

Additional comments for public consultation on the product scope of the EU Timber Regulation

Timber Trade Federation (TTF), UK

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The TTF is committed to the implementation of the EUTR and supports the expansion of EUTR scope to include all timber/timber products. Of greater importance for TTF members we would like to see all products made from timber, panels or veneers in Chapter 44 of the Combined Nomenclature are covered within the EUTR. In addition, we propose products in Chapter 92 and 14, i.e. music instruments and lignified materials other wood, to be given consideration for inclusion in the EUTR too.

We believe that EUTR is and should remain a flexible business friendly regulation. Expanding the scope would encourage a more level-playing field and close current loopholes. For TTF members inclusion of these products would drive members business here in the UK and as a result help stimulate the design and manufacturing sector of the country.

For the list of exemptions, we support the continued exclusion of timber and timber products that have completed their lifecycle.

We foresee that the expansion of the product scope will result in immediate additional administration cost for companies new to the regulation and their supply chain stakeholders. However, if equipped with consistent enforcement and wider capacity building to the private sector, stakeholders at both end of the supply chain shall see long term benefit as the market becomes more regulated and more companies have access to wider markets.

We would also like to reemphasize the following actions for an effective EUTR implementation:

- Capacity building for players at all levels of the industry. EUTR allows companies to make their own judgements on their own supply chains, however we have seen DDSs of varied rigorousness level being used and this variation has led to suppliers 'preferring' establish relationships with buyers requesting less DDS efforts. In order to create fairer playing field, it is important to prompt understanding on the implication of DDS for players across all levels.
- More transparent guidance from Competent Authorities on the interpretation of due diligence requirements, especially for materials originated from high risk countries and areas.
- Supports are needed for SME and companies newly affected by the EUTR to avoid unnecessary burden when conducting and reporting their due diligence processes. This could be done through more awareness and capacity building.