



INTERNATIONAL TROPICAL TIMBER ORGANISATION / FLEGT INDEPENDENT MARKET MONITOR (IMM)

# EU wood promotion programmes and their recognition of FLEGT

AN IMM STUDY – APRIL 2019



Researcher & Lead author:  
Mike Jeffree

Technical editor:  
George White



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*Above: The UK Timber Trade Federation's 2018 Timber Transformer Exhibition on Indonesia's journey through its FLEGT VPA attracted hundreds of visitors. Photo TTF*

*The views expressed herein are those of the consultant and the IMM and do not necessarily reflect the official opinion of the European Commission*

# Executive Summary

This study is based on a series of interviews and a literature survey conducted in the spring of 2019. In total twenty-five interviews were conducted across a range of EU member states and from a variety of perspectives – including wood promotional campaigns, timber trade federations, civil society organisations, companies and other industry commentators.

The study set out to:

- Provide an overview of private and public sector wood promotion campaigns targeting EU countries – specifically of campaigns focussing on tropical timber or on applications tropical timber is suitable for.
- Provide an overview of references to FLEGT-licensing and the VPA process by wood promotion campaigns targeting EU countries.
- Identify key themes of wood promotion campaigns targeting EU countries.
- Estimate the financial resources spent on promotion of FLEGT-licensed timber and the FLEGT VPA process and to contrast those to an estimate of resources spent on specific promotion of private sector third-party sustainable certified timber.
- Provide an overview of references to FLEGT-licensing and the VPA process in NGO / CSO lobby materials and guidance.

The study revealed that Europe's timber and wood products sector has stepped up the level of its marketing and advertising activity and the clarity, cohesion and effectiveness of its communications in recent years.

It has developed a range of national and international marketing programmes and campaigns. In particular it has focused promotion and communications on timber's environmental performance, in recognition that its key markets, notably construction, but also government decision makers are increasingly environmentally aware and informed and addressing climate change issues ever more urgently. Campaigns incorporate latest findings on wood's carbon and climate mitigation benefits, its life cycle analysis performance in relation to competing man-made materials and its potential role in developing a circular, bio-economy.

There is also a stress on timber's renewability and sustainability and the role sustainable forest management can play in maintaining the forest resource, with the carbon and biodiversity gains that entails. The stress here is very much on third-party forest and chain of custody certification as assurance that timber is sustainable.

Europe's timber trade federations are involved in these wider promotion campaigns and also relay their messaging through their own communications channels. They also conduct their own campaigns and highlight the industry's efforts to assure legality of timber placed on the European market and combat illegal logging, with the main focus in this area on the EU Timber Regulation and associated due diligence.

On promotion of FLEGT and FLEGT licensing, there is a central communications hub in the EFI FLEGT Facility, which continues to develop its content, strategy and outreach. The UK Timber Trade Federation ran an exhibition exclusively focused on FLEGT, a UK initiative supporting development of Indonesian FLEGT marketing strategies is underway and other trade federations do communicate the facts on FLEGT.

But otherwise its profile in industry promotion and marketing is low relative to third party forest sustainability certification. Europe's two main tropical timber promotion campaigns, for instance, only commend sustainability certification as a procurement criterion, although they are seen to have potential to make the market more tropical timber-friendly generally and do not rule out more communication on FLEGT in the future.

The emphasis of NGOs in their forestry and timber sector campaigning is also sustainability and certification. There is, however, communication of FLEGT and some active advocacy in the sector.

Some in the European timber industry believe there is potential for raising FLEGT's profile in communications and promotion further, given a more holistic approach. That includes greater emphasis on its wider social, environmental and economic impacts, but also a still greater trade focus, with more information on the actual products available with licences.

A note of caution sounded, however, is over what appetite there is in the timber sector and market for more communication of FLEGT while only Indonesia is issuing licences and only one major tropical timber importing EU country accepts a licence as proof of sustainability and legality under their procurement policy.

Another influence on the direction of wood promotion generally must be that rival materials sectors' increasing communication of their environmental credentials, as this report shows, is focused very much on issues of sustainability, carbon and climate.

Recommendations arising from this report include:

- Provision of targeted materials to support existing timber promotion campaigns
- Increasing demand and recognition of FLEGT Licences by urging EU member state governments to accept FLEGT licences in their timber procurement policy
- Increasing availability in the EU market of FLEGT Licensed materials
- Developing materials that credibly demonstrate the impacts of the VPA process
- Researching, consulting widely and then clarifying the status of FLEGT Licensing compared to third party certification
- Empowering VPA signatory countries to lead the process of communicating VPA impacts

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## ACRONYMS AND ABBREVIATIONS

<b>CITES</b>	Convention on International Trade in Endangered Species
<b>CSO</b>	Civil society organisation
<b>EU</b>	European Union
<b>EUTR</b>	European Union Timber Regulation
<b>FLEGT</b>	Forest Law Enforcement, Governance and Trade
<b>FSC</b>	Forest Stewardship Council
<b>GMO</b>	Genetically modified organism
<b>GPP</b>	Green procurement policy
<b>HCVF</b>	High Conservation Value Forest
<b>HS</b>	Harmonised System (of customs codes)
<b>IFL</b>	Intact Forest Landscape
<b>IMM</b>	Independent Market Monitor
<b>ITTO</b>	International Tropical Timber Organization
<b>m<sup>3</sup></b>	Cubic metre
<b>MFP</b>	Multi-stakeholder Forestry Programme
<b>MO</b>	Monitoring organisation - in the context of the EUTR
<b>NGO</b>	Non-governmental organisation
<b>PEFC</b>	Programme for the Endorsement of Forest Certification
<b>RWE</b>	Round wood equivalent – a conversion factor to allow comparison
<b>TPP</b>	Timber procurement policy
<b>TTF</b>	Timber Trade Federation
<b>VPA</b>	Voluntary Partnership Agreement

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## ABOUT IMM

Independent Market Monitoring (IMM) is a multi-year programme funded by the European Union (EU) and managed by the International Tropical Timber Organization (ITTO). IMM's role is to use trade flow analysis and market research to independently assess trade and market impacts of FLEGT Voluntary Partnership Agreements (VPAs).

# 1 Study rationale & methodology

The rationale for the study was the premise that there are already existing vehicles to promote wood products *per se* in the EU and that there are a number of initiatives that focus on tropical wood promotion. Given the range of drivers of decline of the tropical wood market in Europe, promotion of tropical wood and the value of FLEGT Licensing perhaps make for good partners. The 2018 IMM Trade Survey<sup>1</sup> indicated that “*environmental prejudices and uncoordinated marketing*” are the fourth ranked drivers of the market decline (after substitution, overall market shrinkage and diversion to other markets). Therefore, there is much to be done to counteract these perceived prejudices and there may be a role for FLEGT Licensing.

In total 25 interviews were conducted with organisations responsible for communications around industry issues, and with other organisations with an interest in the wider FLEGT initiative, VPA’s or FLEGT Licensing. The industry bodies were chosen from across Europe on the basis that they currently or previously have managed or supported wood promotion campaigns. The other interviewed organisations were chosen on the basis they formed a body of informed opinion from wider civil society. The trade associations interviewed were all chosen on the basis that they currently or have previously supported their own or broader campaigns. The interviews were conducted in the last quarter of 2018 and in early 2019.

In addition to the organisations interviewed the literature review also identified a further 17 points of reference with a similar profile to those interviewed.

The main timber promotion and marketing campaigns were questioned on their approach, aims and plans going forward. They were asked whether they acknowledged or advocated the FLEGT programme and what lay behind their stance on this. The aim in profiling individual promotional campaigns is also to indicate the ‘volume’ of timber and forest-related communication in the marketplace, the approaches taken and topics covered, all of which could feasibly inform FLEGT communication. To provide wider context, profiles of national timber campaigns with



Figure 1: *Pour moi, c’est le bois* France campaign material for 2019 UN World Forests Day

little likelihood of acknowledging FLEGT, including the promotional programme of the American Hardwood Export Council, were also undertaken.

Ascertaining the size of funding of these campaigns and promotion of FLEGT is difficult as only two campaigns and the project which is supporting the Indonesian industry to develop FLEGT communications strategies, were willing or able to divulge budgets. However, approximate funding levels can be estimated given the nature and activities of campaigns. As the EU’s central information and communications hub, the EFI FLEGT facility was also interviewed on its role and strategies.

Interviews were conducted with trade federations in the seven main EU tropical timber markets and FLEGT-licensed timber and wood products; the UK, Netherlands, Belgium, Germany, Spain, Italy and France. The aim was to gauge their involvement in promotional activity and the degree to which they promoted and communicated FLEGT. Their coverage online was studied too.

Civil society and NGOs, as timber sector market influencers, were also questioned on their stance on FLEGT, the degree to which they communicated on it and the approaches they took in communications. The FSC and PEFC were questioned particularly on how they refer to FLEGT in terms of the status of its legality and sustainability assurance relative to their certification schemes.

The online research was also undertaken to ascertain key topics covered in timber-related communications and promotion and particularly whether they included the EU FLEGT initiative and FLEGT licensing.

Type of organisation	Number interviewed	Number assessed through literature
Trade associations <sup>a</sup>	7	5
Promotional organisations <sup>b</sup>	7	8
Civil society organisations <sup>c</sup>	8	1
Others <sup>d</sup>	3	4

Table 1: The overall sample of interviews and literature surveyed

<sup>a</sup> This category includes timber trade associations and associations promoting other materials such as plastic or steel.

<sup>b</sup> This category includes wood promotion and marketing organisations – e.g. American Hardwood Export Council (AHEC); an eco-labelling scheme – Nordic Eco-label; online business information hubs – e.g. Timber Trade Portal; programmes designed to promote sustainable tropical wood – e.g. STTC

<sup>c</sup> This category includes NGO / CSO programmes which are funded through the EC-FLEGT programme; NGO / CSO organisations who commentate on specific aspects of FLEGT or the wider implementation of the process.

<sup>d</sup> This category includes timber buying companies and other industry commentators.

Additional online research was undertaken into the angle taken in communications on sustainability and wider environmental issues of bodies representing the interests of other construction and manufacturing materials; steel, concrete, plastics, composites, wood plastic composites and modified timber. This included whether these sectors' strategies included criticism of the environmental performance of timber relative to their products and consequently promoted the latter as environmentally sound wood alternatives.

**Figure 2:** "Save a tree" image from UPVC window manufacturer website. Downloaded March 2019. [www.galaxywindows.info/savetree.aspx](http://www.galaxywindows.info/savetree.aspx)



## Wood promotion in Europe: the main building blocks

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Historically the common perception was that the European timber industry lagged behind rival construction and manufacturing materials sectors in marketing and promotion.

As highly concentrated sectors, comprising large-scale and multinational businesses, the concrete, steel and plastics manufacturers and end users were seen as better able to act in concert, deploy significant budgets, coordinate communications and get behind a single focused promotional message. The portrayal of the timber industry was of a fragmented sector comprising a large number of small to medium sized enterprises, which lacked the marketing skills and resources of their competitors.

It's seen as an expression of their confidence that the wood sector would not be equipped to respond effectively, that some of the man-made materials producers' promotion actively targeted and denigrated timber. They cast doubt on its durability, fire risk and environmental credentials. In particular, they played on the popular misconception that wood use generally was implicated in forest destruction and environmental degradation. One marketing line used internationally was 'Save a tree, use uPVC'<sup>2</sup>. Good marketing phrases never die though and similar lines continue to be used today.

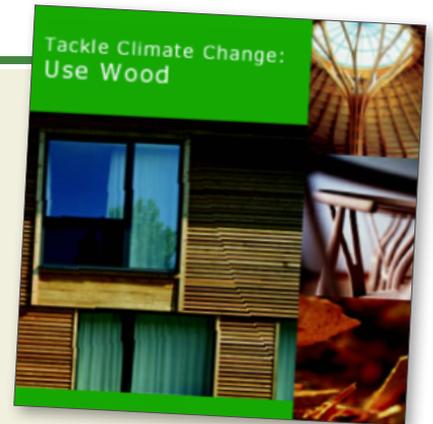
The timber industry still has to contend with to contend with criticism and negative campaigning from NGOs. Illegal logging was portrayed as a prime cause of deforestation, particularly in tropical countries, and it was maintained that the European timber sector, notably the hardwood



**Figure 3:** Screen capture from British Woodworking Federation (BWF) video promoting the use of wood. [www.bwf.org.uk/choose-wood/](http://www.bwf.org.uk/choose-wood/)

**Figure 4:** "Tackle climate change: Use wood." (2007) CEI-bois.

**Figure 5:** "More wood grows back than is harvested" - caption from proHolz video.



business, was not doing enough to prevent illegal timber getting into their supply chains. The subsequent claims, which persist in some quarters today, were that it accounted for a significant proportion of their imports.

Since the 1990's the industry across Europe has on numerous occasions, and continues today to refute such negative claims and in some cases proactively states a case for using wood. Whilst a later section of this study will cover a number of campaigns in more detail it is worth considering the main areas of the potential building blocks for these campaigns.

### Certification and timber's image

The European timber sector has significantly improved its marketing approach and image building techniques in the past two decades. Companies and trade bodies have strengthened their promotional expertise and are now

using latest online communications tools and media as assiduously as any sector.

The industry acknowledges it has also been significantly assisted in this by the adoption of third-party audited sustainability certification, namely the FSC and PEFC schemes. This, in the words of one European trade federation director, has given the timber industry ‘an injection of marketing confidence’.

*“Certification has provided the industry with an objective instrument to help prove and promote that they are not only sourcing sustainably, but care about the environment,” he said. “In underpinning sustainable forest management, it enables them to portray themselves as part of the solution to deforestation, rather than be portrayed as part of the problem; by incentivising sustainable timber production, they are providing a positive, profitable alternative, for often poor supplier countries, to conversion of forest to intensive plantations, agriculture and construction.”*

In line with the uptake of FSC and PEFC forest and chain of custody certification and, the timber trade acknowledges, greater awareness and a more proactive stance in the wood business on the environment generally, there has been greater accommodation between industry and NGOs. It does not extend to all companies and all NGOs, but their relationship is more frequently characterised today by cooperation and consultation, even combining communication and promotional resources, rather than confrontation.

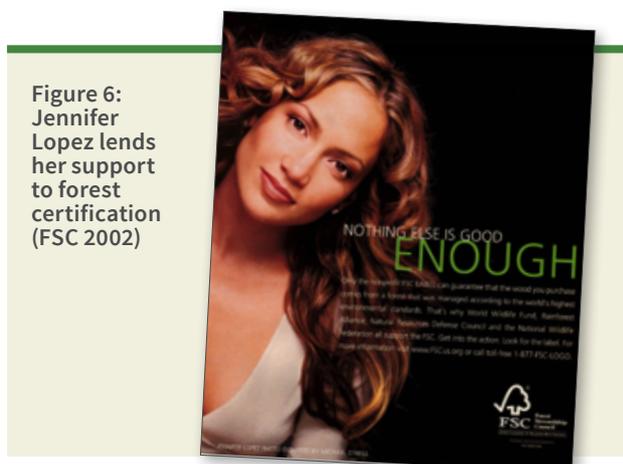
### EUTR as promotional tool

The EU Timber Regulation<sup>3</sup> was initially regarded by some European timber businesses as an unnecessary administrative burden, a duplication of their existing supply chain management and policing<sup>4</sup>. But it has now been largely assimilated by the industry and accepted as a necessity and increasingly a positive, further underlining its commitment to eradicating illegal trade. As a result, it has also become, another tool for the trade for promotion and reputation building.

Traders at the IMM Trade Consultation in Berlin rated the EUTR as currently the third most important driver of decline in EU tropical timber trade. At the same time,



**Figure 7: “Indonesian legal wood” on pack.**  
Source: [www.importpromotiondesk.com](http://www.importpromotiondesk.com)



**Figure 6:  
Jennifer Lopez lends her support to forest certification (FSC 2002)**

however, the Berlin Consultation<sup>e</sup> rated a “regulatory approach”, involving increased supply of FLEGT-licensed tropical timber linked to consistent and effective enforcement of EUTR as one of the two most important opportunities for long-term growth of the European tropical timber market. Not a single participant voted in favour of abandoning it.

National timber trade federations were among advocates of the Regulation early on. The UK Timber Trade Federation subsequently aligned its Responsible Purchasing Process with EUTR due diligence requirements and made it, or an equivalent system, compulsory for members<sup>5</sup>. It has also made the RPP a core component of its corporate identity. Le Commerce du Bois in France, VVNH in the Netherlands and GD Holz Service in Germany also became EUTR Monitoring Organisations<sup>6</sup>, helping members implement due diligence systems and monitoring compliance – and promoting the fact. AEIM in Spain is also pursuing Monitoring Organisation status.<sup>7</sup>

### Wood’s carbon credentials

Increasing understanding of the centrality of carbon to climate change mitigation has also given timber producing and using sectors the opportunity to promote wood as combined CO<sub>2</sub> sink and store, as well as a low emission, energy efficient construction and manufacturing material.<sup>8,9</sup>

A growing number of European architects are now using timber structurally and designing more ambitiously with it thanks to latest developments in engineered wood products.<sup>10</sup> Almost invariably their press and publicity spotlight the resulting building’s embedded carbon volume, and CO<sub>2</sub> emissions savings over equivalent concrete or steel structures.

The European timber sector’s eco-based marketing case is being reinforced with increased use of life cycle assessment (LCA) in manufacturing and construction and it is a focus of several promotional initiatives. The industry is also starting to present timber as the prime material for the sort of low-emission, low-waste, low carbon circular bio-economy, which is increasingly seen as the way forward to limit effects of human activity on climate change. The latest edition of its booklet on the sector from European Wood Industries Confederation, CEI-Bois, is titled “Wood: Building the Bioeconomy”.<sup>11</sup>

<sup>e</sup> [www.flegtim.eu/index.php/newsletter/flegt-market-news/80-risks-and-opportunities-drivers-of-the-eu-tropical-timber-market](http://www.flegtim.eu/index.php/newsletter/flegt-market-news/80-risks-and-opportunities-drivers-of-the-eu-tropical-timber-market)



Figure 8: Screen capture from one of the UK Wood for Good campaign videos. Source <https://woodforgood.com/>

Interestingly, from a pure marketing standpoint, the European timber industry has also seen a modest, but, say businesses, a still significant uptake of branding in recent years. The modified wood industry has been to the fore here, with Accoya,<sup>12</sup> Kebony<sup>13</sup> and Lignia<sup>14</sup> being sold under their brand names rather than the timber species that they use as a substrate.

Engineered wood products, such as Kielsteg structural elements,<sup>15</sup> are also exploring opportunities in this area. Moreover FSC and PEFC are also effectively being used as sales brands, with their logos featured prominently on product packaging and promotional materials, by everyone from timber and other forest product importers, to manufacturers and retailers.

## Marketing and branding the product

As mentioned above, however, the consensus among interviewed timber businesses and their trade federations is that interest in FLEGT and its communication will pick up as more countries approach VPA implementation and licensing, with the qualification that this will also require more active marketing from the supplier countries themselves.

In the interim, there is also now increasing focus on the VPA's impacts and benefits 'beyond legality'. In fact, latest, trade-targeted online development from the EU FLEGT facility, indicates that more communication from the centre is set to take this broader perspective, highlighting the social, environmental and economic benefits of the VPA process.

There's also a trade view that more promotion of the actual timber products available from FLEGT VPA countries and backed by FLEGT licences would help increase interest and awareness. As one industry representative stated – "businesses first and foremost buy products after all, not legality or sustainability certificates". It is perhaps timely therefore that a new project is also just getting underway under the UK Department for International Development's "MFP4 project" (see page 17) to explore the potential of more product-based promotion of FLEGT-licensed goods. Some companies already use the FLEGT acronym in conjunction with the words 'Indonesian legal wood' on product packing.

The timber trade's 'discovery' of communications has resulted in more and more expert and varied marketing channels for disseminating data on and discussing timber's performance and environmental attributes in Europe. It can be seen as presenting a widening promotional doorway for FLEGT to potentially exploit. What can be seen through the review of campaigns and platforms seen in Table 2 is an evolution in the thinking and more importantly, the response of the sector over an extended period of time. The sector's initial responses tended to be reactionary – responding to individual campaigns of other sectors, though letter writing or very limited media responses. Over time and with a degree of coordination across borders there have been a number of more sophisticated responses as detailed in Table 2.

There are also other national campaigns active in Europe focused on marketing timber from a specific country or region, such as Austria's central European-focused ProHolz and the promotional programme of the American Hardwood Export Council. But, with their focus on timber's climate, sustainability and environmental benefits, plus timber's technical merits and widening applications, these are seen as contributing to making Europe a more wood-oriented market generally. That in turn is seen as also potentially opening the way for other sources of supply and timber accredited to other environmental and legality verification schemes, including FLEGT-licensing, to make headway. On the down-side, successful marketing campaigns for temperate wood may have led to further market decline for tropical timber.



Figure 9: "With trees I can build the castle of my dreams" Pour moi, c'est le bois campaign. France, circa 2013

The latest development of timber and wood products promotion in Europe has not only seen more resources devoted to marketing activity, but also an increase in diversity of approaches and target audiences. There are now promotional campaigns and communications programmes focused on timber source, species, and sustainability verification, specific areas of wood product application and on supporting Europe's national industries and increasing consumption of home-grown material.

In the long-established, high profile American Hardwood Export Council marketing programme, there is also promotion dedicated to boosting exports from the world's biggest international hardwood trader to Europe.

This marketing evolution has included the emergence of two initiatives focused on growing the market share of the European tropical wood industry; the Sustainable Tropical Timber Coalition (STTC) and the Fair & Precious branding campaign of the International Tropical Timber Technical Association (ATIBT).

### 3 European promotion campaign references to FLEGT

Europe’s trade federations have also become more effective and consistent communicators, increasingly expert users of websites, social and other online media. They vary in their coverage of FLEGT, but are clearly key channels for reaching the industry on the ground and some express interest in receiving more news and information about the wider FLEGT programme.

Table 2 gives an overview fifteen European based platforms and one US based platform that broadly promote wood products. These include promotional initiatives dedicated to growing European sales of tropical timber, namely the European Sustainable Tropical Timber Coalition and the Fair & Precious branding initiative. As

stated, these are not currently advocating FLEGT licenses as a procurement criterion, but it is felt they could increase market acceptance of tropical timber more widely and they do not preclude some level of acknowledgement of FLEGT in the future subject to clarification of its status relative to certification.

As Figure 11 illustrates thirteen of the sixteen campaigns assessed potentially have scope to make reference to FLEGT Licencing. Five of the campaigns make clear reference to FLEGT Licensing and overall can be described as being positive towards it. Eight of the campaigns make no reference or where they make reference they are not able to support it for the reasons identified in Table 2.

Campaign /Communication platform	Theme/objective	Campaign focus	FLEGT position	Budget
Pour moi, c’est le bois (For me it’s wood) <a href="https://franceboisforet.fr">https://franceboisforet.fr</a> <b>France</b>	National campaign to increase consumption of timber in France with focus on home-grown material	All wood types.  Timber and forest’s CO2, energy and wellness benefits	None as no reference to imported wood	€10 million over three years
Bois.com <a href="http://www.bois.com">www.bois.com</a>	General site for professionals and general public to gain knowledge about the use of wood.	All wood types.  “I say YES to wood and say NO to CO2”	No reference.	Undisclosed
Sustainable Tropical Timber Coalition <a href="http://www.europeansttc.com">www.europeansttc.com</a> <b>EU</b>	Growing EU sales of verified sustainable timber	Tropical wood.  Role of strong EU demand for sustainable timber in incentivising SFM uptake	Neutral. Focus is on sustainability verification. Urges clarification of FLEGT’s status relative to certification	Undisclosed
Fair & Precious <a href="http://www.fair-and-precious.org">www.fair-and-precious.org</a> <b>EU</b>	ATIBT led campaign to grow EU certified sustainable tropical timber sales	Tropical wood.  How healthy tropical timber market supports forest maintenance	Neutral. Mentions FSC and PEFC certification only. Also wants clarification on FLEGT’s status vis a vis certification	Undisclosed
Green Deal <a href="http://www.vvnh.nl">www.vvnh.nl</a> <b>Netherlands</b>	Campaign to grow certified sustainable share of Dutch timber market	All wood types.  Value of growing certified timber market share in tropical forest maintenance	Positive. Focus on sustainably certified, but 2020 target for 95% certified tropical timber market share states that FLEGT- licensed timber can account for 25% of each shipment	Undisclosed
Hout in de GWW / wood in civil and marine engineering <a href="http://www.centrum-hout.nl">www.centrum-hout.nl</a> <b>Netherlands</b>	To increase use of timber, notably tropical, in Dutch civil/hydraulic engineering projects	Tropical wood.  Underlines tropical timber performance but also its CO2 and LCA benefits	None as little if any Indonesian licensed timber used in this application. But could change if other countries, like Ghana, start licensing	Undisclosed
Wood for Good <a href="https://woodforgood.com/">https://woodforgood.com/</a> <b>United Kingdom</b>	To grow all wood use in UK construction and design	All wood types.  Focuses on renewability and wood’s carbon merits, especially in building. Has LCA data base on website	Positive. Website includes background information on FLEGT and Indonesian licensing. Could increase coverage given more information on social, environmental and economic aspects	£215,000 per year budget, plus contributions from 20 supporters from £1,000 to £30,000

Campaign /Communication platform	Theme/objective	Campaign focus	FLEGT position	Budget
<p><b>www.mytropicaltimber.org</b></p> <p>EU</p>	Website created by ATIBT listing EU tropical timber suppliers and giving timber performance	<p>Tropical wood.</p> <p>Basis is communication on legal tropical timber. Links to ATIBT/ETTF site <b>www.timbertradeportal.com</b> for information on legality and <b>www.fair-and-precious.org</b> on sustainability.</p>	Neutral. No direct reference, but VPA status of supplier countries given on linked Timber Trade Portal website. Considering providing more background information.	Undisclosed
<p>Timber Trade Portal</p> <p><b>www.timbertradeportal.com</b></p> <p>EU</p>	ETTF/ATIBT joint venture website to support EU trade in legal timber, providing details on legality verification in 24 mainly tropical supplier countries and business contacts.	<p>Tropical wood (primarily).</p> <p>Legality verification</p>	Positive. Includes information on VPA status of supplier countries and FLEGT licensed product from Indonesia. May increase background information on FLEGT	Undisclosed
<p>proHolz</p> <p><b>www.proholz.at/</b></p> <p><b>Austria / Germany (Bavaria) / Switzerland</b></p>	Ongoing promotional initiative to drive use of domestic timber, primarily in construction. Focused campaign Holz ist genial (Wood is genius) aims to grow awareness of timber sustainability and carbon benefits	<p>All wood types.</p> <p>Timber sustainability and carbon/climate mitigation benefits</p>	None / Not applicable	Undisclosed
<p>Grown in Britain</p> <p><b>www.growninbritain.org</b></p> <p><b>United Kingdom</b></p>	UK campaign to increase use of home-grown timber across all applications	<p>All wood types.</p> <p>Sustainability of managed woodlands and their timber output. Supports FSC and PEFC certification</p>	None / Not applicable	Undisclosed
<p>American Hardwood Export Council</p> <p><b>www.americanhardwood.org</b></p> <p>EU</p>	Aims to increase European use of US hardwoods and grow its applications	<p>American hardwoods.</p> <p>Legality and sustainability of US hardwoods, with focus on its carbon and LCA performance</p>	None / Not applicable	Undisclosed
<p>Le Bois Oxygène campaign of Belgian trade federation Fedustria</p> <p><b>www.fedustria.be</b></p> <p><b>Belgium</b></p>	None	All wood types.	None / Not applicable	Undisclosed
<p>Timber Transformer</p> <p><b>www.ttf.co.uk</b></p> <p><b>United Kingdom</b></p>	FLEGT process and Licencing	<p>Tropical wood.</p> <p>Sole focus of the campaign was FLEGT Licencing</p>	Positive.	Undisclosed
<p>Wood Window Alliance (British Woodworking Federation)</p>	Environmental benefits of choosing wood as a raw material	<p>All wood types</p> <p>Environmental benefits of choosing wooden windows compared to uPVC windows.</p>	None	Undisclosed
<p>Nordic Swan eco-labelling initiative</p> <p><b>www.svanen.se</b></p> <p>Nordic countries</p>	Product labelling based upon lifecycle assessment	All wood types (excludes most tropical species)	None	Undisclosed

**Table 2: European timber promotional campaigns and communication initiative themes and references to FLEGT**

Figure 12 gives an overview of the focal areas of the campaigns and promotional platforms in broadest terms. Aspects of sustainable forest management and its benefits to producers, communities, the forest itself or to the buyer or consumer is the most common theme. Climate benefits, such as reduced carbon dioxide footprint is the second most common focus. Only three of the campaigns assessed (Hout in de GWW, Wood for Good and AHEC) focus on all three aspects.

## FLEGT's place in wood promotion

Given the 'fertile soil', as one trade federation representative described it, in terms of the industry's increased communications activity, combined with its growing environmental focus, many in the trade have expressed disappointment that the EU FLEGT initiative and FLEGT licensing have not been able to gain greater market profile and traction since their inception. FLEGT is, after all, potentially another tool for combating the illegal timber trade and blocking it from the EU market.

A reason commonly cited for the low profile is the slow progress of supplier countries through the FLEGT Voluntary Partnership Agreement process en-route to FLEGT licensing. With just Indonesia so far providing licensed goods, and with the subsequent limits on range and availability of product, the consensus from the interviews is that the project has initially been "a difficult sell". Traders also commented on FLEGT's status as proof of legality only - "legality is the absolute minimum customers expect, whether it's got a label or not. There's an opportunity to market the fact you're going the extra mile to ensure legality, but that has to be alongside timber's other environmental attractions, such as its carbon performance and sustainability."

It is a prevailing opinion of those interviewed that the FLEGT VPA process until now has also been communicated in a rather technocratic way and principally on its legality assurance credentials, rather than on the wider on-the-ground, human and environmental impacts.

The emphasis on sustainability in timber sector marketing is made all the more important given that its rival man-made materials sectors, steel, concrete, plastics and composites are also ever more focused on presenting a green image and developing their own sustainability stories. These efforts are backed with significant budgets, high level research and are perceived as gaining increasing credibility.

At the same time the tropical timber sector in particular in Europe is also facing growing competition from the wood-plastic composite and modified wood producers, which also make sustainability and, indeed, their capacity to substitute tropical timber, core to their marketing.

Perhaps surprisingly the two promotional and communication programmes dedicated to growing the European tropical timber market do not commend a FLEGT licence as a procurement criterion. Both the Sustainable Tropical Timber Coalition (STTC) and creator of the Fair & Precious campaign, the ATIBT, support the aims of the FLEGT initiative and recognise its role in providing legality assurance, but for various reasons neither is willing currently to depart from exclusive advocacy of sustainability certification.

The 2018-20 roadmap of the STTC<sup>17</sup> sets out its stance on FLEGT and certification, underlining the belief that

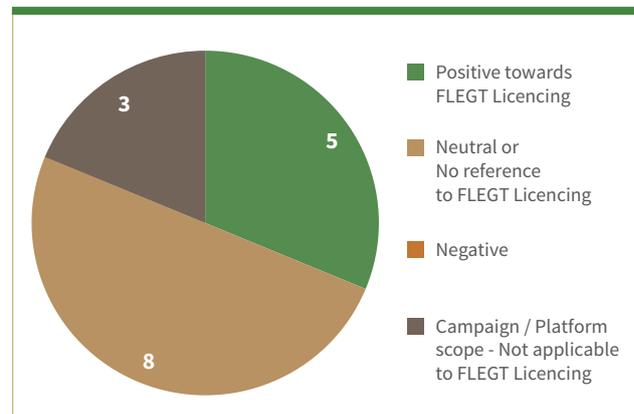


Figure 11: Wood promotion campaigns' references to FLEGT

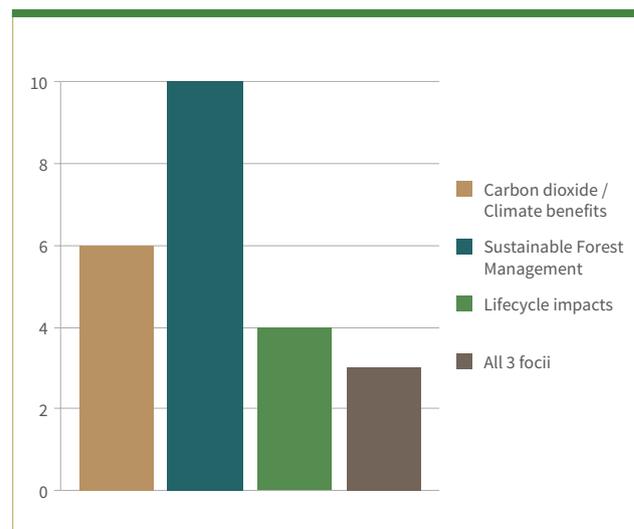


Figure 12: The main focus of the selected campaigns and promotional platforms surveyed

the differentiation between them in the market should be clarified. One of the five key steps it identifies that are needed to improve the market share of verified sustainable tropical timber further is alignment on where FLEGT stands in relation to promoting verified sustainable tropical timber. The Technical Committee advising STTC will consider the relationship between certification and FLEGT in 2019.<sup>18</sup>

The key reasons set out by STTC for not being able to accept FLEGT Licensing include:

- The fear is that FLEGT – or legal tropical timber, essentially – will be seen as sustainable and therefore 'good enough'
- STTC considers FLEGT an important stepping stone towards sustainability

ATIBT<sup>19</sup> stresses that it does promote and support FLEGT it in various ways. It is implementing a project funded by the French Facility for the Global Environment and the EU, in collaboration with the Programme for Promotion of Forest Certification (PPECF), to improve private sector participation in certification and FLEGT and REDD+ processes. At the same time, this is also focused on gaining recognition of certification within the FLEGT VPA process,

with target countries comprising Cameroon, Congo, Gabon, DRC and Ivory Coast.<sup>20</sup>

ATIBT supports a step up in communication of the 'positive effects and opportunities' of a VPA and, as part of the project, representatives have been recruited in each African country to undertake various roles, including informing the private sector on development of VPAs and certification processes, and providing training in both. ATIBT also sees opportunities for including more information on the EUTR, due diligence and availability of timber with FLEGT licences on the two timber sourcing hubs it supports, [www.timbertradeportal.com](http://www.timbertradeportal.com) and [www.mytropicaltimber.org](http://www.mytropicaltimber.org).

The key reasons set out by ATIBT / Fair & Precious for not being able to accept FLEGT Licensing include:

- The Fair & Precious campaign wants to only endorse sustainability certification as criterion for tropical timber procurement
- Common elements and goals between the VPA process and sustainability certification have been identified, with the former seen as a 'first step' to the latter but these need further clarification
- There is currently no homogeneity between VPAs in terms of definitive levels of requirement. So it is not possible to generalise about FLEGT.
- There are differences in terms of transparency and reporting between certification and FLEGT VPAs.

The Nordic Swan Ecolabel<sup>21</sup> organisation says it also sees no grounds for acknowledging FLEGT currently, commending exercise of EUTR due diligence or changing its insistence on certification for label users.

The key reasons set out by the Nordic Swan Ecolabel for not being able to accept FLEGT Licensing include:

- They set requirements stricter than the legislation
- They have a list of prohibited endangered tree species and certification requirements
- They rely on certification requirements

For the time being, FLEGT is not commended under the *French Pour moi, c'est le bois*<sup>22</sup> campaign either.

The key reasons set out by *Pour moi, c'est le bois* for not being able to accept FLEGT Licensing include:

- They are currently liaising with PEFC representatives to highlight the importance of using certification as leverage in communications
- Future communications will focus on wood's environmental benefits,
- Future campaign will not mention imported timber so will not need to refer to FLEGT

One campaign that does not rule out referencing and commending FLEGT licensing in the future is the Netherlands **Hout in de GWW** initiative, promoting timber use in civil

engineering projects. The campaign currently refers to certification and compliance with EUTR legality requirements.

The key reasons set out by **Hout in de GWW**<sup>23</sup> for not being able currently to endorse FLEGT licensing, but potentially doing so in the future include: to potentially accept FLEGT Licensing include:

- Indonesia alone issues FLEGT licences currently, and its timber is hardly ever used in civil works
- If other countries supplying relevant species, such as Ghana, start licensing, the question of mentioning FLEGT will be addressed

The Dutch **Green Deal**<sup>24</sup> is focused on certification, with the goal of achieving 100% sustainably sourced timber market share in the Netherlands. But its stated aim is to 'increase market demand for sustainably produced and FLEGT timber and 'to make its use a natural starting point for all stakeholders'.

The context in which the Green Deal references FLEGT is as follows:

- Green Deal's targets for sustainable timber market share are that 95% of Dutch tropical hardwood imports are sustainably sourced or imported with a FLEGT licence by 2020
- With the proviso that 75% of any shipment is certified

The UK's **Wood for Good**<sup>26</sup> campaign gives summary information about FLEGT on its website. It describes its aims to reduce illegal logging by strengthening sustainable and legal forest management, improving governance and promoting trade in legally produced timber. The UK Timber Trade Federation's **Timber Transformer**<sup>27</sup> exhibition in 2018 highlighted the wider social, economic and environmental benefits for Indonesia of going through the FLEGT VPA process. It told the story of Indonesia's journey through its FLEGT VPA to the start of FLEGT licensing. In particular it focused on what lies behind the FLEGT licence; the social, environmental, economic and livelihood impacts and the structural changes it brings to forest and timber sectors, as well as its core legality assurance aspect. Over its course, the exhibition attracted hundreds of visitors, including journalists, timber businesses, NGO representatives, end users and members of the public. The TTF has now turned Timber Transformer into an online exhibition and is offering its display panel text to other EU federations to mount their own events.

The key reasons set out by the **UK TTF** and the programmes it supports for being able to accept FLEGT Licensing include:

- It has massive potential to produce a positive story line highlighting the on-the-ground positives of the initiative for communities, the forest and wider environment
- There are positive messages concerning the transformative nature of the VPA process, encouraging good forest governance
- FLEGT Licensing represents more than just a green lane through the EUTR

## Multi-stakeholder Forestry Programme phase 4 (MFP4) in Indonesia

The UK Department for International Development (DFID) funds a “Multi-stakeholder Forestry Programme (MFP)” to support Indonesia to achieve its goals on sustainable timber and community forestry. The programme aims to build on earlier phases of DFID’s partnership with the Ministry of Environment and Forestry (MoEF) to deliver an ambitious set of results on national coverage of timber licences, export volumes of sustainably sourced timber and the number and value of community forest businesses.<sup>28</sup>

MFP4 will deliver impact by focussing on:<sup>29</sup>

- Growth in sustainable and legal timber production: ensure the effectiveness and sustainability of the national timber legality assurance system “SVLK<sup>f</sup>”, which underpins EU Forest Law Enforcement, Governance, and Trade (FLEGT) licencing, to further strengthen confidence amongst international buyers and domestic suppliers.

- Growth in community-based forest businesses: catalyse community forest business development to foster more sustainable use of forests, reduce forest degradation and deforestation, and improve prosperity.

While not an above-the-line promotional initiative in its own right, the premise of the latest £5.5 million phase (2018 – 2021) is that implementing a market development strategy is important for underpinning and incentivising the progress of the FLEGT initiative going forward. It is also aimed at increasing and broadening the FLEGT licensed supply base, particularly among small to medium sized businesses.

MFP4’s aim is to provide background assistance to the MoEF and Indonesian stakeholders in building confidence and demand for Indonesian FLEGT timber, in conjunction developing robust, responsible supply from across the Indonesian forestry and timber industries. It will help develop the right strategy, messages and incentives around FLEGT products, so they are more widely endorsed in the marketplace, and offer increasing assurance and

encouragement for Indonesian businesses that have not yet taken up FLEGT certification. The goal “is a legacy comprising positive demand side signals and improvements in supply that continues beyond the three-year term of MFP4.”

One aspect of MFP4 will be a project in collaboration with the Global Timber Forum (GTF<sup>30</sup>) to identify how best to promote specific FLEGT wood products within the European Union.

MFP4 will also examine prospects for a central online resource for information on Indonesian FLEGT achievements and news. The website [www.legalwoodmarket.com](http://www.legalwoodmarket.com) was established as a market for legal and sustainable Indonesian timber and wood products under MFP3, and a new Indonesian Wood Association platform is now currently being developed.

MFP4 is also set to investigate the how Indonesia can demonstrate sustainability credentials of Indonesian FLEGT-licensed timber. “There is growing consensus that a FLEGT Voluntary Partnership Agreement helps to raise the bar on sustainability for the timber industry across a country, leaving enterprises with just a small further step to achieve additional voluntary certification, if this is requested by buyers. MFP4 will look into how that can be highlighted and in particular how the credentials of Indonesia’s national, mandatory sustainable forest management standard can be integrated into FLEGT communications.”

Broadening its remit further afield, another aspect of the programme will be to explore the value of a joint Indonesian and Ghanaian FLEGT communication strategy, as Ghana progresses through the final stages of VPA implementation and ultimately also starts FLEGT licensing.



Top: Sanding down furniture, Jepara.  
Above: Hotpress for sengan veneer to make plywood in Boyolali, Central Java

<sup>f</sup> SVLK (Sistem Verifikasi Legalitas Kayu) is the acronym of Indonesia’s national timber legality assurance system. See [www.flegtlicence.org/svlk-indonesia-s-timber-legality-assurance-system](http://www.flegtlicence.org/svlk-indonesia-s-timber-legality-assurance-system) for more details.

## The EU FLEGT Facility – an information hub

The EU Forest Law Enforcement, Governance and Trade Facility<sup>31</sup> is the primary agency supporting implementation of the FLEGT Action Plan to combat the illegal timber trade. Hosted by the European Forest Institute (EFI), it works with governments, industry, civil society and other stakeholders in countries, negotiating or implementing a FLEGT Voluntary Partnership Agreement (VPA).

The EU FLEGT facility is the principal communications hub for FLEGT VPAs and FLEGT licensing. Its website carries extensive background information, technical details, news on countries' progress through their VPAs and general interest stories geared to a wide audience, including the media. It produces newsletters and press releases on key FLEGT events.

Significantly for the market profile of the VPA initiative and FLEGT-licensed products, it has also just launched a new satellite site specifically targeting the timber trade – [www.timberbuyers.flegtlicence.org](http://www.timberbuyers.flegtlicence.org). Among other topics, this describes the business case for suppliers and buyers to trade in FLEGT-licensed timber products. It is also designed to help timber traders relay the wider story of what FLEGT-licensing is about to their customer base.

The EU FLEGT Facility communications is not a wood promotion programme per se. The site explains how Indonesia's licensing system works, plus the role of national competent authorities policing and administering FLEGT licences in the EU.

In addition it links to a section detailing products covered by licences and those that are not. It also explains the FLEGT procedure for timber and wood products from other producers which transit via Indonesian businesses to the EU.

The FLEGT communication package is designed to reach as wide an audience as possible and is designed to “speak in language people understand<sup>32</sup>”. The focus has been on the timber trade, the FLEGT community, EU Member States and their agencies, the wider development community and the general public.

The Facility has also cultivated close links with NGOs, but does not see it as its direct role to “convince them to back the FLEGT programme or communicate it, it's the [perceived] credibility of FLEGT-licensed timber and the systems underlying it that should get their support.”

The new trade oriented [www.timberbuyers.flegtlicence.org](http://www.timberbuyers.flegtlicence.org) resource, a section within [www.flegtlicence.org](http://www.flegtlicence.org), was created as there was still felt to be a disconnection between buyers and the wider impacts and significance of the FLEGT programme. “Two years into Indonesian FLEGT licensing, speaking to colleagues working in the sector, it became clear that timber buyers were aware it verified legality, but didn't know much about the other impacts and whether it brings social, environmental and economic benefits.”<sup>33</sup>

## Talking point: a 'FLEGT brand'?

A small number of those interviewed for the purposes of this study raised the prospect of a “FLEGT brand”. Opinions as to what it would entail and to whom the brand would be presented vary. As one respondent put it – “Certification schemes have done tremendous work, but still just 11% of forests are certified. The FLEGT programme represents an opportunity to help drive forward the agenda in terms of good forest governance and sustainability. FSC and PEFC came in to fill a gap left by the lack of a proper regulatory framework and have subsequently developed their brand profiles significantly. But now we also have this regulatory structure in the EU FLEGT initiative and FLEGT licensing, which has to be an advance. It's the regulatory world catching up with the voluntary schemes. At the same time it's clearly not deterring or barring these schemes from the market. It's operating alongside, which also has to be a healthy situation.”

“A product-based promotion of FLEGT would give it added business interest”

What this respondent envisaged is not branding in the sense that the certification schemes use it but more based on the model used for business and industry directives. For example the EU WEEE directive for recycling in the electronics industry has effectively become a logo or brand companies use to demonstrate compliance. A similar approach for FLEGT could increase market recognition and industry investment.

Another respondent believed that the existing business-to-business (B2B) labelling used by Indonesia for FLEGT licensed goods which are marked with the FLEGT acronym, or SVLK would be a useful starting point to develop a brand. The V-legal logo, devised as the export brand for SVLK-accredited timber products prior to FLEGT licensing, is also still in use. None of those interviewed foresaw FLEGT Licensing or a derivative brand to be a consumer facing brand.

Both PEFC and FSC have spent over two decades developing their brands and brand messaging. Their supporters have used their logo and supporting systems in many cases to help develop “purpose driven marketing”. When the heart of a brand narrative becomes a cause that customers also support and get behind, it creates a new tone to marketing that can capture potential customers and turn them into passionate “brand ambassadors”. Purpose-driven marketing takes a brand's cause and makes it available to its customers, helping them to connect more fully with the brand as a whole.<sup>34</sup> “These days, everyone wants to feel as though they're part of something bigger. They're driven to connect, to grow, to make a difference. Customers are passionate about their causes and they love the idea that your brand has one, too. That's the foundation of purpose-driven marketing”.

Would a FLEGT “legal” brand pass the test of arousing such passion in customers? For FLEGT Licensing and the wider positive impacts of the VPA to begin to match the credentials of the forest certification schemes a huge investment of time, resources and evidence gathering would be needed.

What is clear from this study is that there is some, but not perhaps overwhelming enthusiasm for the creation of such a brand.

# European wood promotion and communications budgets

There are a wide variety of voices in Europe today promoting timber or otherwise addressing topics around the material or the industry (as covered in *Table 2*). Their coverage and perspectives of environmental issues generally, and the EU FLEGT initiative and FLEGT licensing in particular are similarly diverse.

The range of players in the field also means that widely different forms of funding are involved; from business membership fees and levies for trade associations and industry-based promotion campaigns, with some government grants and subsidy where they have an environmental or development slant, to donor-based funding for NGOs and for the EU FLEGT Facility.

The reluctance of organisations to divulge budgets, makes it difficult to assess how much is being spent on timber sector promotion and communication. A previous detailed study in 2012<sup>35</sup> also experienced difficulties in specifying promotional budgets. The bodies which do currently disclose figures are *Pour moi, c'est le bois* in France and the Wood for Good generic timber campaign in the UK. These at least show the range of sums involved.

The French campaign is run under the auspices of forest and timber sector umbrella organisation *France Bois Forêt*<sup>36</sup> and is focused on boosting homegrown (i.e. French grown) timber's market share versus alternative materials. It has a budget of €10 million for its three-year duration derived from the forest and timber industries, and associated sectors. This enables it to finance a multi-media strategy, stretching to television and radio commercials,

with coverage ranging from the CO<sub>2</sub> absorbing, climate mitigating benefits of sustainable forestry, through to promotion of the use of latest engineered wood products in multi-storey construction.

The UK focused Wood for Good<sup>37</sup> has a core annual spend of £215,000 (approximately €250,000) is funded by the UK Confederation of Forest Industries and the Swedish export industry organisation – Swedish Wood.<sup>38</sup> It also has around 20 individual supporters donating £1,000 to £30,000. It consequently is highly focused, targeting wood use in design and construction.

Other industry promotional initiatives comment that they are at the Wood for Good end of the budget spectrum, but there are those, which, while not making their figures public, clearly also have sizeable funding at their disposal.

The long-established ProHolz campaign, a collaborative effort between Austrian and Italian industries, runs a mobile European roadshow, the WoodBox<sup>39</sup>, focused chiefly on timber building, especially using engineered or massive wood, the particular speciality of the industry in central Europe. Its associate campaign, Holz ist Genial, targets end users and consumers, with complementary messaging on the climate-change mitigation and wider environmental benefits of wood and forest. It communicates via trade and consumer media, in print and online.

The role of the American Hardwood Export Council is to develop the international market for US hardwoods, with the EU one of its prime targets. Funded by the US hardwood industry and Foreign Agricultural Service (FAS) of the U.S. Department of Agriculture (USDA)<sup>40</sup>, it also clearly has a significant budget, with its campaigns and communications going Europe-wide and beyond to 35 countries. In 2018 just one of its projects, involving leading architects and structural engineers, entailed design and construction of a 30-tonne, multi-storey structure in cross-laminated tulipwood. On show initially in central London, it is now being taken to other European venues. This again underlined that AHEC also sees its role as broadening the applications of American wood through technical development and research. Besides the use of US species in engineered products, it has also helped drive their development and application in thermo-treated form. Whilst AHEC's budget does not appear to be publicly available an estimate can be made based on their share of

**Figure 13:**  
I say yes to wood and no to CO<sub>2</sub>. Bois.com campaign circa 2013



<sup>g</sup> USDA Market Access Program funding allocations FY2019 – American Hardwood Export Council, APA - The Engineered Wood Association, Softwood Export Council, and Southern Forest Products Association: \$6,726,807. <https://www.fas.usda.gov/programs/market-access-program-map/map-funding-allocations-fy-2019>

USDA Foreign Market Development Program (FMD) funding allocations FY2019 – American Hardwood Export Council, APA - The Engineered Wood Association, Softwood Export Council, and Southern Forest Products Association: \$2,767,954. <https://www.fas.usda.gov/programs/foreign-market-development-program-fmd/fmd-funding-allocations-fy-2019>

<sup>h</sup> A figure of \$1.5 million budget for Europe was quoted in 2012. Source: Oliver, R & Venables, D. (2012) Efforts to promote use of wood in the EU region - A study for the Japan Lumber Inspection and Research Association. Forest Industries Intelligence Limited

<sup>i</sup> Password protected files are available at: <http://www.euflegt.efi.int/es/24-sc-flegt>



**Figure 14: The proHolz Wood Box on tour.**  
Source [www.proholz.at](http://www.proholz.at)

funding from USDA. In US fiscal year 2019 AHEC shares with three other organisations a budget of around \$9.4m USD<sup>g</sup> plus its contributions from the private sector, suggesting an annual AHEC budget in the range of \$2 million – \$4 million (approximately €1.8m – €3.8m).<sup>h</sup>

The UK Department for Industry Multi-stakeholder Forestry Project, phase 4 (MFP4) has a budget of £5.5 million (approximately €6.4 million) over three years. Whilst not explicitly focused on promotion of FLEGT Licensing it remains the only programme of its type focused on a country able to export FLEGT Licensed Timber.

The UK Department for International Development also part funds the European Forest Institute-managed EU FLEGT Facility.<sup>41</sup> This also underlines that it is not a marketing operation per se, but an objective information support resource for the FLEGT initiative, communicating its broad activities, objectives and how it works. The EU FLEGT Facility detailed budgets are not publicly available available,<sup>1</sup> but the total budget is £2 million (approximately €2.38m) per year over 4 years (2016 to December 31st 2019).<sup>42</sup>

What is apparent is that there are several organisations with significant budgets and remit to promote generally, in some cases tropical wood specifically and to a degree,

the FLEGT process and FLEGT Licensed material. With the possible exception of the EU FLEGT Facility there are no budgets that are directly allocated to support the uptake and growth of FLEGT Licensing.

This raises two questions:

- How much could be spent?
- Does any money need to be spent?

Marketing and promotion, across traditional and social media format is an enormous global business with budgets often running to millions. Smaller scale budgets have proven effective in some quarters but these tend to be for a specific product and feature a specific promotion<sup>43</sup> – and most importantly not attempting to change attitudes towards a whole industry and producing country. The examples of AHEC and *Pour moi, c'est le bois* perhaps give an indication of the likely cost of marketing a whole industry across a range of markets – in the order of €2 – 4 million per year.

Conversely there is an argument that there does not need to be any further expenditure especially focusing on FLEGT Licensed product or on the wider VPA process. This argument is based upon the fact that FLEGT Licensed products have a unique advantage over all other certified or verified materials – they have special status under the EUTR. All other materials must be assessed by those first placing them on the EU market and due diligence demonstrated. Only FLEGT Licensed materials are exempt as operators in the EU do not need to exercise due diligence on imports of FLEGT-licensed timber<sup>44</sup>. This point appears well understood and the only limiting factor for further uptake is perhaps the lack of availability of FLEGT Licensed material. In simplest terms – if there was greater variety of products available from a wider range of countries – the market would respond and buy more.

In reality there is almost certainly merit in continuing to reinforce the messaging around the status, value and implications of FLEGT Licensing (as noted through interviews in a number of IMM studies in 2017 – 2019<sup>45</sup>).

## EU Trade Federations and FLEGT communication

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In terms of European market influencers and communicators for the timber industry, a key role is played by national timber sector associations and federations.

In fact, they maintain, they perform a more significant function than ever due to the increased demands placed on the European timber sector from national and supra-national regulation, notably on issues of legality and sustainability, with the EUTR and FLEGT regulations. They are also providing guidance on wider industrial environmental impact issues, with the increase in targets set in legislation and standards on emissions, energy and climate change mitigation, plus growing governmental and industry focus on circular and bioeconomic development.

*“The range of requirements on industry and trade, external to day to day business, make it increasingly important to have a central body taking a strategic overview; following, advising and lobbying on regulatory development on environment, wider business issues and best practice generally,”* said one federation head.<sup>46</sup> *“In an increasingly competitive market place, with other materials sectors developing their sustainability arguments, market promotion and communication are also increasingly important trade body roles.”*

Within this context sustainable sourcing is a key topic for federations, but there is variation between the emphasis they place on certification and the EU FLEGT initiative, as

there is in their views on communication of the latter and interest they report in it from members.

European woodworking industries federation **CEI-Bois** has significantly increased its role in communicating the part forestry and timber can play in climate change mitigation and low carbon sustainable development. It is also promoting wood as the prime construction and manufacturing material in a circular “bio-economy”, with its new booklet profiling the European industry: *Wood – Building the Bioeconomy*.<sup>47</sup> This details sustainable forest management and sourcing, certification, the EUTR and the FLEGT initiative. On the latter it describes VPAs and the role of FLEGT licences in exempting EU operators from undertaking further due diligence on imports. It also highlights a VPA’s social, economic and environmental impacts and complementarity with certification.

**Le Commerce du Bois**<sup>48</sup> (LCB), as an affiliate of **France Bois Forêt**, supports the latter’s *Pour moi, c’est le bois* campaign. It additionally undertakes its own promotion initiatives, including the “*I believe in certified tropical timber*” series of video interviews with specifiers and NGOs choosing sustainably sourced tropical wood, produced with the STTC’s support. Also backed by STTC, LCB created ‘*The good choice of tropical timber*’ website<sup>49</sup> covering timber applications, technical data and listing suppliers. It also worked with importers and distributors to increase their certified tropical timber procurement, distributed digital tropical timber marketing tool kits, and undertook an outreach programme on the subject to architect and vocational schools. LCB members “responded positively to licensing [but] LCB today rarely gets enquiries on it, other than on the relationship between FLEGT and the EUTR and sustainability certification. It also tends only to report FLEGT news when countries progress in the VPA process”.<sup>50</sup> The French “consensus is that more countries need to start licensing before interest in FLEGT reaches further down the supply chain”. Although greater communication of its wider impacts and VPA case studies from supplier country industries would help – “provided it did not ‘disengage people from sustainability certification’”.

**The UK Timber Trade Federation** (TTF) also has a core focus on timber legality and sustainability as part of its aim to drive market share. It was a leading advocate for the EUTR and early on aligned its compulsory Responsible Purchasing Policy to Regulation requirements.

It is also active in FLEGT communications. The highlight to date was its Timber Transformer (see above) exhibition on Indonesia’s journey through its VPA. It also regularly carries news on latest FLEGT developments and runs joint EUTR and FLEGT workshops with the UK Competent Authority.

The TTF successfully lobbied in association with the Confederation of Forest Industries umbrella body, for FLEGT and EU Timber Regulations to be assimilated into UK law post Brexit.<sup>51</sup> The TTF is now taking the FLEGT message to the specifier community via online training materials, highlighting that FLEGT licences are ‘category A’ proof of

legality and sustainability in UK government procurement policy.<sup>j</sup> It has also invited UK local authorities to undertake its procurement training programme, which covers FLEGT.

The TTF also recommends more communication of the specific products available with FLEGT licences and from VPA countries, given that “customers buy products, not legality and sustainability certificates. The EU and EU trade should be promoting as well as communicating FLEGT”.<sup>52</sup>

German timber trade federation **GD Holz**, an EUTR monitoring organisation, also devotes online space to FLEGT<sup>53</sup> in its tropical timber section, with core information plus links to [www.flegt.org](http://www.flegt.org) and [www.euflegt.efi.int](http://www.euflegt.efi.int) websites.

*“We promote FLEGT as a seal of legality, which reduces members’ due diligence under the EUTR. We communicate latest developments surrounding licensing and work closely with BLE, the German Competent Authority.”*<sup>54</sup>

GD Holz also manages the **Holz vom Fach**<sup>55</sup> timber trade and consumer-facing communication and promotional platform. This carries information on wood performance and applications and also has a section on tropical timber which looks at its applications, the role its sustainable use can play in maintaining the forest and lesser known species. It covers certification and the EUTR as providing assurance on legality and sustainability, but currently makes no reference to FLEGT.

GD Holz would, however, back more overt promotion of FLEGT by the EU and VPA countries, with particular emphasis on “*putting it into context for customers down the supply chain*”. “*All trade stakeholders should promote FLEGT, but it’s firstly the responsibility of the EU and importantly FLEGT VPA supplier countries, which of course have a lively interest in generating demand*”.

The Dutch **VVNH** association’s focus has been on working with members, end users, distribution, retail and government to promote and drive market share of sustainably certified timber and wood products.

Perhaps its highest profile project to date is the **Green Deal initiative**<sup>56</sup>, in which it works with supply chain partners to make ‘certified the norm in the Netherlands’. This, it maintains, has contributed to certified timber reaching 63% share of the country’s tropical timber imports.<sup>57</sup>

Both VVNH and its affiliate communication and research hub Centrum Hout do relay information on FLEGT, with the main emphasis on its assured legality aspects, but another initiative from the latter, **Hout in de GWW**<sup>58</sup>, aimed at growing sales of tropical timber in civil engineering, is currently focused only on certified material, though as discussed above is open to FLEGT Licensing when it becomes relevant to its sources of supply. VVNH “*has no indications from members of any problems with FLEGT or that they lacked information about it*”.<sup>59</sup>

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j Certificates from certification systems (and in the UK – FLEGT Licences) may be accepted by EU member states as proof of evidence for sustainably produced timber. The UK (probably uniquely) classifies this type of evidence as Category A evidence. Member states are legally required also to accept other types of evidence as long as the particular evidence provides sufficient and verifiable proof that the timber originates from a sustainably managed forest.

Belgium’s textiles, wood and furniture industries federation **Fedustria** reports handling some enquiries on FLEGT and licensing. It also organised a meeting with an Indonesian delegation for its members to discuss issues with both, including mismatches in licensed goods product codes between Belgium and Indonesia.

It would like to see “*more communication from the EU down the supply chain, particularly on FLEGT’s ‘wider meaning’ beyond legality assurance*”<sup>60</sup>. “*Our members understand the system and the sustainability aspects, but their clients aren’t informed and we also feel the Belgian government should play more of a guiding role on FLEGT and its status in green public procurement.*”

While it includes information on the EUTR on its website<sup>61</sup> the federation does not yet mention FLEGT. “*The sectoral agreement with other timber sector federations and our environment ministry to increase Belgian market share of certified wood is up for renewal and we’re trying to give a place in it for FLEGT. However, it’s not easy, as government isn’t informed about FLEGT’s sustainability aspects.*”

Spain’s **AEIM** timber trade association details the wider FLEGT programme and VPA initiative on its ‘legal timber’ site<sup>62</sup> where it also has illegality risk assessments of lead timber supplier countries, temperate and tropical. The focus is on legality assurance, with details on the monitoring, licensing and administration framework stipulated by a VPA.

It also highlights the independent creation of a new satellite website<sup>63</sup> by the Spanish environment ministry giving information on FLEGT and the EUTR.

Italy’s **Fedecomlegno** federation does not include in-depth information on FLEGT online. But it does provide guidance on licensed goods import procedures and supports liaison with customs. It reported ‘little interest’ from Italian operators on the wider impacts of FLEGT, but said that there was “*a desire for supplier countries to progress faster through the VPA process*”, citing Cameroon and Gabon as of particular interest to Italian importers. “*There would be interest in updates on countries involved*”

Federation	Communications	Notes
CEI-Bois European woodworking industries confederation  <a href="http://www.cei-bois.org">www.cei-bois.org</a>	Communicates on FLEGT news developments via its website ( <a href="http://www.cei-bois.org">www.cei-bois.org</a> ) and newsletter and informs members via its Sustainability Working Group.	CEI-Bois envisages giving more coverage to FLEGT and would like to see more communication on the wider social, environmental and economic impacts, which it feels are not generally known further down the timber supply chain.
UK Timber Trade Federation  <a href="https://ttf.co.uk">https://ttf.co.uk</a>	Ran the four-month Timber Transformer exhibition on Indonesia’s journey through its VPA highlighting the environmental, economic and social benefits. Covers FLEGT news and communicates initiative further down the supply chain, including to specifiers. Now plans government backed project to target FLEGT information at specifiers across the EU.	TTF sees opportunity to make FLEGT communications more product-focused, developing a FLEGT brand and making linkages with wider issues, such as climate and sustainable development.
GD Holz, Germany  <a href="http://www.gdholz.de">www.gdholz.de</a>	Provides background information and news on FLEGT online, but currently, while the wood promotion site <a href="http://www.holzvomfach.de">www.holzvomfach.de</a> covers the EUTR and certification, it currently does not reference FLEGT	GD Holz favours more overt promotion of FLEGT and communication further down the supply chain. Feels there’s scope for EU and FLEGT countries to be more active in promotion.
VVNH, The Netherlands  <a href="http://www.vvnh.nl">www.vvnh.nl</a>	Core aim to drive up Dutch market share of sustainably certified timber, but also carries FLEGT news online. Recognises shipment as sustainable with up to 25% FLEGT licensed content, provided 75% certified.	Has no indication that members lack information on FLEGT.
Fedustria, Belgium <a href="http://www.fedustria.be">www.fedustria.be</a>	Details EUTR on website, but currently less coverage of FLEGT. Organised meeting for members with Indonesian suppliers to discuss FLEGT issues.	Is seeking a place for FLEGT in industry’s new sectoral agreement with environment ministry on growing certified timber market share.
AEIM, Spain  <a href="http://www.aeim.org">www.aeim.org</a>	Includes information on FLEGT on satellite website <a href="http://www.maderalegal.info">www.maderalegal.info</a> , where it also has supplier country risk profiles.	Supports creation by Spanish environment ministry of new website giving information and guidance on both EUTR and FLEGT, <a href="http://www.mapa.gob.es">www.mapa.gob.es</a>
Le Commerce du Bois, France  <a href="http://www.lecommercedubois.org">www.lecommercedubois.org</a>	Has consulted widely with members on FLEGT and posts news online, but today rarely gets inquiries on it. For next stage of Pour moi, c’est le bois promotional campaign looking at how certification can be better used to leverage wood sales.	Believes more countries need to start licensing before interest reaches down supply chain. Feels new EFI FLEGT facility pages <a href="http://www.timberbuyers.flegtlicence.org">www.timberbuyers.flegtlicence.org</a> are delivering more trade-oriented perspective on FLEGT and favours delivery of more information on its wider impacts, provided this doesn’t ‘disengage’ buyers from certification.
Fedecomlegno, Italy  <a href="http://www.federlegnoarredo.it">www.federlegnoarredo.it</a>	Reports news on FLEGT and provides guidance on licensed goods import procedures.	Detects little trade interest in FLEGT’s wider impacts, but believes a biannual update on supplier countries’ progress through FLEGT VPA process would be welcome in the trade.

**Table 3: EU Timber Trade Federation’s communication on FLEGT**

Position on FLEGT Licencing	Organisation
Promoting EUTR compliance advantages though cautious that FLEGT Licences might gain share from third party certification	<ul style="list-style-type: none"> <li>• Le Commerce du Bois</li> </ul>
Promoting EUTR compliance advantages / Promoting FLEGT as evidence of legality	<ul style="list-style-type: none"> <li>• AEIM</li> <li>• CEI-Bois</li> <li>• Le Commerce du Bois</li> <li>• Fedecomlegno</li> <li>• Fedustria</li> <li>• GD Holz</li> <li>• UK Timber Trade Federation</li> <li>• VVNH</li> </ul>
Mentioning FLEGT as evidence of legality and possibly sustainability (i.e. there are potentially aspects going beyond legality mentioned)	<ul style="list-style-type: none"> <li>• Fedustria</li> <li>• UK Timber Trade Federation</li> </ul>
Promoting third party sustainability certification	<ul style="list-style-type: none"> <li>• AEIM</li> <li>• CEI-Bois</li> <li>• Le Commerce du Bois</li> <li>• Fedecomlegno</li> <li>• Fedustria</li> <li>• GD Holz</li> <li>• UK Timber Trade Federation</li> <li>• VVNH</li> </ul>

**Table 4: Positioning of EU trade federations**

in VPAs, their status and a forecast date for signature and consequent FLEGT licensing.”<sup>64</sup>

What is clear from this overview of EU-based trade associations is that there is no consistency regarding attitudes to FLEGT Licencing and the wider VPA. Generally all of the associations can be said to be supportive of the wider VPA process and benefits that will accrue. Beyond this the level of tangible support around communicating the message is hugely variable.

The UK perhaps represent one extreme, with the Timber Transformer campaign, and promotion of FLEGT Licencing as an equivalent of certification for public procurement – the most pro-FLEGT association. Spain’s AEIM takes a more mainstream route and promotes the legality of

FLEGT Licencing and as a route through due diligence and the EUTR. The other associations can be typified as being much more cautious. Many have invested their energies in certification or domestic production. Promoting a concept that that might make imported timber more attractive is unlikely to feature highly on their agenda.

Other associations remain unconvinced of the merits of FLEGT Licencing, willing to accept that it might equate to “legal compliance” in the country of production, but so far unwilling to consider that it might mean much more of this in terms of environmental (or silvicultural) performance.

Overall the European trade association are not acting cohesively on FLEGT and as can be seen in the summary in *Table 4*, the range of views cover a broad spectrum of positions.

## 6 Selected NGO and CSO views on FLEGT

NGOs, some of whom were also interviewed for this report, are a key market influencer and clearly vital to be kept in the FLEGT communications loop. They can, of course, be critical, but where they see positives in the initiative, the NGOs interviewed for this report say they are keen to promote them and help inform industry and public opinion.

Initially some in the EU trade took a ‘wait and see’ attitude on putting their trust in the FLEGT initiative. They were concerned NGOs would find fault with a timber verification system that wasn’t sustainability certification and that they could lay themselves open to attack if they imported licensed goods without further due diligence.

But criticism on the level anticipated and the attacks did not materialise. The NGOs are clearly willing to highlight flaws in the FLEGT process and the system’s operation

“FSC and PEFC can clean a room, FLEGT cleans the house” *Fern*

where they identify them. But their tone is broadly supportive. Indeed some advocate bringing the NGOs more into the FLEGT community to support the initiative’s communication and development.

WWF<sup>65</sup> does stress the need to draw a distinction between the FLEGT licensing scheme and certification. It feels it is not always made clear, moreover the relationship between the two has not had time to crystallise given that only Indonesia is licensing.

### Key points:

- “Although the long term aim of FLEGT may be to support sustainable development, there is a difference between the FLEGT process, which focuses on legality of timber, while certification focuses on sustainability in the first place.
- Both systems are not the same and, if FLEGT is aiming to move to sustainability, especially from an environmental perspective, this should be directly addressed through the process, and not considered a side effect.
- A difference also needs to be made between the multi-stakeholder process, the agreement of stakeholders on what sustainability means, and its implementation under a licensing scheme.”

WWF also questions whether the FLEGT process in its current form would be sufficient to address sustainability from a ‘holistic perspective’.

- “Whether the current process could be seen as a sustainability stepping stone will depend on circumstances such as willingness of stakeholders to discuss sustainability and its elements”

It maintains too that implementation of some FLEGT timber legality assurance systems need strengthening so illegal timber does not exploit loopholes.

WWF does feel FLEGT needs to be more widely communicated:

- “Information about status/current developments of different VPA processes, including status of the legality assurance systems, that also allow for open exchange between stakeholders would be useful
- There’s a lot of information on the FLEGT facility website, but this could be better advocated, and successes and achievements under FLEGT, as well as VPA status, could be more actively disseminated, including via social media.”

**Fern** rates among the most positive of NGO FLEGT supporters. It produced a briefing in 2016<sup>66</sup> evaluating FLEGT’s impact against indicators including accountability, capacity, equity in gender and benefit sharing and transparency. While acknowledging remaining flaws in the system, Fern’s conclusion was that FLEGT scored well against all these parameters and that ‘it is the most effective functioning process to increase forest governance and combat illegal logging’.

Fern also actively communicates on FLEGT through its *Development Aid Campaign* and its *Forest Stands and Voices from the Forest* grass roots reporting projects. It produces VPA updates every six months and co-manages the *LoggingOff* website<sup>67</sup>, which provides a channel for some civil society perspectives on VPAs.

### Key points:

- “The EU could bring together local and international NGOs to coordinate their communications and fund their existing VPA material
- There’s been a lot of work documenting what a VPA is, but more frequent and transparent communication is needed on country specific VPA processes

- certification and FLEGT can be complementary and alone, certification is not enough and Fern strongly favours regulatory measures on a national basis to tackle deforestation.
- While FSC and PEFC can clean a room, FLEGT cleans the house”

Fern also backs the proposition that FLEGT can be ‘more than just proof of legality’. At the same time, it urges the EC to strengthen and renew efforts on deforestation. “As part of this, the 2018–22 EU FLEGT Workplan needs to be released and adopted and it should tackle all drivers of deforestation, including illegal logging”.

**Earthworm**<sup>68</sup>, formerly TFT (The Forest Trust) also backs FLEGT licensing.

### Key points:

- “Assuring Timber legality is important in its own right and as a prerequisite to wider adoption of sustainable forestry in many countries afflicted by deforestation and degradation
- FLEGT moves things in the right direction.”

However, Earthworm also noted that FLEGT ‘seems to have stalled since Indonesia started licensing – it’s important to maintain and build momentum for the initiative to succeed’.

**Greenpeace** offers little public affirmation of FLEGT VPAs and licensing, but where it criticises, it is in terms of the initiative not having developed or progressed far enough.

### Key points:

- There needs to be tougher action under VPAs to block conflict and conversion timber from supply chains.
- The ‘higher objectives’ of sustainability should be pursued with more determination under the FLEGT Action Plan. That includes environmental sustainability, poverty eradication and defence of human and labour rights.
- Uneven implementation of the EUTR threatens to undermine the wider FLEGT process.
- “With increasing pressure to show progress, there’s a risk it will give VPA countries the go ahead to start licensing before good forest governance is in place, and reforms are implemented to ensure forests are protected and forest people’s rights protected”

The **Environmental Investigation Agency’s**<sup>69</sup> (EIA) comments online, while at times critical on implementation, are also generally favourable towards FLEGT.

### Key points:

- The EIA focuses on the stakeholder engagement involved in a VPA and the independent monitoring it entails.
- It describes the implementation of Indonesia’s VPA framework as a model for achieving effective legality assurance in other industries.
- “The lessons from the forestry industry should be used to advance change in other sectors, particularly palm oil, which has already been identified as a significant threat to

NGO / CSO	Summary of position
WWF	<ul style="list-style-type: none"> <li>• Describes legality assurance as prerequisite of timber and forest sustainability.</li> <li>• Stresses that differentiation between FLEGT and sustainability certification should be made clear.</li> <li>• Questions whether FLEGT in current form is sufficient to address sustainability holistically.</li> <li>• Cites governance improvement and stakeholder engagement as FLEGT major achievements.</li> <li>• Sees opportunities for advocating FLEGT more via social media</li> <li>• It recommends supplier countries consider joining the VPA process.</li> <li>• It urges communication of the FLEGT initiative outside the EU.</li> </ul>
FERN	<ul style="list-style-type: none"> <li>• Describes FLEGT as most effective functioning process to increase forest governance and combat illegal logging.</li> <li>• Recommends EU bring together NGOs to coordinate and support their FLEGT communications.</li> <li>• Backs proposition that FLEGT is more than just proof of legality.</li> </ul>
Earthworm (formerly TFT)	<ul style="list-style-type: none"> <li>• Describes legality assurance as prerequisite of timber and forest sustainability.</li> <li>• Feels FLEGT initiative has 'stalled' since Indonesia started licensing.</li> </ul>
Greenpeace	<ul style="list-style-type: none"> <li>• Says continued uneven implementation of EUTR could undermine FLEGT process.</li> <li>• Warns EU against taking shortcuts in VPA process to get more countries to licensing stage.</li> </ul>
Environmental Investigation Agency	<ul style="list-style-type: none"> <li>• Commends FLEGT as template for other forest commodities industries legality assurance.</li> <li>• Questions aspects of Vietnam's VPA timber legality assurance system.</li> <li>• Backs VPA for Vietnam as likely to incentivise it to regulate its timber import/export trade.</li> <li>• Sees Vietnamese VPA as 'significant precedent' for timber legality assurance in China.</li> </ul>

**Table 5: NGO and CSO views on FLEGT Licencing**

*Indonesia's remaining forests if expansion of plantations continues uncontrolled"*

This year, the EIA also sounded a note of caution over Vietnam's VPA, maintaining that its timber legality assurance system is "both owned and verified by departments of the Vietnamese state, departments EIA has consistently demonstrated to be lacking in capacity to conduct enforcement effectively".

EIA still backs the EU-Vietnam VPA in principle. "We support it because it's the only game in town likely to incentivise Vietnam to regulate its timber import/export trade," she said. "It will also be a world first for a major wood processing hub and Vietnam's example could also serve as a significant precedent for China, the world's number one consumer of [illegal] timber."

Whilst not an exhaustive sample, it is clear that generally the NGO / CSOs operating with interests in the FLEGT process are supportive in principle. Given their remit it should be no surprise that they welcome the implementation of the rule of law in a sector that many NGO have highlighted illegality for decades.<sup>k</sup>

What is clear from the sample that those NGOs close to the process in a range of countries do not have an appetite to embrace the environmental or social impacts of FLEGT Licencing and the VPA at the same level as they with forest certification. There is a general acknowledgement that a level of legal compliance is a step in the right direction but no certainty how down the road to sustainability a FLEGT Licence represents.

## 7 If you throw enough mud... the claims made by competing materials

All the main European construction and manufacturing materials sectors today set out their environmental performance credentials and make a case for sustainability in marketing and communications.

Producers of wood plastic composites and modified wood, softwoods which have undergone treatment to deliver hardwood-like performance, are doing the same. The latter additionally present themselves as offering an environmentally benign alternative to tropical timber.

**Cembureau**, the European Cement Association,<sup>70</sup> highlights that cement manufacturers are increasingly committed

to co-processing – the use of waste in cement production to replace natural mineral resources and fossil fuels. It cites use of inorganic content of waste tyres in cement manufacture and says that 44% of its industry's fuel mix comprises waste biomass, saving 6.7 million tonnes of coal, which represents 18 million tonnes of avoided CO<sub>2</sub>. In the future, it maintains, 95% of its fuel requirement could be waste-based. It states that concrete can be 100% recycled after building demolition as recycled aggregate in new concrete and in 'unbound applications' like road construction and earthworks. Cembureau says its industry contributes to no net loss of biodiversity in Europe through quarry rehabilitation projects.

<sup>k</sup> See White, G. (2018) EU voluntary private sector timber procurement policies & the role of FLEGT Licencing. ITTO / FLEGT Independent Market Monitor

Plastics Europe<sup>71</sup> maintains that plastics' characteristics enable them to play a major role in taking Europe 'along the road to a more sustainable, resource efficient future'. "Lightweight, versatile and durable, plastics can help save key resources, such as energy and water in sectors including packaging, building, automotive and renewable energy," it says. "In addition, plastics in packaging can help reduce food waste."

Plastics are also described as a potential key component in development of a low-waste, recycling-focused circular European economy. To realise that potential, the industry is "committed to developing strategies for 100% plastics recovery and zero waste to landfill".

The European Association of Plastics Recycling<sup>72</sup> claims that if all plastic waste were diverted from landfill, a further 5 million tonnes could be recycled, saving 7 million tonnes of CO<sub>2</sub> emissions. Remaining plastic waste that can't yet be sustainably recycled could be used as fuel, combined with associated recoverable waste, generating 330 TWh of energy a year.

The European Steel Association<sup>73</sup> (ESA) says its industry has already cut emissions by 25% from 1990 to 2010 and through its ultra-low carbon dioxide steel making project (ULCOS) it is set to reduce them by a further 50%.

"A life-cycle perspective already shows that uses of steel in innovative applications saves more CO<sub>2</sub> than is emitted in the production phase, making steel's CO<sub>2</sub> balance positive". It also points out that new heat resistant steels are facilitating higher process temperatures and



Figure 15: "Save trees. Save life". From Welltech Windows (India). <https://upvcwindowsanddoors.tumblr.com/>

therefore fuel efficiency in fossil fuel plants and that steel is indispensable for offshore wind turbine manufacture and so increased renewable energy output. It claims too that latest high strength steels are enabling automotive makers to reduce car weights and make them more fuel efficient, while modern electric steels, with superior electromagnetic properties, are facilitating production of more efficient electric motors, which are increasingly powering vehicles.

These are four of eight case studies of the impacts of modern steel development and use from the ESA, which, it says, add up to 443 million tonnes of CO<sub>2</sub> mitigation per year.

The European Composites industries Federation<sup>74</sup> (EuCIA) stresses the environmental arguments for glass fibre and carbon reinforced composites. EuCIA states that recycling

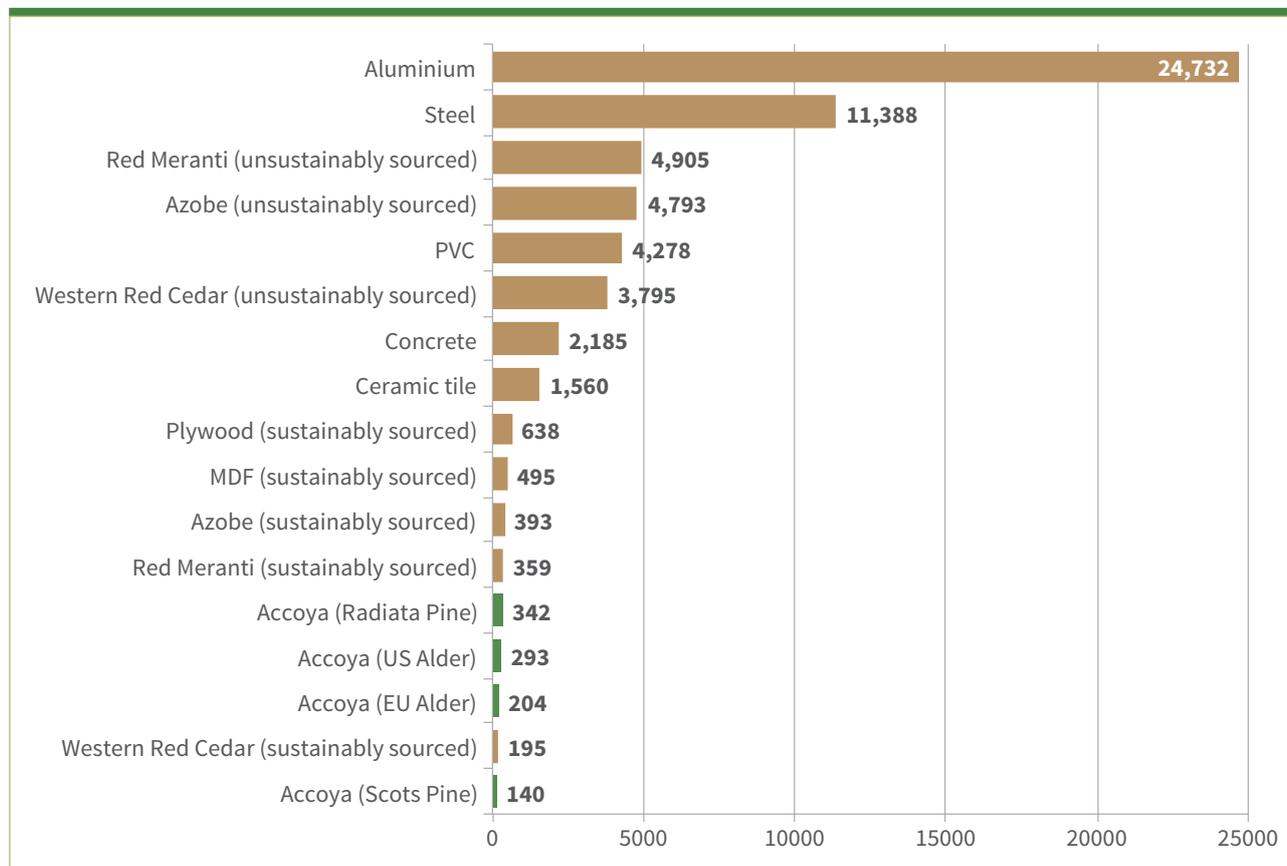


Figure 16: "Greenhouse Gas Emissions (kg CO2 eq per m3 of material)". Accoya presentation targeting tropical wood as well as aluminium and steel. Source: <https://www.accoya.com/sustainability/environmental-assessment/>

Material / Industry	Environmental claims
<b>CONCRETE</b> The European Cement Association <a href="https://cembureau.eu">https://cembureau.eu</a>	44% of industry's energy is generated from waste biomass. Maintains 100% recyclability of concrete from demolition and highlights the industry's Concrete Initiative, to develop energy-efficient, low carbon concrete housing
<b>PLASTICS</b> Plastics Europe <a href="http://www.plasticseurope.org">www.plasticseurope.org</a> European Association of Plastics Recycling <a href="http://www.euro-plasticsrecycling.org">www.euro-plasticsrecycling.org</a>	Claims plastic products help save key resources, including energy and water, across manufacturing. Industry is also aiming for zero plastic waste to landfill and says the EU industry has achieved 72.7% waste recovery
<b>STEEL</b> European Steel Association <a href="http://www.eurofer.org">www.eurofer.org</a>	Maintains that EU steel sector cut emissions by 25% from 1990-2010 and, with development of ultra-low carbon dioxide steels, is set to cut by a further 50%. Claims eight key areas of EU steel use are responsible for 443 million tonnes of CO2 mitigation annually, six times emissions from the steel's manufacture
<b>COMPOSITES</b> European Composites Industry Association <a href="http://www.eucia.eu">www.eucia.eu</a>	Highlights use of glass fibre composite regrind as fossil fuel replacement and as mineral resources substitute in cement manufacture. New ways of recovering and reusing post consumer carbon fibre are being developed and producers claim its durability strengthens its environmental credentials
<b>WOOD-PLASTIC COMPOSITES</b>	Manufacturers claim products are durable, low maintenance substitute for all timber, notably decking and cladding. Use of recycled wood waste and recycled plastic also cited as reducing amount going to landfill. Composites with up to 95% recycled content are now available
<b>MODIFIED WOOD</b> Lignia <a href="http://www.lignia.com">www.lignia.com</a> Accoya <a href="http://www.accoya.com">www.accoya.com</a> Kebony <a href="https://kebono.com">https://kebono.com</a>	Manufacturers stress that raw material is renewable, generally certified softwood, and that treatment processes used to achieve hardwood level durability are environmentally benign. All propose their products as substitutes for tropical timber, which they describe as 'endangered', 'over-exploited' and implicated in illegal logging and forest degradation

Table 6: Environmental performance claims of competitor construction and manufacturing materials to timber

“... tailored to have many properties similar to ... tropical hardwoods making it a desirable, sustainable alternative”

of glass fibre-based composites is helping improve the ecological footprint of cement production. Lifecycle, carbon and environmental footprint studies, have shown that glass fibre composites, through their manufacturing processes and recyclability, “outperform steel and aluminium in global warming potential”.

**Wood plastic composite manufacturers** focus their environmental profiles on the fact they are based on recovered wood waste and a mix of reclaimed, recycled and virgin plastic, with products made from 95% recycled material now available. Among modified wood producers **Lignia**<sup>75</sup> highlights wood's carbon benefits generally, and, in addition to timber's durability, that the modification process means it stores carbon longer. It also stresses that its softwood raw material is from 'well-managed, FSC-certified forests where harvested trees are replaced with saplings maintaining the forest's ability to act as a carbon sink'.

“When forests are not sustainably managed it has negative impact on biodiversity and the environment and accelerates release of greenhouse gas, contributing to climate change,” it states. “This applies to many tropical forests, where certain high-value species such as teak and mahogany are over-exploited, and felling and extraction of trees can lead to significant forest damage. Lignia is tailored to have many properties similar to these tropical hardwoods making it a desirable, sustainable alternative.”

Accsys Technologies, makers of **Accoya**<sup>76</sup>, take a similar approach. “To produce Accoya, only abundantly available wood species, such as radiata pine, are used from certified, sustainably managed forests and plantations, including FSC-certified timber,” it says. “However, supplies of certified slow growing tropical hardwoods suitable for outdoor use are limited, resulting in illegal logging, which, in turn, leads to destruction of tropical rainforests. While in tropical regions deforestation continues, in temperate regions such as Europe and North America net forest area has been increasing for several decades.”

Fellow modified wood producer **Kebony**<sup>77</sup> highlights that its modification process is environmentally benign and does not affect the raw material's recyclability, unlike the 'toxic' chemicals used in treated wood, but it too has tropical timber in its sights.

“Our technology permanently transforms sustainable wood species, such as pine, into Kebony wood, with features that are comparable and in some cases superior to those of environmentally damaging tropical hardwoods, so diverting demand from precious endangered tropical forests,” it says.

It is apparent from this brief review of other material types that the main trade promotional organisations have

“... supplies of certified slow growing tropical hardwoods suitable for outdoor use are limited, resulting in illegal logging, which, in turn, leads to destruction of tropical rainforests”

“... with features that are comparable and in some cases superior to those of environmentally damaging tropical hardwoods, so diverting demand from precious endangered tropical forests”

moved on from directly attacking timber as a material. This may be a result of having achieved the desired effect already or from the fact that the timber trade associations and their campaigns have redressed the balance. The temptation to make claims (such as “save a tree – use PVC”) may still be there but the chances of being challenged are considerably higher than they were in the past.

The industry sector that appears most interested in making negative claims around tropical timber appear to be the modified wood sector. The three main brands assessed in this study all directly compete in the space formerly solely occupied by tropical timbers or preserved timbers. They have a vested interest in their marketing to promote their credentials and pull few punches in doing so.

An example of fighting back by directly countering claims is that of the UK based Wood Window Alliance (WWA).

**FAKE FACT #2**  
PVC-u windows leave trees standing

**MISLEADING**

Using wood from sustainably-managed forests for windows means **MORE TREES ARE PLANTED** and forests grow bigger?

All WWA members offer FSC or PEFC Chain of Custody **CERTIFIED PRODUCTS**

**CERTIFIED**

Wood from sustainable forests is the **ONLY** sustainable material for window frames

**Figure 17: Fighting back – one of 13 similar rebuttals produced by the Wood Window Alliance (UK).**  
<https://www.ggpmag.com/news/wood-window-alliance-calls-time-plastic-promises>

The WWA #woodyoubelieveit? campaign attempted to present answers to the ‘fake facts’ and ‘plastic promises’ to consumers through social media, media engagement, video and visual content. Its stated intention was to encourage ‘a reappraisal of the truth behind the statements made by PVC-U businesses’.

## Conclusions

The forest and timber industries in Europe have had a rough ride in the past two or three decades, facing competition from other materials, such as plastic and steel. The issues of illegal logging, loss of biodiversity have become synonymous with the industry and this has been exploited by the competition. To a degree this direct form of attack has abated somewhat but still persists. The tropical wood sector has been at the sharp end of the negative campaigning and today remains under attack from the modified softwood sector.

Numerous initiatives have arisen over the past two decades to attempt to wrestle back the narrative and to promote the benefits of using wood. Campaigns across Europe (and further afield) have found innovative and slick mechanisms to promote wood as material and to refute the negative claims made by competing materials and by other interests.

The campaigns, current and historical that seek to promote, softwood, temperate or tropical generally feature some, or all, of the following consumer facing themes:

- Wood has a low carbon footprint
- Forests are being sustainably managed
- Using wood is a good way of protecting forests
- More wood is being produced than is harvested

- Wood is not being illegally harvested

At a more focused level there is additional messaging, primarily aimed at business to business communications:

- The use of third-party forest certification and chain of custody certificates
- The use of third-party verified legality
- Development and implementation of purchasing policies<sup>78</sup>
- Compliance with the EUTR in terms of demonstrating due diligence

This study finds that FLEGT and FLEGT Licensed materials are clearly of interest to all of the stakeholders interviewed and opinions were forthcoming on all areas of enquiry. In principle none of the organisations interviewed or reviewed were negative to the FLEGT process, to the principle of VPAs or existence of FLEGT Licensed materials. This in-principle support has not led to widespread promotion.

The civil society organisations interviewed welcome VPAs for as long as they improve forest governance and in the hope that they might lead to higher silvicultural standards.

The well-funded timber promotion campaigns of Europe sit amongst the heartland of forest certification, set in background of high levels of forest governance and eagle-eyed civil society organisations. They have adopted third party forest certification as the leading edge of their campaigns which often focus solely on domestically grown softwood.

The tropical timber promoting campaigns sit arguably in the most exposed position. Tropical timber's long history of association with illegal harvesting and deforestation ensures it sits under the brightest and most inquisitive of spotlights. Their campaigns have most ground to cover to counter claims and perceptions. Their level of "certainty" in what they say to promote their product needs the highest level of efficacy and they have adopted third party certification as their preferred "insurance policy".

Wood promotion campaigns can successfully answer the materials critics and have moved in many cases well beyond reactive communications into creative and well-researched campaigns that chime with consumers, specifiers and industry professionals alike.

Given the in-principle support across a wide range of stakeholders for the underlying VPA process and the in-built market recognition for its special status: there is clearly a role for FLEGT Licensed material in the marketing and promotional messages for wood in Europe. As one commentator stressed though – "*... in isolation, the claim your timber is legal is not much of sales line ...*"

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## 9 Recommendations

The conclusion of this report is that there is scope for raising the profile of the FLEGT initiative and FLEGT Licensing by communicating its activities, achievements and aims through the range of timber sector promotional and communications channels. But this depends on a number of actions being taken and, to an extent, the FLEGT initiative itself developing further.

- **Provide targeted materials to support existing timber promotion campaigns**

FLEGT communication and information strategy should target timber promotion campaigns and trade bodies and to package information to their requirements

- **Increase demand and recognition of FLEGT Licences**

EU member state governments should be urged to accept FLEGT Licences as accepted criteria in their timber procurement policy / green procurement policy. This would not only strengthen trust in FLEGT, but could increase market interest in it and trigger more communication activity.

- **Increase availability in the EU market of FLEGT Licensed materials**

More VPA countries completing the process and starting licensing would increase interest in and lead to more communication on FLEGT and FLEGT Licences. The fact that licensing is currently confined to Indonesian exports to the EU limits interest in trade terms.

- **Develop materials that credibly demonstrate the impacts of the VPA process**

There should be still more communication of the wider on-the-ground social, economic and environmental benefits of the FLEGT VPA process, and particular emphasis given to 'human stories'. Focusing only on its legality assurance has limited 'sales appeal' in the timber trade.

- **Research, consult widely and then clarify the status of FLEGT Licensing compared to third party certification**

An official stakeholder dialogue should be opened to determine where FLEGT sits in relation to private third-party sustainability certification schemes, namely FSC and PEFC, in order to help market players understand the respective strengths and weaknesses of licensing and certification and to maximise the benefits and impact of tropical timber promotion.

- **Empower VPA signatory countries to lead the process of communicating VPA impacts**

FLEGT VPA countries should support FLEGT marketing to the EU though developing their own materials for their own benefit whilst supporting wider efforts within the EU.

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**International Tropical Timber Organization (ITTO)**

International Organizations Center  
5th Floor, Pacifico Yokohama, 1-1-1 Minato-Mirai  
Nishi-ku, Yokohama, 220-0012 Japan

**FLEGT Independent Market Monitor**

IMM Lead Consultant, Sarah Storck, [lead@flegtimm.eu](mailto:lead@flegtimm.eu)

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