

**In response to the Commission initiative on options  
for combating illegal logging**

Illegal logging, and the imports to the EU from these sources, is of great concern for the European land and forest owners. ELO therefore strongly welcomes initiatives that form the follow-up of FLEGT 2003 in searching for criteria and a system that tightens rules for imports from illegal origin.

ELO notes that criteria to assess EU timber law should take into account the following aspects:

1. The **aim** should be to ensure that only timber products from legal sources and well managed forests, applying **equal environmental standards** that are imposed on EU forest owners, are imported. This is crucial to provide an equal playing field and eliminate unfair competition.
2. Actions should be **tight enough** in adopting sustainability and legality measures to discourage unfair competition from illegal harvested imports of importers trying to bypass the controls, but also **flexible enough** for rural businesses depending on imported wood resources.
3. In the light of the globalisation of the forest market, the agreement should incorporate **all main wood trading partners** of the EU. Bringing all partners on board will form a crucial factor of success. A risk assessment towards high-risk countries is needed.
4. Actions should cover the entire **product scope**, both wood used for products (processed products, paper and packaging) and for energy (e.g. wood chips)
5. **Due diligence** seems to be European Commission's preferred option. The exact details of implementation will determine whether this system is feasible and potentially successful. However a system in which companies should use due diligence to check its suppliers must assure that this does **not** create an **additional administrative burden** for forest owners and businesses already complying with the sustainability criteria. Any action taken must be **cost-effective and efficient**.
6. **The first buyer in the EU should be the focal point managing the liability.**
7. Streamlining the criteria for due diligence with **already existing initiatives** (such as MCPFE criteria for sustainable forest management)
8. The creation of an **Advisory and Management Committee** for operations regarding illegal logging is strongly welcomed. The objective of these Committees should be the efficient follow-up and monitoring of the implementation of the new system and they should be able to provide adjustments of the system when difficulties are encountered.

