



Joint voting recommendations of the forest-based industries on the proposal for a regulation on minimising the risk of deforestation and forest degradation associated with products placed on the EU market

Brussels, 8 July 2022

The European forest-based industries would like to share some voting recommendations on the proposal for a regulation on deforestation-free value chains ahead of the vote in the ENVI Committee of 12 July 2022.

The signatories of this statement represent the European forest-based industries: these include the woodworking industries, the industries manufacturing pulp, paper and paper products, the panel industry, the furniture industry and the printing industry. Together they amount to around 420.000 enterprises with a total turnover of over 520 billion euros, supporting 3,5 million direct and indirect jobs in communities across Europe, while providing everyday products such as paper, furniture, construction, packaging, and more.

The forest-based industries are supplied essentially from European forests, which are managed sustainably for multiple purposes, while also making efficient use of secondary sources such as residues and waste materials.

- **We recommend the adoption of Compromise Amendment 1** as that would **enlarge the scope of the regulation** to additional categories of products such as printed products and other wood-based products. This is crucial to ensure a level playing field for manufacturing industries located within or outside the EU and to avoid environmental loopholes.
- **We recommend to reject Compromise Amendment 2** as the proposed definition of “**forest and other ecosystem degradation**” is difficult to measure in an objective way and would create unnecessary legal uncertainty for the EU forest-based sector, who already abides by national legislation on sustainable forest management. If “forest degradation” remains in the regulation, a definition focusing on the degradation of primary forests and other wooded land to plantation forests would be more operational and target the most severe problems of forest degradation. The reference to “**harvesting operations**” should be deleted, as proposed, since these are not the only factors that impact forest degradation.

Moreover, the definition of “**deforestation**” should be rejected as it is not aligned with internationally agreed definitions such as the one of the Commission’s proposal, which incorporates the definition of FAO.

- We recommend to approve **Compromise Amendment 5**, as it is important that the product components that have already undergone due diligence compliance in accordance with Article 4(1) should not be required an additional due diligence procedure.
- We recommend to **reject Compromise Amendment 6**. The requirement to provide **geolocation coordinates** presents a challenge to the industry for technical reasons and may entail potential breaches of EU competition rules. Currently it is sometimes not possible to pin down the specific plot of land of origin, but operators would be able give information about the potential areas of origin. The regulation should adopt a risk-based approach to the information requirements. An obligation for operators to provide plot-level/production area level geo-localisation data should only apply as part of risk mitigation mechanism for commodities that are sourced from countries classified as high-risk.

The undersigned organisations remain available to provide more detailed explanations:

CEI-Bois – The European Confederation of Woodworking Industries

CEPI – Confederation of European Paper Industries

CITPA – The International Confederation of Paper and Board Converters in Europe

EFIC – European Furniture Industries Confederation

EOS – European Organisation of the Sawmill Industry

EPF – European Panel Federation

ETS – European Tissue Symposium

FEFCO – The European Federation of Corrugated Board Manufacturers

FEP – The European Federation of the Parquet Industry

INTERGRAF – European Federation for Print and Digital Communication