

TRADE NOTE	Clarifying the position of 'pre-conflict' timber
FOR	Importers, Merchants, Manufacturers
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This statement seeks to clarify how the timber industry should approach existing stock of Russian and Belarusian timber already in the supply chain.

Following the advice of the TTF to all members on 8 March 2022 to cease trading with Russian and Belarus, and amidst the classification of materials originating from these countries as 'conflict timber', the TTF has received a number of questions from the industry.

These questions have centred around the status of goods which arrived in the UK prior to the invasion and this designation by certification bodies.

The TTF endorses the view of both PEFC and FSC that goods from Russia and Belarus be classified as "conflict timber" and as ineligible for certification or responsible trade. However, we also recognise that there will be stock already on the ground in the UK or EU and goods in transit which have been ordered and paid for before the conflict began.

We have since been working to clarify the position of these timber products, in connection with PEFC and FSC, to provide further clarity over the trading status of goods from these two sanctioned countries and the relevant dates.

PEFC: Material originating in Russia and Belarus for which a PEFC DDS was applied after 2 March 2022, 11:55 am EST is considered conflict timber and therefore cannot be used in the PEFC chain of custody. Goods which have a completed a PEFC DDS prior to March 2 2022, 11:55 am EST are classified as "preconflict", regardless of whether the good is purchased or shipped after this date. More PEFC information and FAQ's can be found here.

FSC: For FSC, any goods shipped or placed on the market in the EU or UK after 8 April 2022, regardless of prior certification should be considered "Conflict Timber" and therefore ineligible for certification.

Any FSC certified or controlled material that has arrived from Russia and Belarus before 8 April 2022 will maintain FSC status.

More FSC information and FAQ's can be found here.

TTF is endorsing the PEFC guidelines for any other materials without certification and considers stock already on the ground in the UK or EU or goods in transit prior to 2 March 2022 as pre-conflict goods which can be further processed and sold through the supply chain in the coming weeks. However, all members are reminded to refer to Section 7 of the UKTR Guidelines regarding conflict timber and whether a 'negligible risk' conclusion can be reached when conducting due diligence.

Material without the added security of certification being placed on the UK or EU market after 2 March 2022 should be considered as being "conflict timber" unless there is some other form of compelling evidence to the contrary. To prove material is in line with these requirements, proof of landing dates can be shown via:

- Customs entry document
- C88 form

The war is likely to cause significant disruption to supply throughout Europe and we advise close communication between all points of the supply chain to help navigate this crisis.

Further inflationary pressure is also a likely consequence of the conflict. The TTF will keep the market regularly informed through quarterly 2022 market statements, the first of which will be released in March 2022.

TTF members also have access to a trade note looking at the potential impacts. This can be found on the TTF website.

About Timber Development UK

Timber Development UK was formed from the merger of two of the largest and longest established organisations in the supply chain, the Timber Trade Federation (TTF) and Timber Research and Development Association (TRADA). It is the largest, most comprehensive supply chain body in the UK, spanning from sawmill to specifier and all points in between. Find out more about the merger at www.timberdevelopment.uk.