



Confederation of European Forest Owners

SYNTHESIS REPORT

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# Survey among private forest owners on the European Union Timber Regulation (EUTR) implementation

Confederation of European Forest Owners (CEPF)  
Brussels, May 2015



Confederation of European Forest Owners

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## Summary

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Following the introduction of the European Union Timber Regulation (EUTR) in March 2013, the Confederation of European Forest Owners (CEPF) carried out a survey among its members, aimed at gathering the experiences, expectations and views regarding the implementation process from a private forest owners' perspective. The aim of this study is to stimulate the discussions within CEPF and to provide input to the forthcoming European Commission evaluation on the EUTR to be carried out in the course of 2015.

This synthesis report entails the outcome of an online-based questionnaire, which was conducted between October and November 2014 and includes the responses of fourteen CEPF members. Even though Europe's private forest owners are not the main concern of the EUTR, the results of this survey show that its implementation also affects them and their activities. For some of the CEPF Members and their constituencies there are critical issues that need further attention and consideration. Overall, the respondents expect that the Regulation will bring an increase in bureaucracy and administrative costs for forest owners, while not leading to desirable positive effects on the sales and value of domestic timber. In addition, the role and awareness of forest owners and their preparedness to comply with their new obligations has also emerged as a key concern, highlighted together with the need for further support, information and simplification of the processes.

The results show further that the competent authorities enforce the EUTR to a varying extent and intensity, causing a great level of incoherency and inconsistency. Only in few cases the checks on operators to investigate possible non-compliance have started. This demonstrates that in many EU Member States the EUTR is still at an early stage of implementation.

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## 1. Background

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This report entails the outcome of a survey on the European Union Timber Regulation implementation conducted by the Confederation of European Forest Owners (CEPF) among its members.

The EU Timber Regulation (Regulation EU 995/2010<sup>1</sup>), commonly known as the EUTR, came into force in March 2013, introducing new obligations for individuals and companies who place timber and timber products on the EU market. The Regulation was adopted as an overarching measure to prohibit the placing of illegal timber on the European internal market, aiming to ensure that the timber extraction is in compliance with the national legislation of the country of origin. The EUTR lays down three core obligations: *i*) it prohibits the placing of illegally harvested timber and timber products<sup>2</sup> on the EU market for the first time; *ii*) it requires EU operators placing timber on the market to exercise Due Diligence; and *iii*) it requires subsequent traders to keep records of their suppliers and customers. EU private forest owners are not the main concern of the Regulation and according to it they should face fewer difficulties than importers and companies in complying with the requirements. However, since forest owners play a role under the EUTR there are some implications affecting them and their activities that need to be considered.

Against this background, the CEPF Secretariat decided in September 2014 to conduct a survey among its members. The survey aimed at gathering insights of the CEPF members on the implementation of the EUTR across Europe and the effects thereof on private forest owners. Specific focus has been given to the experiences, expectations and views on the implementation of the EUTR from a forest owners' perspective. The awareness of forest owners, role and level of readiness for complying with the EUTR obligations, as well as main gaps, challenges and best practices are assessed in greater detail in this study.

The present survey should not to be considered as a representative study. The outcome serves the CEPF Secretariat in its task to contribute to the EUTR evaluation process, carried out by the European Commission in 2015.

## 2. Methodology and respondents

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The survey questionnaire was carried out in an online format using Google Forms<sup>®</sup> and it was sent to all the 22 CEPF members<sup>3</sup> in October 2014. Fourteen members from the following countries responded to the survey between October and November 2014: Austria, Croatia, Czech Republic, Denmark, Finland, France, Germany<sup>4</sup>, Latvia, Lithuania, Luxembourg, Portugal, Slovenia, Spain and Sweden. The list and the details of the respondents are shown in **Table 1**.

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<sup>1</sup> Text of the Regulation EU 995/2010: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32010R0995&from=EN>

<sup>2</sup> For the list of timber products under the scope of the Regulation refer to Annex 1 of the Regulation EU 995/2010.

<sup>3</sup> For the list of CEPF members, please refer to the website page: [http://www.cepf-eu.org/organisation.cfm?ID\\_kanal=31](http://www.cepf-eu.org/organisation.cfm?ID_kanal=31)

<sup>4</sup> The German member did not responded to the original survey but provided feedback through email.

**Table 1: Questionnaire respondents**

<i>Country</i>	<i>Organization</i>
Austria	Austrian Chamber of Agriculture
Croatia	Croatian Union of Private Forest Owners' Associations
Czech Republic	Association of Municipal and Private Forests Owners
Denmark	Danish Forest Association
Finland	Central Union of Agricultural Producers and Forest Owners
France	French Forest Owners Association
German	German Forest Owner Association
Latvia	Latvian Forest Owners' Association
Lithuania	Forest Owners Association of Lithuania
Luxembourg	Family Forestry Luxembourg
Portugal	Forestis - Forestry Association of Portugal
Slovenia	Forest Owners Association of Slovenia
Spain	Confederation of Spanish Forest Owners Organizations
Sweden	Federation of Swedish Family Forest Owners

The questionnaire was built with close-ended questions, making use of multiple choice, checkboxes, yes-no questions, as well as open-ended questions where respondents were able to express their views and opinions. In some cases, due to the lack of empirical data or real examples the questions were based on the perception or expectation by the respondent.

The questionnaire includes fourteen main questions grouped in six sections: 1) Perceived implications of the EUTR on the domestic timber market; 2) Private forest owners as 'operators'; 3) Due Diligence and obligations for private forest owners; 4) Checks on operators; 5) Penalties for non-compliance; and 6) Private forest owners information and awareness on the EUTR.

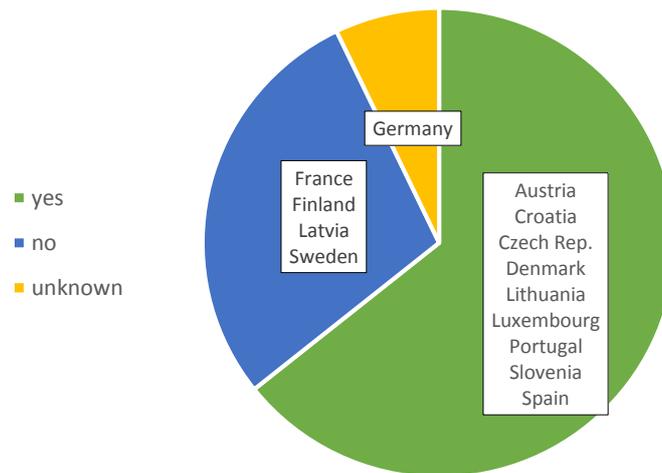
## 3. Results

This section of the report sets out the results of the survey, grouped according to the survey questionnaire structure. Charts are used to summarise the close-ended answers and the semantic answers are as well reported using the italic font in the text.

### 3.1 Perceived implications of the EUTR on the domestic timber market

**Question 1:** From a forest owners' perspective, do you expect the EUTR to have any impact on the domestic timber market?

The first question required the CEPF members to answer whether from a private forest owners perspective the EUTR is expected to have any impact on the domestic timber market. The responses are shown in **Figure 1**.



**Figure 1: Respondents' perceptions concerning the impact of the EUTR on the domestic timber market**

The results, presented in the figure above, show that nine CEPF members (from Austria, Croatia, Czech Republic, Denmark, Lithuania, Luxembourg, Portugal, Slovenia and Spain) expect the EUTR to have an impact, while four members (France, Finland, Latvia and Sweden) do not expect the EUTR to have an impact on the domestic timber market. The respondent from Germany had no knowledge whether the EUTR would have any impact.

To those concurring, a set of more specific questions was posed, assessing the extent/degree of the impact of the EUTR. **Figure 2**, below, illustrates the expected impact of the EUTR on bureaucracy, administrative costs, harvesting activities, sales of timber, cooperation between private forest owners and purchasers/customers and on the value of domestic timber.

**Question 2:** (If yes) how do you expect the EUTR to have impact on the following aspects in your country?

- **Expected impact of the EUTR on bureaucracy for private forest owners**

While three members (Austria, Portugal and Slovenia) responded that they are expecting an increase in bureaucracy for private forest owners and four members (Czech Republic, Denmark, Lithuania and Luxembourg) expect a only slight increase compared to current situation, the Croatian respondent foresees a slight decrease of bureaucracy.

- **Expected impact of the EUTR on the administrative costs for private forest owners in performing their activities**

Five of the respondents (Czech Republic, Denmark, Lithuania, Luxembourg and Slovenia) expect a slight increase of the administrative costs for private forest owners, following the

implementation of the EUTR. Austria and Portugal anticipate a more significant increase of the administrative costs, while no changes are expected by the respondents from Croatia and Spain.

- **Expected impact of the EUTR on harvesting activities of private forest owners**

As it can be observed from Figure 2, no changes in harvesting activities of private forest owners as a consequence of the EUTR implementation are expected by the large majority of the respondents, including Austria, Czech Republic, Denmark, Lithuania, Luxembourg, Portugal and Spain. However, the Croatian and Slovenian CEPF members are considering the EUTR to have a positive impact on the harvesting activities by private forest owners in their countries.

- **Expected impact of the EUTR on sales of timber for private forest owners**

Four CEPF members (Croatia, Portugal, Slovenia and Spain) anticipate a slight increase of timber sales for private forest owners as a consequence of the EUTR implementation, while Austria, Czech Republic, Denmark, Lithuania and Luxembourg do not expect any changes.

- **Expected impact of the EUTR on the cooperation between private forest owners and purchasers**

According to the responses, five CEPF members (Austria, Croatia, Portugal, Slovenia and Spain) expect a slight increase in cooperation between private forest owners and purchasers/customers from implementing the EUTR.

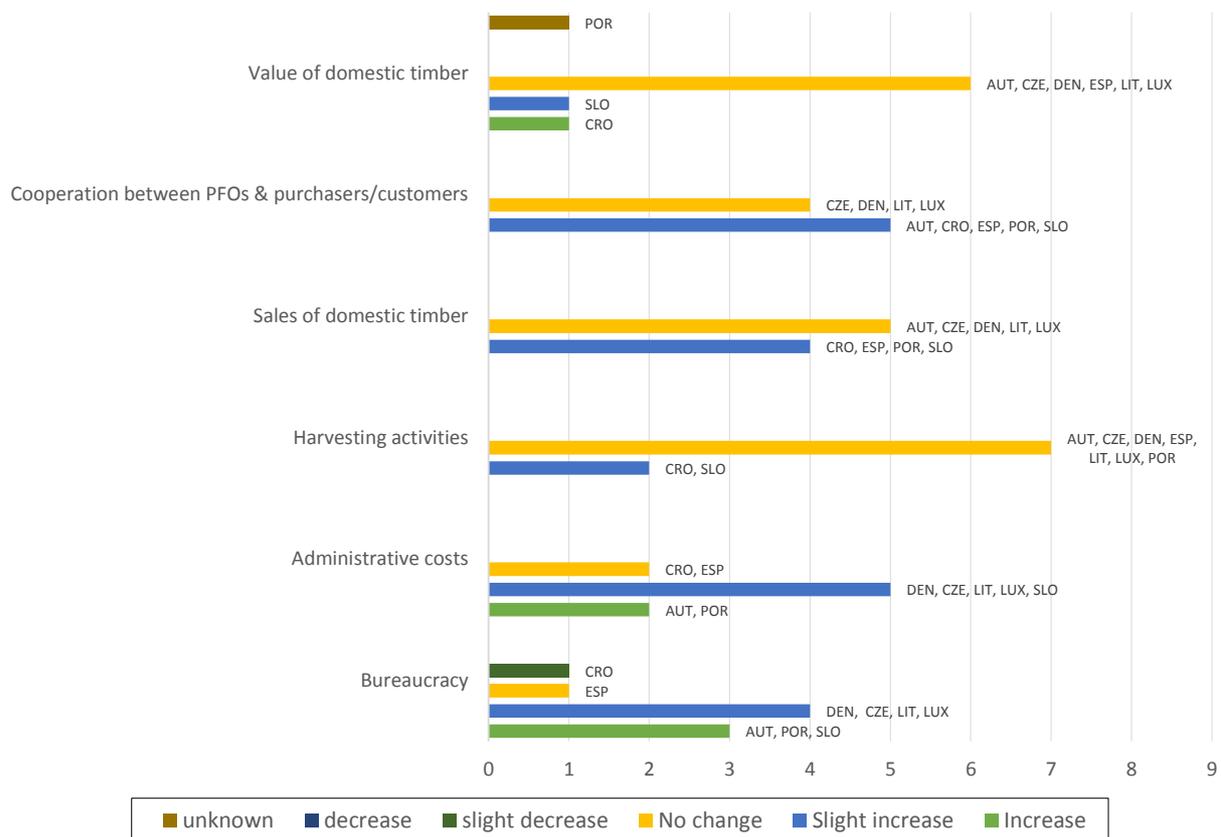


Figure 2: The perceived impact of implementing the EUTR on various aspects (for private forest owners)

- **Expected impact of the EUTR on the value of the domestic timber market**

No relevant changes are expected by the large majority of the respondents, including Austria, Czech Republic, Denmark, Lithuania, Luxembourg and Spain). Only the respondents from the Balkan region expect an increase (Croatia) and a slight increase (Slovenia) of the value of the domestic timber market.

Respondents were also asked if they expected the EUTR to have any other relevant impact, not included in the aforementioned questions. A few considerations are summarized in the following:

- *“The EUTR could lead to an increase of certified forest area and chains of custody. This is because the certification schemes already largely respond to the EUTR requirements”.*
- *“Increased financial burdens for forest owners”* was highlighted once more as a risk by three respondents

### 3.2 Private forest owners as ‘operators’

The Regulation defines an ‘operator’ as a natural or legal person who place timber or timber products on the EU market. According to the definition, private forest owners, as companies or individuals, act as ‘operators’ under the EUTR when they harvest for the purpose of processing or for distribution to commercial or non-commercial activities or consumers. Due to possible differences in interpretations and approaches by the national Competent Authorities there will be situations where the application of the Regulation might result problematic (i.e. the case of distribution of firewood to non-commercial consumers, which already has been mentioned as an unclear situation in some countries).

**Question 3:** Are there any problematic issues concerning the role of private forest owners as operators in your country?

The CEPF members were asked whether they have experienced any problematic issues concerning the role of private forest owners as ‘operators’. The responses to this question are illustrated in **Figure 3**, below.

At the time of the study, nine CEPF members, including Denmark, Finland, France, Latvia, Lithuania, Luxembourg, Portugal, Spain and Sweden responded that they did not experience any problematic issues related to the role of forest owners as operators so far. In three countries, namely Austria, Czech Republic and Slovenia, private forest owners did experience problems as operators. The respondents from Croatia and Germany answered that they had no knowledge (‘unknown’) about problems concerning the role of private forest owners as operators in their countries. The respondents were also able to provide additional information to this questions. The following includes some comments:

- One respondent elaborated further: *“In most of the cases forest owners sell standing trees, hence - according to the definition of the EUTR - they are not acting as operators. However there*

are several situations, for example the distribution of timber products like firewood on the local market (often informally), where the application of the EUTR will be challenging”.

- Another respondent commented differently: “No problems have emerged because the Due Diligence procedures are not fully implemented yet in the country”.
- “More problems of illegal cutting can exist outside forest areas, making the application of the Regulation more problematic”.
- Two respondents highlight that in complying with the EUTR requirements “more effort for documentation and more effort for determine volume is needed, and this can be problem for forest owners in situations where the access to information is complex”.

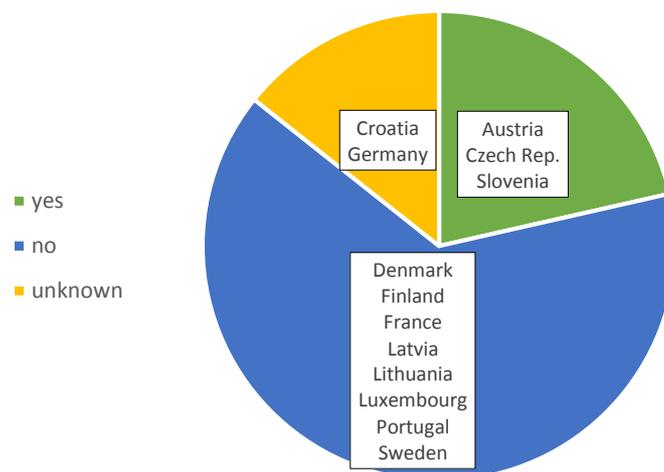


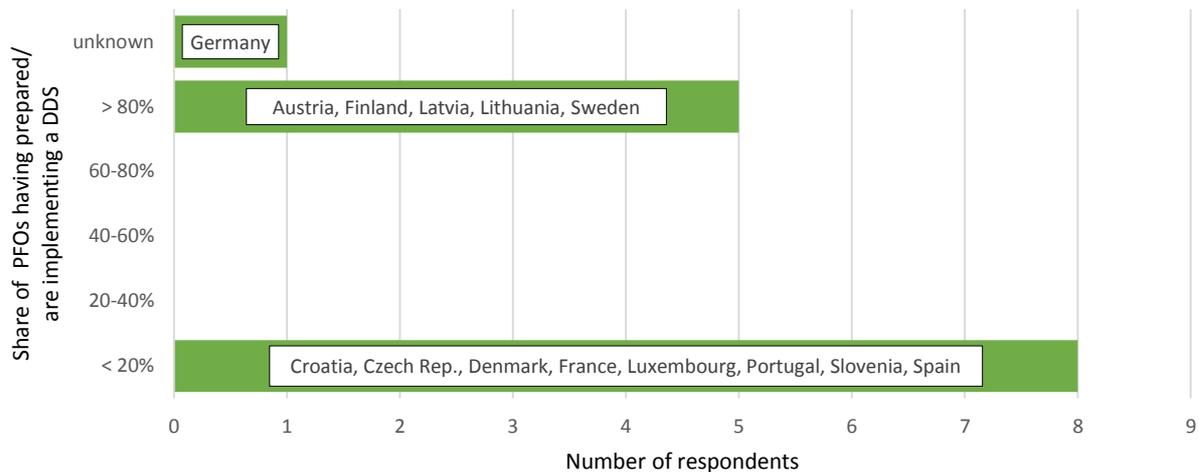
Figure 3: Response to Question 3: Problematic issues concerning the role of private forest owners as operators

### 3.3 Due Diligence and obligations for private forest owners

According to the Regulation, all operators must comply with the obligation to exercise a Due Diligence. A Due Diligence System (DDS) requires an operator to gather information about the timber and timber products and their suppliers in order to conduct a full risk assessment that ensures the compliance with the national legislation of the country of origin. It can be implemented independently, through a private consultancy or by adopting a system developed by a Monitoring Organization, which can be private entities (e.g. companies, associations) recognized by the European Commission. As operators, private forest owners are required to put in place a DDS which includes general (context, level of risk etc.) and specific information on the products (description, supplier and trader, documentation indicating the compliance with applicable legislation).

**Question 4:** According to your estimation, what is the percentage of private forest owners who have prepared or are already implementing a Due Diligence System in your country?

In this context, CEPF members were asked how many forest owners, according to their estimation, have prepared or are already implementing a DDS. In this case respondents were able to choose between the following options: I do not know (unknown), most of them (more than 80%), a rather high percentage (between 60 and 80%), some (40-60%), few (20-40%) or very few (less than 20%).



**Figure 4: Extent to which EU private forest owners have prepared or are already implementing a Due Diligence System**

As it can be observed from **Figure 4**, two extreme groups emerged from the responses. The respective CEPF members from Austria, Finland, Latvia, Lithuania and Sweden estimate that more than 80% of their forest owners have prepared or are already implementing a Due Diligence System in their respective countries. The respondents from eight countries (Croatia, Czech Republic, Denmark, France, Luxembourg, Portugal, Slovenia and Spain), on the other hand, believe that less than 20% of their respective private forest owners are prepared for a DDL system.

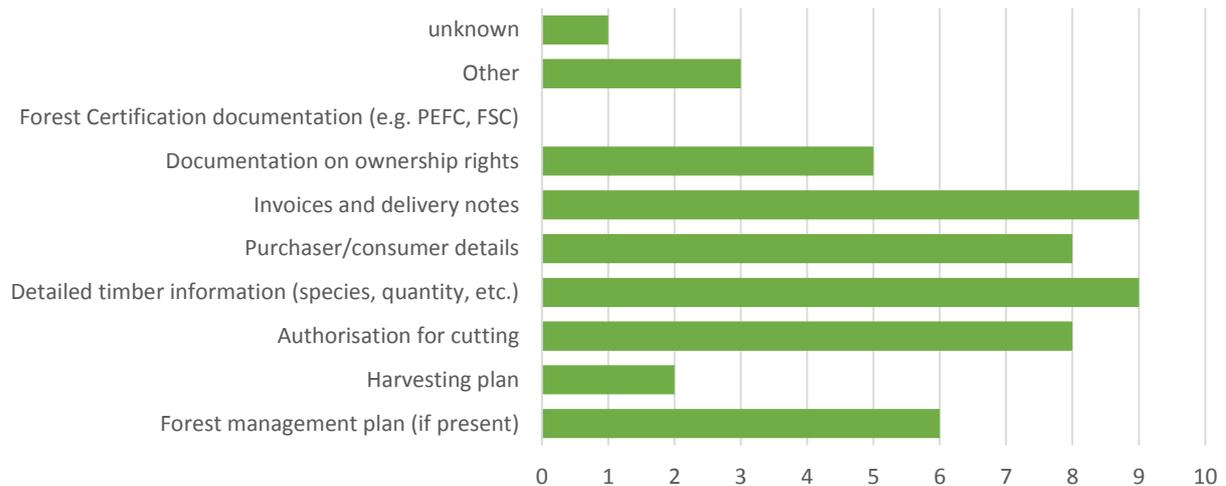
In this context, some respondents elaborated further:

- In the case of one Nordic CEPF member, most of the forest owners are considered prepared because *“most requirements of the EUTR are compatible with the already existing ones from the tax authorities and data collected in the Forest Sector database”*.
- Opposite to the above mentioned case, in a central European country very few forest owners are aware of the existence of EUTR obligations because *“the competent authority has not started controls yet, and the only proposed DDS for private forest owners so far consists of a draft document from February 2013 with several check-boxes (operator, destination, quantity, species, and claims of legality of operations)”*.

**Question 5: Which information private forest owners are required to provide in a DDS in your country?**

In addition, the respondents were requested to elaborate further on which information private forest owners are generally required to provide in a DDS. The results, presented in **Figure 5**, shows that the

information mostly required is: detailed information on the timber (species, quantity etc.), invoices and delivery notes, detailed information on the purchaser and the authorization to cutting.



**Figure 5: DDS information requirements for private forest owners**

*Note: Respondents were able to choose more than one of the options listed or add more elements*

However, the results show that the amount of information required varies significantly among countries, as shown in **Table 2** below:

**Table 2: DDS information requirements for private forest owners per responding CEPF member**

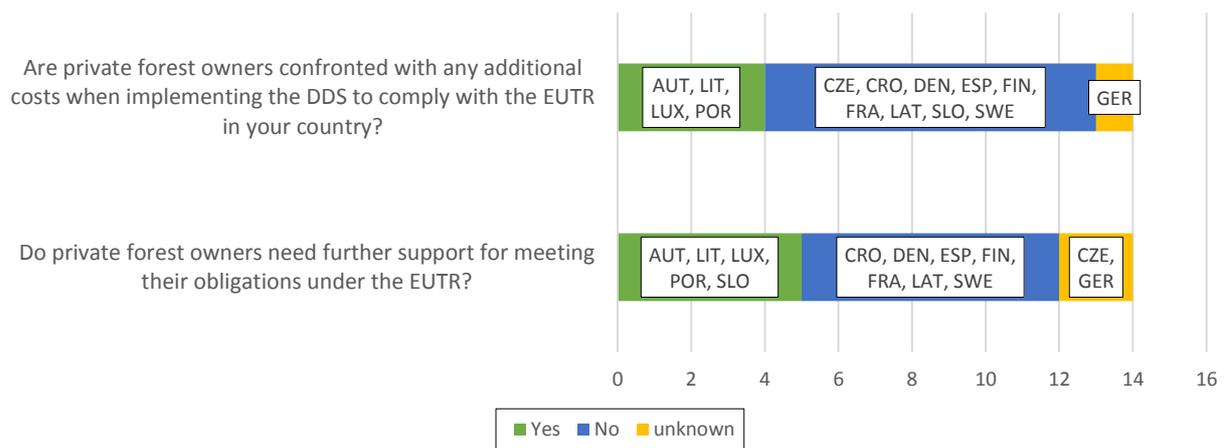
CEPF member	AUT	CRO	CZE	DEN	ESP	FIN	FRA	GER	LAT	LIT	LUX	POR	SLO	SWE
Forest management plan (if present)		x	x				x		x	x		x		
Harvesting plan						x				x				
Authorisation for cutting		x	x		x		x		x	x		x	x	
Detailed timber information (species, quantity, etc.)	x		x		x	x			x	x	x	x	x	
Detailed information on the purchaser/consumer	x		x		x	x					x	x	x	x
Invoices and delivery notes	x	x	x			x	x		x			x	x	x
Documentation on ownership rights			x			x				x			x	x
Forest Certification documentation (e.g. PEFC, FSC)														
Other						x								
unknown								x						

**Question 6:** Are private forest owners confronted with any additional costs when implementing the DDS to comply with the EUTR in your country?

The survey participants were also asked whether additional costs do occur to private forest owners as a consequence of implementing the DDS requirements under the EUTR. **Figure 6**, below, shows that four CEPF members (Austria, Lithuania, Luxembourg and Portugal) have learned that their respective

constituency is confronted with additional costs when specifically implementing the Due Diligence to comply with the EUTR, while nine of the respondents recorded no additional costs for their constituency (Croatia, Denmark, Finland, France, Latvia, Spain and Sweden). Two CEPF members of the former group highlighted the additional burden further:

- “A significant increase of bureaucracy and administrative costs”
- “Too much unnecessary bureaucracy and requirements to domestic forest owners, whom are not the main focus of the EUTR”.



**Figure 6: Consequences of implementing the DDS requirements under the EUTR for private forest owners**

In the following, the CEPF members were asked whether private forest owners need further support for meeting their obligations under the EUTR:

**Question 7: Do private forest owners need further support for meeting their obligations under the EUTR?**

As also presented in **Figure 6**, five CEPF member countries (Austria, Lithuania, Luxembourg, Portugal and Slovenia) concurred that their forest owners need further support for meeting their obligations under the EUTR. Providing more detailed explanations or examples, the need for more information and training has been reported for Austria, Slovenia, Lithuania and Luxembourg.

- A central European CEPF member: “so far there is no clear vision of how private forest owners are supposed to implement a DDS. A draft was presented in February 2013 and has so far not been applied by any private forest owner in the country. As on-site controls are probable to start in the coming months, awareness is likely to increase”.
- A Southern European CEPF Member highlighted the “necessity to inform forest owners to evaluate if they are considered operators and about the obligations they are required to meet. When appropriate and if a significant number of operators exists, technical support should be given to

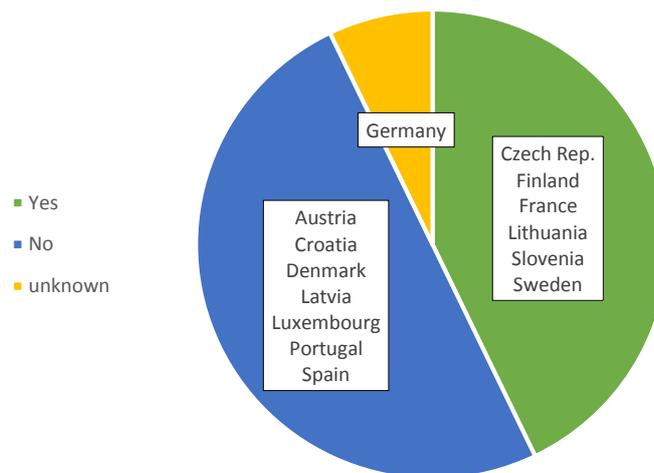
organizations so they can provide a simplified DDS system that meets their needs (not just for owners, but also to logging companies working with them). Moreover, certification can be an important asset to meet the EUTR requirement, so it is important to have instruments that allow small forest owners to achieve forest certification easily, through increased information and technical support”.

### 3.4 Checks on operators

When checked by the Competent Authority (CA), operators will need to show that they have established a Due Diligence System. The Competent Authority<sup>5</sup> is the institution designated by each Member State as responsible for the application of the Regulation and indeed the monitoring and checks.

**Question 8:** Has the Competent Authority started to carry out any checks on operators to investigate their compliance with the EUTR requirements in your country?

In the context of checks on operators the CEPF members were asked whether the CAs have started to carry out checks on operators to investigate their compliance with the EUTR requirements in their respective countries. The responses to this question are presented in **Figure 7**.



**Figure 7: CEPF Member countries in which checks on operators have been conducted under the EUTR**

According to the responses, in six CEPF Member countries the Competent Authorities have already started to conduct checks on operators to investigate possible non-compliance with the Due Diligence requirement. The countries, in which this is the case are: Czech Republic, Finland, France, Lithuania, Slovenia and Sweden. No respective checks by the CAs were recorded for seven of the CEPF Members, namely Austria, Croatia, Denmark, Latvia, Luxembourg, Portugal and Spain. The respondent from

<sup>5</sup> List of Competent Authorities: [http://ec.europa.eu/environment/forests/pdf/list\\_competent\\_authorities\\_eutr.pdf](http://ec.europa.eu/environment/forests/pdf/list_competent_authorities_eutr.pdf)

Germany was not able to provide further information to what extent operator checks were or were not conducted by the respective CAs.

In case of a positive response, the participants were asked to provide further details of the checks on private forest owners (e.g. frequency and procedure):

- *“The checks were already done by the administration as a monitoring of silvicultural activities”.*
- *“Based on Forest Use Declarations the Competent Authority checks documentation and carries out field checks. The field checks are directed to sites having some special features e.g. environmental value. Documentation covering the timber sales information can be required. The proportion of the checks is defined in the monitoring plan.”*
- *“Our Government designated two Competent Authorities responsible for the implementation of EU Timber Regulation: State Forest Service (responsible for timber raw material - 4401 and 4403 as specified in Timber Regulation Annex) and State Non Food Products Inspectorate under the Ministry of Economy (responsible for timber products - all timber products as specified in Timber Regulation Annex, except 4401 and 4403). State Forest Service: 3 officers in central bureau, 98 inspectors involved in spot checks. State Non Food Products Inspectorate under the Ministry of Economy – 2 officers in central bureau, 10 inspectors involved in spot checks. Until now State Forest Service assessed 206 operators, State Non Food Products Inspectorate under the Ministry of Economy – 25. All checks were made using risk based approach and they cover due diligence and legality of timber.”*
- *“Checks have been conducted only for importers”.*
- *“Checks are performed only for large importers in key spots (e.g. at deep sea port)”.*
- *“There has been a meeting with the CAs, and the CA has distributed a press release about EUTR and how it would carry out the checks (very recently). No further activities have been started.”*

In those members’ countries where the checks on operators have not started yet, the following comments were provided by the respondents:

- *“Checks will only be carried out at forest management level if some illegal activities are notified.”*
- *“The procedure will start at the beginning of 2015”.*
- *„The CAs is currently working to start the checks”.*
- *“Despite the national Competent Authority has not started the checks, it was already submitted to the EU a plan which predicts until the end of 2014 the beginning of those checks, in proportion of the number of registered operators.”.*

**Question 9:** Are you aware of any negative assessment resulting from checks on private forest owners?

Referring to the previous questions, the participants were asked whether they had any knowledge about a negative assessment resulting from checks on private forest owners. None of the respondents reported such a negative outcome of the assessments resulting from checks on private forest owners.

### 3.5 Penalties for non-compliance

According to the EUTR, Member States should ensure that infringements by operators, as well as by traders and monitoring organisations, are sanctioned by effective, proportionate and dissuasive penalties.

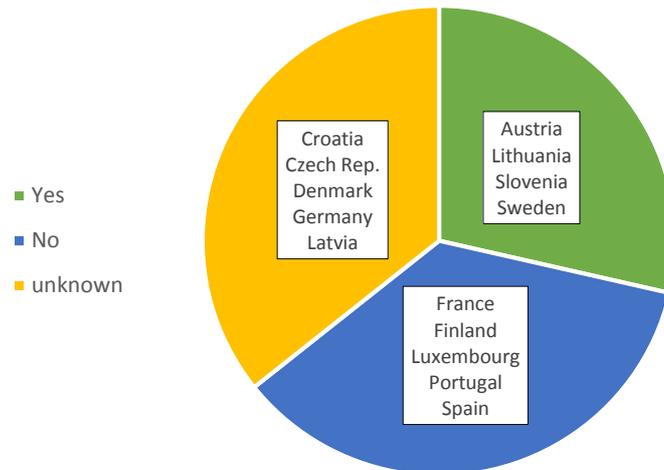
**Question 10: Are penalties being enacted in your country?**

In this section, the CEPF members were asked if the penalties were already enforced in their countries. The results presented in **Figure 8**, below, show that in four countries penalties have been already enacted (Austria, Lithuania, Slovenia and Sweden). For France, Finland, Luxembourg, Portugal and Spain the respondents reported no penalties for non-compliance under the EUTR. However, four respondents did not know whether in their countries the penalties have been enacted or not.

**Question 11: Are the penalties proportionate to the size of business and income level of private forest owners?**

In case of those members' countries where the penalties were enacted already, the respondents were asked whether the penalties are considered to be proportionate to the size of business and income level of private forest owners.

- One respondent added that the penalties are *“very high and not proportionate to private forest owners' business size”*.
- *“The penalties are too high/not proportional. Administrative Code foresees fines from 15 to 8,688 EUR, for repeating violations - up to 17,377 EUR (in the near future it is planned to increase fines for illegal felling, forest legislation infringements from 2 to 10 times). Additional sanctions are set for damages to the environment caused by illegal felling (these sanctions were raised up to 10 times in 6 March 2014): amount of compensation depends on illegally harvested volume of timber and protected area status, if illegal felling was made in protected area”*.
- Although penalties are not enacted yet *“It is not clear if they will have a direct relation to the size of the business and income level. National legislation has provided a system of sanctions taking into account the nature of the operator who commits the infraction (individual or collective) and the gravity of the failure (between a range from 50 EUR to 44 000 EUR)”*.
- Another respondent quotes its national legislation: *‘Anyone who intentionally or negligently violates the prohibition to put illegal timber on the market will be punished with a fine or imprisonment (not exceeding six month)’. “Consequently, the national legislation makes no distinction between intended wrongdoing and unintended mistakes, as well as between once-off and multiple infringements. This particularly problematic in case of small operators who are not always acquainted with all details of the law.”*



**Figure 8: Enforcing penalties for non-compliance under the EUTR**

### 3.6 Private forest owner information and awareness for the EUTR

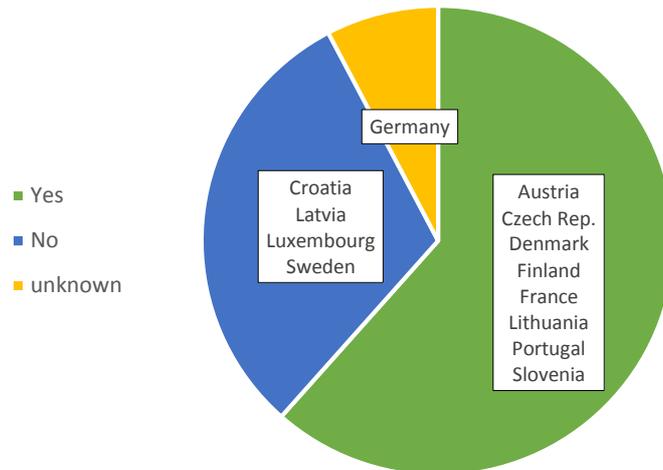
The EUTR was approved in October 2010 and came into force on 3 March 2013. This period of time was set in order to allow sufficient time for EU operators, timber producers and Member States to prepare and inform all the stakeholders about the contents of the Regulation.

**Question 12:** Do you know of any information campaign in your country that included clarification for private forest owners on their role and obligations under the EUTR?

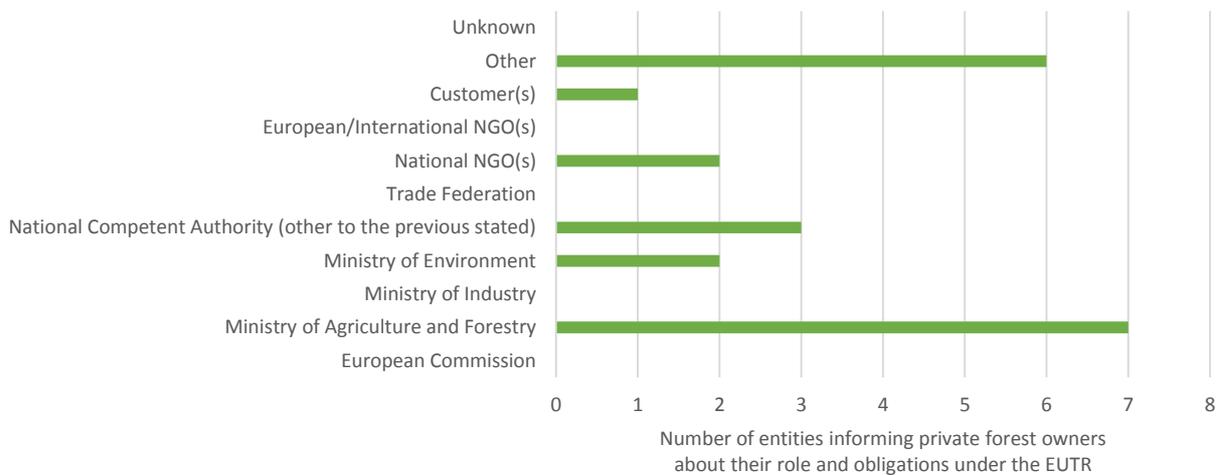
In this section the CEPF members were asked whether they are aware of any information campaign in their countries that included clarification for private forest owners on their role and obligations under the EUTR. As shown in **Figure 9**, eight out of the fourteen responses confirm that information campaigns also informing private forest owners have been conducted.

**Question 13:** Who made this information available?

The follow-up question was aimed to provide further details on who is providing additional information on the EUTR to private forest owners. In seven of the responding CEPF Member countries the Ministry for Agriculture and Forestry (or the respective equivalent) provided further information on the role and obligations of private forest owners under the EUTR, while none of the European organisations and institutions informed private forest owners accordingly. Six of the respondents indicated that their own organisations informed their constituency about their role and obligations (grouped as 'other'). Two Ministries for Environment and three Competent Authorities did so as well.



**Figure 9: Information campaigns providing clarification on the role and obligations of private forest owners under the EUTR**



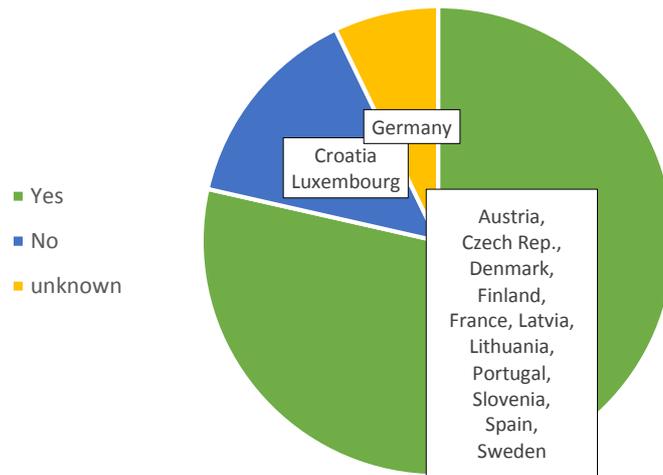
**Figure 10: Entities informing private forest owners about their role and obligations under the EUTR**

*Note: Respondents were able to choose more than one of the options listed or add more elements*

**Question 14:** Has your organization been active in disseminating the information on the EUTR to private forest owners?

Additionally, the CEPF members were asked if they have been active in disseminating the information about EUTR to private forest owners. As shown in **Figure 11**, a large majority of the responding CEPF members, namely 85 percent, have been active in informing their constituency. Together with the results from the previous questions, it appears that private forest owners in Croatia and Luxembourg have been

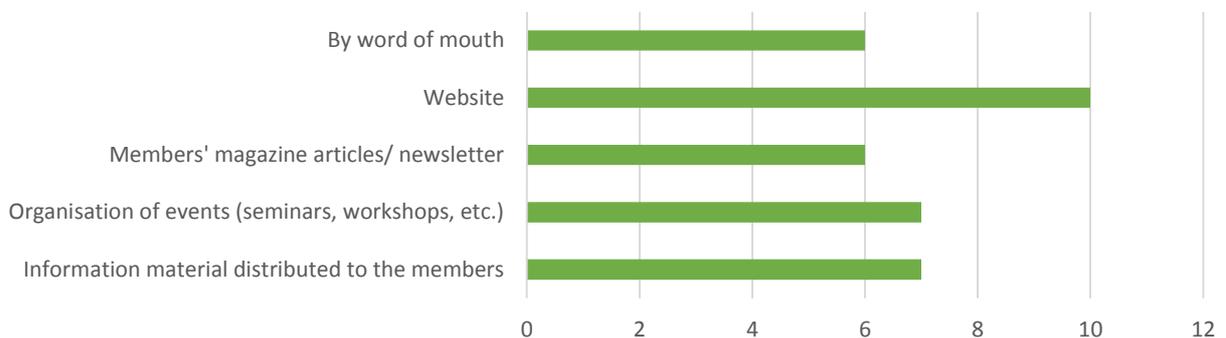
informed neither by public institutions nor by private organisations. Given the diverse structures of private forest owner organisations, once more no clear answer has been submitted by the German member.



**Figure 11: CEPF Member organisation active in disseminating EUTR information material**

**Question 15:** Please specify the means of how your organisation has disseminated the information your constituency?

In addition to the previous question, the questionnaire participants were asked which means for disseminating the respective information has been used by the CEPF member organisation. Using their own webpage for informing their members was listed by ten of the responding organisations, while seven CEPF members also used the means of distributing information material to their members and of organising information events, such as seminars or workshops. The organisations’ newsletter or merely by word of mouth were also listed by the respondents (refer also to **Figure 12**).



**Figure 12: Amount and type of dissemination means used by CEPF members**

*Note: Respondents were able to choose more than one of the options listed or add more elements*

## 4. Conclusions

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Based on the survey, when talking about the EUTR implementation and its impacts, not sufficient attention is paid to the European private forest owners' viewpoint. Although as mentioned at the beginning private forest owners are not the main concern of the EUTR, the outcome of the present survey shows that there are several issues concerning private forest owners that need further attention and consideration.

The main outcomes of the survey can be summarised in the following points:

- From a private forest owners' perspective, the majority of the CEPF members expect an impact from the EUTR implementation on the domestic timber market of their respective countries. The main concerns are, *inter alia*, the increase of bureaucracy and administrative costs for forest owners when selling their timber on the domestic market, while no relevant changes are expected in the value and sales of domestic timber.
- Based on the respondent's replies, it is clear that the EUTR is still far from being coherently and fully implemented in the EU Member States and important gaps are present when it comes to interpretation and enforcement by the different national Competent Authorities.
- According to the responses, only some CEPF Member States are able to fulfil the EUTR requirements with the already existing forest governance and trading schemes in place, not expecting thus any other relevant burden or problematic issue. In other CEPF Member States, implementing the EUTR is reason for several concerns from a private forest owner's perspective. These are mainly related to the role and awareness of forest owners and their preparedness to implement a Due Diligence in order to comply with the EUTR obligations. For instance, in eight CEPF Member States it results that still only very few (less than 20%) forest owners are considered prepared to implement a Due Diligence System, and in many cases a need for further support and simplification of the process have been highlighted.
- The type and amount of information required in a Due Diligence varies significantly among respondents' countries. It has been also emphasized that the role of third party forest certification (i.e. according to the FSC or PEFC schemes) is not acknowledged as an asset when demonstrating the compliance with the national legislation.
- At the time, when the survey was conducted (October – November 2014), only few Competent Authorities have started to undertake checks on operators to investigate possible non-compliance with the regulation requirement during the period of October to November 2014. Where introduced, companies and traders were checked. No negative assessment on forest owners has been reported by the respondents.
- Concerning penalties, some respondents point out that in some instances these are considered to be not proportionate to forest owners' size and business.

*The CEPF Secretariat wishes to thank all the questionnaire respondents for their valuable and important inputs*

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