**EU Timber Regulation Training of Trainers**

**Day 5 Activity 1 How to run a due diligence system - answers**

**Supplier Questionnaire**

**Part 1: Supplier information**

|  |  |
| --- | --- |
| Supplier name | Lucky Flooring Ltd |
| Contact person |  |
| Email & Tel | [luckyflooring@163.com](mailto:luckyflooring@163.com); tel: +86 21 1234 5670 |
| Address | 123 Remin Road, Shanghai, China |

**Part 2: Certification/ verification status (please attach copy)**

If the product(s) you supplied is/are certified or legally verified, please fill in section 2. If not, please go to section 3. Please note that if you are a CoC certificate holder but do not supply certified products, then you do not have to fill in this section.

|  |  |
| --- | --- |
| List the certified/legally verified products here | NIL |
| Certification/verification scheme |  |
| Certification/verification number |  |
| What are the issue and expiry dates of the certificate? |  |
| What is the product scope of the certificate? |  |

**Part 3 Products information**

Please provide information on the products that you supplied

| Suppliers name and location | Raw materials supplied (e.g. MDF, solid wood) | Scientific name of the species | Name, location and country of origin of timber species | What types of documents are provided? |
| --- | --- | --- | --- | --- |
| Lithuanian Sawn Timer | Solid wood | Fagus sylvatica  Quercus alba | Kaunas State Forest, Lithuania | Invoice, delivery note, Second party audit report |
| Asian Timber | Solid wood | Koompassia spp | Maybe from Malaysia but need to further information from supplier to check the location of certified forest – FSC is developing an Online Claim Platform for this | Invoice, delivery note, FSC certificate |
| Qingyuan City Gaohong Trading | Solid wood | Intsia bijuga (note merbau was mentioned in document) | Indonesia? | Invoice, delivery note, certificate of origin |
| Prime Hardwood | Solid wood | Khaya ivorensis | Ghana? | Invoice, delivery note |
| Shanghai Timber Trading | Plywood | Betula pendula (note birch was mentioned in document) | ? | Delivery note |
|  |  |  |  |  |

**Please draw a supply chain diagram showing your suppliers and the forest source**

|  |
| --- |
| Merbau  Oak, beech  Birch plywood  African mahogany  Kempas  FSC certified forest in Malaysia?  Kaunas State Forest, Lithuania  Unknown forest in Ghana?  Unknown forest  Unknown forest in Indonesia?  Asian Timber  Lithuanian Sawn Timber  Prime Hardwood  Shanghai Timber Trading  Qingyuan City Gaohong Trading  Lucky Flooring  Floors For Everyone |

**For discussion:**

We will look at the following areas in our feedback/ discussion section:

* Are the information and documents provided sufficient to complete the questionnaire? If not, what are missing?

No, it was only feasible to complete the supply chain for Lithuanian Sawn Timber. There was not enough information to complete the questionnaire for the remaining suppliers.

For Asian Timber – it has to provide information on the name and location of FSC certified forest.

In general, information on forest sources are missing. It did not identify the forest sources. This is a common issue. Transaction documents between the forest and the sawn mills are also required.

Certificate of origin for merbau – it does not identify forest source, it only proved that merbau sawn timber was exported from Indonesia, it did not necessary mean that it was originated from a forest in Indonesia. Further information on forest source and the transaction between the forest and sawn mill was required.

* Is the information provided sufficient to ascertain whether a product is high or low risk? If not, what additional information is required?

It is not possible to assess the risk of product from all suppliers. Only products from the following suppliers can be regarded as low risk:

* + Oak solid wood from Lithuanian Sawn Timber: It only purchased oak and beech from FSC certified forest (Kaunas State Forest) and no other sources. Even though it does not have CoC in place, the risk of mixing or substitution is very low.
  + Beech engineered wood from Lithuanian Sawn Timber: Beech solid wood was ok as it was from FSC certified forest, but there was no information provided on birch plywood (NOTE: engineered wood made of solid wood and plywood). So even if the solid wood component was ok, it could not be placed on the EU market.
  + Kempas solid wood from Asian Timber: It is a FSC CoC certificate holder and the scope of its certificate covers the processing of kempas sawn timber. However, it is not sure where the certified forest is, it may be in Malaysia. This is why even though certification may be used as assurance of compliance with applicable legislation under the EU TR, operators still need to fulfil the requirements of access to information. FSC is developing an Online Claim Platform (OCP) to address this issue.

For the other suppliers, documents regarding forest sources (e.g. harvesting license) and the link between the source forest and sawn mills (e.g. transport documents) are required.

You also need to ask your suppliers how many forest sources/suppliers they buy from. They may only show you one supplier but in fact they purchased from a number of sources. Buying from agents/trading companies also is more difficult to establish traceability than buying from sawn mill.

It is also important to know if your suppliers have any internal systems to trace timber from different sources. This is important if they have several timber sources.

* Do you think the products you supplied to your client will be able to meet the EU TR?

Only oak solid wood flooring will be able to meet the EU TR.

Information regarding birch plywood is missing so for beech engineered wood, even though the risk of solid beech wood is low, the forest source of the plywood component is missing.

When asked about forest sources, many suppliers only provided information regarding solid wood, and do not think that other materials such as MDF, plywood, veneers are also wood products. This is also a common problem. Operators in the EU are expected to provide information on all wood raw materials so suppliers have to make sure that supply chain and forest source information on all raw materials used is available