For consideration by the competent authorities:
EU Timber Regulation (EUTR) should support - not discourage
- the use of independent verification and certification

Brussels, 28 June 2012

The Timber Retail Coalition (TRC), the Confederation of European Paper Industry (CEPI) and the European Confederation of woodworking industries (CEI-Bois), believe that the added value of third party certification must be recognized by the competent authorities as it can help the forestry related industry reach its sustainability targets, that include and go beyond legality.

The EUTR recognises the role of 3rd party verification/certification of timber supply chains as a means to demonstrate low risk sources within a due diligence system. However, the obligations of the operator when purchasing certified product is unclear, leaving the operator to apply the same level of due diligence to certified products as they would for non-certified products. Therefore there is a risk that the interest for voluntary certification will drop. This is out of line with the stated long-term aim of the EU policy to support sustainable forest management.

Many public and private bodies support sustainable forest management through voluntary market mechanisms of certified products. The procurement policies of the world’s leading companies in the retail, packaging and paper sectors, rest on the cornerstone of this independent third party verification.

The EUTR is in danger of undermining 20 years of work on, engagement in and commitment to forest certification if operators and commercial teams around the world are obliged to apply the same amount of diligence to certified products as they will have to for un-certified products.

Our request:
Clear, unambiguous acknowledgement that independently audited/verified timber products are included as ‘low risk origin’ in the list of acceptable evidence by the national competent authorities.

Our offer:
The Timber Retail Coalition (TRC), the Confederation of European Paper Industry (CEPI) and the European Confederation of woodworking industries (CEI-Bois) are willing to provide support and advise the competent authorities in view of the implementation of the regulation.
The Timber Retail Coalition (TRC)

Illegal logging is a serious offence causing severe environmental consequences, threatening biodiversity, undermining the user rights of indigenous people and creating unfair competition and severe distortions on the global and European market. **Kingfisher, IKEA, Carrefour and Marks & Spencer** have formed the Timber Retail Coalition (TRC) in support of measures to curb illegally harvested timber and to ensure that EU regulations are effective and workable.

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CEPI aisbl - The Confederation of European Paper Industries

The Confederation of European Paper Industries (CEPI) is a Brussels-based non-profit organisation regrouping the European pulp and paper industry and championing industry’s achievements and the benefits of its products. Through its 19 member countries (17 European Union members plus Norway and Switzerland) CEPI represents some 550 pulp, paper and board producing companies across Europe, ranging from small and medium sized companies to multi-nationals, and 1000 paper mills. Together they represent 25% of world production.

Website: [www.cepi.org](http://www.cepi.org) Follow CEPI on Twitter @EuropeanPaper

CEI-Bois aisbl – European Confederation of Woodworking Industries

CEI-Bois

CEI-Bois, the European Confederation of woodworking industries, was founded in 1952 and represents the interests of the European woodworking industry, which includes more than 350,000 companies generating an annual turnover of 201 billion euro and employing around 2.5 million workers in EU27.

The primary goal of CEI-Bois is to further the interests of the European wood sector. It is the main body representing and defending the interests of the European woodworking and furniture industries towards the European Union.

[www.cei-bois.org](http://www.cei-bois.org)