

23 February 2024

Mr. Shane Moffat, Greenpeace Canada
and
Mr. Timer Manurung, Auriga Nusantara

Your letter about the “Policy for Association Complaint against Paper Excellence”

Sent via email to shane.moffatt@greenpeace.org and timer@auriga.or.id

Dear Mr. Moffat, Dear Mr. Manurung,

Thank you for your letter dated 7th November 2024 and the subsequent email exchanges.

First of all, I would like to thank you for the thorough research with valuable information. This will help to draw the right conclusions in this case.

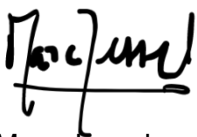
As outlined previously by the team, we were already in the process of planning a corporate group review when we received your complaint. We needed some time to re-assess and adapt our plan to provide a more detailed response including concrete steps we are taking.

We do not consider the complaint to fall in scope of a case that has to be managed according to the procedure for *Processing Policy for Association (PfA) Complaints* (FSC-PRO-01-009). At the same time, we take the information provided very seriously and will act with the same urgency and assertiveness. The complaint does not comprise alleged unacceptable activities as defined by the PfA. For processing complaints as PfA complaints and initiating an evaluation, substantial information needs to be presented about “the associated party [being] in violation of the FSC PfA” (see FSC-PRO-01-009, section B). This is not the case in the complaint you shared with FSC so we cannot treat this case as a PfA complaint.

FSC will proceed with the corporate group review as planned. We have agreed the terms with Paper Excellence and the contracting of a third-party law firm is at an advanced stage. We expect to see the results within two months and plan to publish a statement about the results thereafter. With regards to other requests listed in your letter, we cannot share the terms of reference and it will not be possible to have additional observers in the investigation. Nevertheless, we certainly aim to explain the rationale of any decision that may be taken based on the outcome of the review.

Lastly, I would like to point out again that we value your engagement and support in this case. It is our aim to use this opportunity to bring more clarity to open questions.

Yours sincerely,



Marc Jessel
Chief System Integrity Officer