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The Timber Retail Coalition welcomes the Commission's assessment of the EU Timber Regulation but stresses that more is required to ensure its objectives are achieved:

- Harmonization of the performance of competent authorities
- Clarification and appreciation of third party certification schemes
- Impact assessment of the scope of products

As retailers committed to establishing supply chains that strive to be free of illegally harvested timber, members of the TRC welcome the Commission's review of the function and effectiveness of the EUTR since its introduction in 2013. Indeed it is clear from the report that the EUTR requires further strengthening to be implemented and enforced effectively in all Member States.

The Commission's review suggest that the EU is on track to achieving its objectives in preventing illegal timber and timber products from being placed on the market. However it recognizes the inconsistency of the implementation of the EUTR, the capability of competent authorities and the frequency of checks made on operators and Monitoring Organisations across Member States.

Whilst the members of the TRC widely appreciate the Commission's formal recognition of these problems, we would like to reiterate that more is required if the EU is to truly achieve its objectives.

## Our recommendations for an effective EU Timber Regulation

Therefore the TRC strongly recommends that the Commission ensures uniform enforcement across all Member States to avoid market distortions and establish a fair operating environment that does not punish those businesses that source timber responsibly. Likewise, harmonising the performance of competent authorities is essential for constructive cooperation of the business sector. In particular, we would like to reiterate that further clarification and appreciation of third party certification schemes, as part of the Due Diligence systems, would allow greater recognition of business best practice models and promote sustainable forestry management, both of which are stated aims of the EUTR.

The TRC also welcomed the suggestion of conducting an impact assessment into the scope of products included in the EUTR once a more harmonised approach to enforcement has been achieved.

Following the publication of the review, the TRC will continue to engage with the Commission to help reach its objectives of halting the trade of illegally sourced timber.









## 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.

Building on the Copenhagen Accord's acknowledgement of the importance of tackling global deforestation linked to climate change, these leading European retailers agree to provide a single platform with which to engage politicians and policymakers at national and EU levels.

TRC members will work together in support of the introduction of European Union-wide regulation based on market-proven 'due diligence' mechanisms, with a robust compliance and enforcement regime in place, to ensure minimum ethical standards for all timber and wood products sold in the EU.

Although the TRC companies already implement extensive voluntary measures, appropriate legislation will help to create a more level playing field in the supply chain and marketplace.

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