

Impan GmbH's responses to Earthsight and Auriga Nusantara's findings in *Risky Business*

First response, 25 July 2025

thank you for reaching out to us. We clearly support all activities that preserve our natural forests.

Please note that IMPAN GmbH is not importing wood products from Indonesia. You might want to verify with the Bundesamt für Landwirtschaft (BLE) and European customs.

We would advise addressing your concerns towards the importers and producers.

Email from Earthsight and Auriga Nusantara to Impan GmbH, 12 August 2025

Thank you for your response to our letter.

Please find attached a sample of international shipment records which indicate that Impan GmbH imported plywood from Indonesia in 2024-2025. These records list Impan as both a buyer and consignee of plywood shipments from Indonesia. We have cross-referenced these records with Indonesian export data and believe the information to be true.

We welcome any further comments you may have regarding this matter, as well as any feedback relating to our original letter.

Second response, 29 September 2025

We do not know where this data is coming from. Please cross-check with European and German authorities. As mentioned before, IMPAN has not imported / declared goods from Indonesia. Please refer to the Bundesamt für Landwirtschaft (BLE) and European customs.

Email from Earthsight and Auriga Nusantara to Impan GmbH, 30 September 2025

Our records confirm that your company is listed as the consignee in records submitted to both Indonesian Customs and the Indonesian Ministry of Forestry by companies exporting plywood from Indonesia. Your company also has an FSC chain-of-custody certificate as a 'broker/trader without physical possession' of meranti plywood. Your company also [claims publicly](#) to be in "close collaboration with leading plywood manufacturers in Southeast Asia".

Yet you claim however that your company "has not imported / declared goods from Indonesia".

To help understand how both can be true, we have some follow-up questions which we hope you can answer.

- *Is your company listed as the buyer or consignee on FLEGT Licenses (as legally recognized under the FLEGT Regulation (EC) No 2173/2005) for shipments of plywood arriving in the EU from Indonesia?*

- *Does your company have any commercial relationship with any manufacturer of plywood in Indonesia?*
- *Is your company an ‘Operator’ under the definitions given in the text of the EU Timber Regulation ((EU) No 995/2010), in relation to any goods from Indonesia?*
- *If not, is your company a ‘Trader’ under the definitions given in the text of the EU Timber Regulation ((EU) No 995/2010), in relation to any goods from Indonesia?*
- *Is your company an ‘Operator’ under the definitions given in the text of the EU Deforestation Regulation ((EU) 2023/1115)), in relation to any goods from Indonesia?*
- *If not, is your company an ‘Trader’ under the definitions given in the text of the EU Deforestation Regulation ((EU) 2023/1115)), in relation to any goods from Indonesia?*
- *If your company responsible for releasing plywood from Indonesia for free circulation within the EU?*
- *Does your company provide ONLY logistical or transport services for plywood from Indonesia arriving in the EU? If not, please can you describe what else your company’s role involves in relation to this wood.*
- *If your company is not an operator or trader under the definitions given above, in relation to the services it provides for the import of plywood from Indonesia, please can you let us know the identities of the companies which are declaring the products in the EU and releasing them for free circulation, so that we can alert them to the legal risks discussed in our earlier letter regarding compliance with the forthcoming EU Deforestation Regulation?*