

# Komodo National Park: The Only Home of Komodo Dragons in Peril

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Komodo National Park (KNP) is the natural habitat for Komodo dragons (*Varanus komodoensis*), the world's largest surviving lizard with only 3,022 specimens remaining in the habitat. The park provides refuge for other notable terrestrial and critically endangered species, and it is also the home of the *Ata Modo* and *Ata Bajo* indigenous peoples who have dwelled in the area for centuries. Located in Manggarai Barat District, Flores, East Nusa Tenggara Province, Eastern Indonesia, Komodo NP is an archipelago region consisting of three main islands - Komodo, Rinca and Padar - and numerous small islands. In 1977, UNESCO recognized Komodo, Rinca and Padar Island as a "Man and Biosphere Reserve". In 1991, UNESCO declared Komodo National Park (KNP) as a World Heritage site for its superlative natural beauty, the Komodo dragon, marine and terrestrial biodiversity.



Fig. 1: Komodo Dragon (*Varanus komodoensis*). Photo: WALHI NTT, 2021

Today, KNP is facing threats that will directly harm the Komodo ecosystem and the existence of the indigenous peoples who live in the park. In the past two decades, mass tourism and deer smuggling put the sustainability of ecosystems in KNP at a higher risk. The government, however, has exacerbated conditions in the park by pushing tourism investment.



Fig. 2: The daily life of Ata Modo indigenous community in Komodo Village, Komodo Island.  
*Photo: WALHI NTT, 2021*

### **Threats and Problematic Policies Facing Komodo National Park**

Since the establishment of Labuan Bajo<sup>1</sup> as one of 10 national primary destinations which the government is billing as the “New Bali” in 2015, tourism development has changed from community-based to industry. To that end, the President Jokowi’s administration then issued a Presidential Decree in 2019 to include KNP and the surrounding area in the National Strategic Tourism Areas (KSPN). Through the Decree, KNP is targeted as the new epicenter of tourism investment in Flores island.

Under this new design, the government gears up for investment projects inside the park. There are three out of seven companies that have been granted permits by the government. Komodo Island, the land of the *Ata Modo*, will be specifically designated as a super premium tourism zone with an entrance fee of US\$ 1,000. In 2014, the government granted permits for PT Komodo Wildlife Ecotourism (PT KWE) to manage a total of 151, 94 ha in Long Liang and a total of 274,13 ha on Padar island. The government also is in the process of granting permits to PT Flobamora, a provincially-owned company, to build an exclusive resort on Komodo Island.

According to leaked meeting notes between the governor of East Nusa Tenggara Province and the KNP Office on July 23, 2019, the *Ata Modo* were to be relocated to Rinca island to support the project<sup>2</sup>. However, this plan and development have received waves of rejection by the *Ata Modo* community as it would put them at disadvantage. Before the government designated the area to be a national park in 1980, the local community voluntarily gave the land of their settlement to the government for conservation purposes. Now their land is given to PT KWE for tourism purposes.

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<sup>1</sup> Labuan Bajo is the capital city of West Manggarai, East Nusa Tenggara, which is also the entrance to Komodo National Park

<sup>2</sup> Tempo Investigation “Berebut Komodo” dated January 02, 2021.



Fig. 3: Ata Modo protesting against their removal from Komodo in 2019. *Photo: [www.portalntt.com/2000-warga-pulau-komodo-memilih-mati-daripada-direlokasi/](http://www.portalntt.com/2000-warga-pulau-komodo-memilih-mati-daripada-direlokasi/)*

In 2015, the government granted permits to PT Sagara Komodo Lestari for a total area of 22,1 ha for the development of a Jurassic Park for massive tourism on Rinca island. On Tatawa island, the government issued permits on April 24, 2020 to PT Synergindo Niagatama for developing underwater tourism business in a total concession area of 15,32 ha.



Fig. 4: Tourism concessions in Komodo NP. *Graphic: Sunspirit for Justice and Peace*



Fig. 5: Construction process still continuing on Loh Buaya, Rinca island. Photo: WALHI NTT, 2021

All of these permits for companies were granted after the government changed the zoning of the park in 2012. According to Decree No. 65/Kpts/DJ-5/2001 of the Directorate General of Natural Resources and Ecosystem Conservation on the zoning system of KNP, issued in 2001, Padar island only consisted of a core zone and wilderness zone. However, after the Ministry of Environment and Forestry issued Decree No. SK.21/IV-SET/2012, 303,9 ha of wilderness zone in Padar Island were converted into utilization zones. The same happened on Tatawa island. According to the 2001 Decree, the whole island was included in the wilderness zone, but the 2012 Decree converted 20,944 ha to be utilised for land tourism. Still part of the ambitious project, the government also plans to change the conservation status of Muang island and Bero/Rohtang island, two islets located between Rinca and Flores island which are included in the core and wilderness zones, and are respectively the natural habitat of Turtle and Yellow-Crested Cockatoo. Under this new scheme, the government plans to manage the islets as part of Tana Mori Special Economic Zone that covers an area of 560 ha.

In addition, the zoning policy directly impacts the indigenous peoples who mainly base their livelihood on maritime resources. They can only access two zones of the sea, the Traditional Nautical Use of 17,308 ha (since 2020 part of the renamed Local Community Traditional Zone), and the Pelagic Use / Traditional Pelagic Zone of 59,601 ha but requires fishermen to share it with tourism activities. The zoning has narrowed the fishing area even further and caused criminalization and intimidation of some indigenous people. Due to the failure to communicate the new zoning system, since 2012 at least 36 fishermen have been intimidated for entering the wrong zone, and one person was put into jail for entering the wilderness zone.



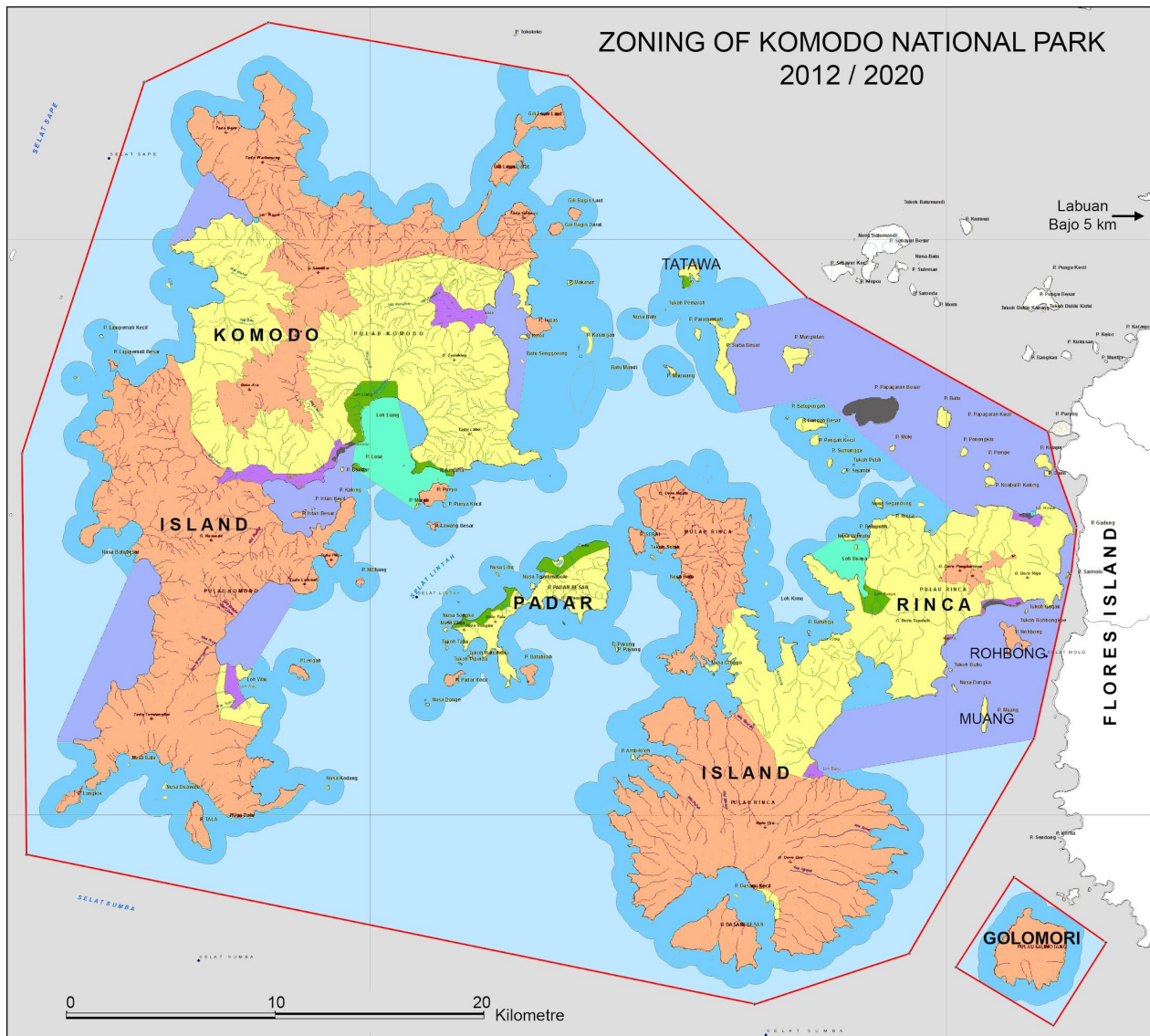
Picture 6: The local fishermen in Komodo island collectively operate local boats to catch fish as fishing is the main livelihood that supports the life of the people. Photo by: local community

In order to ensure a smooth process of investment in the National Park, the government keeps rearranging the zones of the park. On November 6, 2020, the Ministry of Environment and Forestry issued another Decree concerning zoning of KNP, noting that several zones in the 2012 Decree are not in accordance with its designation and are no longer relevant for the needs and external and internal dynamics of the management of KNP.<sup>3</sup> In the 2020 Decree, the zones are narrowed down from nine to seven zones. Even though the size of KNP in both 2012 and 2020 zoning remain the same, 173.300 ha. There is contradictory data in the document and map of the 2012 zoning system, in the Decree document of 2012 the total accumulated area of the park is 218.205 ha where in the map the size of the park is 173,300 ha. Comparatively with the new zoning in 2020, the wilderness zone which was recorded in the 2012 zoning documentation covered an area of 66.921 ha while in the 2020 zoning document, the wilderness zone covers a total of 22.192 ha which resulted 44.905 ha is lost in the wilderness zone from the previous zone. The property was inscribed as a National Park in 1980 and a World Heritage site in 1991 covered an area of 219.322 ha<sup>4</sup>. The shrink of 44.905 ha, raises a question about the official size of the national park.

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<sup>3</sup>Decree of the Directorate General of Natural Resources and Ecosystem Conservation No. SK.212/KSDAE/SET.3/KSA.0/11/2020

<sup>4</sup> The 1991 IUCN Evaluation Report document page 21



2012 Zoning and Total Area (map!)	2020 Zoning (renamed / merged)	Area changes 2012 =>2020
Core Zone (34.311ha)	Core Zone (34.305ha)	- 6ha
Wilderness Zone (22.187ha)	Wilderness Zone (22.192ha)	+ 5ha
Nautical Protected Zone (36.308ha)	Nautical Protected Zone (36.308ha)	0
Pelagic Use (59.601ha)	Traditional Pelagic Zone (59.601ha)	0
Settlement (298ha)	Special Zone (313ha)	+ 15ha
Land Tourism Use (824ha)	Utilization Zone (2408ha)	0
Marine Tourism Use (1.584ha)		
Land Traditional Use (879ha)	Local Community Traditional Zone (18173ha)	- 14ha
Nautical Traditional Use (17.308ha)		

Fig. 8: Zoning Map of Komodo National Park. Map: Martin Lenk.

## Zoning explanation of Komodo National Park

Zoning System		Designation
2012	2020	
Core Zone	Core Zone	Extremely and thoroughly protected area. Any change and intervention by human activity is strictly prohibited, except activities pertaining to research.
Wilderness Zone	Wilderness Zone	Any human activity is prohibited, as mentioned in the explanation about the core zone, except limited tourism activity.
Nautical Protection Zone.	Nautical Protection Zone.	Any activity involving sea product exploitation is prohibited in the water protection zone. The only allowed activities are those of limited nature tourism.
Land Tourism Utilization Zone.	Utilization Zone.	Intensively used for nature tourism activities.
Water Tourism Utilization Zone.		
Land Traditional Utilization Zone.	Local Community Traditional Zone.	The zone is utilized to accommodate the basic needs of the native residents. However, the land utilization in this zone requires a special permit from the head of the Komodo National Park. Native people are allowed to exploit the sea only if they use eco-friendly technology, such as a fishing rod.
Nautical Traditional Utilization Zone.		
Settlement	Special Zone	The zone is used for settlements for native residents. The ruling is based on the special regulation issued by the Komodo National Park and the local/regional administration.
Pelagic Use	Traditional Pelagic Zone	People are free to fish or exploit a variety of sea products in which the exploitation method is not limited only to the usage of eco-friendly technology. The zone is also available for any tourism activities.

\*source from Decree 2012 and Decree 2020 documents concerning the zoning of Komodo National Park.

Alarmingly, the Ministry of Environment and Forestry, who is supposed to be the main guardian of the Park, excluded the obligation to conduct Environmental Impact Assessments (EIA)<sup>5</sup> when developing infrastructure in the park. According to the Ministry, companies are not obliged to prepare EIAs because the development is already listed in the document on environmental management and environmental monitoring efforts (UKL-UPL) for protected areas. This alibi could be used to enable development in other protected areas, too. This exception also violates the principles of sustainable development as it neglects the significant assessment concerning the impacts on the social, economic and environmental aspects.

<sup>5</sup> Ministerial Decree No. S.576/KSDAE/KK/KSA.1/7/2020 concerning "The exception of EIA for the construction of tourism infrastructure in Komodo National Park"

The negative impacts resulting from the expansion of tourism development that ignores protection and conservation will continue and expand in the future. For instance, in 2009-2010, there was a surge of visitors from 36,000 - 45,000, which grew to 107,000 in 2016 with a majority of foreigners. This shows that infrastructure development leads to a proportional increase of visits. Despite the positive effect on state income, it will endanger the preservation of Komodo dragons and their habitats. The inevitable exposure to human activities, especially ecotourism, influences phenotypic and demographic aspects of the Komodo dragon's ecology. These protected species might lose their hunting instincts due to dependence on food from humans in tourism activities.<sup>6</sup> Furthermore, critically endangered endemic birds which inhabit the island will also become more vulnerable to the noise produced by human activities.

In addition, Komodo dragons are predicted to be extinct by 2050 due to climate change impacts on small islands if no quick mitigation efforts are taken in the park and its surroundings<sup>7</sup>. Since 2000, Komodo dragons have been extinct on Padar Island<sup>8</sup>. One of the triggers for this extinction lies in the Komodo dragon food chain. According to WALHI's records, from 2018-2019 there has been rampant smuggling of Komodo dragon prey such as deer. At the end of 2020, the West Manggarai Police managed to thwart the smuggling of 300 kg of dried venison which is equivalent to 20 deer. This should be an alarm for the government to make vigorous efforts to protect Komodo dragons from extinction.

## Key Recommendations

The problematic policies issued by the government in the management of KNP certainly violate the essence of the park as a conservation area. In efforts to protect KNP and its species from extinction, restore their habitats, and sustain the livelihoods of its indigenous peoples, we call on the Indonesian government to implement the following recommendations:

1. Revoke the concessions granted for private and state companies and thoroughly evaluate the planned development inside Komodo National Park.
2. Prioritize the interest of science in conservation and the protection of Komodo dragons from extinction.
3. Prioritize sustainable community-based tourism and conservation.
4. Revoke the conversion of the core zone and wilderness zone to become a special utilization zone for investment purposes.
5. Restore the marine culture of the Indigenous peoples which has slowly disappeared, and give up plans to relocate the indigenous peoples from their rightful home.

We call on the UNESCO World Heritage Committee and IUCN to consider the following recommendations:

1. Call on the Indonesian government to protect Komodo National Park from harmful development projects by suspending or cancelling permits within the Komodo National Park.
2. Call on the State Party of Indonesia to require EIAs in project mechanisms for conservation measures.
3. Call on national and international financial institutions not to support or fund any development projects in Komodo National Park that will directly or indirectly harm the Komodo National Park.

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<sup>6</sup> Ardiantiono *et al* (2018) Effect of Human Activities on Komodo Dragons in Komodo National Park.

<sup>7</sup> Alice R. Jones *et al* (2020) Identifying island safe havens to prevent the extinction of the World's largest lizard from global warming.

<sup>8</sup><https://regional.kompas.com/read/2019/08/16/18385061/cerita-punahnya-komodo-di-pulau-padar-perburuan-liar-hingga-pembakaran-lahan>



4. Request the State Party of Indonesia to submit to them, according to § 172 of the Operational Guidelines to the WH Convention, any plans for projects in or near KNP in order to allow UNESCO/IUCN an assessment whether these projects, if implemented, would adversely affect the Outstanding Universal Value of the property.
5. Request the State Party of Indonesia to invite a UNESCO/IUCN Reactive Monitoring Mission with a view to establish whether the property should be inscribed in the List of World Heritage in Danger.