

INTERGRAF - UNI EUROPA GRAPHICAL JOINT STATEMENT EUROPEAN TIMBER REGULATION

May 2015

The deadline for the review of the EU Timber Regulation is 3 December 2015. Article 20.4 states that *“the current Union economic and trade situation with regard to the products listed under Chapter 49 of the Combined Nomenclature [printed books, newspapers, pictures and other products of the printing industry; manuscripts, typescripts and plans], taking particularly into account the competitiveness of the relevant sectors”* shall be evaluated in order to consider their possible inclusion in the list of timber and timber products covered by the scope of the Regulation.

The European social partners of the graphic industry, represented by INTERGRAF for the employers and UNI Europa Graphical for the employees, would like to bring to the attention to the European legislator the following:

Although printed products are currently excluded from the scope of the Regulation, European printers provide their customers with printed products protected from illegal logging as they only purchase compliant raw material. Indeed paper and board bought by European printers are covered by the scope of the Regulation.

By contrast, imported printed products entering the European market fall entirely outside the scope of the Regulation and could therefore originate from illegally harvested timber products.

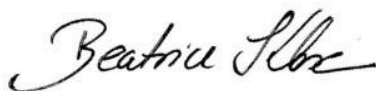
In terms of environmental protection, this creates a significant loophole. Moreover, this creates distortion of competition between non-EU printers, exempt from any requirement in that regard and European printers, which may have to bear raw material price increases if paper and board suppliers pass on the costs of increased EUTR-related red tape to printers.

In 2013, €3 billion worth of printed products were imported on the European market. One third of these originated from China. Between 2003 and 2013, imports of printed books from China have more than doubled¹. When it comes to illegal logging, China has been identified as a high risk country. Each year, millions € worth of books and other printed products are entering the European market without protection from illegal logging.

The European Union needs to ensure that the high environmental standards in Europe do not become a disadvantage in comparison to imported printed products.

Considering the above, we call on the European legislator to ensure that European companies do not lose further competitive advantage against non-EU competitors by granting non-EU printed products the possibility to circumvent a further environmental requirement.

Illegal logging blemishes the reputation of our value chain and the image of our products. The European Union should ensure that all printed products on the European market are safe from illegal logging and include printed products in the scope of the European Timber Regulation.



Beatrice Klose
Intergraf
Secretary General



Nicola Konstantinou
UNI Europa Graphical & Packaging
Secretary

¹ Eurostat, November 2014