



NOTIFICATION TO THE PARTIES

No. 2024/138

Geneva, 16 December 2024

CONCERNING:

EUROPEAN UNION

Information on current domestic measures regarding the import of timber into the EU and the review process

1. This Notification is being published at the request of the European Union (EU) and its Member States.
2. The EU and its Member States wish to inform Parties about the current domestic measures regarding import of timber of CITES-listed species into the EU (requirements and criteria) and the review process of those measures.
3. CITES is implemented in the EU through the Wildlife Trade Regulations¹ (EU WTR), which to some degree constitute stricter domestic measures (in accordance with paragraph 1 of Article XIV of the Convention). These measures include additional import permit requirements for species listed in Annex B of the EU WTR (containing all species listed in Appendix II and some additional species). Within the EU it is the legal duty of each Management Authority of the EU Member State of import to conduct a Legal Acquisition Finding (LAF) whilst the Scientific Authority of the EU Member State of import has to conduct a Non-detriment Finding (NDF) for imports of Annex B species. The objective of NDFs is to ensure that the 'introduction into the Community would not have a harmful effect on the conservation status of the species or on the extent of the territory occupied by the relevant population of the species' (Article 4 (2) (a) of the [Council Regulation \(EC\) No 338/97](#)).
4. The EU and its Member States would like to inform CITES Parties about the current requirements and the criteria used by the Scientific Authorities of the EU Member States when making NDFs for imports of CITES-listed timber species. These can be found in Annex 1 of this notification.
5. It should be noted that the requirements and criteria for timber imports into the EU, presented in Annex 1, are currently being reviewed by the Scientific Review Group (SRG), comprising all Scientific Authorities (SA) of the EU Members States. The review aims at further improving the assessment of sustainability (in the sense of Article 4 (2) (a); see above) and the harmonisation of the NDF making processes within the EU Member States. Information compiled by SAs about

¹ [Council Regulation \(EC\) No 338/97](#), [Commission Regulation \(EC\) No 865/2006](#), [Commission Implementing Regulation \(EU\) No 792/2012](#).

this ongoing review process and the potential new criteria can be found in [PC26 Doc. 18](#), [Notification No. 2023/102](#), [PC 27 Inf. 10](#). It was also explained during the side event “[Evaluation of CITES-listed timber imports into the European Union – State of play and discussion of the evaluation criteria under the EU Wildlife trade regulations](#)” at PC27 in Geneva.

6. The EU and its Member States value the insights and feedback from range States and stakeholders on the potential new criteria, including on possible impact from a wider range of expertise. Therefore, exchanges with range States and stakeholders are an important part of the review process. The next consultations are planned for spring 2025 and will also include feedback from the EU and its MS on responses received so far on the potential new criteria and the envisaged guidance.
7. The ongoing review process also includes the exchange with forestry and forestry ecology experts. The EU welcomes further nominations of forestry or forest ecology experts who can be contacted during the ongoing review process. The contacts may be sent to ENV-CITES@ec.europa.eu.
8. Once finalised, the reviewed evaluation criteria for timber imports to the EU will be communicated through a CITES notification. A transitional period of at least 12 months will be put in place before the Scientific Authorities of the EU Member States start applying the new criteria.

Information on the minimum data requirements and criteria currently used by the Scientific Authorities of the EU Member States for imports of CITES-listed timber

The information serves to evaluate the sustainable management of the respective timber species in its harvest area. Any deviation of the criteria or absence of information should be justified to be considered in the overall evaluation of the sustainability of harvest.

1. General recommendations:

- a. CITES export documents should be species-specific.
- b. CITES export quotas must be set at species level. Export quotas set at genus level are not in line with CITES Res. 14.7 and are not accepted.
- c. CITES export quotas should be differentiated per commodities. Export quotas for mixed commodities require publication of the quota per commodity with a conversion rate to roundwood equivalents for the respective commodities.
- d. CITES export documents of mixed batches require the identification and verification of the proportion of the volumes originating from each specific harvest area (usually for the Forest Management Unit (FMU))
- e. NDFs for import requests into the EU are generally made on the FMU level.

2. Required documentation:

- a. Long-term forest management plan (FMP) for the FMU
- b. Inventory data for the FMU including diameter distribution across diameter classes from 20 cm onwards (usually at minimum 10 cm DBH-classes)
- c. Corresponding harvesting plan (Annual Operating Plan - AOP) for the designated Annual Cutting Area or Annual Allowable Cut (AAC) including the inventory data at the AAC level.
- d. Annual harvest or felling permit
- e. Official approval documents for the long-term forest management plan and the corresponding AOP, along with any necessary legal clearances (required annually for each additional year an AAC remains open)

In cases where the necessary data cannot be provided a NDF for import to the EU can generally not be made.

3. Currently applied criteria:

- a. Timber must be harvested from areas that are designated to remain forest (not subject to land clearance or any land-use change)
- b. The consideration of a species-specific minimum exploitable diameter (MED) is required.
- c. The minimum species-specific population density before harvest must be ≥ 0.05 stems/ha above 20 cm DBH in the FMU

- d. The species-specific recovery index must be $\geq 50\%$. Harvest rates are considered in the calculation of the recovery index in the following formula (adapted from Durrieu de Madron and Forni (1997)²):

$$RI\% = \frac{(N_0 + N_p * (1-h)) * (1-\Delta) * (1-\alpha)^T}{N_p * h} * 100$$

$RI\%$ = Percentage recovery of the number of initially harvestable stems at the end of the logging cycle.

N_0 = Number of stems in the diameter classes immediately below the minimum harvesting diameter (DMA) that will have a DBH greater than the DMA after one logging cycle. The lower diameter (D_i) of the trees to be considered is calculated as follows: $D_i = DMA - (T * d)$, with d being the annual increment rate in cm.

Δ = Harvest damage rate;

α = Natural mortality rate;

h = harvest rate.

T = Duration of logging cycle (in years);

N_p = Total number of all stems above DMA (at the date/period of the forest management inventory). The SRG does not accept the so-called “bonus approach” or any other similar rationale³.

² Durrieu de Madron, L., & Forni, E. (1997). *Aménagement forestier dans l'est du Cameroun: Structure du peuplement et périodicité d'exploitation*. *Bois Et Forêts Des Tropiques*, 254(4), 39–50.

³ The “Bonus approach” considers for N_p not all trees beyond the DMA but only those between DME and a certain upper limit (e.g. DME + 40 cm, which could be DMA + 40 cm if DMA = DME). This approach or similar ones that do not consider ALL stems above DMA is not accepted by the SRG.