

阿马扎尔林浆一体化项目（北极星林业经贸合作区）

Amazar Pulp and Saw Mill (Polar Star Forestry Trade Zone)

众多民间组织如今正高度关注一家充满争议并临近中国的俄罗斯纸浆厂，敦促相关公司、银行和投资方避免注资该项目。以下是对该项目高风险原因的全面分析，详细内容点击：

http://www.banktrack.org/project/amazarsky_pulp_and_paper_mill

基本介绍

阿马扎尔林浆一体化项目（APSM 项目）位于俄罗斯后贝加尔州的阿马扎尔河沿岸，靠近中国边界。该项目包括一个纸浆厂、两所木材加工厂、阿马扎尔河上的水坝和水库，以及其它辅助基础设施。该企业由中国黑龙江兴邦国际资源投资股份有限公司（HXIC）全资所有。

纸浆厂初期计划每年生产 243,486 吨纸浆。原本打算每年生产 40 万吨纸浆，由于森林资源稀缺被迫缩小规模。APSM 获准租赁近 260 万公顷森林，租期 49 年，其中一半面积是当地鄂温克族的传统使用区，另有一些地区之前被开辟为自然保护区。到 2016 年初，APSM 已租赁交易了中俄边界 22 万公顷的原始森林，其中一半是全球公认的重要和濒危老化森林。

为了完成 110 至 250 万立方米的年均木材产量，和生产年度所需的纸浆与木材，APSM 需要清除、砍伐森林。然而，方圆 250 公里的森林资源目前远无法支持 APSM 十年的运营。木材供应问题被该公司以及俄总统人权委员会于 2016 年 4 月正式承认。

历史简介

APSM 项目拥有复杂的历史，其中包括多次所有权的转移。

2003 年，俄罗斯后贝加尔州和中国黑龙江省签署了关于 APSM 建设的第一份协议。起初，工厂定于 2007 年正式投入使用。这份协议的存在是为了证明在伐木日益受限的中国东北，进口木材的合法性。“私营性质”的跨国木材运输发生在 2000-2008 年的冬季，每天有 60 辆卡车穿过冰封的阿穆尔河将原木材运送到中国。但由于多次违反俄罗斯法律和腐败丑闻，洛古河口岸于 2008 年被关闭。APSM 不断对俄罗斯官方施压，要求重新开放口岸，甚至建造一座大桥来促进俄方的年度出口量。2016 年，俄罗斯和中国交通运输部将洛古河—波克罗夫卡界河大桥和跨境有关的协议列入 2017 年议事列表。HXIC 宣称，跨境运输是中国“丝绸之路经济带”倡议的一个重要组成部分，尽管此项目曾被环保人士和研究者批评。

2010 年，国家开发银行通过[黑龙江龙兴国际资源开发集团有限公司](#)向 APSM 授予贷款 1.7 亿美元和 11.6 亿人民币。阿马扎尔河上的一座水库的建设始于 2012 年，没有进行适当的环境影响评估或公众咨询。一年后，2013 年，第一家木材加工厂建设完成，产能达到 10 万立方米，但到 2016 年才投入生产。2016 年，第二家木材加工厂建设完成，年产量至少 30 万立方米，但迄今为止尚未投入大规模生产。

2015 年 11 月至 2016 年 2 月期间，俄罗斯总统人权委员会对 APSM 进行影响调查，这促成了两个积极的进步。首先，在后贝加尔地区的莫戈恰区/Mogochinsky，占地面积为 239639 公顷的 Verkhneamursky（阿穆尔河上游）自然保护区正式成立并配备工作人员。贝加尔州副州长亚历山大·塞米托夫已经向高级委员会保证，将撤销中国伐木商目前租用的生物多样性丰富的成熟森林，并划入阿穆尔河上游自然保护区。第二，当地鄂温克人的传统使用地也将被从在采伐计划里撤销。

APSM 浆纸林一体化项目预计将于 2019 年底开始运作。

社会和人权影响

APSM 正在摧毁当地人民所依赖的生态系统。4000 多人居住在 Tungiro-Olekminsky 地区，其中 2000 人来自中西部西伯利亚、蒙古和内蒙古的鄂温克族，该项目威胁到这些当地民族的生计。由于 200 万公顷的森林已经被用于租赁，他们的土地将被毁坏。

依据传统，当地的妇女经常收集林下产品，如浆果、蘑菇、食用或药用草本。此外，在莫戈恰区/Mogochinsky，成千上万以此为生的职业猎人将会遭受所在地区森林资源被破坏的惨状。开放口岸将加强对中国伐木商的监督。由于没有经过环境影响评价或公众商议通过的大坝建设，阿马扎尔河被堵塞，当地人民被剥夺了为维持生计或为休闲娱乐的捕鱼权利。

当地居民失业率达到高峰，但公司没有履行聘用本地工人的义务。2016 年，尽管协议规定至少有 50% 的劳动力应该是当地人口，但公司依旧雇用了 90 名俄罗斯工人和 300 名中国工人。

再者，APSM 对当地社区造成持续不断的打击，并对阿马扎尔镇及其区域经济的发展造成负面影响。公司形成了自己独立的社区，与当地人民竞争资源和影响力。它试图开发自己的运输路线和系统，忽略了阿马扎尔镇是跨西伯利亚铁路的枢纽站的事实。来自中国的森林企业在获得森林租赁方面胜过本土商人的公司，这导致当地居民更难获得薪柴和林下产品。当地森林管理部门由于负责监督大型中国租赁业务而因此负担过重，所以服务当地人民生活的能力就十分受限。地方和地区层面的官员经常接受贿赂，以牺牲地方利益为代价为 APSM 提供优惠待遇，阿马扎尔镇当地的积极分子多次采取直接行动，避免 APSM 的违规行为，例如他们在居民点附近提取建筑材料。

环境影响

APSM 计划通过清除森林完成每年 115 万到 250 万立方米的伐木量，这将会导致诸多有害后果：

APSM 将破坏生物多样性的热点地区。大部分采伐计划在原始森林中进行，而目前工厂租用的大部分森林都是具有生物多样性最高值的完好原始森林，那里生活着许多稀有的动植物。

APSM 会导致森林砍伐和资源的破坏。俄罗斯绿色和平组织关于 APSM 项目所需木材的可用性的分析显示，方圆 250 公里的森林资源无法支撑纸浆厂十年的运作。政府委员会在一份关于公民社会发展以及俄罗斯联邦政府人权的报告中支持了这个观点。

该地区的北方森林（北方针叶林）生长缓慢，且生产力不高。这片区域受到气候波动的严重影响，导致永久冻土融化，进而使得森林再生更加困难。在此之后，地方官员也意识到遭遇火灾后的森林没有足够的资源来支持可持续生产。

该项目破坏了重要的水生生态系统。建立在阿穆尔河主要支流上的大坝严重危害了被列入世界自然保护联盟红色名录的稀有哲罗鲑 (*Hucho taimen*) 的数量。在不到 100 年的时间里，相邻支流上的一个较小的水坝已经将鱼类物种数量从 22 降至 3 个。而且，据预测，纸浆厂的运行也将造成严重的水污染及废弃物污染。

该地区将会被过度工业化。此公司计划重新开放俄罗斯波克罗夫卡到中国洛古河的口岸（洛古河临时过货通道），像 2000 至 2008 年一样将原木和木材运往中国。当地居民担心该项目以及口岸的再次开放将是本地区遭受无休止的工业化毁灭的开端。一路一桥将阿穆尔自然保护区一分为二，并将最后一片古老的森林曝于机器之下。这片森林坐落于俄罗斯境内，在界河阿穆尔河和额尔古纳河的沿岸。此工厂的所有者 HXIC 目前正在为项目建设奔走游说。

金融投资方

黑龙江兴邦投资有限公司（HXIC）是 APSM 的所有者。截止 2016 年 6 月，他们只筹集了完成了工厂建设阶段所需投资的一半。根据官方审核，筹资已达 22 亿人民币，项目所需总额为 49 亿人民币。

筹资来源分为三大类：

- HXIC 股东提供的资金，至少 7.5 亿人民币。
- 私营银行和开发银行发放的贷款，来自中信实业银行和中国国家开发银行，至少 1.7 亿美元和 5.36 亿人民币。
- 通过深圳证券交易所获得的来自中捷资源的融资。

中捷资源（[中捷资源投资股份有限公司](#)）是一家融资购买金马集团（[大兴安岭金马实业投资有限公司](#)）在兴邦投资有限公司 60% 股权的公司。用来收购 HXIC 并投资 APSM 的资金应由非公开发行股票募集。但是，由于造假和伪造项目，俄罗斯大规模的公众抗议，潜在的股东以及中国证券监督管理委员会直到 2015 年 11 月都在怀疑股票出售的合法性。从 2015 年 11 月至 2017 年 1 月，购买协议被改写六次，一个潜在的买方退出交易。与此同时，另外的九个买方将他们所要购买的中捷股份数额从 50 亿减持到 35 亿。根据 2017 年 1 月 21 日中捷的披露文件，中国证券监督管理委员会尚未提供此项交易的清算。在此过程中，HXIC 的公允价格下降了 30%，从 6 亿元直至 4 亿元。因此，最近的股票发行设想决定在股票市值为 35 亿元的情况下，用 2.4 亿元收购 HIX60% 的股份，同时，不超过 13.2 亿元将被投入 APSM。截至 2017 年 2 月 2 日，金马集团业主徐建初继续持有对 HXIC 的控制权。他如今还在阿穆尔河的跨境规划和发展项目中与俄罗斯符拉迪沃斯托克的一位中国实体注册方结为合作伙伴。该私募的赞助商是新时代证券有限责任公司（[New Times Securities Co.](#)）。

必需重视并促成的方面

潜在的金融家应该避免参与阿马扎尔项目，除非该项目能够做到：

- 木材供应和森林开采的 APSM 重新开发计划不能破坏北方森林的生态系统。这可能意味着纸浆和木材的年度生产量或 / 和通过铁路从外省引进的主要木材量会减少；
- 该公司确保 APSM 租赁的森林中不包括原始的成熟老林，以及土著社区所拥或自然保护区规划的土地；
- 新的商业计划采用其它运输路线满足 APSM（防止波克罗夫卡—洛古河口岸的破坏性发展）的需求；
- 大坝从阿马扎尔河迁走，同时追求更具有可持续性的供水选择（如在其恰特卡河修复旧水坝）；
- APSM 开发长期培训体系，履行承诺，确保至少一半的员工来自本地；
- APSM 新推出的计划要求全面通过新环境影响评估和公众协商（以前的环境影响评估忽略了大坝，森林租赁和运输计划）。

同时有必要通知所有潜在的投资人，APSM 附近的森林资源不足以实现企业的可持续经营。

Amazar Pulp and Saw Mill (Polar Star Forestry Trade Zone)

Civil society organisations are highly concerned about a controversial pulp mill development in Russia, close to the Chinese border, and urge all companies, banks and investment to avoid financial involvement in this project. The following is a summary of a more comprehensive analysis of why the risks of this project are unacceptably high, which can be found here:

http://www.banktrack.org/project/amazarsky_pulp_and_paper_mill

Introduction

The Amazar Pulp and Saw Mill (APSM 阿马扎尔林浆一体化项目\北極星林业经贸合作区) is being constructed on the shore of the Amazar river in the Zabaykalsky Province of Russia, near the border with China. The project will consist of a pulp mill, two wood processing facilities, a dam and reservoir on the Amazar River and supporting infrastructure. This enterprise is 100% owned by 黑龙江兴邦国际资源投资股份有限公司 - Heilongjiang Xingbang Investment Company - (HXIC-) from China.

The initial stage pulp mill is planned to produce 243,486 tonnes of pulp per year. The original plan was 400,000 tons of pulp per year, but downsized due to scarcity of forest resources. APSM was granted permission to lease almost 2.6 million hectares of forest for 49 years. Half is in traditional land-use areas of Indigenous Evenks and some of it in areas previously reserved for nature reserve creation. By early 2016, APSM had leased and paid for 220,000 hectares of primeval forest along the Sino-Russian border, half of which is globally recognised as important and endangered old-growth forest.

APSM needs to clear cut forest to produce from 1.1 to 2.5 million cubic metres of wood per year, to annually produce the necessary pulp and lumber. However, current forest resources in a 250 kilometre radius will be hardly enough for 10 years of APSM's operation. The problem with wood supply was officially acknowledged by the company and [Russian Presidential Council on Human Rights](#) in April 2016.

Brief history

The APSM project has a complex history, with several shifts in ownership.

In 2003, the first agreement on the construction of APSM was signed between authorities of Zabaykalsky region in Russia and the Heilongjiang Province of China. Originally, the launch of the mill was scheduled for 2007. The reason for this agreement was to justify the import of raw logs to Northeast China, where logging was subject to increasing limitations. A "private" border crossing operated in the winters of 2000-2008, with 60 trucks bringing raw logs to China across the frozen Amur river every day. It was shut in 2008 due to multiple violations of Russian law and a corruption scandal. APSM kept pushing on the Russian authorities to reopen this channel of resource exports and even to build a bridge to facilitate year-round exports. In 2016, the Russia and China transportation ministries [included](#) Pokrovka-Louguhe Bridge and Border Crossing on the list of agreements to be discussed in 2017. HXIC claims that this border crossing is an important part of the China's 'Silk Road Economic Belt' Initiative, an initiative [criticised](#) by environmentalists and researchers.

In 2010, a loan of USD 170 million and CNY 1.16 billion was granted to APSM by the China Development Bank through [黑龙江龙兴国际资源开发集团有限公司](#) LongXin Co. The construction of a reservoir on the Amazar River was started in 2012, without proper EIA or public consultations. A year later, in 2013, the first timber processing factory was completed: it has the capacity to produce 100,000 cubic metres of lumber, but was not put into operation until 2016. In 2016 the second timber processing factory was completed. It has the capacity to produce at least 300,000 cubic metres of lumber annually. However no large-scale production has been reported so far.

Between November 2015 and February 2016, the impacts of APSM were investigated by the Russian Presidential Council on Human Rights. This triggered two positive developments. First, the Verkhneamursky (Upper Amur) Wildlife Refuge in Mogochinsky district of Zabaikalsky Province [was established and staffed](#), with an area of 239,639 hectares. Zabaikalsky Vice-Governor Aleksander Shemetov has promised to the High Council that biodiversity-rich old growth forests presently leased by Chinese loggers will be taken from them and added to the Upper-Amur wildlife refuge. Second, traditional use lands of the Evenki Indigenous People were promised to be excluded from logging plans.

The APSM complex is expected to start operations at the end of 2019.

Social and human rights impacts

The APSM is destroying ecosystems on which local people depend. 4,000 people live in the Tungiro-Olekminsky District, of which 2000 are native Evenki Indigenous Peoples of central and eastern Siberia, Mongolia and Inner Mongolia. As such, the project threatens livelihoods of this indigenous group. Their land will be devastated, because up to two million hectares has been offered for forest lease.

Traditionally, women of the region collect non-timber forest products such as berries, mushrooms, and edible or medicinal herbs. In addition, in the Mogochinsky District thousands of subsistence and professional hunters will suffer from devastation of forest resources in their district. The border post will exacerbate poaching by incoming loggers from China. Local people are also deprived of subsistence and recreational fishing due to the dam blocking the Amazar river, built without EIA or public consultation.

There is a high level of unemployment among the local population in the region, but the company is not living up to its obligation to employ local workers. In 2016 it employed 90 workers from Russia and 300 from China, although agreements prescribe at least 50% of the workforce should be local.

Moreover, the APSM has brought continuous disruption to the local community and the development of Amazar township and its regional economy. The company forms its own isolated community that competes for resources and influence with local people. It seeks to develop its own transportation routes and system, ignoring the fact that Amazar is a hub-station on the Trans-Siberian railroad. Chinese forest enterprises outcompete local businessmen in securing forest leases and make it more difficult for locals to access fire-wood and non-timber forest products. The local forest management department is overburdened by overseeing large Chinese leases and has limited capacity to serve the subsistence need of local population. The officials at the local and district level are often corrupt and provide preferential treatment to the APSM at the expense of local interests. Local activists in the town of Amazar have many times engaged in direct action to prevent violations by APSM, such as extraction of construction material near residents' homes.

Environment

APSM plans to log between 1.15 million and 2.5 million cubic metres of timber every year by clearcutting, which will lead to several detrimental consequences:

- APSM will destroy biodiversity hotspots: Most of the logging is planned in primary forests. Forests presently leased by the mill for the most part are [intact old-growth forests](#) of the highest biodiversity value, home to many rare species of flora and fauna.
- APSM will lead to deforestation and devastation of resources: A Greenpeace Russia [analysis](#) of the availability of timber for APSM operations shows that the wood resources in a 250 km radius are insufficient even for 10-year operation of the pulp mill. This is supported by a [report](#) of the President's Council on Civil Society Development and Human Rights in Russian Federation.
- Boreal forests of the region are slow-growing and not very productive. The area is severely affected by climate fluctuation, which causes permafrost melt and makes forest regrowth more problematic. Subsequently, regional officials also recognized that the area after fires has insufficient forest resources to support sustainable production.

- The project destroys important aquatic ecosystems: The dam built on the major tributary of the Amur river threatens the population of IUCN Red List rare salmonid fish (*Hucho taimen*). A smaller dam on an adjacent river has already driven down fish species numbers from 22 to just three species in less than 100 years. Significant water pollution and waste production is also expected from the pulp mill operation.
- Industrialisation of the region: The company plans to reopen the border gate Porkovka-Loguhe (Russia-China) to bring raw logs and lumber to China, as was the case between 2000-2008. Locals fear that this project and the reopening of the border will be the beginning of endless industrial devastation of the region. This road and bridge will dissect two nature reserves and open the last old-growth forests to exploitation. The forests are present in Russia along Amur and Argun rivers, which are trans-boundary rivers. HXIC, the owner of the mill, has lobbied for this construction.

Financiers

Heilongjiang Xingbang Investment Co (HXIC) is the owner of the APSM. As of June 2016 it had raised only half of the investment needed to complete the mill's construction phase: according to [an official audit](#), investment reached CYN 2.2 billion out of CYN 4.9 billion required.

Investment in the project can be divided into three broad groups:

- Funds provided by HXIC's shareholders: At least CNY 750 million.
- Loans from private banks and development banks: At least USD 170 million and CNY 536 million from CITIC Industrial Bank and China Development Bank.
- Funds obtained through Shenzhen Stock Exchange by Zoje Resources.

中捷资源投资股份有限公司 - Zoje Resources ([ZJR](#)) is a company raising money to buy the of JinMa Group's 60% stake in HXIC. The funds to acquire HXIC and invest in APSM should have been raised by a non-public share offering . However, due to [falsifications](#), [faked projects](#), and as a result massive public protest in Russia, potential shareholders and China Securities Regulation Commission doubted the validity of the sale until November 2015. From November 2015 to January 2017 the purchase agreement was rewritten six times, one potential buyer quit the deal, while [nine other buyers](#) decreased the amount of Zoje shares they want to buy from 5 billion to 3.5 billion CNY. According to a Zoje disclosure document from 21 January 2017 the China Securities Regulation Commission is yet to provide clearance for this deal. During this process the fair price of HXIC decreased by 30% from CNY 600 million to CNY 400 million. So, the most recent share offering envisions that out of CNY 3.5 billion raised on the stock market, CNY 240 million will be used to buy 60% of HIX, while not more than CNY 1.32 billion will be invested into the APSM. As of 2 February 2017, Xu Jianchu, the owner of [大兴安岭金马实业投资有限公司](#) - JinMa Group, continues to control HXIC. He also now partners with a Chinese entity registered in Vladivostok, Russia in [planning and development](#) of the border-crossing on the Amur River. The sponsor of the private placements is [New Times Securities Co](#).

What must happen

Potential financiers should stay away from the Amazar project unless and until:

- the APSM Plan for Wood Supply and Forest Exploitation is redeveloped in a way that cannot lead to devastation of boreal forest ecosystems. This likely means further reduction in annual figures of pulp and timber production and/or sourcing significant part of wood from other provinces by rail;
- the companies ensure that APSM forest leases do not include intact old growth forests, lands important for indigenous communities or areas where nature reserves have been planned;
- a new business plan is adopted with alternative transportation routes for the needs of the APSM (to prevent destructive development of the Pokrovka-Louguhe border crossing);
- the dam is removed from the Amazar River and more sustainable water supply options (like repair of the old dam on Chichatka River) are pursued;

- APSM develops a long-term training system to enable it to meet its commitments to ensure at least half of its employees are local;
- a new plan for the APSM is subjected to a new EIA and public consultations in its entirety (as the previous EIA excluded the dam, forest leases and transportation scheme).

Meanwhile it is necessary to inform all potential financiers that the forest resources in the APSM vicinity are not sufficient for sustainable operation of this enterprise.