



Center for Human Rights and Environment

General Paz, 186 - 10A, Córdoba, 5000 Argentina, Cedha@cedha.org.ar 54 (351) 425-6278 www.cedha.org.ar

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April 18th, 2006
Córdoba, Argentina

Michel Tilmant
Chairman Executive Board, ING Group

RE: Response to ING's Pullout of Uruguay Papermill Project by Botnia

Dear Mr. Tilmant,

In response to the letter we received from Arnaud Cohen Stewart at ING Group dated April 12, 2006 announcing that ING's participation in Botnia's papermill project in Uruguay is no longer in consideration, we would like to take this opportunity to convey, on behalf of local stakeholders, the Citizen's Environmental Assembly of Gualaguaychú, and the Local Provincial Government of Entre Rios, whom we represent, our sincere thanks and pleasure that ING Group has decided to withdraw its support from this project. We are certain that this must have been a very difficult decision.

Difficult decisions such as this one stand out and are remembered in time, as they reach above the *status quo*, make a statement, set a standard, and many times reach beyond our own full understanding of the true implications, risks and issues that are at stake. Nevertheless, when a decision like this one is made based on what is right and just, above and beyond what is convenient, or economically profitable, *that* decision can never be a wrong one.

We are sure that ING Group has diligently reviewed our Equator Principles Compliance Complaint, the reports of the CAO, the many official documents to which we have drawn your attention and which attest to many still existing doubts over Botnia's regulations compliance, and surely to the growing uncertainty and increasing risk factor that surrounds this investment, and closely followed public opposition to Botnia's proposed mill alongside escalating conflict between Argentina and Uruguay.

You mention in your communication to us that your decision was *not* based on project compliance with the Equator Principles; we would hope that this comment does not reflect your trust and belief in the evolution of a global system to ensure responsible investment. We understand the reasons for which you might make this statement, however, we also appreciate the energy and effort ING Group has contributed to helping evolve the Equator Principles.

We hope that in the future ING Group will continue to make difficult decisions like this one when it is warranted, and that ING will help overcome some of the remaining barriers that exist in fully evolving the Equator Principles into a real and effective compliance control mechanism. In this respect, ING Group and help lead responsible investment worldwide. We chose to file what we called an "Equator Principles Compliance Complaint" but recall that no established rules or mechanisms, or a CAO-equivalent independent body exists for stakeholders like ourselves to submit concerns, complaints, or initiate other actions to become informed about the impacts of large development projects like this one. We hope that ING will recognize this great deficiency of the Equator Principles system, and help evolve these so that it becomes a truly effective mechanism to guarantee responsible investment, protect the environment and ensure the human rights of affected stakeholders.

Most Respectfully,

Jorge Daniel Taillant
Executive Director
Center for Human Rights and Environment