

The EU Timber Regulation

A guide for retailers

What is the EU Timber Regulation and what does it require you to do? Use this leaflet to find out more, including what products you need to carry out due diligence on, and how to do the due diligence.



EUTR Guiding Leaflet no. 1

Updated December 2017



Developed by NEPCon under the project "Supporting Legal Timber Trade" funded by the EU LIFE programme and UK aid from the UK government.



NEPCon has adopted an “open source” policy to share what we develop to advance sustainability. This work is published under [the Creative Commons Attribution Share-Alike 3.0 license](#). Permission is hereby granted, free of charge, to any person obtaining a copy of this document, to deal in the document without restriction, including without limitation the rights to use, copy, modify, merge, publish, and/or distribute copies of the document, subject to the following conditions: The above copyright notice and this permission notice shall be included in all copies or substantial portions of the document. We would appreciate receiving a copy of any modified version.

The European Commission support for the production of this publication does not constitute endorsement of the contents which reflects the views only of the authors, and the Commission cannot be held responsible for any use which may be made of the information contained therein.

This material has been funded by UK aid from the UK government; however the views expressed do not necessarily reflect the UK government’s official policies.



About

§ The EU Timber Regulation

The EU Timber Regulation is law in all EU countries. It aims to halt the trade of illegal timber into the EU by:

1 Banning the sale of illegally harvested timber

The EUTR prohibits companies from placing illegally-harvested timber or timber products on the EU market for the first time.

2 Requiring EU companies to carry out due diligence

All EU companies that place any timber products* (see next page for precisely which ones) on the EU market for the first time are

required to exercise “due diligence” in order to minimise the risk of illegal timber entering into the European Union. Due diligence consists of:

- Accessing information about where the timber in your products comes from
- Assessing the risks that the timber in your products might have been harvested, traded or transported illegally
- Mitigating any identified risks of illegality to the point that they are negligible

*See next page for details of precisely which products.

3 Requiring EU companies to register their trade

All EU traders of wood and paper products are required to keep records of their buyers and suppliers.



Product Scope



Which products do you have to do due diligence on?

Step one in a due diligence process is to find out which products you will need to carry out due diligence on.

If you bought the product from another company within the EU, you are allowed to assume that they have done the due diligence and therefore you do not have to.

Almost all timber products are included in the scope of the EU Timber Regulation. The few exceptions are listed below. Paper is included, but books are not.

Products that fall outside the scope of the EUTR, as of January 2017, include:

Products exempt by EUTR

- * Printed Books
- * Games
- * Seats
- * Hooks & Hangers
- * Toys
- * Lamps & Lampshades
- * Wall Art
- * Christmas Cards
- * Kitchen Utensils
- * Clocks
- * Chopping Boards/bowls
- * Venetian Blinds

Products covered by EUTR



Pulp and paper

Including scrap books, plain card, boxes, envelopes, tissue paper, roll wrap, tissue paper, gift bags, boxes, tags, roll wrap, address books, blank postcards, refill pads, notelets, organisers, pads, ring binders, cake cases, paper trays, dishes, plates & cups.



Wooden furniture

Including TV & media storage units, cribs, cot beds, bathroom furniture, wooden laundry baskets, beds, cabinets, chest of drawers, dressing tables, divans, headboards, children's desks, corner units, cupboards, coffee tables, desks, dining tables, door knobs, garden furniture, wall units, shelves, hat stands, shoe racks.



Wooden frames

Including for paintings, photographs, mirrors or similar objects.



Packing cases, boxes, crates, drums & similar packings of wood

Including garden & home crates, chests, storage, keepsake, toy and decorative boxes, (excluding packaging used exclusively as packing material to support, protect or carry another product).



Transparency



How to map your supply chains

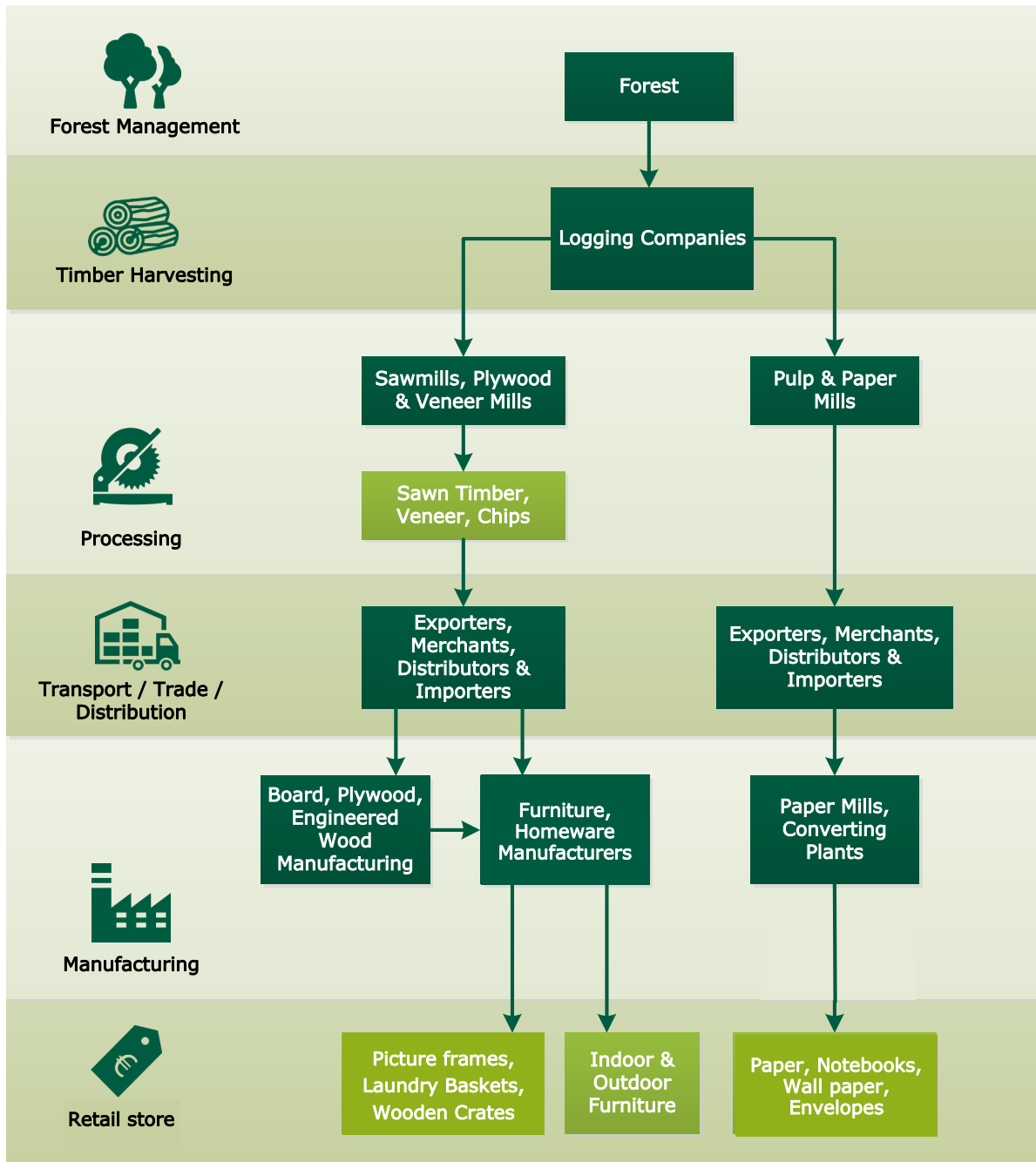
Step two in carrying out a due diligence process is to map your supply chains for all your products that you identified as part of step one. You should:



Ask your suppliers to map their supply chains. You are likely to have to map the supply chains until you get to the forest that the timber came from. For products that contain lots of different types of wood, you will need to know the supply chain for each component.



Tell your suppliers that if they intend to change their supply chain, they must notify you.



Risk assessment



How to access your risks

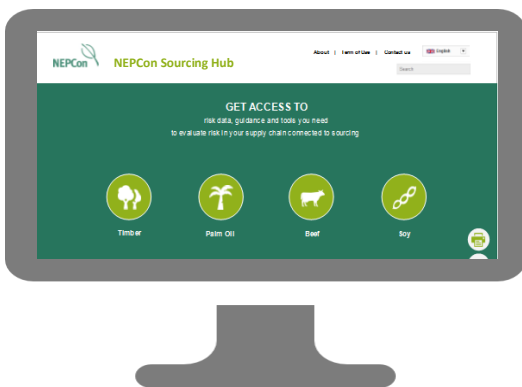
Step three in a due diligence process is to work out which components of which products come from places with a non-negligible risk of timber illegality.



Ask your suppliers which species their products contain.



Ask your suppliers where each species in the product comes from. Knowing the supply chain will help with this. Note that you need to know where the timber was harvested, not the where the product was manufactured



Use [NEPCon Sourcing Hub](#) to find detailed, objective data on whether there is a risk that timber from a particular country is

harvested, transported or traded illegally. We have analysed 21 different areas of law for 62 timber-producing countries. For each area of law, we state whether:



there is a negligible risk those laws are broken in that country. If this is the case, you need not do any risk mitigation for this product component



there is a non-negligible risk those laws are broken. If this is the case, you will need to proceed to mitigate those risks so that they become negligible.



there are no applicable laws in that specific area. If this is the case, you are not legally obliged to do any risk mitigation for that area of law. You may be required to do so with regards to some of the other 21 areas of law of course.

If there is a non-negligible risk that a component has been sourced illegally, ask your suppliers what type of forest the wood was harvested from. In some countries, there is a significantly lower risk of illegality in, for example, timber that comes from plantations as opposed to natural forests.

Risk mitigation

✓ How to mitigate your risks

The final step in a due diligence process is to do something to mitigate the risk that any of your products contain illegal timber. You need to satisfy yourself that you have mitigated the risks to the extent that there is now only a negligible risk that the timber was harvested, traded or transported illegally.

Use [NEPCon Sourcing Hub](#) to find detailed suggestions on what to do to mitigate the specific risks you identified in step three. In general, you can:



Obtain evidence that the products you are purchasing do not contain illegal timber. For example, you can obtain documentation that might

be able to show that the timber met all laws in its country of origin.

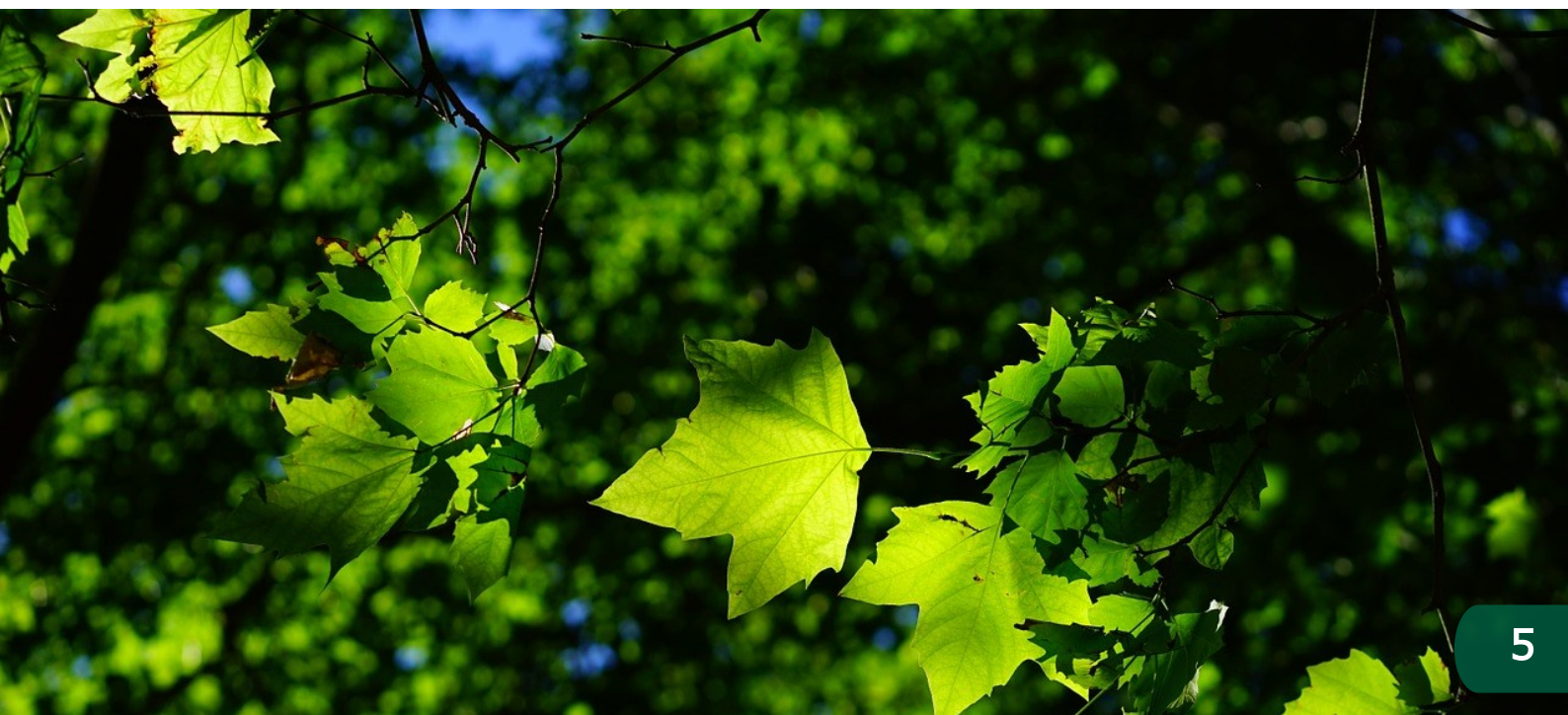
The sort of documentation to ask for depends on which areas of law the product is at risk of breaking – examples are given on [NEPCon Sourcing Hub](#).



Ask your supplier if their products are or can be supplied as certified to FSC™ or PEFC standards. If so, you should, ask your supplier for a copy of their certificate and keep it on file. If not, you could ask your supplier if they can become certified to either of these schemes. Obtaining certified material does not mean you need not do any due diligence, but it will make the process a lot easier.



Change suppliers.



About

Supporting Legal Timber Trade

Supporting Legal Timber Trade is a joint initiative run by NEPCon with the aim of supporting timber-related companies in Europe with knowledge, tools and training in the requirements of the EU Timber Regulation. Knowing your timber's origin is not only good for the forests, but good for business. The joint initiative is funded by the LIFE Programme of the European Union and UK Aid from the UK Government.



NEPCon (Nature Economy and People Connected) is an international, non-profit organisation that builds commitment and capacity for mainstreaming sustainability. Together with our partners, we foster solutions for safeguarding our natural resources and protecting our climate.

NEPCon |

info@nepcon.org | www.nepcon.org