The Amazon’s silent crisis
Illegal timber for export – with official documentation

Daniela Montalto - Greenpeace International
For ‘Forest Product Legal Trade Legislation: Substantiated Concerns and Producer Country Cooperation’ mtg
FAO, Rome, 29th October 2014
A re-cap on due diligence and risk mitigation

**Article 4 (2) EUTR – Operators’ obligations**

“Operators shall exercise due diligence when placing timber or timber products on the market.”

**No due diligence = breach of legal obligation.** Timber might be “legally harvested” but it is still traded in violation of the law, i.e. illegally.

**Risk mitigation** procedures consist of a *set of measures and procedures* that are *adequate and proportionate* to *minimise effectively risk – following risk analysis* - and which *may include* requiring additional information.

Official documents being currently issued in Brazil to certify the legality of timber from the Amazon/Para State, where illegal logging and timber laundering is a systemic problem, cannot alone be considered as evidence of legality. Operators should act on this information, incorporating it into their risk assessments and implementing effective mitigation measures.
• One third of timber exported from the Brazilian Amazon is destined to the EU

• Pará state, twice the size of France, is the biggest producer & exporter of timber in the Br Amazon.

• 78% of the area logged in Pará state between August 2011 & July 2012 (157,239ha) was harvested illegally.

• 50% of Para’s timber exports are destined to the EU.
Brazilian Amazon timber exports by value (2013)

Source: Brazilian Ministry of Development, Industry and Trade
www.aliceweb.desenvolvimento.gov.br

www.greenpeace.org
The five ways to launder (illegal) timber - through the use of official systems -

1. Logging authorised in area already harvested or deforested
2. Overstating of the total volume of trees belonging to valuable species within a PMFS
3. Authorised area with no signs of timber extraction
4. Credits issued for more timber than the AUTEF authorises to be harvested
5. Credits issued without an AUTEF of PMFS
Manipulation of species' name, diameter and high estimation

www.greenpeace.org
### Correct calculation

<table>
<thead>
<tr>
<th>Formula</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>( V = 0.775 + (0.5179 \times DAP^2 \times H) )</td>
<td>42.200,36 m³</td>
</tr>
</tbody>
</table>

### Fraud?

<table>
<thead>
<tr>
<th>Formula</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>( V = 0.775 + (0.5179 \times DAP \times H) )</td>
<td>47.971,1 m³</td>
</tr>
</tbody>
</table>

**Overestimation = 5.771,63 m³**
Anexo I - Autorização para Exploração Florestal

<table>
<thead>
<tr>
<th>AUTEF Nº</th>
<th>VALIDADE ATÉ</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Protocolo Nº: [redacted]
Data do protocolo: [redacted]
Cadastro Ambiental Rural Nº: [redacted]
Licença Atividade Rural Nº: [redacted]

QUANTIFICAÇÃO DE TORAS DE MADEIRA NATIVA - Autorizado no Plano Operacional Anual

<table>
<thead>
<tr>
<th>ESPÉCIES FLORESTAIS DO POA</th>
<th>NOME CIENTIFICO</th>
<th>NOME POPULAR</th>
<th>QUANTIDADE (m³)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>por ha</td>
</tr>
<tr>
<td>Apuleia sp.</td>
<td>Garapa</td>
<td>1,5000</td>
<td>2,516,8204</td>
</tr>
<tr>
<td>Astronium leocintei Ducke</td>
<td>Muiracatiara</td>
<td>0,2135</td>
<td>2,670,2313</td>
</tr>
<tr>
<td>Bagassa guianensis Aubl.</td>
<td>Tatapuba-de-belém</td>
<td>0,0813</td>
<td>1,539,1103</td>
</tr>
<tr>
<td>Bowditchia nitida Spruce</td>
<td>Sucupira</td>
<td>0,2953</td>
<td>2,266,555</td>
</tr>
<tr>
<td>Carapa guianensis Aubl.</td>
<td>Andiroba</td>
<td>0,1558</td>
<td>2,57,8789</td>
</tr>
<tr>
<td>Caryocar villosus (Aubl.) Pers.</td>
<td>Pequiúna</td>
<td>0,4384</td>
<td>725,4938</td>
</tr>
<tr>
<td>Cedrela odorata L.</td>
<td>Cedro</td>
<td>0,2951</td>
<td>488,3549</td>
</tr>
<tr>
<td>Chrysophyllum prieurii A.DC.</td>
<td>Abiurana</td>
<td>1,2143</td>
<td>2,909,5079</td>
</tr>
<tr>
<td>Cordia goeoidiana Huber</td>
<td>Frejô</td>
<td>0,6784</td>
<td>1,124,7447</td>
</tr>
<tr>
<td>Couratari guianensis Aubl.</td>
<td>Tauari</td>
<td>2,1947</td>
<td>3,632,0003</td>
</tr>
<tr>
<td>Dipteryx odorata (Aubl.) Wild.</td>
<td>Cumaru</td>
<td>0,0217</td>
<td>35,9643</td>
</tr>
<tr>
<td>Goupia glabra Aubl.</td>
<td>Cupiúba</td>
<td>0,7322</td>
<td>1,196,7988</td>
</tr>
<tr>
<td>Hymenaea courbaril L.</td>
<td>Jatobá</td>
<td>3,6829</td>
<td>6,094,8986</td>
</tr>
<tr>
<td>Hymenaea sp.</td>
<td>Jutai</td>
<td>0,1905</td>
<td>181,2607</td>
</tr>
<tr>
<td>Hymenolobium sp.</td>
<td>Angelim</td>
<td>0,2379</td>
<td>393,7245</td>
</tr>
<tr>
<td>Manilkara huberi (Ducke) Chevalier</td>
<td>Maçananduba</td>
<td>3,6171</td>
<td>5,986,1123</td>
</tr>
<tr>
<td>Mezilaurus itaba (Meech.) Taub. ex Mez.</td>
<td>Itaúba</td>
<td>0,2584</td>
<td>427,5538</td>
</tr>
<tr>
<td>Micropholis sp.</td>
<td>Currupixá</td>
<td>0,4045</td>
<td>669,4970</td>
</tr>
<tr>
<td>Parkia sp.</td>
<td>Faveira</td>
<td>5,824</td>
<td>9,403,9401</td>
</tr>
<tr>
<td>Simaroba amara Aubl.</td>
<td>Marupá</td>
<td>0,3626</td>
<td>599,6524</td>
</tr>
<tr>
<td>Tabebuia serratifolia (Vahl) Nichol.</td>
<td>Ipê</td>
<td>4,2577</td>
<td>7,946,1630</td>
</tr>
<tr>
<td>Virola surinensis (Rol.) Warb.</td>
<td>Vígora</td>
<td>0,4838</td>
<td>800,3036</td>
</tr>
<tr>
<td>Vochysia maxima Ducke</td>
<td>Cedrora</td>
<td>0,0863</td>
<td>132,0296</td>
</tr>
</tbody>
</table>

TOTAL DE VOLUME AUTORIZADO: 29,1394 m³ = 47,971,1873 m³
Supply Chain – an example

GREENPEACE
www.greenpeace.org
Last, Greenpeace produced a list of international buyers that had bought, between March 2013 and Feb 2014, timber from exporting sawmills whose supply chains had been contaminated by illegal timber laundered by means of fraudulent use of official documentation.
Greenpeace’s investigation in May 2014

- 18 CASES
- 72 MILLS
- 104 EXPORTING COMPANIES/MILLS

Research in Brazil

Export markets

www.greenpeace.org
Already the ‘Country Guide to Timber Legality: Brazil’ funded by the EU’s TTAP highlights, prior to Greenpeace’s May 2014 report, a number of widely used illegal timber laundering tricks.

“DOF and/or SISFLORA timber harvesting credits have been known to be sold on the black market, for many product types e.g. logs, sawn timber or final products. This means that trucks could be carrying timber covered by an official DOF/GF but in reality do not originate from the authorised area.”

“Manipulation and misrepresentation of species data at the inventory phase can be deliberate to overstate the stock of certain tree species as a means to gaining additional harvesting credits for that particular species.”

“Forest Management Plans submitted to IBAMA/SEMA for harvest authorisation (AUTEF) have been known to have been submitted for a completely different area.”

“Evidence shows that timber has been laundered to and from neighboring countries such as Peru.”
Risks confirmed by Para’s Federal Prosecutor

On May 9th 2014, Para’s Federal Public Prosecutor launched a legal case against the State of Para and the Brazilian Institute of Environment and Renewable Natural Resources (IBAMA).

The case indicated a general failure of the systems intended to monitor compliance, and included an assessment that the Forest Management Plans exposed by Greenpeace investigation as examples case studies on the laundering of illegal timber, should be subject to immediate suspension.

The Federal Prosecutor demanded inspections in all existing PMFS’s in the state of Para, during their execution as well as post-exploitation, and no further approval of new PMFS’s without qualified and independent inspections in advance.

The case was later on dismissed at court, arguing the Federal Prosecutor had no jurisdiction - the State Prosecutor would. Evidence in the case was not challenged.
Corporate reactions to our investigation from May 2014

Jewson & International Timber: statement on the sale of timber decking made from Ipe (Brazilian Walnut)

Jewson, and associated brand International Timber, have issued the following joint statement refuting recent allegations of selling illegal Brazilian Timber:

"In common with many UK builders and timber merchants, a number of Jewson branches offer timber decking manufactured from ipe, a species of timber from Brazil also known as Brazilian Walnut. Ipe is a popular choice with UK specifiers for decking, as it is does not require any weatherproofing or pesticidal treatment to withstand external weather conditions. This has led to architects and other specifiers choosing the timber for many prestigious projects worldwide including the Brooklyn Bridge in New York, the National Library in Paris and even the Presidential Palace in Brazil itself.

Jewson sources all tropical hardwood species through International Timber, an associated brand with expertise in timber importing and distribution. As such, International Timber has expertise and professionals committed to sourcing timber legally and responsibly and ensuring full and absolute compliance with all the legal requirements.

Ipe currently stocked by Jewson, and purchased during 2013 and 2014, is sourced from two companies, Robinson Lumber, based in New Orleans USA, who have been dealing in lumber since 1983 and Vogel Import Export based in Antwerp, who specialise in the import of South American timbers... International Timber demands that these suppliers provide the necessary documentation to ensure the legality and traceability of the timber. This includes the names of the original exporters in Brazil, in this case Solimad Madeiras and Condor Florestas Industrial Madeiras Ltda, who have to obtain the export licence (DOF-GF3) from IBAMA, the Brazilian environmental ministry.

In addition the supplier is also expected to provide details of the specific concession and region in Brazil for each shipment. This level of detailed information ensures that International Timber and Jewson comply with UK and EU legislation for the import of timber, the Timber and Timber Products (Placing on the Market) Regulations 2013. The Regulations are the UK's implementation of the EU Timber Regulation (EU NO 995/2010, known as the EU TEEA) which came into force on 3 March 2013.

www.greenpeace.org

Robinson Lumber and Vogel were exposed by Greenpeace’s investigation due to their ties with suppliers that handled laundered timber.

Solimad Madeiras and Condor Florestas have been fined over £2 million in the last ten years for illegal logging and timber laundering.
Operators and traders exposed by Greenpeace – or anyone - could check the track records of their suppliers in Brazil – by accessing information made freely available by IBAMA's (Brazil’s environmental enforcement agency).

IBAMA holds a database with track records of fines and processes on environmental law infractions in Brazil:

Link 1
- for background checks on fines and embargoed areas for Brazilian timber trading companies.

Link 2
https://ibamanet.ibama.gov.br/docibama/publico/
- for further details on the reason why the fines were granted.
I also wanted to confirm with you the actions I outlined on Monday that we have also taken as a business:

- That we have, as of last week, implemented a suspension of the sale of Ipe from Jewson. Current stock, which is extremely limited, has been withdrawn and returned to an International Timber Depot.
- We have also implemented a suspension of the sale of existing stock, and further purchases by International Timber. This material is being quarantined and a decision about what we do with this material will be taken following the conclusion of our audit and the NMO investigation.
- Finally, that we plan to undertake an audit, utilising both audit and legal resources from our Brazilian Delegation, together with external support and legal counsel. This audit, will inform future trading decisions we will take.

From Letter to Greenpeace from Mark Rayfield, Chief executive at Saint Gobain UK & Ireland, June 5th 2014
Substantiated complaints were filed in Belgium, Denmark, France, Germany, The Netherlands, Italy, Spain and the UK – based on our May investigation.

| In Greenpeace’s report in May, a number of EU importers were flagged, including: |
| French companies: |
| Ets Peltier |
| Guillemette & Cie |
| Rougier Sylvaco |
| Belgium companies: |
| Vogel Import Export NV |
| Vandecasteele Houtimport |
| Leary Forest Products |
| Spanish companies: |
| Lopez Pigueiras |

| IN ADDITION, Greenpeace’s substantiated complaints then listed further market links, including: |
| To CAs in France, on: |
| Etablissements Peltier |
| Bois Tropicaux du Midi |
| A/S Global Timber (based in DK) shipping to France |
| Getez Miauton AS (based in Switzerland) shipping to France |
| To CAs in Holland, info on: |
| Rodenhuis Holding |

Details on supplying sawmills were included.
Night Terrors – Greenpeace’s investigation
15th Oct 2014
Rainbow Trading Importação e Exportação Ltda

CTF: Active
Operating licence: 8884/2014 valid until 09/09/2016
Ceprof: Active

Rainbow Trading is a medium-sized sawmill and a timber wholesaler and exporter based in Santarém. Its sawmill has an annual production capacity of 32,950 m³. It has been fined twelve times in the past seven years by IBAMA for illegal logging. These fines total R$47,684.1 (US$15,010).

Rainbow Trading sells sawmill throughout Brazil. It also frequently exports timber to international markets. Official export data shows that between 2008 and 2013, Rainbow Trading exported Amazon timber to companies in Belgium, China, Denmark, France, Germany, India, Italy, Japan, The Netherlands, Spain, the United Kingdom and the United States. In 2014, between January and August, Rainbow Trading sold timber to companies based in Portugal, Belgium, France, and The Netherlands (see p. 11).

According to the GIFFA system, Rainbow Trading supplied the market with 8,000 m³ of timber between January and August 2014. Over 16% of this timber was accompanied by credits from five private logging estates.

ACORGE (Traditional Quilombolas Association, AUTEF 2011/2012: 3,646 m³)
Rejane Celeste Moraes Rebeto (AUTEF 2014/2015: 3,205 m³)
João da Silva Campos
Elissario Moraes De Lima
Gilson de Oliveira Brandão

ACORGE is a traditional quilombola association that has been involved in illegal logging. It is funded by Rainbow Trading. The Fair Trade programme did not detect any illegal timber from this estate until December 2012. The same applies to ACORGE, which is supposed to have provided almost 3,500 m³ of timber in 2014 to Rainbow Trading and a total of 3,600 m³ to the market since 2012. A reconnaissance survey of the ACORGE estate on 14 October 2014 uncovered active movements of timber — logging — even though the logging permit for this estate expired in August 2014.

In addition to these suspicious results, no logging was detected at the three other estates up to August 2014. This suggests that paperwork from these estates is being used to launder timber. With no mention elsewhere.

Rainbow Trading bought logs from two sawmills in 2014:
Schmitt e Schnor Ltda., Santarém (CTF 587686, CEPROP #452)
Comercial De Madeiras Odani Ltda, Mossoró (CTF 539604, CEPROP #501)

Illegal logging camp in the rainforest. A truck monitored by Greenpeace made two trips between this camp and the Rainbow Trading sawmill in Santarém.
Transactions between Jan and August 2014, as recorded in Sisflora control system in Para State. Further transactions in EU, between agents and buyers until September – based on Greenpeace’s investigation.
Several buyers buying from Rainbow Trading and other sawmills that trade in laundered illegal timber, had already been exposed in Greenpeace’s earlier investigation in May.
Bedrijf staat handel in illegaal gekapt hout

Een van de drie Nederlandse bedrijven die hout in zouden voeren dat illegaal is gekapt in Brazilië legt de handel hierin stil. Dat heeft Stiho donderdag in een brief aan Greenpeace laten weten. Greenpeace riep woensdag de Nederlandse Voedsel- en Warenautoriteit (NVWA) opriep te handhaven.

Het bedrijf zegt in de brief onlangs nog goed door een controle van de NVWA te zijn gekomen. De onderneming, die stelt duurzame producten hoog in het vaandel te hebben staan, betreurt het dat het blijkbaar nog steeds mogelijk is om illegaal hout 'in de keten te mengen' en te verhandelen. "Hier nemen wij volledig afstand van."

Stiho stelt een onderzoek in. Mochten zagerijen of leveranciers zich niet aan de regels houden dan is 'afscheid onvermijdelijk', geeft de onderneming verder aan.

Greenpeace laat donderdag in een reactie weten dat het onderzoek maanden in beslag kan nemen. De milieuorganisatie vindt het verder bizar dat de NVWA 'voortdurend in papieren fraude tuint'. "Stiho had de indruk dat alles op orde was op basis van administratieve inspecties van de NVWA. Zoals het onderzoek van Greenpeace heeft uitgewezen, gaat achter die papieren werkelijkheid een schimmige werkelijkheid schuil die ten koste gaat van de Amazone."

De milieuorganisatie meldde woensdag op basis van eigen onderzoek dat drie Nederlandse bedrijven hout hebben ingekocht van een zagerij die betrokken zou zijn bij het witwassen van illegaal gekapt hout en het sjoemelen met papieren. Greenpeace onderzocht de zagerij door met zenders de routes van houttransporten in het regenwoud van de deelstaat Para te volgen. Daaruit bleek dat de wagens rechtstreeks naar locaties reden waar geen vergunning voor houtkap bestond. Het hout werd vervolgens verkocht met documenten met kapvergunningen van andere gebieden.

Some companies react and drop Rainbow Trading's timber – such as Stiho in Holland (Oct 16th).

Question remains on how their DDs systems would be fixed.
Reaction from Belgium company Omniplex however:

“That's non sense. We have never been controlled so strictly as the last months, and the European rules are more strict than ever. Moreover we support these rules, because we don't have interest in illegal logging. Greenpeace only wants to counter the timber import. **Omniplex** gets less than five percent from Brazil. If it's illegal, the lot will be confiscated and I risk to be thrown out of the federation. That's something I don't want to risk.”

(translation from quote in the newspaper Het Nieuwsblad, October 15th)
“We act in good faith and trust the veracity of the Brazilian documents… We are not there when they cut the trees.” – Leary Forest Products as quoted in De Morgen newspaper, BE, Oct 15th
La Belgique est une plaque tournante

Il y a de grandes chances que le bois illégal coupé au fin fond du Brésil se retrouve en Belgique, si l'on en croit le rapport de Greenpeace. Selon l'organisation, en effet, des entreprises belges achètent du bois à Rainbow Trading. Au moins indirectement. “Nous sommes sûrs à 100% que le bois illégal est arrivé dans les scieries brésiliennes de la société Rainbow Trading, chez qui une société belge (Leary Forest Products, basée à Anvers) se fournissent, dit Jonas Hulsen. Nous ne sommes pas sûrs à 100% que le bois acheté par Leary soit illégal. Mais les risques qu'il le soit sont extrêmement élevés.”

Des entreprises belges concernées

Selon l'étude de Greenpeace, il apparaît que l'entreprise anversoise Leary a fourni du bois, entre janvier et août 2014, aux compagnies belges (basées en Flandre) Vandecasteele Houtimport, Lemahieu, Omniplex, Lagaie, Debeuckelaere et De Groote. En outre, Vandecasteele et De Groote auraient reçu du bois de Rainbow via un bateau arrivé le 10 octobre à Rotterdam. Particulièrement de la Belgique, c'est une plaque tournante en matière de commerce de bois exotique. Selon les chiffres officiels brésiliens, la Belgique est le cinquième importateur mondial de bois amazonien. “Une partie de ce bois importé est vendue chez nous, par exemple pour la construction de terrasses. Mais une grande partie du bois importé est également réexportée vers d'autres pays. Il est donc important que les entreprises belges suivent les règles, car la Belgique est un “noeud”.” En effet, selon la législation européenne, c'est l'entreprise acheteuse qui doit vérifier elle-même la légalité du bois, et doit mener une analyse de risque, ainsi que prendre des mesures d'atténuation de ce risque. “Oui, bien sûr, c'est compliqué de faire cela pour les entreprises belges, admet Jonas Hulsen. Alors, le mieux pour elles, c'est tout simplement de ne pas acheter ce bois dans ces régions, car le risque est trop élevé.”

Leary : “Nos papiers sont corrects”

La principale entreprise belge mise en cause par le rapport, Leary, nous confirme commencer avec Rainbow, mais torse aussi que Greenpeace "induit les gens en erreur". “Tous les documents légaux que nous avons de Rainbow montrent que le bois est légalement récolté. Ils sont aussi approuvés par les autorités brésiliennes. Si on doit commencer à douter des papiers officiels et de l'organisation d'un pays... De toute façon, des organismes externes, aux Pays-Bas, vérifient aussi que ces chargements sont légaux. Et c'est OK! Arrêter de commencer avec certaines régions du Brésil? Ces problèmes arrivent partout dans le monde. Il faut surtout travailler avec les bonnes personnes. Par exemple, on embarque beaucoup de bois avec le label FSC (bois durable), depuis l'État du Pará.”

De son côté, le président de la fédération européenne de commerce de bois, section feuillus, le Belge Armand Stockmans, avec sa société Somex, évite de commencer avec cer-
Meanwhile, authorities in the state of Para acknowledged Greenpeace’s investigation (quotes on UK paper, The Guardian, Oct 15th)

but the leader of the Greenpeace operation told the Guardian he had been determined to succeed.

“Everyone is afraid of something sometimes. But, even with fear, we wanted to expose that official papers are worth nothing in proving the legality of Amazon timber,” said the leader, who is Brazilian but requested anonymity. “We were convinced the operation would bring strong evidence of this silent crisis affecting the Amazon and its people.”

The Pará state Environment department (Sema) said in a statement: “Greenpeace’s research into timber companies transporting and receiving illegal timber demonstrates the necessity to improve the control and monitoring mechanisms to prevent illegal logging.” Sema said it had made major advances in recent years but still lacked the modern technology and resources it needed.

A fifth of the vast Amazon rainforest has disappeared over the past three decades, leading to the murder of at least 1,470 people, according to UN data. But the vast majority of loggers’ emissions that are a significant source of greenhouse gases by Brazil’s government had so far escaped monitoring.

Pará state produces and exports more timber than any other in Brazil and data from figures from Imazon, a Brazilian NGO, suggests three-quarters of the wood shipped is illegally felled. “The current efforts to prevent illegal logging in the state forests are aimed at modernising licensing, control and supervision,” said Sema in its statement. It added that a new system using GPS “chips” to control, trace and confirm the origin of wood would be in place in the second half of 2015.
... and seized timber at one of the sawmills (Odani, which supplies Rainbow Trading) exposed by Greenpeace’s investigation, placing fines on the company for a variety of illegalities.
“The timber we receive, we don’t know if they log it from the [authorised] forest management plan or if they log somewhere else, we do not go there to check.” said Odani sawmill’s manager on camera the day after our investigation was launched – as reported on Globo, Brazil’s biggest TV channel, which joined the raid.
Where else Rainbow Trading’s timber paperwork comes from.

Example AUTEF 2218: One of the two forest managements plans recorded to supply Rainbow Trading – shows trace of logging. Credits equivalent to 93% of the harvestable timber until end of 2013 in this estate have already been traded (over 28 thousands m3). Field auditing is needed to verify if such amount of timber was extracted.

In similar fashion, AUTEF 2214, provided paperwork for 40 thousands m3.

Land sat analysis on other three estates ‘supplying’ Rainbow, show no trace of logging until July 30th 2014.
Due diligence? Rainbow Trading’s timber latest supplies to EU

Rainbow Trading’s shipment Oct 10th 2014
Tatajuba, Ipe Decking and Massaranduba shipped on CMA-CGM Platon to Rotterdam and sold by Leary Forest Products (BE) on behalf of Rainbow Trading to respectively Stiho (NL), Vandecasteele Houtimport (BE) and Hout De Groote (BE).

Leary Forest Products was highlighted to Belgium and other EU authorities back in May 2014 for buying timber from Brazilian sawmills trading laundered timber with paperwork produced as a result of fraudulent forest management plans in the Brazilian Amazon, including Rainbow Trading in particular (Greenpeace May’s report can be accessed at http://www.amazoncrisis.org/doc/EN-INT/amazon_silent_crisis_all.pdf).

Vandecasteele Houtimport was also highlighted publicly and to authorities as result of the same investigation in May, for buying timber from a variety of exporters that were trading laundered timber with paperwork produced by fraudulent forest management plans.

Greenpeace informed authorities in Holland and Belgium that Rainbow Trading’s timber had been delivered in Rotterdam on Oct 10th, at around 1am on 15th Oct.
Shipment Oct 17th 2014

Four containers of Rainbow Trading arrived in Rotterdam on Oct 17th around 1 am (according to ship monitoring site) onboard UK flagged ship CMA CGM Homere.

Content: approximately 40 m³ of Ipe decking and approximately 40 m³ of Massaranduba decking sold by Leary Forest Products (BE) on behalf of Rainbow Trading to respectively Vandecasteele Houtimport (BE) & W. Houthoff & Zoon (BE).

Leary Forest Products, Stiho, Vandecasteele Houtimport and Hout De Groote had been publicly challenged on Greenpeace reports and communication materials on October 15th for buying timber from Rainbow Trading. Leary Forest Products and Vandecasteele Houtimport had also been publicly challenged on risks in their supply chain back in May 2014.

Greenpeace informed relevant authorities of Rainbow Trading’s containers estimated to arrive in Rotterdam in the morning of on Oct 17th on the evening of October 16th (9pm) in Holland, and early hours (3am) of Oct 17th in Belgium.

It’s likely there were more shipments Greenpeace have not uncovered.
How many more shipments with Rainbow Trading’s timber will be allowed into the EU market?
The vessel's latest position and movement history combining AIS and Lloyd's Agency Network data, with all movements back to 1997

- Last Position: Brava, Cape Verde
  - Location
  - Position: 8° 32' 32.4" N – 26° 52' 26.4" W
  - Distance: 397.8724nm
  - Speed (SOG): 19.2 knots
  - Course (COG): 31°

- Voyage origin: Fortaleza, Brazil
- Voyage destination: n/a

MARFRET GUYANE CARRIES RAINBOW TRADING’s TIMBER FOR THE EU MARKET - ETA AS PER OCT 29TH, IS NOV 7TH 2014, ROTTERDAM.

www.greenpeace.org
How could the DD system of companies still importing Rainbow Trading’s timber be fit for purpose – given the context.
Companies buying next Rainbow Trading’s shipment, ETA Rotterdam Nov 7th (ETA) – already exposed by Greenpeace on May and back on October 15th.

Timber for additional buyers could be onboard.
Thank you.
Daniela.montalto@greenpeace.org