

**INTERGRAF POSITION**  
**EXTEND THE SCOPE OF THE PROPOSED REGULATION ON**  
**DEFORESTATION TO PRINTED PRODUCTS**  
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The Commission’s proposal for a Regulation on commodities and products associated with deforestation and forest degradation repeals the timber Regulation (EU/995/2010) and will now regulate wood-derived products.

Since its adoption in 2010, a revision of the scope of the EU Timber Regulation was never initiated by the Commission while it clearly recognised that printed products should be considered for inclusion in the initial legislation<sup>1</sup> and following progress Reports<sup>2</sup>.

**The ongoing legislative procedure on the proposed Regulation on deforestation is the opportunity to correct the scope on wood and extend it to printed products (Combined Nomenclature category 49). Intergraf therefore calls for the inclusion of printed paper products as follows:**

**ANNEX I**

Wood	[...] Pulp and paper of Chapters 47 and 48 of the Combined Nomenclature, with the exception of bamboo-based and recovered (waste and scrap) products <u><b>Printed paper products of Chapter 49 of the Combined Nomenclature</b></u>
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Intergraf represents the European printing industry, gathering 21 national printing federations in 19 countries in Europe. The printing industry provides jobs to more than 625,000 Europeans active in 112,000 companies and generates a turnover of approximately € 79.5 billion. The industry throughout Europe consists mainly of small enterprises, as 90% of them employ fewer than 20 persons.

Intergraf demonstrates below how the exclusion of printed products from the scope negatively impacts the environment and the competitiveness of European industry.

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<sup>1</sup> Article 20.4 of the EUTR states that the Commission shall present a report, which shall include “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 in order to consider their possible inclusion in the list of timber and timber products set out in the Annex to this Regulation.”

<sup>2</sup> The Report from the Commission to the European Parliament and the Council (COM(2016)74) states: “In terms of market share, an important group of products currently exempted is “printed books, newspapers, pictures and other products of the printing industry; manuscripts, typescripts and plans”. Unlike domestically printed media, where imported pulp and paper material is controlled for legality, imported printed media do not undergo due diligence and are not subject to checks for the legality of wood fibres imbedded in them. Therefore, they may carry a higher risk of originating from illegally harvested timber. The difference in treatment of domestically-produced and imported printed products would be overcome if printed paper were included in the product scope.”  
 The Fitness Check on the Timber Regulation concluded: “As such, significant volumes of such products continue to be imported to the EU, meaning illegally harvested timber is prevalent in the internal market, including in the form of books, magazines and newspapers.” and “In terms of value, books are the most valuable item imported by the EU-27 not covered by EUTR, followed by other types of printed matter, [...]”

## Different treatment of European vs imported printed products

Although printed products are excluded from the scope of the proposed Regulation, paper and board purchased by European printers are covered. European printers therefore have to comply with the due diligence requirements for their input material. European printers therefore provide their customers with printed products fully compliant with the Regulation as they have to purchase compliant raw material.

By contrast, imported printed products entering the European market fall entirely outside the scope of the proposed Regulation and could therefore originate from illegally harvested wood. Printers based outside the EU, in countries which are not applying equivalent legislation, can freely import into the EU market printed products regardless of the origin of their raw material.

In terms of environmental protection, this creates a significant loophole. Moreover, this creates a tremendous distortion of competition between non-EU printers, exempt from any requirement in that regard and European printers.

## Imports of printed products from possibly unsafe origin

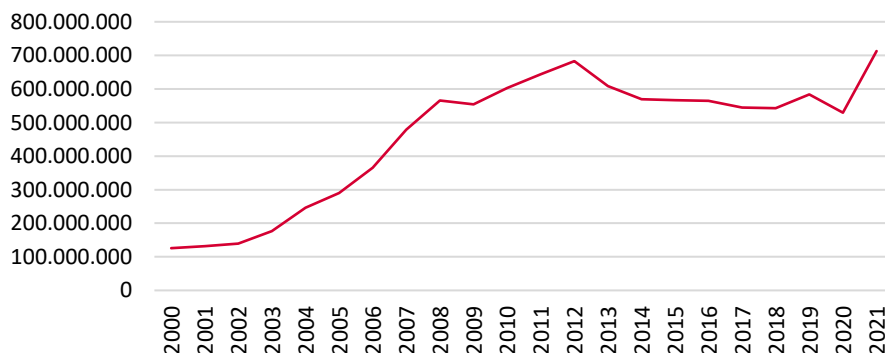
In 2021, € 1.5 billion worth of printed products were imported from third countries outside neighbouring countries (UK, Norway and Switzerland).

Half of these imports originated from China (€ 712 million). Adding Hong Kong and Singapore, which are mainly re-exports of printed products sourced from China, and imports from India, Malaysia and Russia, which are all identified as high-risk countries<sup>3</sup>, a **total of € 856 million worth of printed products have been imported into the European market from a possibly unsafe origin in 2021.**

Over 40% of the printed products imported from China are books, 20% are children pictures and colouring books and 11% are cards. Hence, **every year over € 300 million worth of books are entering the European market without protection from illegal logging.**

The pressure from Chinese imports intensified over the last decades. Imports of printed products from China to the EU have more than quadrupled since 2000 and registered **historic highs in 2021** (Graph 1).

Graph 1: Imports of printed products from China, 2000-2021, in €  
(Source: Eurostat, 2022)



<sup>3</sup> 2019 Corruption Perception Index (CPI) of less than 50 out of 100. CPI of China is 45, India is 40, Malaysia is 48 and Russia is 29.

## Distortion of competition

The non-coverage of printed products creates distortion of competition between non-EU printers, exempt from any traceability requirement, and European printers.

Granting non-EU printed products the possibility to circumvent a key environmental requirement provides a significant competitive advantage to non-EU competitors. It is not acceptable that the future deforestation Regulation further **incentivises the imports of printed products from high-risk countries to the detriment of products manufactured in Europe.**

The European Union therefore needs to ensure that the high environmental standards in Europe do not become a disadvantage in comparison to imported printed products. To restore fair competition and secure that all wood products entering the EU market are protected from illegal logging, the product scope should be extended to printed products.

## Environmental loophole

There is no environmental justification for the exclusion of printed products, which are wood-based products. While operators have to prove that paper and board is from safe origin, the simple fact of “putting ink on it” gives it a free access to the EU market.

This situation represents **a significant environmental loophole and contributes to EU-driven global deforestation.** The high environmental standards that apply to EU products should be extended to imported products, especially when it globally benefits the environment.

## Image, reputation and consumers' confidence

The image of our products is also a competitiveness issue for our industry, especially when confronted with competition from digital media. Indeed, **illegal logging, deforestation and forest degradation blemish the reputation of our value chain and the image of our products.**

It is not acceptable for our companies that the reputation of European companies and European products are tarnished because of the behaviour of non-European competitors. The European Union should ensure that all printed products on the European market regardless of their origin are deforestation-free.

Consumers' confidence in our products is a further concern. In practice, consumers rarely look at the origin of the book they buy. It is therefore crucial that **European consumers can trust that the books or children colouring books they buy on the European market do not contribute to global deforestation.** The future deforestation Regulation should provide this guarantee to European consumers.

**Intergraf therefore calls on the legislator to restore fair competition on the European market, close the environmental loophole and secure the reputation of and confidence in printed products in Europe by extending the scope of the proposed Regulation on deforestation to printed products.**