

EU Timber Regulations - a guide for suppliers, agents and manufacturers

Introduction

The EU Timber Regulation (EUTR), in place since 2013, bans illegally harvested timber, originating from within the EU or internationally, from being placed on the European market. It was implemented to help reduce illegal logging and deforestation, encouraging sustainable forest management methods.

Businesses and Products: where the regulation applies Operators

The regulation applies to all businesses trading in timber and timber products in the EU. The businesses fall into two categories.

Traders

Traders are defined as businesses that buy or sell timber or products made from timber-based materials that has already be placed on the EU market. Traders are required to maintain and keep records for five-year detailing where the timber, or timber product, was purchased from and sold on to.

Operators

Operators are businesses that are the first placers of timber or timber products on the EU market. This includes timber grown in the EU or imported into the EU. If your company's name is on the Customs form C88, you are the Operator. Operators are required to implement a 'due diligence' system designed to identify the risk of illegal timber in your products. A due diligence system has to be based around information gathering (species, countries of harvest, manufacturer identity, volumes, etc.,) and documentation assessment (harvesting permits, third party audits, transport documentation, etc.,) to ascertain the likelihood of the illegal timber entering the supply chain. If risk is identified, the system should include what steps are taken to mitigate it.

Products

Only products imported under specific customs codes are required to be assessed for EUTR. You can also contact the TRG expert team if you have queries about whether specific products are covered by the regulation. The scope of the EUTR is due to be updated in 2019. [Check here for updates.](#)

Products in Scope (Annex of the EU Timber Regulation).

- 4401** Fuel wood, in logs, in billets, in twigs, in faggots or in similar forms; wood in chips or particles; sawdust and wood waste and scrap, whether or not agglomerated in logs, briquettes, pellets or similar forms
- 4403** Wood in the rough, whether or not stripped of bark or sapwood, or roughly squared
- 4406** Railway or tramway sleepers (cross-ties) of wood
- 4407** Wood sawn or chipped lengthwise, sliced or peeled, whether or not planed, sanded or end-jointed, of a thickness exceeding 6 mm
- 4408** Sheets for veneering (including those obtained by slicing laminated wood), for plywood or for other similar laminated wood and other wood, sawn lengthwise, sliced or peeled, whether or not planed, sanded, spliced or end-jointed, of a thickness not exceeding 6 mm
- 4409** Wood (including strips and friezes for parquet flooring, not assembled) continuously shaped (tongued, grooved, rebated, chamfered, V-jointed, beaded, moulded, rounded or the like) along any of its edges, ends or faces, whether or not planed, sanded or end-jointed
- 4410** Particle board, oriented strand board (OSB) and similar board (for example, waferboard) of wood or other ligneous materials, whether or not agglomerated with resins or other organic binding substances
- 4411** Fibreboard of wood or other ligneous materials, whether or not bonded with resins or other organic substances
- 4412** Plywood, veneered panels and similar laminated wood
- 4413** Densified wood, in blocks, plates, strips or profile shapes
- 4414** Wooden frames for paintings, photographs, mirrors or similar objects

4415 Packing cases, boxes, crates, drums and similar packings, of wood; cable-drums of wood; pallets, box pallets and other load boards, of wood; pallet collars of wood. Note that exemptions apply to packing material used exclusively as packing material to support, protect or carry another product placed on the market.

4416 Casks, barrels, vats, tubs and other cooperers' products and parts thereof, of wood, including staves.

4418 Builders' joinery and carpentry of wood, including cellular wood panels, assembled flooring panels, shingles and shakes. Pulp and paper with the exception of bamboo-based and recovered products. These include among others: paper and paper board; envelopes; plain postcards; boxes of stationery; copy paper; wall paper; cigarette paper; toilet paper; handkerchiefs; cleansing tissues; towels; serviettes; napkins for babies; tampons; bed sheets, sanitary and hospital articles, articles of apparel and clothing accessories made from paper; registers, account books, note books, order books, receipt books; letter and memorandum books; diaries; albums; book covers; paper and paperboard labels; trays, dishes, cups and the like of paper and paperboard; egg boxes.

Wooden furniture Note that exemptions apply to seats, bamboo furniture, and medical, surgical, dental or veterinary furniture. (9403 30, 9403 40, 9403 50 00, 9403 60, 9403 90 30)

9406 Prefabricated buildings

Risk of non-compliance

Non-compliance with the European Union (EU) Timber Regulations puts your business at risk of prosecution.

Possible impacts of non-compliance:

The UK Government's Office of Product Safety and Standards carry out audits of timber products on the UK market. If they are found to be non-compliant, this can result in the timber products being removed from the market and fines.

Possible outcomes of products being removed from the UK market:

- High cost to your organisation.
- A loss of trust from your potential customers and consumers.
- A negative impact on your ability to continue trading.

Failing to meet your compliance obligations could be extremely costly and could result in serious damage to your brand and opportunities for further trade in the EU.

Getting Started

Track Record Global has expert and highly experienced timber assessors who can help you with your EUTR compliance to minimise risk of your business trading illegal products and thereby risking prosecution.

Questions:	√(Yes) X (No)
Do you have a timber due diligence system in place?	
Do you collect complete supply chain information for all your in scope timber and timber products, including MDF, Particleboard, Paper?	
Do you know the level of risks associated with illegal logging or transport or all species/countries of harvest and manufacturing countries?	
Do you know exactly which documents are required for timber sourced from each timber producing country?	
Do your suppliers produce the appropriate documentation before the products are shipped?	
Are you able to confidently identify digitally altered documentation?	
Do you have a system to store your supply chain maps, documentation and link these to your products?	

If you answered **X (No)** to one or more of the questions above, then you may have some gaps in your timber compliance processes which will require a review and action.

10 Steps to successfully implementing your Due Diligence system

With years of experience TRG has simplified the process of getting low risk timber product(s) to market for our clients and have developed a range of tools, systems and expert advice to help you.

Step 1	Determine which timber products are in scope for EUTR.
Step 2	Contact your suppliers to gather detailed supply chain information from forest through to your company for all the timber-based material used to manufacture your products.
Step 3	Identify the inherent risk of the species used and countries in the supply chains.
Step 4	Request the appropriate harvesting, transport and certification documentation based on the species, forest type, countries of harvest and countries of manufacture that the timber passes through, ensuring volumes are accounted for.
Step 5	Risk assess all documentation received in terms of compliance with Article 6 of the EUTR
Step 6	Risk rate the timber and timber products based on this information
Step 7	Write a narrative explaining how your risk rating was reached
Step 8	If necessary, devise and implement steps to mitigate any risks identified
Step 9	Link the supply chain information with each of your timber products
Step 10	Carry out these checks regularly especially if your suppliers are known to change sources

Track Record Global Services

Track Record Global provides expert professional services to help you manage risks and demonstrate that you are meeting your legal responsibilities and public commitments.

We work with leading responsible companies to deliver full transparency and accountability throughout their supply chains, turning auditable sustainability and product compliance into brand advantages.

We combine powerful software, exceptional supplier training and support, with world class technical expertise to significantly reduce your costs, risks and time to market.

Services we offer:

Risk Management Software	Compliance Library	Product Technical File - PREMIUM	Supply Chain Risk Assessments - PREMIUM
<p>Industry leading, customisable compliance software to allow your compliance team to manage Product Technical Files or Supply Chain due diligence.</p> <p>Your systems and workflows can be significantly enhanced by integrating our service. Product risk and supplier performance indicators are available to view instantly online. Simple reports are delivered via your systems to the key decision makers. The software enables you to work with your suppliers around the world, keeping them informed and managing supply chain risk.</p>	<p>Instantly identify what regulatory requirements must be met before products can be placed on the global markets for the first time.</p> <p>Subscribe to our regulatory requirements library compiled by the TRG expert team, receive alerts when regulations change and attend our webinar briefings. You can add your own quality specifications and filter reports by product category and type.</p>	<p>If you have problems maintaining Product Technical Files, you can outsource all, or some, of the burden of costly administration. The premium service is fully customisable to your specific product compliance requirements.</p>	<p>TRG are experts in managing the challenges of Timber due diligence (EUTR, Lacey Act and ILP). If you have timber due diligence challenges, our robust processes, systems and expert team will help you minimise your risk of illegal imports.</p> <p>Our robust processes and systems are applicable to any raw material supply chain risk and will save you time and money. You will be able to demonstrate how your organisation meets legal requirements. It will make corporate sustainability commitments transparent and simple to audit.</p>

We are experts in products compliance and specialise in the below compliance categories, regulations and directives.

Compliance Categories	Regulations and Directives
<ul style="list-style-type: none"> • Technology & Electronics • White Goods • Domestic Appliances • Lighting • Furniture • Toys • Baby & Nursery • Sports, Leisure & Fitness • Clothing & Footwear • Textiles • Home & Garden • Health & Beauty • Jewellery & Watches • Arts & Crafts • Paper & Card • Plumbing, Insulation & Heating • DIY • Construction <p>and more ...</p>	<ul style="list-style-type: none"> • REACH • Radio Equipment Directive (RED) • Electromagnetic Compatibility Directive (EMC) • Low Voltage Directive (LVD) • Restriction of Hazardous Substances Directive (RoHS) • Toy Safety Directive • Machinery Directive • Gas Appliances • Medical Devices • Personal Protective Equipment • Safety Data Sheets (SDS) • WRAS / KIWA • TMV 2 / TMV 3 • EUTR • Lacey Act • ILP • Corporate sustainability requirements <p>and more ...</p>

No matter how small your product compliance query - please contact us. We can help.