

What requirements should timber products comply with to be allowed on the European market?

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You can only sell timber products on the European market when you comply with several European regulation like the European Union Timber Regulation (EUTR) and several product safety requirements. Besides the legal requirements buyers often ask for sustainable forest management certification (Forest Stewardship Council, FSC) and perhaps for some premium or niche market requirements like ISO. All requirements are summarized in the figure below.

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1. What legal and non-legal requirements must my product comply with?

When exporting to Europe you have to comply with the following legally binding requirements:

European Union Timber Regulation (EUTR): controlling the legal origin of timber

All timber imported into the European Union needs to come from verifiable legal sources.

European buyers that place timber or timber products on the market have to show [due diligence](#). You can do this on the basis of long-term contracts, or separately for every container you ship. In addition the EUTR forces operators to trace their products back to the source. This means that when suppliers supply legal timber, but cannot provide well-documented guarantees of legality, they will not be able to supply the European Union market.

The easiest way to prove compliance is through a [voluntary legality verification system](#) or regular sustainable forest management certification (provided by the Forestry Stewardship Council, FSC).

The EUTR is part of the Forest Law Enforcement, Governance and Trade (FLEGT) Action Plan. Another part of the plan is the Voluntary Partnership Agreements (VPAs). These are voluntary trade agreements between the European Union and timber exporting countries. If a given country is fully implementing its national control scheme, it receives a European FLEGT license, and all timber exported from that country is considered legal.

Note, however, that FLEGT does not prove sustainability, nor does it address deforestation; only legality.

At this moment, European buyers consider sustainability certification important, and EUTR essential. Consumers will only ask for more sustainable products in the future, when informed about the difference between “legal” and “sustainable”. Enforced sustainable forest management could be the next step after EUTR. For now, the European Union is working on a stricter implementation of the EUTR.

Regardless of the delays in implementation in many countries, most large and professional buyers comply with the requirements in the EUTR, and are asking their suppliers to prove legal origin of timber. Compliance is especially common in North and West European Union countries where there is a strong commitment towards legality and sustainability. However in these regions (smaller) buyers can also be less pro-active and not yet fully compliant.

Check the [EU-EFI website](#) for the current status of your and competing countries.

Tips:

- With the implementation of the EUTR the European Union is less than ever a market for incidental selling. In case you decide to keep selling to the European Union market keep in mind that legality assurance is an essential aspect of trade together with price and quality. More information is provided by the [Guidance Document for the EUTR](#).
- Read more about [control on illegal timber and timber products](#) in the EU Export Helpdesk.
- The [European Timber Trade Federation](#) and [EU FLEGT facility](#) provides regular updates about the status of the implementation of the EUTR. For establishing long-term business relations suppliers are advised not to wait for the EUTR and FLEGT systems to be fully up and running, but to be pro-active and ensure full transparency and legal sourcing and even take your own measures to this end if necessary.

Product safety

The European Union [General Product Safety Directive](#) applies to all consumer products. For finished products (for instance, furniture) or parts of a finished product, product specific legislation can apply to the final product depending on its final use. The General Product Safety Directive can therefore be complemented by harmonised safety requirements for specific products (for instance, outdoor furniture, cribs, cradles: see [overview](#) of the Safety Directive).

The obligation of complying will firstly be the responsibility of the European company that places the finished product on the market. However, they will often ask their suppliers to comply with the requirements. For suppliers of parts this can translate into demand for more information, test reports or compliance with standards.

Tip:

- To get a better understanding of reasons behind the confiscations of products by European Union customs authorities refer to the EU's [Rapid Alert System database](#).

Conformité Européenne (CE) marking for timber products used in construction

Timber or timber products that are permanently incorporated into construction works will have to be CE-marked: this applies to windows, doors, frames, industrial flooring and parquet, stairs, glued laminated timber, panels (plywood etcetera), cladding and structural timber.

This marking shows that the products comply with harmonised requirements regarding mechanical resistance, stability, fire safety, hygiene, health and the environment. Manufacturers of the above-mentioned construction products have had to provide a "Declaration of Performance" (DoP) since July 2013.

As it is not common for exporters from developing countries to supply finished timber construction products to

the European Union, the CE requirement will probably not apply to you as a supplier of timber parts. But if you are a “component” supplier, you will have to provide your buyer with information on the basic properties of your product.

Tips:

- For a detailed explanation of CE and CE marking, check the corresponding [European Union website](#) for legislation or the easy-to-use [CE manual](#). You can also search for your own product and confirm the [CE validity date](#).
- Visit the website of the ‘Swedish Wood Support’ for an example of a [Declaration of Performance](#).
- Read more about [CE marking of construction products](#) on the [EU Export Helpdesk](#). This Helpdesk lists all requirements for all timber and timber products in Chapter 44, and you can select your product code to find the information you require.

CITES

In case you are supplying endangered timber species you will only be able to harvest and export them if they are on the list of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), and if you have obtained a CITES permit. With a CITES permit you automatically comply with the requirements of the European Union Timber Regulation (EUTR) and your timber is considered to be legally harvested.

Tip:

- To check if your timber specie is included in the CITES-list go to of Annexes A, B and C of the [CITES-Regulation](#). Read more about [CITES – Endangered Species Protection](#) on the [EU Export Helpdesk](#).

Chemicals in timber: REACH

The preservatives arsenic, creosotes and mercury are used to prevent rot, and improve the durability of timber, especially that used in outdoor applications. The European ‘Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)’ regulation does not allow the use of these preservatives, with some exceptions, such as wood used in industrial installations, or as railway sleepers.

There are also restrictions for wood (for instance, doors, window frames, and floor parts) treated with certain oils, glue varnishes, and lacquers that may contain harmful substances. For example, painted articles shall not be placed on the market if the concentration of cadmium is equal to or greater than 0.1% by weight of the paint on the painted article.

There are also restrictions for the use of chemicals in processing. Buyers are increasingly implementing sustainable practices in their own company, but also their supply chain. Therefore, they can ask you to also comply with these requirements regarding the use of chemicals during processing and production (for instance, volatile organic compounds (VOCs) used in coatings, formaldehyde and pentachlorophenol). The main guidelines for the timber sector are listed briefly below:

Painted and lacquered items such as furniture and toys may be a problem. Use of water-based products free from lead and mercury will avoid most problems. Wood products treated with creosotes are prohibited by the European Union.

The use and marketing of arsenic and all chromated copper compounds, including Chromated Copper Arsenate (CCA), Copper Chrome Boron (CCB) and Copper Chrome Fluoride (CCF), in wood preservatives are no longer

allowed. Natural oils for garden furniture protection can be used in almost all cases. But still, check the content of your oil on the European Chemical Agency ([ECHA](#)) website.

Tips:

- Make sure to ask your buyers what their policies on chemicals are, and what they expect from you. Check the websites of the [ECHA](#) and the [European Union](#) to read more about REACH. ECHA also maintains an [ECHA database](#) where you can check the status of the chemical you use.
- Guidance notes on [creosote](#) and [arsenic](#) can also be found on the Timber Trade Federation website.
- Visit the European Union website on [reduction of emissions and substitution of solvents](#) to learn more about how to reduce VOCs.

Packaging and the use of the International Standards for Phytosanitary Measures 15 (ISPM) packaging logo

There is also [non-product-specific legislation on packaging](#) that applies to all goods marketed in the European Union.

All wooden packaging material (mostly pallets) you use must display the ISPM 15 logo, together with your unique identification number if you produce the packaging material yourself. If you do not produce the material yourself, you will need to buy it from a licensed producer in your country. Producers are licensed by the National Plant Protection Organisation (NPPO) in your country.

Licensed packaging material includes cases, boxes, crates, drums and similar packing, pallets, box pallets and other load boards, and pallet collars. All wood used in this material must be debarked and heat-treated (HT). This means applying a minimum wood core temperature of 56°C for a minimum of 30 minutes.

Kiln drying (KD), chemical pressure impregnation (CPI) or other treatments may be considered HT treatments, as long as they meet HT specifications. Alternatively, fumigation with methyl bromide (MB) at a minimum temperature of 10°C and a minimum exposure time of 24 hours, is also allowed.

Tip:

- Contact the National Plant Protection Organisation ([NPPO](#)) in your country to find the addresses of licensed packaging producers.

2. What additional requirements do buyers often have?

Next to the legally binding requirements, you may also have to comply with the following non-legal requirements in order to be able to find a buyer:

Sustainable forest management

Sustainably produced timber goes much further than focusing on the legality of timber and encompasses many more elements relating to environmental, economic and social facts and impact of your forest or company management.

Sustainable forest management has become commonplace in the market for non-tropical timber. Although the share of certified timber is growing, this is less the case in the market for tropical timber. Sustainable forest management is, however, especially relevant for tropical timber, due to concerns about deforestation and global warming.

A particularly high proportion of timber and timber products from sustainable sources is marketed in Northern and Western European countries. This proportion is still growing, but is generally lower in the market for tropical timber and tropical timber products. Some importers foresee a reduction of sales for sustainably produced timber because buyers will judge that legal is good enough, but others state that the demand for sustainable timber remains unchanged.

There are two main certifications: the [FSC](#) (Forest Stewardship Council) and the Programme for the Endorsement of Forest Certification ([PEFC](#)). At the moment, FSC is the most widely used scheme for certification of tropical timber forests.

Tips:

- To get a better understanding of what sustainable forest management is refer to principles and guiding criteria of [FSC](#) and [PEFC](#). Please be aware that as a supplier of sustainably certified timber you will need to obtain a Chain-of-Custody (CoC) certificate. This also means that you have to target buyers that have a CoC-certificate as well, because these are allowed to sell your certified timber. Non-certified buyers, in contrast, are not allowed to sell certified timber. Find out what is necessary to obtain a CoC-certification.
- The website of the Global Forest & Trade Network (GFTN) provides a [GFTN roadmap](#) to certification.
- To find European or local buyers (e.g. importers, processors and retailers) and suppliers of certified timber and timber products go to [FSC Global Marketplace](#) and [PEFC database](#).
- Consult the [Standards Map database](#) for more information on the FSC and PEFC. Check the [Standards Map videos](#) to see how Standards Map can help you to determine which initiatives may be useful for your company.

Corporate responsibility

Importing companies often also need to address other issues than the origin of wood. European buyers (especially those in western and northern European countries) pay more and more attention to their corporate responsibilities regarding the social and environmental impact of their business. This also affects traders and processors. Important issues are:

Respect for indigenous rights, land owner's rights, environmental performance in general (pollution, waste etc), respecting labour laws and healthy and safe working conditions.

Many European companies in the timber and timber sector have policies addressing these issues. Part of these policies can be to ask their suppliers to address these issues. They can ask their suppliers to abide to a code of conduct, or sign suppliers declarations to ensure compliance with applicable local laws and regulations, industry minimum standards, [International Labour Organisation](#) (ILO) and UN Conventions.

Tips:

- Train your workers on how to work more efficiently and reduce the generation of waste and emissions. For more information read [Wood processing and furniture making: Cleaner production fact sheet and resource guide](#).
- Refer to the factsheet [health and safety management](#) in the woodworking industry by the Building and Wood workers International association (BWI).
- Refer to the [Less Dust Guide](#) from the European Federation of Building and Woodworkers (EFBWW) to reduce wood dust in the workplace.
- Ask your European buyer about its suppliers' policy with regard to labour standards. Do not forget to find out how these standards are supposed to be monitored and/or evaluated.
- It is possible to implement a sustainability certification for continuous process improvement: [ISO](#)

14000 (environment), OHSAS 18001 (health and safety) and SA8000 (labour standards).

What are the requirements for niche markets?

Next to the requirements you have to comply with to be allowed on the European market and / or to find a buyer, complying with the following additional requirements could offer you a competitive advantage and makes finding a buyer easier:

Eco-label for timber

Eco-labels do not only focus on sustainable sourcing, but also on other aspects of the products: processing (for instance, energy consumption, waste management), packaging and the use of chemicals. There are several eco-labels but the most widely recognized is the European “Eco-Label” which is available for [floor coverings](#) and [furniture](#). The number of certified products has grown in recent years but the market is still small.

Tip:

- For facts and figures on the use of the EU Eco-Label refer to the [EU ECO label website](#).

Dual certification

Smallholders and communities often face tough competition in the global timber market. FSC is looking to differentiate products from communities and smallholders in the marketplace. Dual certification of FSC and Fair Trade has been tested and is available.

In addition to sustainable forest managements practices (FSC), extra attention is paid to the social conditions in the producing areas (the Fair Trade part). FSC/Fairtrade timber is sold with a Fairtrade premium which allows an extra 10% of the total value of the wood to be paid to the certified smallholder communities concerned. The market for dual certification seems to be small.

Tip:

- The website of FSC has more information about [FSC dual certification](#).

ISO 14001

The ISO 14001 standard considers multiple aspects of your business procurement, storage, distribution, product development, manufacturing, et cetera.- so that it reduces its impact on the environment. It also drives you to evaluate how you manage emergency response, customer expectations, stakeholders and your relationships with your local community.

Such certification can result in a more efficient business with less cost and with substantial waste reductions. It can also convince your buyers of your professionalism, because ISO is worldwide recognizes as a respectable certification organisation.

Tip:

- The [ISO website](#) explains more details about ISO 14001 and other ISO standards.

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