

AmCham EU's response to the public consultation questionnaire on the evaluation of the EU Timber Regulation

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AmCham EU speaks for American companies committed to Europe on trade, investment and competitiveness issues. It aims to ensure a growth-orientated business and investment climate in Europe. AmCham EU facilitates the resolution of transatlantic issues that impact business and plays a role in creating better understanding of EU and US positions on business matters. Aggregate US investment in Europe totalled €2 trillion in 2014 and directly supports more than 4.3 million jobs in Europe.

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Important notice on the publication of contributions

Information about the respondent:

Please provide us with the following information:

Name of the public authority / international organisation / organisation or company you represent: *(Optional) (The information you provide here is for administrative purposes only and will not be published)*

The American Chamber of Commerce to the European Union (AmCham EU)

Full name (first and last name) of the individual respondent: *(Optional) (The information you provide here is for administrative purposes only and will not be published)*

Stéphanie Brochard

Email address of the respondent: *(Optional) (The information you provide here is for administrative purposes only and will not be published)*

stephanie.brochard@amchameu.eu

Are you replying*:

- On behalf of an organisation
 As a private individual

Your role in the organisation:

- Management
 Specialist/Expert
 Strategy/Policy function
 Other (please specify)

Other (please specify):

Country of origin (of the organisation if relevant)

Your organisation's geographical area of activities (indicate your area of activities if answering as an individual person)

- Local
 Regional
 National
 European
 Non-European
 Not applicable

Your organisation's type of activity (indicate your activity type if answering as an individual person) *

CONSULTATION RESPONSE

- International organisation
- Competent authority for the EUTR
- Other government body
- Professions organisation/federation
- Small enterprise operator (*less than 50 people, turnover/balance sheet total ≤ € 10 m*)
- Medium-sized enterprise operator (*less than 250 people; turnover ≤ € 50 m / balance sheet total ≤ € 43 m*)
- SME trader
- Large business operator (*over 250 people; turnover more than € 50 m / balance sheet total more than € 43 m*)
- Civil society organisation
- Monitoring organisation (as per EUTR)
- Certification body/institution
- Consultancy
- Other (please specify): Trade association

Questionnaire

The EU Timber Regulations (EUTR) and its objectives and impacts

1.1 With the EUTR the EU aims at contributing to international efforts to combating illegal logging and associated trade.

In my view, the EUTR has so far been effective in...

| | Strongly agree | Agree | Disagree | Strongly disagree | No opinion |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| ...preventing illegally harvested timber or timber products derived from such timber being placed on the EU market. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ...helping create a level playing field for timber trade and for operators acting in accordance with applicable legislation. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ...contributing to the EU's international obligations {e.g. on sustainable forest management, combating deforestation and forest degradation, climate change, biodiversity conservation, and other internationally agreed goals}. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Others (please indicate)

The EUTR can be a complementary measure to the existing sustainable forest management regulatory framework.

1.2 The EUTR specifically aims at preventing illegally harvested timber and timber products from being placed on the EU market. It contains a prohibition on placing such products on the EU market and requires operators who place them on the market for the first time to carry out due diligence.

In my view, the EUTR's aims are addressed effectively by...

| | Strongly agree | Agree | Disagree | Strongly disagree | No opinion |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|
| ...the prohibition of placing illegally harvested timber and timber products on the market. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ...the due diligence requirement for operators. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ...both provisions, i.e. prohibition and due diligence. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Others (please indicate)

1.3 In my view, since the EUTR became applicable in March 2013, it has made a change to...

| | Strongly agree | Agree | Disagree | Strongly disagree | No opinion |
|--|--------------------------|-------------------------------------|-------------------------------------|--------------------------|-------------------------------------|
| ...the quantity of certified/verified timber on the EU market. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ...the areas of origin of timber and timber products entering the EU market. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ...the volume of timber and timber products entering the EU. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ...the value of timber and timber products entering the EU. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ...the species of timber and timber products entering the EU. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ...the entry points of timber and timber products into the EU. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ...the timber trade, beyond its original stated aims (see under 1.1). | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

...the level of engagement by timber-exporting countries to ensure that exports are verified to be of legal origin (including by engaging in FLEGT Voluntary Partnership Agreements with the EU and/or by developing national verification schemes).

Please specify if possible

1.4 What are, in your view, the main challenges to implementing the EUTR effectively?

| | Strongly agree | Agree | Disagree | Strongly disagree | No opinion |
|---|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|-------------------------------------|
| Levels of penalties across the EU. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Resources for enforcement by competent authorities in EU MS. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| What is required by an operator to exercise due diligence. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Gathering information on applicable legislation in timber/timber products-exporting countries. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Carrying out risk assessment and mitigation on high-risk supply chains and/or high risk timber sources. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Cooperation from timber suppliers in third countries. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| The interface with third party verification/certification. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| The definition of legal timber. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| The definition of risk (and its related assessment). | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| The product scope. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Others (please indicate)

On the product scope: AmCham EU finds it very helpful that the regulation provides the customs code of the products falling within the scope of the regulation. This reduces the challenges for industry since there is no need to guess which categories of products are covered; it increases certainty. However, the product scope is a challenge when it comes to paper products which constitute a more complex supply chain than wood.

Additionally, the reference to pulp and paper in combined Nomenclature Chapters 47 and 48 includes 'cotton based pulp'. Cotton is a cultivated crop not derived from deforestation. Bamboo is excluded from the Regulation and cotton should be as well, given the purpose of the EUTR.

2. The EUTR and the added value of EU action in this field

It is important to assess the added value that the EUTR brings, compared to what could be achieved by MS at national level without a specific EU action.

| | Strongly agree | Agree | Disagree | Strongly disagree | No opinion |
|---|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| In my view, the EUTR's objectives could have been achieved more effectively through measures at national level without any EU action. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| In my view, other policy instruments or mechanisms provide, or can potentially provide, better cost-effectiveness than the EUTR. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| In my view, other market instruments/mechanisms provide, or can potentially provide, better cost-effectiveness than the EUTR. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Further comments

AmCham EU strongly believes that individual Member State regulation or any fragmentation of the market should be avoided.

3. Implementation and enforcement of the EUTR

EU Member States are responsible for laying down rules on penalties applicable to infringements of the provisions of the EUTR.

3.1 In my view, the penalties set in my Member State are...

| | Strongly agree | Agree | Disagree | Strongly disagree | No opinion |
|---|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| ... effective | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ... proportionate | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ...dissuasive in discouraging infringements | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Further comments

AmCham EU would like to underline that the EUTR is still a recent legislation for which full assessment remains difficult at the moment.

The Member States are also obliged to designate one or more Competent Authorities responsible for the application of the EUTR. Member States' Competent Authorities are required to check operators in order to verify they comply with all their obligations. Competent Authorities are also required to check monitoring organisations.

3.2 In my view, the Competent Authority in my Member State has so far...

| | Strongly agree | Agree | Disagree | Strongly disagree | No opinion |
|--|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| ...carried out a sufficient number of checks on operators. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ...carried out effective checks on operators. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ...given appropriate penalties to operators for infringements of the EUTR. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ...carried out a sufficient number of checks on monitoring organisations. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ...carried out effective checks on monitoring organisations. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Further comments

We support Member States' action as appropriate and sufficient, although we have observed that enforcement has not yet been fully implemented because of the recent adoption of the regulation (see 3.1).

4. The EUTR and the business environment (i.e. operators, traders)

Operators are companies or individuals who place timber or timber products on the market; they are required to undertake due diligence before doing so. Traders are companies or individuals who buy/sell on the internal market timber products already placed on the market; they are required to keep records of their suppliers and customers. Monitoring organisations are recognised by the European Commission and can provide due diligence services to operators in the EU.

4.1 In my view, in my Member State...

| | Strongly agree | Agree | Disagree | Strongly disagree | No opinion |
|--|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| ...operators have set up and maintained effective due diligence systems. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ...operators have effectively prevented illegally harvested timber or timber products from being placed on the market. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ...traders have effectively kept records of timber and timber products. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Others (please indicate)

AmCham EU members operate across Europe and cannot comment on specific Member States.

4.2 It is important to understand the impacts of the EUTR on businesses in the EU.

| | Strongly agree | Agree | Disagree | Strongly disagree | No opinion |
|--|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| The overall benefits of implementing the EUTR outweigh the costs regardless of the type and size of the business. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Some categories of enterprises are benefiting more than others. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| The EUTR has a net benefit for large business (over 250 people; turnover more than € 50 m/balance sheet total more than 43 m) compared to small (less than 50 people, turnover/balance sheet total ≤ € 10 m) and medium size enterprises (less than 250 people; turnover ≤ € 50 m/balance sheet total ≤ € 43 m). | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

The EUTR has created direct benefits for businesses in general.

Further comments

4.3 In my view, the EUTR has created additional obligations and burdens for business in the EU particularly on...

| | Strongly agree | Agree | Disagree | Strongly disagree | No opinion |
|--|--------------------------|-------------------------------------|-------------------------------------|--------------------------|-------------------------------------|
| ...setting up a due diligence system. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ...maintaining a due diligence system. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ...using a monitoring organisation's due diligence system. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ...changing suppliers. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ...changing geographic supply sources. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ...changing timber species. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Another reason (please specify)

4.4. It is important to understand the impacts of the EUTR on businesses outside the EU.

| | Strongly agree | Agree | Disagree | Strongly disagree | No opinion |
|---|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| The EUTR has brought overall benefits to timber exporters to the EU and non EU operators. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| The EUTR has a net benefit for large businesses compared to small and medium-sized enterprises. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| The EUTR has created direct benefits only for certain types of businesses. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Please specify

5. Monitoring organisations

Monitoring organisations are recognised by the European Commission to provide due diligence services to operators in the EU.

5.1 In my view, monitoring organisations have so far developed due diligence systems that...

| | Strongly agree | Agree | Disagree | Strongly disagree | No opinion |
|--|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| ...effectively help operators to assess and mitigate the risk of placing illegal timber on the EU market. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ...are affordable for large businesses (over 250 people; turnover more than € 50m/balance sheet total more than 43 m). | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ...are affordable for small (less than 50 people, turnover/balance sheet total ≤ €10m) and medium enterprises (less than 250 people; turnover ≤ € 50 m/ balance sheet total ≤ € 43 m). | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ...do not currently have a market while other services are preferred (i.e. training, free access to information, other tools). | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ...are in need of further improvements. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Further comments

6. Third parties' substantiated concerns

The EUTR allows for third parties to raise substantiated concerns with Competent Authorities concerning compliance by an operator with the EUTR.

| | Strongly agree | Agree | Disagree | Strongly disagree | No opinion |
|--|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| Competent Authorities in my Member State have responded appropriately to substantiated concerns. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| I am aware of concerns but without proven evidence. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| It is not clear how to channel | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

concerns and substantiate them.

Further comments

7. Communicating about EUTR

For the EUTR to function effectively it is important for operators and traders to be aware of information which affects their businesses.

7.1 In my view, operators in my Member State are sufficiently aware of...

| | Strongly agree | Agree | Disagree | Strongly disagree | No opinion |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|-------------------------------------|
| ... the requirements of the EUTR. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ... how to access the European Commission's online EUTR guidance documents. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ... who their EUTR Competent Authority is. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ... how to access information from their EUTR Competent Authority. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ... the requirements of the due diligence obligation. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ...the services provided by monitoring organisations. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Further comments

7.2 In my view, traders in my Member State in general are sufficiently aware of...

| | Strongly agree | Agree | Disagree | Strongly disagree | No opinion |
|---|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| ... the requirements of the EUTR. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ... how to access the European Commission's online EUTR guidance documents. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ... who their EUTR Competent Authority is. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

CONSULTATION RESPONSE

| | | | | | |
|--|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| ... how to access information from their EUTR Competent Authority. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ... the requirements of the due diligence obligation. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ...the services provided by monitoring organisations. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Further comments

8. The EUTR and other relevant legislation

The EUTR has specific links to other policies, such as the Forest Law Enforcement, Governance and Trade (FLEGT) Regulation, and the EU Wildlife Trade Regulations. Optimising these synergies can enhances their effectiveness.

| | Strongly agree | Agree | Disagree | Strongly disagree | No opinion |
|--|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|
| The EUTR is complementary to other existing legislation and has a coherent approach. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| In my view, the implementation and enforcement of EUTR and/or other related legislation can be improved to benefit their interconnections. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Please specify

AmCham EU closely follows the US Lacey Act and other legislation on legal harvesting globally. We generally favour any legislation that provides a clear scope and definitions. We believe it would be helpful if the EU could receive information on relevant legislation in other countries, including third countries and those not designated as low-risk.

We are also very supportive of the FLEGT initiative, however, we would like to see more progress with the issuing of licenses.