games is a constructed concept to understand how an actor plays the notion of sovereignty to protect its autonomy and enhance its influence. However, in this case, both Indonesia and the EU acknowledged their autonomy. The EU emphasises that the EU RED is issued for its member states. Indonesia also acknowledged that the EU RED is a legally binding directive for the EU's member states. However, Indonesia perceived that the EU's standards for sustainable palm oil influences the image of Indonesia's palm oil.

In responding to the EU RED, the sovereignty games were played in two different arenas: the domestic and the international arenas. In the domestic arena, the games were played by different ministries stretching their given mandate to respond to the EU RED. Meanwhile, the international arena is where Indonesia as a sovereign state interacted with different actors to influence the EU RED. Indonesia strategically chose with which actors and in which arenas they wanted to play the games. For instance, to indirectly influence the EU RED, Indonesia chose to negotiate bilaterally through the IE-CEPA. Then, in the region of Southeast Asia, Indonesia used ASEAN as a platform to discuss palm oil issues with the EU by establishing the Joint Working Group on Palm Oil. Indonesia also used multilateral forums such as WTO or created a new alliance (CPOPC). Finally, by interacting with different actors in different arenas, the Indonesian state could indirectly influence the first and revised EU RED. Moreover, Indonesia was able to create new norms and rules by creating a new alliance (CPOPC).
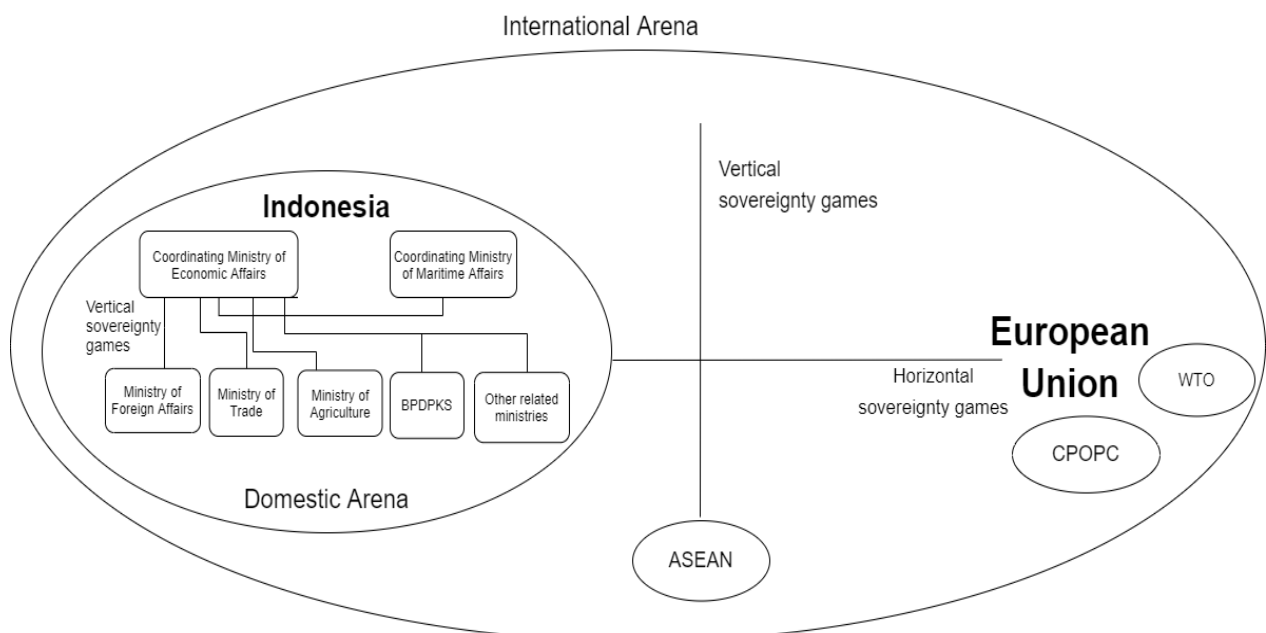

Figure 12. Actors Involved in Sovereignty Games Played by Indonesia

5. Discussions

This chapter aims to reflect upon and discuss: the research findings (organised per research question); the research objectives; and the conceptual framework and methodology used in this research. From this, recommendations for future studies and policymaking will follow.

5.1 Reflections on Answers to the Research Questions

The main research question this study set out to answer was: "Why and how have Indonesian public authorities responded to the EU RED I and RED II?" To answer this question, four sub-research questions were formulated and will be discussed in this section.

The first sub-research question asked: "What actors and knowledges were involved in the drafting of the EU RED I and EU RED II?"

In answering the research question, the study traced the historical development of the first and revised EU RED. The EU is the main policy actor that created the first and revised EU RED. It has the power to include or exclude actors in the decision-making process. Because Indonesia is not an EU member states, they were not directly involved as decision-makers of the directives. However, the EU invited Indonesia, as one of the main palm oil-producing countries, in a stakeholder consultation of the revised EU RED drafting process. Besides the Indonesian government, the EU also invited the palm oil companies from Indonesia.

Knowledge for the EU RED were mainly provided by EU policy actors. For instance, the methodology to assess the ILUC was based on the research conducted by the EU. This methodology was challenged by palm oil-producing countries such as Malaysia and Indonesia, because palm oil is categorised as a crop with high ILUC risk in the revised EU RED. However, they could not directly influence the issuance of the revised EU RED. It was difficult for Indonesia to influence and include its interest in the revised EU RED because Indonesia is not the main decision-makers.

The second sub-research question was about the perception the Indonesian government on the first and revised EU RED for Indonesia's palm oil.

This study shows that the existing palm oil trade between Indonesia and the EU has caused the interactions between the two actors. Thus, when the revised EU RED categorised palm oil as a crop with high ILUC risks, it had consequences for Indonesia's palm oil export to the EU market. In this research, these interactions were analysed using the framework of policy interactions. It also discussed several palm oil related policies such as RANKSB, a moratorium of peatland, and ISPO. A reflection shows that the EU RED affected Indonesia's policies. For instance, Indonesia strengthened RANKSB by changing it from a Ministerial Decree into a Presidential Decree and Indonesian government officials planned to increase the acceptability of ISPO. These moves happened during the discussions of the revised EU RED in the EU parliament level.

Several perceived consequences are found in the identified counter-frames. Frame packages were collected through media-framing analysis and interview analysis. Then, the study used

the theoretical framework of counter-frames as a lens to analyse the identified frame packages. This study identified four frame packages. Three counter-frames were found from media framing analysis, which are: the revised EU RED is a trade discrimination that will limit Indonesia's palm oil to EU's market, the revised EU RED will affect the smallholders on palm oil sector, and the perception on the method to assess ILUC in the revised EU RED. These three frame packages were also found in the interviews. One additional counter-frame was captured via the interviews only, namely the revised EU RED as a form of selling another certification. This counter-frame only showed up in the interview analysis because the interview respondents were Indonesian government officials from several ministries and mostly involved in the technical issues. Thus, more technical specific counter-frames can be seen only in the interviews.

The third research question asked in what ways the government of Indonesia tried to influence the first and revised EU RED.

This study has identified several moves the Indonesian government made to respond and influence the first and revised EU RED. Indonesia did not show strong responses to the first EU RED because the first EU RED accommodated them to export more palm oil as a biofuel base to the EU market. Meanwhile, the revised EU RED was perceived as a barrier for Indonesia to export its palm oil. Therefore, the answer to this question is more focused on how Indonesia tried to exert influence on the revised EU RED.

The study used the concept of sovereignty games and distinguished Indonesia's responses based on two arenas: the domestic and the international arena. At the domestic level, the different ministries used their given mandate to respond to the EU RED. They were more structured and consolidated in their efforts to influence the revised EU RED than the first EU RED. At the international arena, the research has found that Indonesia directly interacted with the EU and indirectly influenced the first and revised EU RED by interacting with other state actors and international organisations.

At the international arena, Indonesia made a horizontal and vertical move to conduct diplomatic negotiations with other countries or international organisations. Several actors that have been discussed are EU, Malaysia, ASEAN, and WTO. Indonesia also created a new alliance with palm oil-producing countries. From this case, it can be argued that policy actors can establish a new institution to accommodate their interest.

Finally, the last sub-research question asked about the manoeuvre of the Indonesian government in planning palm oil trade in the future.

In one of the captured counter-frames, Indonesia's plan for palm oil trade can be seen. Domestically, the government of Indonesia instructed a policy that emphasises on the absorption of palm oil supply for the domestic market. At the international level, the Indonesian government focused on promoting the sustainable palm oil and economic diplomacy. Through economic diplomacy, Indonesia aimed to promote a better image on palm oil and to expand the export to the new markets. Finally, the Indonesian government is currently going through the WTO's litigation process because they perceive the revised EU RED as a trade violation under the WTO law.

5.2   Reflections on the Objectives of the Research

There are four objectives for conducting this research and they explained in different sections. Firstly, objective of contributing to existing debates about sustainability politics in governing palm oil sectors is elaborated on in Section 5.2.1. Secondly, objectives regarding the use and contributions to scientific literature about several policy interactions, counter-frames, and sovereignty games are discussed in Section 5.2.2. Moreover, Section 5.2.3 is discussed about the methodology used in this research. Finally, the fourth objective is to provide insights on how policy dialogue between Indonesian and the EU can be strengthened. From studying this case, several recommendations on future dialogues between Indonesia and the EU have been formulated in the Section 5.2.4.

5.2.1 Contribution to the Existing Debate on Sustainability Politics in Governing Palm Oil

The emergence of private certification in governing global commodities is often explained as being caused by the absent role of the states in sustainably governing the commodities. Previously, there was an emerging rivalry between private and public actors (See 4.1.1.2). However, this study argues that states still play a prominent role in governing sustainable commodities. This can be seen in the fact that the EU had the capability to categorise palm oil as a crop with a high ILUC risk. On top of that, the EU had the power to determine which certifications schemes are seen as valid. The rivalry between Indonesia and the EU in determining and influencing sustainability standard of palm oil has been the focus of this study. Thus, the research presented an in-depth study about the increasing roles of state actors in governing the sustainability standard of palm oil.

5.2.2 Reflections on the Conceptual Framework

This section provides a discussion of the concepts used in this research. The explanations aim to achieve the first and second objective of this research, namely, to describe the policy interactions between Indonesia and the EU over the first and revised EU RED and to contribute to existing literature about sovereignty games and counter-frames. The research used multiple conceptual frameworks, which are policy interactions, counter-frames, and sovereignty games. The use of different concepts as a tool of analysis on this case was helpful to analyse the complex study case. With using three different concepts, each concept complemented each other. However, to be relevant for this case, the concepts need to be integrated and adjusted.

The research shows that the emergence of economic interdependence has caused environmental policies to have extra-territorial implications. The research used the framework of policy interactions to see those cross-border implications. According to Sorrel (2013), the concept of policy interactions is defined as the situation where one policy has an implication on another policy. The framework provided a typology of policy interactions to illustrate interactions among policies. However, the framework of policy interactions has limitations in understanding the interactions and powers of policy actors. To be applicable in this research, it is considered important to include the study of actors and their power in discursively

influencing a policy. Thus, the concept of sovereignty games and counter-frames were used to elaborate on the aspects of policy actors' interactions and their discursive power.

The second theoretical approach in this research is the concept of counter-frames. This concept was used to capture the perception of Indonesian government officials on the first and revised EU RED. Counter-frames have been found and discussed in this study. These frames were used by the Indonesian government to challenge the EU RED discursively. Thus, the counter-frames can be categorised as a move of the Indonesian government to respond to the EU RED.

The classic Westphalian definition of sovereignty declares that all states are sovereign in their territories (Enabulele, 2010) and cannot intervene in the internal affairs of other states or claim their territories (Krasner, 2004). Meanwhile, Adler-Nissen & Gammeltoft-Hansen (2008) define the concept of sovereignty games as a constructed game where the actors claim their authority outside their sovereign boundaries. However, this study shows that Indonesia did not play sovereignty games as an attempt to claim territory. The games were played to challenge the EU's claim over the sustainability level of palm oil.

The EU created the first and revised directives to regulate renewable energy use for its member states. Indonesia acknowledged that the first and revised EU RED are '*a country-centric policy*' with legally binding policies for EU member states (Interview 3). Indonesia then played sovereignty games over the knowledge claims on sustainability levels of palm oil. The moves of Indonesia were based on economic reasons, because Indonesia perceived that the EU has a big role in determining a sustainable standard. Moreover, the EU RED also influenced the access of palm oil trade in the EU and international market. In the games, Indonesia challenged the legitimacy of the ILUC methods created by the EU in the revised EU RED and made claims on the sustainability of its palm oil (through counter-framing).

Indonesia's efforts in playing sovereignty games can be seen from the way they moved in different arenas and interacted with different actors. It was argued in the study that Indonesia cannot directly influence the EU to change the EU RED. However, it could be seen that Indonesia played sovereignty games to indirectly influence the EU. In playing the horizontal games at the international level, Indonesia chose different actors and arena to influence the first and revised EU RED. For instance, in playing horizontal sovereignty games with the EU, Indonesia used IEU-CEPA to negotiate. They had to use IEU-CEPA for this, because Indonesia's interests in palm oil issues could not be accommodated directly in the revised EU RED since Indonesia is not an EU member states.

Indonesia was be able to set a new rule of the games by choosing other actors as the new negotiation partners. For example, Indonesia moved vertically by interacting with ASEAN and CPOPC to create an alliance with palm oil-producing countries. Moreover, Indonesia filed a lawsuit to the WTO and used the WTO as a third party to influence the revised EU RED. Indonesia also used diplomacy to promote palm oil on African market.

At the domestic level, the sovereignty games can be seen from the involvement of the two Coordinating Ministries. The Coordinating Ministry of Maritime Affairs moved vertically to be involved, even though palm oil is the responsibility of Coordinating Ministry of Economic Affairs. The Coordinating Ministry of Maritime Affairs played the game using the state laws

that mandated the energy sector to this ministry. However, the study cannot capture many claims of mandate among different ministries in responding to the EU RED. It is because in responding to the EU RED, it is more focused to play in the international arena to influence the revised EU RED. Moreover, there were less moves in the domestic arena as Indonesia's ministries spoke with one voice.

Finally, this research has identified that Indonesia moved by creating counter-frames over the first and revised EU RED. However, it is argued that the concept of counter-frames cannot be integrated with the concept of sovereignty games as a move. This is because that framing is another dimension of sovereignty games. The components of moves, players, and rules were emphasised in the sovereignty games framework. Meanwhile, when analysing the counter-frames of Indonesia, it was able to capture the framing of rules, the framing of actors, and the framing of moves.

5.2.3 Reflections on Methodology

The research used different methods in collecting data, which are in-depth interview, media framing analysis, and document analysis. These methods were complementary to each other. The in-depth interview could provide information about behind-the-scene processes. The media framing analysis and the interview analysis were used to collect the counter-frames. Thus, the counter-frames were based on the collected data from both methods. Lastly, the document analysis provided secondary data to the research.

Several challenges were faced in conducting interviews, such as complex bureaucratic procedures and unclear authorities within an institution. On top of that, the research dealt with sensitive issues, such as the reasons behind the states' actions or power-relations among ministries. Because the interviews discussed sensitive issues, several interviewees refused to be recorded and quoted (even anonymously) in this report. Then, some interviewees could not provide a clear answer to several sensitive questions. Thus, triangulation was crucial for the validity of this research.

In-depth interviews provided slightly more counter-frames than the newspaper articles. This is because most of the respondents in this research were handling technical issues. That is also why the counter-frames about the certification could be captured from the interviews. However, two limitations are recognised from capturing the counter-frames through in-depth interviews. Firstly, there is a limitation to generalise the counter-frames as several ministries' officials could not be interviewed. Secondly, the research could not capture the counter-frames on the first EU RED from the respondents because some of them had not yet been involved at that time.

There were challenges in collecting documents and newspapers. As the discussions and negotiations on the revised EU RED are still on-going, it is difficult to always follow-up on these changes. In sampling the news article, the researcher chose to end the collecting phase of the news article at the end of fieldwork time (August 2019). Even though this time frame provides enough data to capture the counter-frames of the Indonesian government, in reality,

both newspapers were still publishing more news articles regarding the EU RED after August 2019.

Finally, the triangulation process is very useful for the research to increase and assess the validity with different sources of data. However, this study has a low external validity as the scope of the research is limited to the interactions of Indonesia and the EU over the EU RED. Thus, conclusions cannot be directly generalised to the outside research condition.

5.2.4 Recommendation for Policymaking

In this section, several recommendations have been formulated to strengthen the policy dialogue between Indonesia and the EU, and for Indonesia to strengthen its role in the negotiation of sustainable palm oil. This research argues that Indonesia's responses to the first and revised EU RED are based on the economic and trade reasons. The first and revised EU RED have cross border implications to Indonesia due to economic relations. A large share of Indonesia's palm oil is sold on the EU's market, and it is difficult for Indonesia to replace the EU's market. Besides that, the EU has a big influence on determining the sustainability standard in the international market. In responding to the EU RED, Indonesia was able to declare its national position. They also had the resources to send delegations to negotiate in Brussels and other EU countries and gave stronger responses on the directives. However, Indonesia could not stop the EU from issuing the directive, as Indonesia is not a member state of the EU.

At the domestic arena, this study would like to recommend Indonesia to address its challenges in the palm oil sector. The Indonesian government must address the existing domestic problems, such as inter-ministerial coordination and implementation of domestic policies (e.g. RANKSB, ISPO, and a moratorium of peatlands). Meanwhile, at the international level, Indonesia must focus on enhancing its partnership through economic diplomacy with the EU and other actors. Studying Indonesia's counter-frames, it has become clear that countering the EU RED with strong threat responses were not a solution. The Indonesian government must strengthen partnership and economic diplomacy with other actors, such as CPOPC and ASEAN. These actors can bridge the discussion with the EU. Another important point has to be made on Indonesia's ability to underpin their claims of sustainability with proof. Words alone are not enough; Indonesia must be able to prove the sustainability level of its palm oil sector to the EU and international community. Indonesia should increase its research on science policy if they want to challenge the legitimacy of EU's methodology. By proving the sustainability level of their palm oil, they can strengthen the acceptability of palm oil in the international market and proving the sustainability practices did by Indonesia in governing its palm oil.

5.3 Recommendations for Future Study

Based on this research, additional studies about the role of states in sustainability politics are recommended. Firstly, it is highly recommended to study how the EU and its member states formulated the EU RED. By studying specifically about the EU, it will provide a more comprehensive insight about each member states' role in the decision-making process of

determining the ILUC standard and the policies on renewable energy. Secondly, the study about the approved certification by the EU RED can give insights on how states collaborate with the private sectors. Finally, further research to study the theoretical perspective of this research can be conducted, such as a study to address the cross-border policy influencing in determining sustainability standards.

6. Conclusion

This research has studied the interactions between Indonesia and the EU over the first and revised EU RED. In studying this case, the research has used different theoretical frameworks consisting of policy interactions, counter-frames, and sovereignty games. Besides, using multiple frameworks, the research has been conducted with different methodological approaches, which are in-depth interviews, media framing and document analysis. Studying the case with multiple approaches has given the answers to the research questions. The main findings of why and how the Indonesian government responded to the first and revised EU RED are discussed as follows:

The implications of the first and revised EU RED happened outside the boundaries of the EU, where it affected Indonesia as a non-EU member state. The framework of policy interactions was used to illustrate the implications. Meanwhile, the study used the counter-frames and sovereignty games frameworks to study the involvement of policy actors and the extra-territorial interactions of the first and revised EU RED.

The framework of policy interactions provided answers about the reason behind Indonesia's responses to the EU RED. The main reason of Indonesia's responses to the issuance of the EU RED, especially the revised one, is that it had implications on Indonesia's palm oil trade access on the EU's market. The implications are due to a trade interdependence of palm oil commodities between Indonesia and the EU. In the decision-making process of the first and revised EU RED, Indonesia had difficulties in influencing the directives. This is because the target group of the directives are EU member states, which Indonesia is not. However, the EU invited Indonesia to be in the stakeholder consultations. Even though the EU involved Indonesia in the decision-making process, Indonesia could not change the directives because Indonesia is not an EU member states.

The counter-frames and sovereignty games framework were used to analyse the moves of Indonesia in responding to the EU RED. Four counter-frames were captured in this research. Three of the counter-frames were captured from media-framing analysis, while one additional counter-frame was captured from the interview analysis. These counter-frames were used by the Indonesian government to influence public opinion and challenged the EU discursively.

Indonesia responded to the EU RED at the domestic and international arena. At the domestic arena, the games were played by different ministries to claim a mandate to respond to the EU RED. Meanwhile, at the international arena, Indonesia as a sovereign state interacted with other state actors and international organisations to influence the EU RED, directly and indirectly. At the international arena, Indonesia combined the use of horizontal and vertical moves. Indonesia has tried to influence the EU RED indirectly by interacting with international organisations, such as the WTO. Indonesia also indirectly interacted with the EU by using other issues, such as IEU-CEPA, to include its interest in palm oil on the negotiation with the EU. Then, Indonesia moved vertically by using its power to create an alliance with palm oil-producing countries and ASEAN. To conclude, Indonesia played sovereignty games by influencing the first and revised EU RED to win over the trade access to the EU's market.

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Appendix 1. List of Respondents

No	Affiliation	Date of Interview	Location	Type of Interview
1	Deputy VII, International Economic Cooperation, Coordinating Ministry of Economic Affairs	27 August 2019	Jakarta	Face to face
2	Deputy VII, International Economic Cooperation, Coordinating Ministry of Economic Affairs	27 August 2019	Jakarta	Face to face
3	DG of Plantation, Ministry of Agriculture	29 August 2019	Jakarta	Face to face
4	DG of Plantation, Ministry of Agriculture	29 August 2019	Jakarta	Face to face
5	DG of International Trade Negotiations, Ministry of Trade	30 August 2019	Jakarta	Face to face
6	Policy Analysis and Development Agency, Ministry of Foreign Affairs	3 September 2019	Jakarta	Face to face
7	EU Mission in Jakarta	4 September 2019	Jakarta	Face to face
8	Researcher, IPB	5 September 2019	Bogor	Face to face
9	International Cooperation Bureau, Ministry of Agriculture	6 September 2019	Jakarta	Face to face
10	DG Food and Agriculture, National Development Planning Agency (Bappenas)	10 September 2019	Jakarta	Face to face
11	Indonesian Palm Oil Producers Association (GAPKI)	10 September 2019	Jakarta	Face to face
12	Researcher, WUR Phd	12 September	Bogor	Face to face
13	Indonesian Oil Palm Estate Fund (BPDP KS)	16 September 2019	Jakarta	Face to face
14	Indonesian Oil Palm Estate Fund (BPDP KS)	16 September 2019	Jakarta	Face to face
15	Council of Palm Oil Producing Countries (CPOPC)	17 September 2019	Jakarta	Face to face
16	Council of Palm Oil Producing Countries (CPOPC)	17 September 2019	Jakarta	Face to face
17	Researcher, PASPI	18 September 2019	-	Email Correspondence
18	Former official at ISPO	20 September 2019	Bogor	Face to face
19	Indonesian Embassy in The Hague	22 October 2019	The Hague	Face to face
20	Indonesian Embassy in Brussels	24 October 2019	Brussels	Face to face
21	Indonesian Embassy in Brussels	29 October 2019	-	Whatsapp call
22	DG Energy, EU Commission	24 October 2019	Brussels	Face to face

Appendix 2. Interview and News Article Samples Coding Step

A. Interview Steps

1. Requesting and scheduling interview: Sending letter of interview request through institution's contact point, e-mail or Whatsapp to the interviewees. Explain briefly about myself and the research when sending the request.

2. During the interviews:

a. Introducing myself and my research briefly

b. Asking for interviewee's consent and assuring the confidentiality of the interviewees

c. Get to know in brief about the role of my interviewees in palm oil sectors

d. Asking questions from interview guide and elaborate by asking follow-up questions

Interview Guides:
- How do you, as Indonesian government officials, perceive the EU RED I and the revised EU RED?
- What actors were involved in the drafting of the EU RED I and the revised EU RED II?
- What were the basis of EU RED I and the revised EU RED II?
- How the EU RED and the revised EU RED impact Indonesia's palm oil industry?
- How Indonesia respond the EU RED, particularly your ministry?
- How the development of interaction from EU RED to the revised EU RED?
- Which actors are involved in the interaction between Indonesia and EU?
- How is the coordination of Indonesian government to respond to the EU RED?

B. News Article Samples Coding Step

1. Focus on the framing devices (Explicit statement)

2. Use the key concept to code: "black campaign", "discrimination", etc

3. Code the verbal devices "to protect the market", etc

4. Focus to find reasoning devices (implicit framing) by carefully reading, and confirm it with the interview

5. Count one frame happens once in an article

6. Because I think it important to know which Indonesian government officials involved in the framing, I coded the engaged stakeholders in the framing

7. Count one stakeholder once in an article

Appendix 3. Code Book

Code_English	Code_Indonesian	Code Group 1	Code Group 2	Code Group 2	Code Group 3	Code Group 4[4]
Act_Bappenas	Act_Bappenas	Actor				
Act_BPDP	Act_BPDP	Actor				
ACT_BPS	ACT_BPS	Actor				
ACT_DPR	ACT_DPR	Actor				
ACT_Kemendag	ACT_Kemendag	Actor				
ACT_Kemenko Kemaritiman	ACT_Kemenko Kemaritiman	Actor				
ACT_Kemenko Perekonomian	ACT_Kemenko Perekonomian	Actor				
Act_Kemenperin	Act_Kemenperin	Actor				
Act_Kementan	Act_Kementan	Actor				
Act_Kemlu	Act_Kemlu	Actor				
Act_KLHK	Act_KLHK	Actor				
Act_President	Act_President	Actor				
black campaign	kampanye hitam		Economic Barrier			
discrimination	diskriminasi		Economic Barrier			
market access	akses pasar		Economic Barrier			
protectionism	proteksionisme		Economic Barrier			
economy	ekonomi			Palm oil contribute to SDG		
productive	produktif			Palm oil contribute to SDG		
smallholder	smallholder			Palm oil contribute to SDG		
ILUC validity	ILUC				Method Validity	
policy improvement[5]	perkembangan kebijakan				Method Validity	
RSPO	RSPO					Selling of new certification
Sustainable certification	Sertifikasi					Selling of new certification

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[4] This code exists only in the interview

[5] this code consists of several government policies: ISPO, Moratorium peatland and palm oil, NAP, REDD

Appendix 4. Total Frame Occurrence in the News Paper Articles

(frames are counted once in a news article)

Newspaper: The Jakarta Post			Total news sample: 34
Year	Frames		
	Trade Barriers	Contribution to SDGs	Method validity
2008	1	0	0
2009	0	0	0
2010	0	0	1
2011	0	0	0
2012	0	0	0
2013	0	0	0
2014	1	1	0
2015	0	0	0
2016	0	0	0
2017	3	1	1
2018	3	2	2
2019	11	8	8
Total	**19**	**12**	**12**

Newspaper: Antara News			Total news sample: 70
Year	Frames		
	Trade Barriers	Contribution to SDGs	Method validity
2008	0	0	0
2009	0	0	0
2010	2	2	0
2011	0	0	0
2012	0	0	0
2013	0	1	0
2014	0	0	0
2015	0	0	0
2016	0	0	0
2017	4	3	2
2018	10	6	3
2019	36	21	18
Total	**52**	**33**	**23**

Total article 104

Total occurrence

Counter Frame 1: Trade Barriers	71
Counter Frame 2: Contribution to SDGs	45
Counter Frame 3: Method validity	35

Appendix 5. Total Frame Occurrence in Interviews with Indonesian Government Officials

(frames are counted once in a news article)

Respondents	Institution	Counter-Frame			
		Trade Barriers	Contributions to SDGs	Method Validity	Selling of new certification
Interview 1	Coordinating Ministry of Economic Affairs	✓	✓	✓	✓
Interview 2		✓	✓	✓	✓
Interview 3	Ministry of Agriculture	✓	✓	✓	✓
Interview 4		✓	✓	✓	✓
Interview 9		✓	✓	✓	-
Interview 5	Ministry of Trade	✓	✓	✓	-
Interview 6	Ministry of Foreign Affairs	✓	✓	✓	✓
Interview 10	Bappenas	-	-	-	-
Interview 13	BPDPKS	✓	✓	✓	✓
Interview 14		✓	✓	✓	✓
Interview 19	Indonesian Embassy	✓	✓	✓	-
Interview 20		✓	✓	✓	-
Interview 21		-	-	✓	-
Total Occurrence		**11**	**11**	**12**	**7**

Appendix 6. Stakeholders Involvement in the Frames (stakeholders are counted once in a news article)

Stakeholder	2008		2009		2010		2011		2012		2013		2014		2015		2016		2017		2018		2019		Total
	JP	AN	JP	AN	JP	AN	JP	AN	JP	AN	JP	AN	JP	AN	JP	AN	JP	AN	JP	AN	JP	AN	JP	AN	
National Development Planning Agency (Bappenas)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	**1**
Palm Oil Estate Fund (BPDPKS)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	1	**3**
Statistics Indonesia	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	**2**
House of Representatives (DPR)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	1	4	**6**
Min of Trade	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	2	0	2	3	2	**10**
Coord Min of Maritime Affairs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	3	6	**11**
Coord Min of Econ Affairs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	1	0	2	3	18	**25**
Min of Industry	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	**1**
Min of Agriculture	1	0	0	0	0	2	0	0	0	0	0	1	1	0	0	0	0	0	0	0	0	0	0	2	**7**
Min of Foreign Affairs	0	0	0	0	1	1	0	0	0	0	0	0	1	0	0	0	0	0	1	2	1	6	5	8	**26**
Min of Envi and Forestry	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	**1**
President	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	1	2	1	0	1	1	**7**