



WWF

REPORT

UK

2015

DO TIMBER PRODUCTS IN THE UK STACK UP?

A REPORT ON THE RESULTS OF TESTING SELECTED
RETAIL PRODUCTS THAT AREN'T COVERED BY
THE EU TIMBER REGULATION

ABOUT WWF-UK

About WWF-UK. WWF was established in 1961 and is at the heart of global efforts to address the world's most important environmental challenges. We work with communities, businesses and governments in over 100 countries to help people and nature thrive. Together, we're safeguarding the natural world, tackling climate change and enabling people to use only their fair share of natural resources. Find out more about our forests work at:

wwf.org.uk/forests

ABOUT PERIDOT PLANET

Peridot Planet Limited offers consultancy services in responsible procurement, event organisation and management, research and report writing. Rachel Hembery, the Director of Peridot Planet Ltd has over 20 years experience in international responsible trade issues and has trained government officials both in the UK and abroad on responsible timber procurement. She has also worked with Local Authorities on the implementation of sustainable timber purchasing policies.

www.peridotplanet.com

CONTENTS

SUMMARY	4
INTRODUCTION	6
RESULTS	12
1. Products made of high-risk species with a mismatch between retailers' declaration and anatomical results	14
2. Products made of high-risk species without a mismatch	14
3. Products made of low-risk species	15
CONCLUSION	16
RECOMMENDATIONS	17
APPENDIX	19
Appendix 1	
Further details of company responses for products made of high risk species	19
Appendix 2	
Details and company responses of products made of low-risk species	21
References	24

SUMMARY

Timber products from illegal sources may still be on sale in the UK, despite restrictions placed on imports of illegal wood under the European Union Timber Regulation (EUTR).

More than half of timber imports by value are not covered by the EUTR, and UK-based companies selling these products are not legally obliged to ensure – or prove – they come from legal sources. There is no requirement for companies to buy from sustainable sources.

1/3

NEARLY A THIRD OF THE 26 PRODUCTS TESTED WERE NOT ACTUALLY MADE FROM THE WOOD TYPE OR SPECIES CLAIMED BY THE COMPANY



This study targeted products not covered by the EUTR. It established that some companies are selling products in the UK made of types of wood that carry a high risk of coming from illegally logged forests, and are unable to provide evidence of a comprehensive assessment.

Our research shows that of the 17 companies we purchased products from, none was able to supply evidence to assure us that they had carried out adequate due diligence to ensure they were from a legal source. Seven (nearly half) of these companies were selling products made from what we consider to be high-risk species.

Eight (nearly a third) of the 26 products tested were not actually made from the wood type or species claimed by the company.

WWF believes that changes to the EUTR are required if European member states, like the UK, are to ensure that all timber and timber products being placed on the market are coming from – at a minimum – legal sources. This would require all wood-based products to be covered by the regulation.

If companies are not voluntarily undertaking due diligence on their products, or if they are not obliged by law to ensure forest products are from a legal source, then our market continues to threaten some of the world's most biologically diverse forests through deforestation and degradation.

Our report recommends that the businesses we targeted need to do much more to ensure they are not contributing to demand for illegally logged timber; that government regulation should oblige companies to check for legality as a minimum; and that to avoid buying products that contribute to deforestation and degradation, both business and customers alike should choose those that are certified as having come from a sustainable source.



© THINKSTOCKPHOTOS.COM

INTRODUCTION

The importance of forests cannot be overestimated. Forests are home to more than half of all known land-based animals, plants and insects.¹

Almost all forests on Earth are inhabited; the livelihoods of over a billion people depend on them.²

Forests also play a crucial role in regulating the Earth's climate by absorbing and storing carbon dioxide from the atmosphere. Climate change is one of the greatest threats humankind has known, and forests are a vital part of the solution. Forest conservation can both slow the rate of climate change and help people and species adapt to changes that are already occurring. Conserving forests is the single largest and most cost-effective thing we can do to limit the impact of climate change.³

41%
RESEARCH
SHOWS THAT THE
EUTR COVERS
ONLY 41% OF THE
VALUE OF
WOOD-BASED
PRODUCTS
ENTERING
EUROPE

Illegal logging is one of the major threats to the world's forests. It drives the loss and degradation of forest ecosystems, destroying wildlife habitats and threatening biodiversity. It also impacts on people – particularly local communities and indigenous groups that are directly dependent on forest resources for subsistence, whose livelihoods, rights and security are threatened.⁴

Closely associated with corruption and organised crime, illegal logging also undermines the rule of law, principles of democratic governance, and respect for human rights.⁵ In some cases, it is also associated with violent conflict, with profits from illegal exploitation of forests and other natural resources having been used to fund and prolong wars.⁶

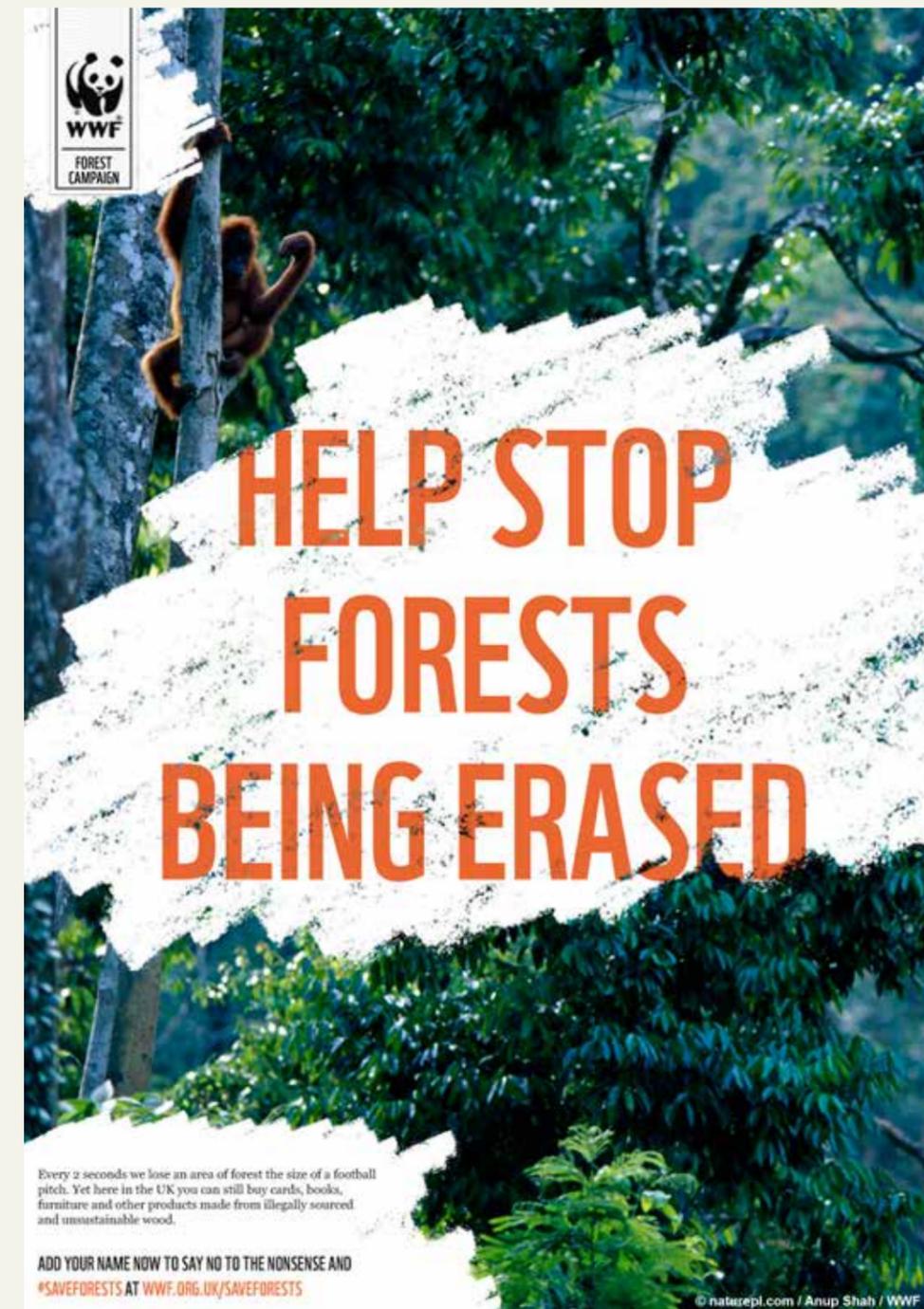
Illegal logging and the related trade also hinder economic development. It's been estimated that developing countries lose more than US\$10 billion per year from illegal logging on public lands alone – eight times the total global development assistance for sustainable forest management. In addition, governments lose an estimated US\$5 billion due to evaded taxes, fees and other revenues associated with legal forestry.⁷

To address this problem, the European Union Timber Regulation (EUTR) came into force in March 2013 to prevent sales of illegal timber and timber products in any European member state, including the UK. It requires businesses placing products on the market to apply 'due diligence' to ensure that the timber is legally sourced.

The regulation covers timber and timber products such as logs, plywood, paper and fibreboard, but many items routinely found on sale and in our homes are not included. For example, while empty picture frames are covered, those with a picture in are not. Tables are included, but not chairs. Books are covered – but only if they are printed in Europe, imported printed materials are not included in the regulation.

WWF-commissioned research shows that the EUTR covers only 41% of the value of wood-based products entering Europe.⁸ The report concludes that the EUTR's current scope is therefore not comprehensive enough to stop illegal timber from being sold in Europe.

This study looked at products that are not covered by the EUTR being sold in the UK, that we suspected may be from wood from areas with a high risk of illegal logging. We wanted to see if the wood that the retailer declared the product was made from was correct, as part of an assessment on whether they had carried out sufficient checks to make sure the wood was at least from a legal source.



WWF's Forest Campaign is calling for a market in 100% legal and sustainable timber by 2020

450 SIBERIAN TIGERS

ILLEGAL LOGGING
THREATENS THE
HABITAT OF THE
LAST REMAINING
TIGERS FOUND IN
RUSSIA FAR EAST



Areas which are currently experiencing high levels of illegal logging include the Russian Far East (an area at the eastern end of Russia bordering the Pacific Ocean and extending inland along the Amur River) and tropical regions.

The Russian Far East has the world's last large tracts of temperate forests. Large-scale logging of ancient oak, ash, linden (also known as basswood) and elm forests in Russia threatens the livelihoods of indigenous communities and important habitats: the last remaining 450 Amur (Siberian) tigers are found here. Between 50%⁹ and 80%¹⁰ of timber from the Russian Far East is believed to be logged illegally. Almost all of this timber crosses over the Russian border and into China where it is manufactured into flooring and furniture destined for markets in Europe, America and Japan.¹¹

Tropical forests cover less than 7% of the Earth's surface, yet they are home to well over half of all living things on land.¹² Despite their importance, they continue to decline. One study estimates that the rate of tropical forest loss is still increasing by 200,000 hectares per year.¹³ Interpol estimates that illegal logging accounts for 50-90% of all forestry activities in key producer tropical forests, such as those of the Amazon Basin, central Africa and south-east Asia.¹⁴

For many years, WWF has been advocating that businesses in the UK and elsewhere trading in such species carry out checks and due diligence to avoid contributing to loss of forests, especially those of high conservation and social value. However, many companies worldwide continue to source timber products from regions and species where the risk of illegal logging is high.

WWF supports credible, independent forest certification. Wood products bearing the Forest Stewardship Council (FSC) logo, for example, are from forests that have been independently certified as being managed sustainably. Without this kind of verification, it's much harder for the public to ensure the products they are purchasing are from legal or sustainable sources.

METHODOLOGY

SELECTION OF PRODUCTS

Acting as a member of the public, we purchased 26 products that are not currently covered by the EUTR from 17 companies.

The products we chose were either advertised by the retailer as containing tropical wood or oak; or we suspected they may have been due to the appearance of the product. None of the products indicated whether the wood was from an independently certified, well-managed forest source.

PRODUCT TESTING

To confirm the identity of the wood in each product, samples were sent to the Thünen Institute of Wood Research laboratory in Germany for wood anatomy testing.

Samples that were confirmed as oak were then sent to another laboratory (Agroisolab GmbH) in Germany where isotopic verification of origin testing was carried out to ascertain whether they were from the Russian Far East, based on their isotopic fingerprint.¹⁵

We used the IUCN Red List to assess the conservation status of tropical species used in the manufacture of the products we purchased, and therefore the risk of illegal logging (due to their higher value). Any oak confirmed to be from Russian Far East was also considered high risk.

We had hoped to ascertain provenance of linden (basswood), a valuable hardwood harvested in the Russian Far East. At present, however, isotopic techniques are unable to verify this.

CONTACT WITH COMPANIES

All companies were contacted through their customer services department, or a named contact within the company, to ask for information about the species of wood used in the product and its country of origin (provenance of the tree species). We stated that any supporting documentation the company had, such as certificates of origin and any declaration that the wood was legally verified, would be welcome. Companies were not asked to provide commercially sensitive information about their supply chain.

After the results from the analyses had been received, all companies that were selling products made of high-risk species, or where there was a discrepancy between the species stated by the company and the laboratory test results, were sent an official letter giving a minimum of 14 days to respond.

50-80%
THE PERCENTAGE
OF TIMBER
FROM THE
RUSSIAN FAR
EAST THOUGHT
TO BE LOGGED
ILLEGALLY

BOX.1 FORENSIC METHODS TO VERIFY SPECIES AND ORIGIN OF WOOD

Wood anatomy testing

An established method routinely used to identify wood types for solid woods, veneers, plywood, etc. It consists of a macroscopic and microscopic examination during which the genus and in many cases the species of wood samples can be determined exactly based on their anatomical structure.

Isotopic testing

Isotopes of common elements such as hydrogen, oxygen, nitrogen, sulphur and carbon occur in different proportions in different geographic areas, and are absorbed by plants and incorporated into their structure. By analysing the proportions of the isotopes in plants, it's possible to determine where they were grown, as long as reference material is available.



RESULTS

Seven of the 17 companies sold products made of high-risk species: 1to1Music, Absolute Music Solutions, Cargo, Dunelm, Fender, Garden4less and Oak Furniture Land.

>30%
PRODUCTS
TESTED THAT
WERE NOT MADE
OF THE MATERIALS
STATED BY THE
COMPANY



There was a discrepancy between what the company stated the product was made of and what the laboratory results found in eight of the 26 products tested: Three of these eight were made from high-risk wood sold by Absolute Music Solutions, Dunelm and Fender; the remaining five were made of wood considered to be low risk and were sold by Early Music Shop, Furniture Village, Melissa & Doug, Musikshop Speyer and Silver J.

No company provided adequate documentary evidence to assure us that they had carried out due diligence to check whether the wood in the products we bought and tested was from a legal source, let alone a sustainable one. In terms of information:

- Cargo was the only company to provide any documentation about its product. However, the documents were in Chinese, and it acknowledged that its UK office should have had these translated as part of its systems to ensure legality in the supply chain.
- Three companies (Better Bathrooms, Dunelm and Melissa & Doug) correctly told us the type of wood the product was made from as well as its country of manufacture for at least one of their products.
- Two companies (Fender and Oak Furniture Land) responded to confirm that they would not give us the information we asked for.
- Four companies (Devonshire Pine, Musikshop Speyer, Plumbworld and The Entertainer) made no response at all.
- The remaining seven companies did reply to our correspondence but did not give us the information we asked for.

The results have been categorised as follows:

1. Companies selling products made of high-risk species with a mismatch between retailers' declaration and anatomical results (three).
2. Companies selling products made of high-risk species without a mismatch (four).
3. Companies selling products made of low-risk species where a mismatch was found (five).
4. All other products – made of low-risk species with no mismatch (eight products from six companies).

Summary details can be found on the next page.



© GLOBAL WARNING IMAGES / WWF

TROPICAL SPECIES LISTED ON THE IUCN RED LIST, AND THEREFORE CONSIDERED HIGH RISK, FOUND IN THE TESTING

- **Okoumé** – vulnerable
- **Sapele** – vulnerable
- **Indian rosewood** – vulnerable
- **Keruing** – a name given to around 70 commercially harvested timber species from the genus *Dipterocarpus*. More than half of these are on the Red List as critically endangered or endangered
- **Nyatoh** – from *Palaquium* genus, *Sapotaceae* family – of 18 species on the Red List, 15 are endangered or vulnerable
- **Canarium** – from *Burseraceae* family – of 18 species on the Red List, 12 are endangered or vulnerable

1. PRODUCTS MADE OF HIGH-RISK SPECIES WITH A MISMATCH BETWEEN RETAILERS' DECLARATION AND ANATOMICAL RESULTS

	Company	Product purchased	Retailer's description of wood in product	Wood anatomy test results confirmed
	Absolute Music Solutions – Supplier of musical instruments and equipment	Halona UKS-15 soprano ukulele	Shapperi top, back and sides and a mahogany neck (We have been unable to verify 'shapperi' as a timber species ¹⁶ but have assumed that it refers to sapele).	Fretboard: Indian rosewood (IUCN vulnerable), veneer: sapele (IUCN vulnerable), poplar and okoumé (IUCN vulnerable); neck: okoumé (IUCN vulnerable).
				Response to request for information: None initially, but after a follow-up email the owner offered to email their supplier, Freestyle Music Ltd, which did respond with concern and offered in turn to get in touch with another supplier company. However, they sent no information. (More details in Appendix 1).
	Dunelm – Retailer of home furnishing products	Colonial clock	Wood	Fibreboard covered with black and brown veneers, which were okoumé (IUCN vulnerable) and agathis. The fibreboard contained individual elements of radiata pine, sweet gum, tulip tree, magnolia and fortunes China bells.
				Response to request for information: An initial prompt response was received from Dunelm stating that the clock was made from fir. When test results were sent later, they expressed concern and removed the product from sale. The company did not give any information when asked to provide details about the species, country of origin or legal status of the wood used in the product. The company has since engaged with WWF directly to discuss the problems and any improvements it could make in its systems. (More details in Appendix 1).
	Fender – Manufacturer of musical instruments	Fender CF-140-SCE electro acoustic guitar, natural from Gear4Music	Mahogany back and sides, rosewood bridge, fret board and headstock, solid spruce top and a mahogany neck	Nyatoh (from <i>Palaquium</i> genus, <i>Sapotaceae</i> family, 18 species listed on IUCN, 15 of which are endangered or vulnerable), Indian rosewood (IUCN vulnerable), Himalayan spruce, okoumé (IUCN vulnerable), canarium (from <i>Burseraceae</i> family, 18 species listed on IUCN, 12 of which are endangered or vulnerable) and poplar.
				Response to request for information: Fender did not give any information when asked to provide details about the species, country of origin or legal status of the wood used in the product. (More details in Appendix 1).

2. PRODUCTS MADE OF HIGH-RISK SPECIES WITHOUT A MISMATCH

	Company	Product purchased	Retailer's description of wood in product	Wood anatomy test results confirmed:
	ito1Music – Supplier of musical instruments	Traditional Irish D flute	Beautiful rosewood	Rosewood (IUCN vulnerable).
				Response to request for information: ito1Music initially responded to our request for information to say that the product was bought from suppliers in Pakistan, but correspondence asking for further information went unanswered. (More details in Appendix 1).

	Company	Product purchased	Retailer's description of wood in product	Wood anatomy test results confirmed
	Cargo Homeshop – Retailer of home wares, accessories and gifts (owned by Steinhoff UK Upholstery Ltd)	Darcy chairs (mink plain mangrove)	No information	Oak and ambar wood Isotopic testing confirmed: oak is from Russian Far East (likelihood >95%).
				Response to request for information Steinhoff Group (the owners of Cargo) responded to our request for information and took our concerns seriously. We received Steinhoff's timber procurement policy (which wasn't publicly available), their wood policy letter, group EUTR compliance procedure and examples of how individual forest-based products are scored within the company. Cargo stated that it took its supplier's word that the material was from a legal source but acknowledged it should have translated the documents from Chinese. The company has since engaged with WWF directly to discuss the problems and any improvements it could make in its systems. (More details in Appendix 1).
	Garden4less – An internet-based garden superstore company	Red check hardwood garden parasol and hardwood Carlisle folding chair	Hardwood; customer services stated keroin (but possibly meant keruing)	Keruing (IUCN vulnerable from Dipterocarpus species, more than half of these are critically endangered or endangered).
				Response to request for information Garden4less expressed concern and stated that they were told by their suppliers that all the products are from legal sources and have certificates. They passed on the details to the suppliers, but no response was forthcoming. They stated that the two products are old and will no longer be stocked. (More details in Appendix 1).
	Oak Furniture Land – Retailer of solid hardwood furniture (owned by JB Global)	French Farmhouse rustic solid oak dressing table mirror	Solid oak	Oak Isotopic results confirmed: oak originating from the Russian Far East.
				Response to request for information Oak Furniture Land responded saying they did have systems in place to ensure that the wood in their products came from legal sources, but would not provide details about the species, country of origin or legal status of the wood used in this particular product. (More details in Appendix 1).

3. PRODUCTS MADE OF LOW-RISK SPECIES

	Even when species were not considered high risk in terms of illegal logging, mismatches between the companies' description and the test results were common.			
	For example, a mahogany music stand purchased from the Early Music Shop was indicated by our test results as made from birch; a Melissa and Doug wooden kitchen play-set was not wooden but wood-plastic composite; a "solid wood" jewellery box purchased from Silver J was made from fibreboard, as was a clock also claimed to be made from solid wood from Furniture Village. A maple recorder from Musikshop Speyer was made from sweet gum and red cedar.			
	Details of products and company responses concerning these and products which were made from low-risk species with no mismatch can be found in Appendix 2.			

CONCLUSION

When we started this research, we set out to find whether the origin of the wood in the products we tested was as the company stated.

What we found was that not only was the wood often a totally different species to the one declared, but most companies were either unable or not prepared to tell us where the wood came from, even when they were selling products made of high risk wood.

This study shows that retailers in the UK are selling products made of wood which carry a high risk of coming from illegally-logged forests without any obligation to ensure they are from a legal or sustainable source; and that most companies are either not willing or not able to be transparent about the origin of the wood in their products.

- Products may contain wood from different species to those advertised or stated.
- These may include species which have a high risk of coming from illegally-logged sources.
- Sellers may not even be aware that their products contain wood from these species, putting themselves at risk of selling timber that has been illegally sourced.
- Companies in the UK that sell timber products may be relying on assurances from their suppliers that their products are from legal sources – without any evidence to prove this.
- Without better information from companies, customers cannot be sure the product they buy is as described, or that it is from a legal/sustainable source.
- Without improvements to the EUTR, companies can still legally sell certain products that have been made of illegally sourced wood.

RECOMMENDATIONS

BUSINESS

Business can play a vital role in ensuring forest resources are well managed.

The combined purchasing power of UK business can help create a thriving, mainstream market for responsible forest products, but to do this, companies must take responsibility for ascertaining their products' origins.

They need to be able to demonstrate the legality and sustainability of the wood-based products they trade, to ensure that they and their customers are not contributing to deforestation.

Progress on responsible sourcing requires top-level management buy-in, clear goals and a set time frame. This work should be made a positive experience for the company, demonstrating their commitment to forests, investing in relationships with suppliers and understanding their footprint on people and nature. They can show their business cares – to both their suppliers and customers.

We recommend that companies:

- Publish on their website a clear purchasing policy to prevent illegal timber from entering their supply chain.
- Include transparent and measurable reporting on progress against their sustainability targets in their annual reports (for example, what percentage of products comes from certified well-managed forests, recycled/reclaimed sources, or legal-only verified sources).
- Systematically verify that products are at minimum legal, while progressively moving towards certified, sustainably managed forest sources and insist their suppliers do the same.
- Engage and work with suppliers to prevent high-risk timber from entering supply chains, and exchange evidence to prove products are legal and sustainable.
- Embed a business culture based on promoting sustainability – and communicate this to customers.
- Where necessary, work with organisations like WWF, the Timber Trade Federation and NEPCo that offer guidance and systems to enable committed businesses to overcome obstacles to responsible forest trade.

The rewards are obvious. As well as managing the risk of illegal and unsustainable forest products entering the market, businesses will benefit by reducing risks to their reputation and supply security. As the market evolves, companies without sustainable sourcing policies risk becoming uncompetitive.

WWF is encouraging companies to sign up to its Forest Campaign to pledge to buy from legal and sustainable sources and help protect forests. All companies covered in this report are welcome to get involved.

www.wwf.org.uk/forestcampaign

**RESPONSIBLE
SOURCING
BUSINESS CAN
PLAY A VITAL ROLE
IN ENSURING FOREST
RESOURCES ARE
WELL MANAGED**

EUTR WITHOUT IMPROVEMENTS TO THE EUTR, COMPANIES CAN STILL LEGALLY SELL CERTAIN PRODUCTS THAT HAVE BEEN MADE OF ILLEGALLY SOURCED WOOD.

EUROPEAN COMMISSION

The EUTR was designed to provide consumers with assurances that wood products purchased in EU member states such as the UK are not contributing to forest destruction due to illegal logging. The introduction of the regulation itself marked a significant step forward – but it does not go far enough. Right now, the annual EU import value of wood-based products that are not covered by the scope of the EUTR totals €31.8 billion – more than half the total value of wood-based products being imported into Europe.¹⁸

The current scope of the EUTR isn't comprehensive enough to stop illegal timber from being placed on the EU market. This means that if retailers are unable or unwilling to provide information about their supply chains, consumers are still at risk of unwittingly buying products that have come from illegally logged sources.

This year (2015) the EUTR is being reviewed. The European Commission should recommend that the scope of the regulation be expanded so that all wood-based products are covered. Alongside measures to ensure that the regulation is being properly implemented and enforced in all 28 member states, this will ensure that it fulfils its objective to prevent products made of illegally sourced timber being sold on the EU market.

CONSUMERS

Consumers may be surprised to learn that current regulations do not prevent illegally-sourced products being sold in UK stores or on the internet. Despite the EUTR, UK consumers do not have the right to know where a product has come from or that it is from a well-managed source, or even a legal one. Voluntary independent certification schemes, like the FSC which WWF currently recognises as the gold standard, provide the best means for customers to ensure that the products they buy come from legal, sustainable sources.

Everyone can play a positive role in protecting the world's forests by only purchasing products that are from responsible sources. Public buying power can support companies that sell independently certified forest products, such as those carrying the FSC trademark.

If it's not clear where a forest product is from, or whether it's from a legal and sustainable source, customers should ask the company for details – either in the store or via customer services.

Consumers should refuse (or return) products that are described inaccurately, and refer to trading standards (through the Citizens Advice Bureau).

To support WWF's campaign for a market in legal and sustainable timber, visit wwf.org.uk/saveforests

APPENDIX 1: FURTHER DETAILS OF COMPANY RESPONSES FOR PRODUCTS MADE OF HIGH RISK SPECIES

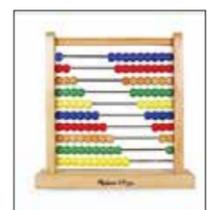
PRODUCTS WITH A TIMBER TESTING MISMATCH	
	<p>Absolute Music Solutions - Halona - UKS-15 soprano ukulele</p> <p>A spokesperson responded: "My view was that it is the importer/manufacture bringing products into the EU that is responsible for compliance issues. Is that not the case? I see from your letter that the importer (Freestyle) have not given you the appropriate information. It is my view that they need to have the correct documentation in place, so I have emailed them today to ask them." A spokesman at Free Style Music Products contacted us to say that they did not have the information about the sustainability and legal status of the timber used in the ukulele but were concerned about this. They assumed the manufacturer of the ukulele (their supplier) would have it. The supplier, a Korea-based company, was contacted but was not able to provide the paperwork immediately. The supplier said it would do so as soon as possible. At the time of writing, we have received no further information confirming the country of origin, or that the ukulele was from a legal or sustainable source.</p>
	<p>Dunelm – Colonial clock</p> <p>We asked Dunelm to provide information about the species of wood used in the clock and a customer services representative stated that it was made from fir and was made in China.</p> <p>When we sent the wood anatomy test results to Dunelm, they responded that: "the manufacturer has told us that the product does not contain these materials, however the original information provided to us was incomplete. The manufacturer has now stated that the body of the clock is MDF made from 100% recycled material, which is typically fir, and the veneer used is Ailanthus altissima. This is not consistent with your testing and therefore we have asked for further investigation to be made. The product will remain off sale until we have verified the product materials." At the time of writing, we have received no further information confirming the clock was from a legal or sustainable source, but the company has engaged with WWF directly to discuss the problems and any improvements it could make in its systems..</p>
	<p>Fender – CF-140-SCE electro acoustic guitar</p> <p>Fender Guitars did not give any information when asked to provide details about the species, country of origin or legal status of the wood used in the product.</p> <p>The wood anatomy test results were sent to Fender who responded: "Musical instruments are exempt from the requirements of the EU Timber Regulation (EUTR) and therefore Fender chooses not to disclose internal procedures to third parties; however, Fender is responsible in its direct sourcing of timber supplies and ensures that its suppliers are also responsible in their sourcing. None of the timber species identified in your testing are identified by CITIES [sic] as being at risk. 'Mahogany' is used as a generic term in many industries to describe reddish/brown wood species. Although okoumé is not a genuine mahogany species, it is not uncommon to refer to it as 'mahogany'."¹⁹</p> <p>We asked Fender if they would share any official policy document to support their statement about Fender's responsibility. No response was received. At the time of writing, we have received no further information confirming the country of origin, or that the guitar was from a legal or sustainable source.</p>
PRODUCTS MADE OF HIGH-RISK SPECIES WITHOUT A MISMATCH	
	<p>1to1Music – traditional Irish flute</p> <p>1to1 Music's initial response to our request for information about the origin of the product was to say they "buy flutes from Pakistan, so would guess the wood is from Pakistan or India but I'm not certain". Follow-up contact asking for further information went unanswered.</p>

	<p>Cargo Homeshop – Darcy chairs (mink plain mangrove)</p> <p>A spokesperson for Steinhoff (which owns Cargo) was very willing to talk to us about their due diligence processes and provide supply chain information.</p> <p>An FSC chain of custody certificate was included in the documents sent to us but we were unable to verify that this related to the chairs supplied. The spokesman did not realise that it was possible for a company to hold FSC chain of custody and still be able to supply non-certified material.</p> <p>Steinhoff's supplier employs a company to operate a "due diligence system" with each of the factories used to manufacture products and the Steinhoff spokesman had understood that this was an adequate assurance.</p> <p>The spokesman was concerned that the laboratory results had shown that the wood used in the manufacture of the chairs had a 95% likelihood of having come from the Russian Far East and planned to investigate whether it was from a legal source.</p> <p>We were told that over a year ago, Steinhoff began to assess products within their stores that were not covered by the EUTR to ensure that they were from a legal and sustainable source and would continue to do so.</p> <p>Steinhoff also stated that they are members of FIRA (the Furniture Industry Retailers Association) and have played an active role in FIRA's meetings regarding the EUTR.</p>
	<p>Garden4less – Red check hardwood garden parasol and Carlisle folding chair</p> <p>Garden4Less responded to our request for information by stating: "We don't source anything directly from overseas ourselves and we are told by our suppliers that all of these products are legally sourced and have certificates. The Keruing products and the two you mentioned are from Innovators International, I will pass your details over to Innovators so that they can provide you with the certificates and any other information that you require."</p> <p>At the time of writing, we have received no further information confirming the country of origin, or that the parasol or chair were from a legal or sustainable source.</p>
	<p>Oak Furniture Land – French Farmhouse rustic solid oak dressing table mirror</p> <p>Oak Furniture Land responded to our request for information about the country of origin and source of oak used in the manufacture of the mirror we purchased. An Oak Furniture Land sales support representative stated they were unable to answer these detailed questions: "The 1st reason being is because it is part of our manufacturing process, and Oak Furniturland doesnt [sic] want any of that information to fall into one of our competitors hands. The 2nd reason is that we are not legally oblidged [sic] to give out that information."²⁰</p> <p>We sent the wood anatomy test results to Oak Furniture Land, and received the following response: "Addressing the issues raised therein and in particular the Agrois Laboratory redacted 'report' that purports to test one of our products, it is very difficult to comment on this actual analysis as we cannot confirm the findings or indeed verify its contents." It continued by stating that Oak Furniture Land "take their obligations to source products that derive from legal harvest and forests very seriously. We are also fully aware of our obligations and requirements as a business to comply with all aspects of the EUTR 995/2010.</p> <p>"Furthermore, we believe we go over and above our legal obligations to ensure we source legal timbers by working on a consultancy basis with outside agencies such as NEPCon. As a business we have adopted the NEPCon LegalSource system to our own in house due diligence procedures and we conduct regular on site visits to overseas suppliers. Therefore in my capacity as Legal Compliance consultant to JBG may I reiterate the point that we cannot comment on the specifics or even the generalities of your letter/enquiry. However what I can say is we as a major UK retailer of solid hardwood products are fully confident in our systems which are constantly evolving and directed to all aspects of our supply chain which we believe fully demonstrates that in all circumstances we ensure we procure products from legal sources."²¹</p> <p>At the time of writing, we have received no further information confirming the country of origin, or that the mirror was from a legal or sustainable source.</p>

APPENDIX 2: DETAILS AND COMPANY RESPONSES OF PRODUCTS MADE OF LOW-RISK SPECIES

PRODUCTS MADE OF LOW-RISK SPECIES WHERE A MISMATCH WAS FOUND				
	Company	Product purchased:	Retailer's description of wood in product	Wood anatomy test results confirmed:
	<p>Early Music Shop – Supplier of early and historical musical instruments</p>	<p>Mahogany music stand</p>	<p>Mahogany</p>	<p>Birch.</p>
<p>The Early Music Shop responded to a request for information about the species of wood used and its country of origin. "Please be aware that the reference of mahogany is related to the colour and not the actual wood being used to produce them. In most cases it is a colour spray or stain applied to the wood during manufacture. We do try to make this clear when listing new products on our website, but if you draw my attention to any you think are misleading, I'll try to amend them. Where a coloured spray or stain has been applied, the woods are usually Maple or Paduk (or Padauk), which as far as we're aware, do not carry or require specific documentation."</p> <p>The results of the wood anatomy test confirmed that the wood used in the music stand's manufacture was birch and these were sent to the Early Music Shop. A spokesperson replied thanking us for the information, and said: "On your advice we've amended our website so the description reads as follows. 'Solid Wood -available in Maple (Birchwood) or Mahogany (stained Birchwood)'. In our defence, we've always acted on what our suppliers tell us, but perhaps a more detailed inspection should be carried out as new stock arrives."</p> <p>At the time of writing, we have received no further information confirming that the music stand was from a legal or sustainable source.</p>				
	<p>Furniture Village – Retailer of home furniture</p>	<p>Parisienne wall clock</p>	<p>Solid wood</p>	<p>Fibreboard of pine, sweet gum and eucalyptus.</p>
<p>No initial response was received from Furniture Village when asked for information about the wood species used in the manufacture of the clock or its country of origin, or that the wood was from a legal or sustainable source. Later, they engaged with WWF directly to set up a specific meeting to discuss the problems and find out how to take action on responsible sourcing more widely.</p>				
	<p>Melissa & Doug – American Manufacturer and purveyor of children's toys</p>	<p>Wooden kitchen accessory set</p>	<p>No information provided</p>	<p>Pots made of wood-plastic composite, and spatula from katsura.</p>
<p>When asked to provide information on the species of wood used in the product along with its country of origin, a Melissa & Doug spokesperson confirmed that the pots were made from "wood, sawdust and resin. The knobs, spatula and spoon are solid wood. The country of origin is China." Melissa & Doug was one of only three companies who responded to the question of what the species their product was made from and its country of origin, but no information about whether the product was from a legal or sustainable source was received.</p>				

	Musikshop Speyer – German retailer of musical instruments	Gewa German-made descant recorder	Maple	Sweet gum body and red cedar mouthpiece.
No response was received from Musikshop when asked for information about the wood species used in the manufacture of its recorder, its country of origin or that the wood was from a legal or sustainable source.				
	Silver J – Retailer of handmade gifts	Handmade, wooden, mother of pearl jewellery box	Wooden	Fibreboard, with individual elements of pine and white oak.
When Silver J was asked for information about the product, it stated that the jewellery box was made from hardwood. When asked to elaborate, there was no response. When we sent the anatomical testing results showing that the box was actually made of fibreboard, Silver J responded: “If this is the case, we will have to return the trinket box back to our supplier. We will process full refund and reimburse your return cost.” We received no comments about the laboratory results and no information confirming the country of origin or that the wood was from a legal or sustainable source.				
ALL OTHER PRODUCTS - MADE OF LOW RISK SPECIES WITH NO MISMATCH				
	Company	Product purchased	Retailer’s description of wood in product	Wood anatomy test results confirmed
	Better Bathrooms – Retailer of bathroom products	Oak toilet seat	Solid oak	Oak Isotopic tests confirmed: Not from Russian Far East.
A Better Bathrooms representative told us that the toilet seat was made of “European White Oak and originates from the Czech Republic”. Better Bathrooms was one of only three companies who responded to the question of what species their product was made from and its country of origin, but at the time of writing, we have received no further information confirming that the toilet seat was from a legal or sustainable source.				
 	Dunelm – Retailer of home furnishing products	25mm blind, 50mm blind and Penzance slatted dining chair	Hardwood	Basswood (linden)
When Dunelm were asked to provide information about the species of wood and the country of origin of their blinds. A customer services representative replied stating that the hardwood used in the manufacture of the blind was basswood and the country of origin was China. Dunelm was one of only three companies who responded to the question of what species their product was made from and its country of origin. Basswood (otherwise known as linden) is a valuable hardwood that is exported from the Russian Far East, but at present isotopic techniques are unable to verify this. At the time of writing, we have received no further information that the blinds were from a legal or sustainable source.				

	Company	Product purchased	Retailer’s description of wood in product	Wood anatomy test results confirmed
	Devonshire Pine – Manufacturer of pine furniture, distributor of oak furniture	Ladder back dining room chair	Oak	Oak Isotopic tests confirmed: Not from Russian Far East.
No response was received from Devonshire Pine when asked for information about the wood species used in the manufacture of its dining room chair, its country of origin or whether the wood was from a legal or sustainable source.				
	House of Fraser – Department store	Pebble chopping board and acorn ornament	Oak	Oak Isotopic tests confirmed: Not from Russian Far East
No response was received from House of Fraser when asked information about the country of origin and species used for the chopping board and acorn ornament purchased. We sent a follow-up email, and a House of Fraser customer services representative said that any such request for information had to be put in writing and posted to their head office. This was done but no response was received.				
	Plumbworld – Retailer of bathroom products	Toilet seat	Solid oak	Oak Isotopic tests confirmed: Not from Russian Far East.
No response was received from Plumbworld when asked for information about the wood species used in the manufacture of its toilet seat, its country of origin or that the wood was from a legal or sustainable source.				
	The Entertainer – Retailer of toys, craft products and electronic games	Abacus	Wooden	Abacus frame made from rubberwood and bead made of Chinese gugar.
No response was received from The Entertainer when asked for information about the wood species used in the manufacture of the abacus, its country of origin or that the wood was from a legal or sustainable source.				

REFERENCES

1. UNEP. *About forests* [online]. Available from: www.unep.org/forests/AboutForests/tabid/29845/Default.aspx
2. World Bank. 2004. *Sustaining forests: a development strategy*. World Bank, Washington DC, USA. Available from: siteresources.worldbank.org/INTFORESTS/Resources/SustainingForests.pdf
3. WWF International. 2013. WWF Living Forests: Chapter 3, p.3. WWF International, Gland, Switzerland.
4. Rosander, MN. 2008. *Illegal Logging: Current Issues and Opportunities for Sida/SENSA Engagement in Southeast Asia*. Regional Community Forestry Training Centre for Asia and the Pacific.
5. European Union. 2006. Combating illegal logging and related trade in developing countries. Available from: europa.eu/legislation_summaries/other/r12528_en.htm
6. European Commission (EC). 2003. Communication from the Commission to the Council and the European Parliament Forest Law Enforcement, Governance and Trade (FLEGT): proposal for an EU action plan [COM(2003)251]
7. INTERPOL/World Bank. 2009. Chainsaw Project – An INTERPOL perspective on law.
8. Newleaf. 2014. *In or out? Can the European Union's Timber Regulation keep out illegal timber?* WWF-UK, Woking, UK. Available from: assets.wwf.org.uk/downloads/wwf_in_or_out_report_web_v3.pdf
9. Smirnov, DY (ed.) Kabanets, AG, Milakovskiy, BJ, Lepeshkin, EA and DV Sychikov. 2013. *Illegal logging in the Russian Far East: Global Demand and Taiga destruction*. WWF-Russia, Moscow, Russia.
10. EIA. 2013. *Liquidating the forest: Hardwood flooring, organized crime, and the world's last Siberian tigers*. Environmental Investigation Agency. Available from: eia-global.org/images/uploads/EIA_Liquidating_the_Forests.pdf
11. EIA. 2013. *Liquidating the forest: Hardwood flooring, organized crime, and the world's last Siberian tigers*.
12. www.rainforestfoundation.org/commonly-asked-questions-and-facts
13. Kim, D-H et al. 2015. Accelerated Deforestation in the Humid Tropics from the 1990s to the 2000s. *Geophysical Research Letters*, doi: 10.1029/2014GL062777. This new paper reports a 62% rise in tropical deforestation from the 1990s to the 2000s.
14. Project Leaf (Law Enforcement Assistance for Forests): see www.interpol.int/Crime-areas/Environmental-crime/Projects/Project-Leaf
15. www.agroisolab.de/e-isotopen-analyse-funktion.htm
16. The Wood database, Trada Species database, The Plant Book (Cambridge University Press), Woodworkers Source
17. Isotope results showed that origin from the Amur Region in the Russian Far East was “possible”, with matches for isotopes of hydrogen, carbon and oxygen, but with an atypical result in isotopes of sulphur. The lab later provided a likelihood percentage about >95% (taking into account IRMS (Isotope Ratio Mass Spectrometry) and NIR (near infra-red spectroscopy) data – S. Hofem, pers. comm
18. Newleaf. 2014. Op. cit.
19. S. Sullivan, Fender. Pers. comm. 23 March 2015.
20. G. Jenkins, Oak Furniture Land. Pers. comm. 17 March 2015.
21. P. Mohamed, JB Global Ltd. Pers. comm. 23 March 2015.

Timber in numbers...



2015

in 2015 the EU Timber Regulation is being reviewed - WWF is working across Europe to bring about positive changes to exclude illegal timber from the EU market

40

So far 40 businesses and one industry association have made a pledge through WWF's Forest Campaign to buy their timber from legal and sustainable sources



US\$10 BILLION

The amount that developing countries are estimated to lose per year from illegal logging on public lands alone

59%

The value of wood-based products imported into Europe for which there is no legislation to require the wood to come from legal sources.



Why we are here

To stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature.

wwf.org.uk