

Kurz KG's responses to Earthsight and Auriga Nusantara's findings in *Risky Business*

First response, 29 July 2025

thanks you for your email and letter. We are happy to respond to the points raised in your letter, as we are also very aware of our responsibility towards the environment.

We welcome your commitment and are pleased to be able to support you in your investigation.

With regard to deliveries from our supplier PT Putra Buana, we can inform you that we only accept imports whose documents pass our checks.

Regarding the deliveries you mentioned, we have the following facts:

- All suppliers of PT. Putra Buana are correct.
- For the shipment of 2024 -- all shipments are still based on FLEGT
- For the shipment of 2025 -- all shipments are still based on FLEGT but under preparation for EUDR.

As a responsible importer, this means for us:

- All the mentioned suppliers of PT. Putra Buana have been verified and certified by the forest department of Indonesia.
- For every shipment from PT. Putra Buana to us -- we have every single FLEGT and COO -- these 2 documents are verified by the Indo govt which is legal.

However, if your organization doubts the fundamental function and reputation of FLEGT licensing, this system would need to be reviewed. As an importer, we rely on the official state institutions in Indonesia.

We purchase PEFC and FSC certified products worldwide. For products that do not have this certification, we only purchase goods that comply with the former EUTR and current EUDR regulations. All documents contain the relevant documentation and codes that can be used to verify the resources.

As a matter of principle, we do not purchase any products that have not been exported in accordance with the new EUDR regulations. Even though the EUDR will not come into force until the end of 2025, our company has always had a clear purchasing policy. We do not purchase from any sources that cannot provide these documents.

If your company believes that our suppliers' documents are not genuine, please let us know. So far, there has been no reason to believe that the documents provided by our suppliers and their upstream suppliers are incorrect.

We hope this has been helpful and would be glad to answer any further questions you may have. It is also in our interest that producers who do not comply with EUTR or EUDR rules disappear from the market.

Email from Earthsight and Auriga Nusantara to Kurz KG, 12 August 2025

Many thanks for your response to our letter. We have carefully considered your comments and would like to follow up with a few further questions and points of clarification.

You note that “For the shipment of 2025 -- all shipments are still based on FLEGT but under preparation for EUDR.” Could you clarify what is meant by “under preparation for EUDR”? Is your company already tracing shipments in 2025 back to the source, as required under the upcoming law?

You also note the following: “As a matter of principle, we do not purchase any products that have not been exported in accordance with the new EUDR regulations. Even though the EUDR will not come into force until the end of 2025, our company has always had a clear purchasing policy. We do not purchase from any sources that cannot provide these documents.” Please could you specify which documents you are referring to here?

I’d like to clarify that we are not alleging any illegal activity by PT Putra Buana Indonesia. Our research does indicate, however, that PT Putra Buana Indonesia has consistently purchased wood from deforestation sources. Such wood would not comply with the EUDR once it comes into force.

Please find attached an annotated copy of PT Putra Buana Indonesia’s 2024 official timber sourcing document (RPBBI) which informed our analysis. I have also attached PT Putra Buana Indonesia’s 2023 RPBBI document for your reference.

An RPBBI (Rencana Pemenuhan Bahan Baku Industri) or Industrial Raw Material Fulfilment Plan, is a mandatory document required by the Indonesian Ministry of Environment and Forestry for wood-processing industries outlining how a company sources its raw materials. These documents offer detailed insights into each company’s raw material supply, including the names of suppliers, the types of supplier, and the volume of wood supplied in cubic metres. Crucially, they disclose the amount of timber obtained from land clearing (as opposed to selective logging) and identify the specific concessions from which this timber originated.

*In the attached RPBBI document, PT Putra Buana Indonesia declares that it sourced 3,594.27 m3 of timber from land clearing in PT Indosubur Sukses Makmur in 2024.**

**Please note a correction to our initial letter: in 2024, PT Putra Buana Indonesia sourced 3,594.27 m3 of timber from land clearing in PT Indosubur Sukses Makmur and 5,196.16 m3 from PT Tanjung Redeb Hutani.*

Thank you for your attention to this matter. I look forward to your response and would appreciate updates on any decisions you may take, so we can accurately reflect these in our report.

Second response, 27 August 2025

Thank you for your email and apologies for the delayed response. It is currently vacation season in Germany.

As we take our imports and the associated responsibility towards our customers and the environment very seriously, we are just as interested as you are in the comprehensive verification of supply chains.

For the documentation that we require from the suppliers are :

1. FLEGT
2. COO
3. coordinate area of the cutting quota of certain year from the concession in geo file (appear in QR code)
4. name of concession with the legality from forestry department

For the EUDR which will be applied by 30 December 2025 -- we are still waiting for the fixed formula from the EU regulator which handles this issue. That means under preparation.

That means for our suppliers that they have to follow these guidelines:

- Every log that come in to supplier are verified on the documents.
- Be committed to make sure that every timber that they buy is coming from legitimate source and oblige to Indonesian regulation.
- Be a law-abiding company and place findings that have a valid legal basis.
- All pre suppliers meet strict sustainability and legality requirements including SVLK - legality of the supplied company, proof of origin of raw materials, compliance with the principle of zero deforestation and no involvement in human rights violations.

According to our records, our supplier Buana has fulfilled all the requirements for our inspections.

We would appreciate it if you could keep us informed and are happy to provide further information at any time.

Email from Earthsight and Auriga Nusantara to Kurz KG, 26 September 2025

Regarding our upcoming report on high-risk supply chains of Indonesian timber, which we plan to release in October, we'd like to give you a further opportunity to comment on the following specific points, which we plan to include in the report.

- *The [website](#) for your company's 'Tiger Premium' brand of decking states: "As a PEFC and FSC® certified company, we attach great importance to the origin of our materials. We only purchase wood from sustainably managed forests." A reader may assume this means all these wood products are PEFC and/or FSC-certified, but the website in fact indicates Tiger Premium decking in Indonesian bangkirai decking is available both FSC-certified and not.*
- *You have previously shared a set of guidelines that your company's suppliers must follow, including "compliance with the principle of zero deforestation and no involvement in human rights violations". You stated that PT Putra Buana Indonesia Wood Industry was judged to have fulfilled all these requirements. Can you comment on how PT Putra Buana Indonesia Wood Industry was judged to have met these guidelines, when the company bought more than 29 per cent of its logs in 2024 from oil palm and timber plantation concessions with permits to clear natural forest?*

We would very much like to include your company's response on these points in our report, along with any further actions you may be taking in response to our research findings. We can consider any responses received by Thursday 2 October.

Third response, 30 September 2025

We like to answer your questions as follows:

The TIGER PREMIUM website is primarily aimed at end customers in Germany. They are not familiar with the FLEGT and SVLK systems. However, we are happy to take your idea on board and will consider how we can draw attention to these systems so that end customers know what they are.

Buana follows the regulation from

a. forestry department no P.21/MENLHK/SETJEN/KUM.1/10/2020 which about SVLK which must oblige all timber coming from legal forest and sustainability supply

b. trade department PERMENDAG no 15 year 2021 about SVLK which ruled about sustainability and zero deforestation

Buana and Kurz also follow on Regulation (EU) 2023/1115 EUDR that require deforestation free and produce in accordance with the relevant legislation of the country of production.

We hope this has been helpful and remain with kind regards.