

# Public consultation on the product scope of the EU Timber Regulation

Fields marked with \* are mandatory.

## Introduction

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This public consultation is part of the [impact assessment](#) being undertaken by the European Commission to inform a possible change to the product scope of the EU Timber Regulation (Regulation (EU) No 995/2010) (EUTR).

The EUTR prohibits the placement of illegally harvested timber on the EU market. For that purpose, it obliges "operators" (those who first place timber products on the EU market) to exercise due diligence to minimise the risk to source illegal timber. It also obliges "traders" (those further down the supply chain) to keep records of their direct suppliers and customers. The EUTR applies to both domestically produced and imported timber products that are listed in its Annex. The Annex defines the product coverage using a combination of references to codes from the EU Combined Nomenclature (CN) and description of products.

The Commission has evaluated the effectiveness and functioning of the EUTR during its first two years of application. The findings were presented in February 2016 in a report to the Council and the European Parliament available at [http://ec.europa.eu/environment/forests/eutr\\_report.htm](http://ec.europa.eu/environment/forests/eutr_report.htm). The evaluation noted that the EUTR covers a significant number of timber products, but not all are included in its scope. Some timber-based products, such as musical instruments or wooden seats, are not covered. In terms of market share, an important group of products currently exempted is printed paper (such as books, newspapers, manuscripts, typescripts and plans). Unlike domestically printed media, where imported pulp and paper material is controlled for legality, imported printed media are not subject to checks for the legality of wood fibres imbedded in them. Therefore, they may carry a higher risk of originating from illegally harvested timber.

Consultations with stakeholders have shown that many do not consider the current EUTR product scope optimal and feel it should include more timber products. However, others consider that the product coverage should not be expanded before the EUTR is fully implemented and effectively applied. The stakeholders have also pointed to the fact that the EUTR covers some products made of bamboo, i.e. a non-wooden material, while other bamboo-based products are explicitly exempted from the scope. They have suggested considering their consistent removal from the product scope because bamboo-based products are not made of wood.

The evaluation concluded that the Commission may consider expanding the product scope, subject to an impact assessment of options. The European Commission is therefore undertaking an impact assessment to analyse possible changes to the EUTR product scope. Three policy options are being considered. The first option is to continue operating under the current EUTR product scope **without any changes**. The second option is to amend the product scope to **include one or more** additional categories of products. The third policy option is to amend the product scope to **include all** products that contain timber and, if appropriate, provide for a **list of exemptions** (as it is the case now with recycled timber and timber products). Each policy option may also involve the possibility to **remove products** which are currently covered by the regulation.

The impact assessment aims to inform stakeholders and others about the Commission's work to allow them to provide feedback on the envisaged initiative and to participate effectively through consultation activities. Through this public consultation, you are invited to provide your views on the issue, the proposed options and the range of likely impacts for each of the options.

Your responses, along with those from other citizens and stakeholders, will be taken into account in the impact assessment. It is therefore important that you complete this questionnaire as fully as possible. Responses can be provided in any EU official language.

The survey has three sections and takes around 20 minutes to complete. It will be available online for twelve weeks starting from 29 January 2018 and closing on 24 April 2018.

## Section 1: Background information

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Your replies will be used exclusively to help the European Commission assess its policy on the issue in question.

### Q1) How would you prefer your consultation to be published?

**Respondents should not include personal data in documents submitted in the context of a consultation if they opt for anonymous publication.**

Please note: regardless of the option chosen, your contribution may be subject to a request for access to documents under Regulation 1049/2001 on public access to European Parliament, Council and Commission documents. In such cases, the request will be assessed against the conditions set out in the Regulation and in accordance with applicable data protection rules.

- In full - you consent to us publishing any information in your completed form, including your name / the name of your organisation (your email address will not be published)
- Anonymously - you consent to us publishing any information in your completed form – apart from your name / the name of your organisation and your email address

**Q2) Please provide your name if replying as an individual, otherwise give the name of your organisation**

BIBM European Federation for Precast Concrete

Please provide your email address in case further details on the submitted information are required

zk@bibm.eu

**Q3) If your organisation is registered in the Transparency Register, please provide your Register ID number below.**

In the interest of transparency, organisations, networks, platforms or self-employed individuals engaged in activities aimed at influencing the EU decision-making process have been invited to provide the public with relevant information about themselves by registering in Transparency Register and subscribing to its Code of Conduct. Please note: If the organisation is not registered, the submission will be published separately from the registered organisations. During the analysis of replies to a consultation, contributions from respondents who choose not to register will be treated as individual contributions (unless the contributors are recognised as representative stakeholders through Treaty provisions, European Social Dialogue, Art. 154-155 TFEU).

If your organisation is not registered, you have the opportunity to [register now](#).

Transparency Register ID number:

07055806769-32

**\* Q4) In what capacity are you replying to this questionnaire?** *Please note that for the purposes of this survey all references to the EU will be considered to include the countries of the European Economic Area to which the EUTR applies.*

Choose one option

- 1. Individual (personal opinion, not affiliated with any of the below)
- 2. Operator, as defined by the EUTR (natural or legal person that first places timber products on the EU market)
- 3. Trader, as defined by the EUTR (natural or legal person that in the course of a commercial activity, sells or buys on the internal market timber or timber products already placed on the internal market)
- 4. Other business
- 5. Industry and/or trade association
- 6. EUTR competent authority
- 7. Other public authority (including from non-EU Member States)
- 8. Recognised EUTR Monitoring Organisation
- 9. Civil society organisation
- 10. Other

**Q4a) Please indicate which of the following statements best describes your situation**

- All the goods that I sell, or that are sold by the business I represent, are covered by the EUTR
- Some of the goods that I sell, or that are sold by the business I represent, are covered by the EUTR
- None of the goods that I sell, or that are sold by the business I represent, are covered by the EUTR

**Q4c) At which level do you operate?**

Choose one option

- Worldwide or in a global region (incl. third countries)
- EU (more than one MS)
-

National (one MS)

Sub-national (Small coverage within the same country)

**\* Q4d) If you represent a business or an organisation that is established in a country other than that in which you operate, please specify in which countries your business or organisation operates.**

Belgium

**Q5) In which country do you reside or are you established?**

Choose one option

Belgium

## Section 2: Possible Changes to the EUTR Product Scope

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This section gathers views on the current product scope and possible changes.

**\* Q6) In your view, is the current product scope adequate to achieve the objective of the EUTR - the fight against illegal logging and related trade?**

- Yes  
 No  
 I don't know

**\* Q7) In your view, is there a need to amend the current product scope of the EUTR?**

Choose up to two options

1. No, the product scope should not be amended  
 2. Yes, the products scope should be amended by adding products  
 3. Yes, the product scope should be amended by removing one or more categories of products  
 4. I don't know

## Section 3: Likely impacts of changes to the product scope

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### Sub-section 3.1 – Adding one or more categories of products to the product scope

**Q8) Overall impacts**

Compared to the current situation, what impacts do you think this change to the product scope would have on the following?

	Very negative impact	Somewhat negative impact	No impact	Somewhat positive impact	Very positive impact	I don't know/Not relevant

a) Environmental impacts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Social impacts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c) Economic impacts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

### Sub-section 3.2 – Including all products that contain wood in the product scope

#### Q9) Overall impacts

Compared to the current situation, what impacts do you think this change to the product scope would have on the following?

	Very negative impact	Somewhat negative impact	No impact	Somewhat positive impact	Very positive impact	I don't know/Not relevant
a) Environmental impacts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Social impacts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c) Economic impacts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

### Sub-section 3.3 – Removing certain products from the scope

#### Q10) Overall impacts

Compared to the current situation, what impacts do you think removing certain products from the scope would have?

	Very negative impact	Somewhat negative impact	No impact	Somewhat positive impact	Very positive impact	I don't know/Not relevant
a) Environmental impacts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Social impacts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

c) Economic impacts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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**Q11) You may wish to provide additional comments. A one-page document in pdf format containing these comments can be uploaded here.**

Maximum one page in pdf format, please

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*\*The uploaded document will be published alongside your response to the online questionnaire.*

## **Contact**

ENV-TIMBER-REG@ec.europa.eu

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