



Earthworm Foundation Charcoal Customs Data Charcoal Bags Analysis 2022

Poland

| Background

The European Union imports most of its barbecue charcoal from countries outside the EU-27. In 2021, Europe imported over 600'000 tones of charcoal, from which a significant share came from countries with well documented forest degradation and deforestation.

In Europe today, no binding legislation is applicable to regulate the import of wood charcoal. This loophole allows for cheap and undeclared charcoal to enter European consumer markets, usually without any traceability information; no indication of origin, wood species or manufacturing site printed on the charcoal bag.

Since 2012 Earthworm Foundation (EF) advocates for increased transparency on the European charcoal market. EF has engaged several key industry players on their journey to more responsible practices and in 2015 developed the **Charcoal Bags Analysis Methodology**. A simple but effective tool to monitor the level of transparency on key European consumer markets.

Since 2015 we have analyzed more then 400 charcoal bags. This report contains a brief market analyses for charcoal sold on the Polish market as well as this year's results of the charcoal bags analyses for Poland.





EARTHWORM FOUNDATION



Earthworm

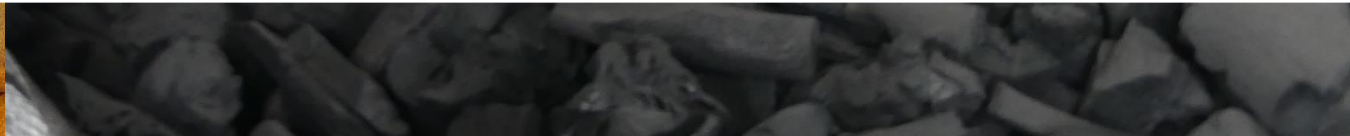
*(Previously known as The Forest Trust)
is a global non-profit organization built on
values and driven by the desire to positively
impact the relationship between people and
nature.*

- Founded in **1999**
- Over 100 **members** and **partners**
- Expertise on **social** and **environmental** issues
- Working across **5 continents**
with ground-based projects

The products we consume represent our biggest impact on the planet.
Changing the way they are made can change the world.



CHALLENGES AROUND CHARCOAL & EF CHARCOAL PROGRAM



Forest &

 **1 Ton of charcoal**
= 4 – 12 tons of wood

 Emissions of GHG
2 to 7 % GHG anthropogenic emissions

 **Forest degradation, deforestation**

Social



Forced labour
Violation of human rights



Land tenure conflicts



Missing occupational health and safety

Economica



Unfair payment

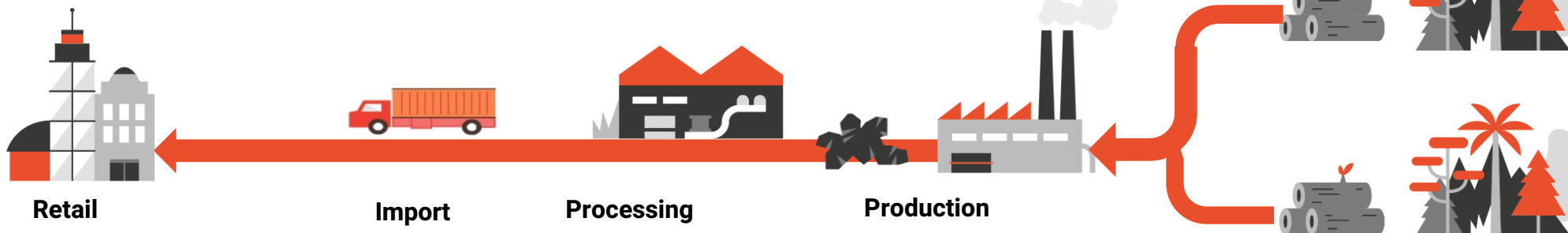


Debt bondage



Missing legal regulations

Challenges along the charcoal supply chain depend on context and configuration



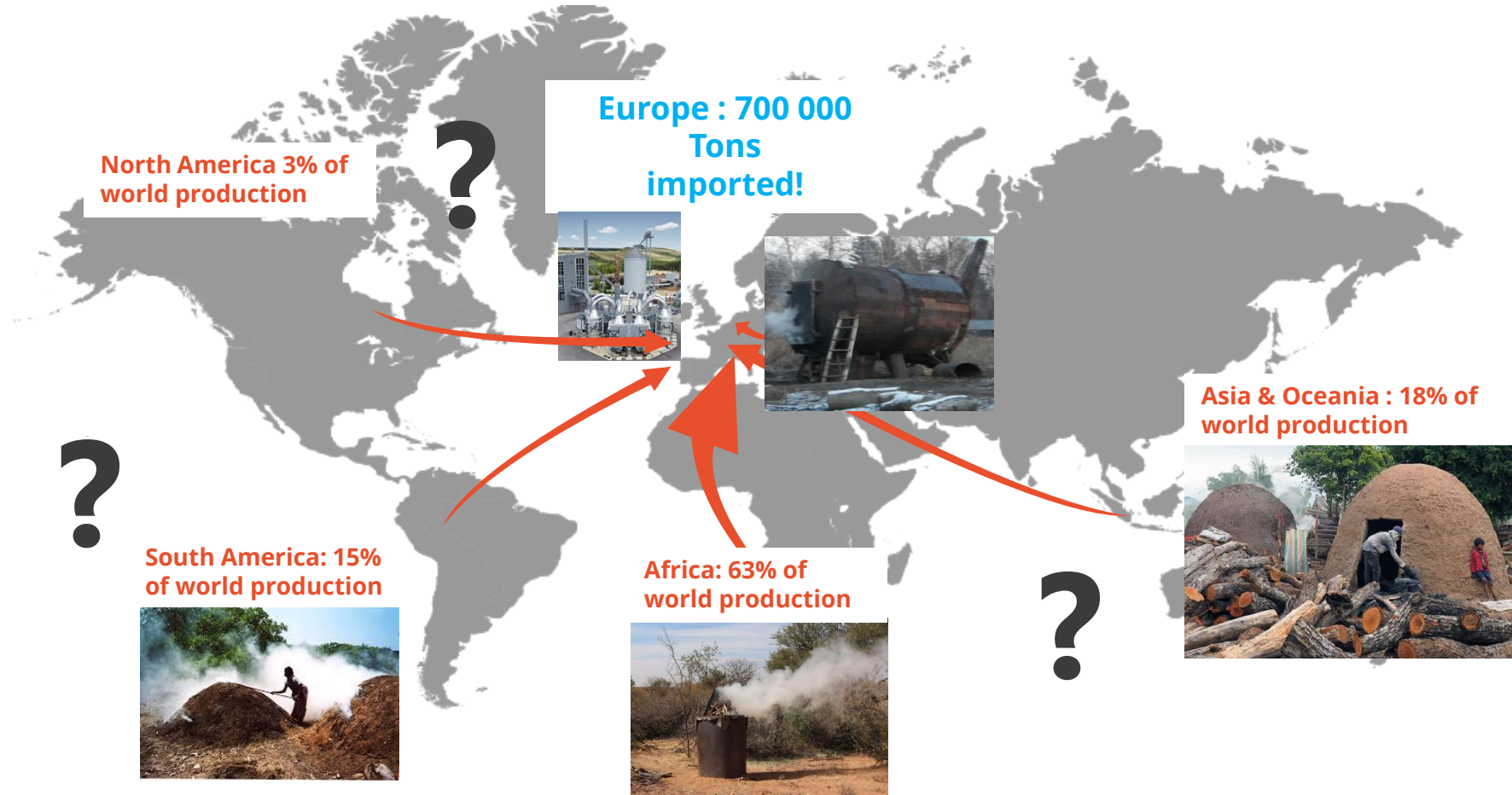


Charcoal Market opacity

Often the origin of the charcoal is unknown.

Europe is importing around 70% of charcoal consumed

No regulation : the EUTR does not apply to charcoal.





EF CHARCOAL PROGRAM : INNOVATIONS FOR TRANSPARENCY

Charcoal Control System

A pathway towards responsible charcoal



By I Florian Wiesner

Charcoal Analysis

The Methodology Behind The Transformation Of The European Charcoal Market



By I FLORIAN WIESNER

RESPONSIBLE CHARCOAL

Do you know where your charcoal comes from ?



SEARCH FOR YOUR PRODUCT

Search for product

See all products

Discover the Charcoal Transparency Initiative project

<https://charcoal-transparency.org/>

Charcoal Transparency Survey

Earthworm Foundation would like to make you a Charcoal Transparency survey.

Earthworm Foundation (EF) surveys The Forest Trust (TFT) can report about, use profit information with the data to bring positive change to the relationship between charcoal Europe. Since 2015, we have been working towards the European charcoal sector together with partner NGOs, experts, producers and other key market actors. EF is not a certification body but helps in doing innovative solutions to bring more transparency to the charcoal market.

In June 2019, EF launched the Charcoal Transparency Survey as a research tool to help the charcoal industry to share its knowledge and to make it more transparent. The survey aims to improve transparency and responsible charcoal. It also aims to help Europe's charcoal producers, processors, distributors and retailers to communicate their product origin to the consumer via a QR code printed on the charcoal bag. This survey is a field diagnostic by EF and our website at <https://charcoal-transparency.org/>.

The year 2019 is the first year of the Charcoal Transparency Survey. It aims to assess the level of responsible engagement of all charcoal brands and producers. The survey aims to provide a first step towards the transparency of the charcoal sector and to help the charcoal industry to improve its transparency. It will enable companies to increase their charcoal product visibility in European consumer markets. In addition, the platform can serve as a tool for the end consumer to compare and choose charcoal bags to make a more informed purchasing decision.

How it works:

1 Fill out the survey

Answer to the questions. Provide your product information and your ready-made information on the web site. You can download during the survey. The information will be treated and will be confidential. Please see our **Privacy Policy** for more information about the survey.

2 Evaluation of your information

Earthworm Foundation will evaluate your company, product and supply chain information and provide your product origin with a **Charcoal Tag score**.

The scores depend on the transparency of the product and the data provided by the Charcoal Tag score. The score will appear as a percentage on your product origin - some of your confidential information will be designed to prepare to provide the end customer with additional information regarding the responsible sourcing of the product.

Please note that, as it is based on self-declaration, the Charcoal Tag score cannot be compared to an EF field diagnostic, which can be used to validate your product origin in our survey. If a company has already undergone an EF field diagnostic and is a member of the Charcoal Transparency Initiative, the field diagnostic results of the Charcoal Tag score will be taken into account in the Charcoal Tag score. However, we also encourage correct Charcoal Transparency members to complete the survey in the Charcoal Tag score will be published as an additional source of information.

Click on the link to see our **survey methodology** for the Charcoal Tag score.

3 Publication of your charcoal products and the Charcoal Tag score

If you have completed the survey and your product information and your company information, you will receive a Charcoal Tag score together with your product information and your company information on **charcoal-transparency.org**. You will receive a QR code and your product information has been validated.

The survey will take you about 20 minutes. Thank you very much for your time, engagement & transparency!

Click here for our terms and conditions
Click here for the Charcoal Transparency survey
Click here for the frequently asked questions (FAQ) about the Charcoal Transparency Survey
Click here to learn more about the Charcoal Tag score

Start Survey

2014

2015

2016

2017

2018

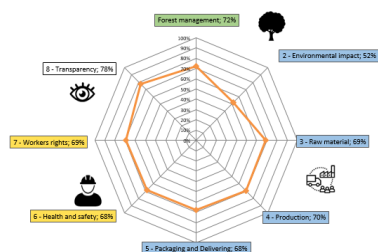
2019

2020

2021

Final Results 28th of November 2019:

Criteria:	Note
1 - Forest management	72%
2 - Environmental impact	52%
3 - Raw material	69%
4 - Production	70%
5 - Packaging and Delivering	68%
6 - Health and safety	68%
7 - Workers rights	69%
8 - Transparency	78%
Total CCS	68%



Charbon de bois analyse TFT

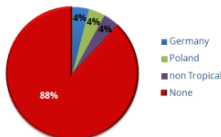
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German market analysis 2016

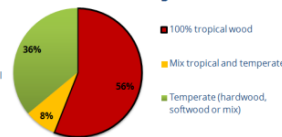
25 different charcoal bags tested from 16 stores

Declared country of origin

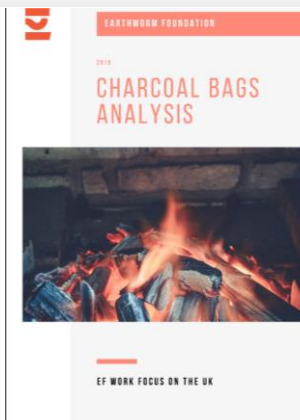


• Almost 90 % of charcoal bags tested without any information on declared origin

Real timber origin



• More than 50 % of charcoal bags tested containing tropical wood (fully or partially)



NAMBUKO Charcoal 4 kg (4 Kg)

MY EVALUATION MY STORY...

Overall field rating: **74%**

How to read these indicators?

Origin, Production, Journey, Evaluation

Survey Score: **A**

Brand: NAMBUKO Charcoal 4kg

Brand owner: (S)

Type of charcoal: Standard

Conditioning: 4kg

Declared Species: (S)

State of origin: Namibia

Brand origin: Germany

Certification: FSC 100% VWF



22G1
MAX. GROSS 30.480 KGS
67.200 LBS
TARE 2.100 KGS
4.630 LBS
NET 28.380 KGS
62.570 LBS
CU. CAP. 33.2 CUM.
1.172 CU.FT.

22G1
MAX. GROSS 30.480 kg
67.200 lb
TARE 2.100 kg
4.630 lb
PAYLOAD 28.380 kg
62.570 lb
CUBE 33.2 cu.m
1.165 cu.ft.

MSKU 769 753 0
22G1

MRKU 734 355 6
22G1

SUDU 769 689 9

POLAND CHARCOAL MARKET DATA

CUBE 33.2 M³
1.170 FT³

CUBE 33.2 M³
1.170 FT³

maerskline.com

CIMC

EF | Custom Data Analysis Poland 2022

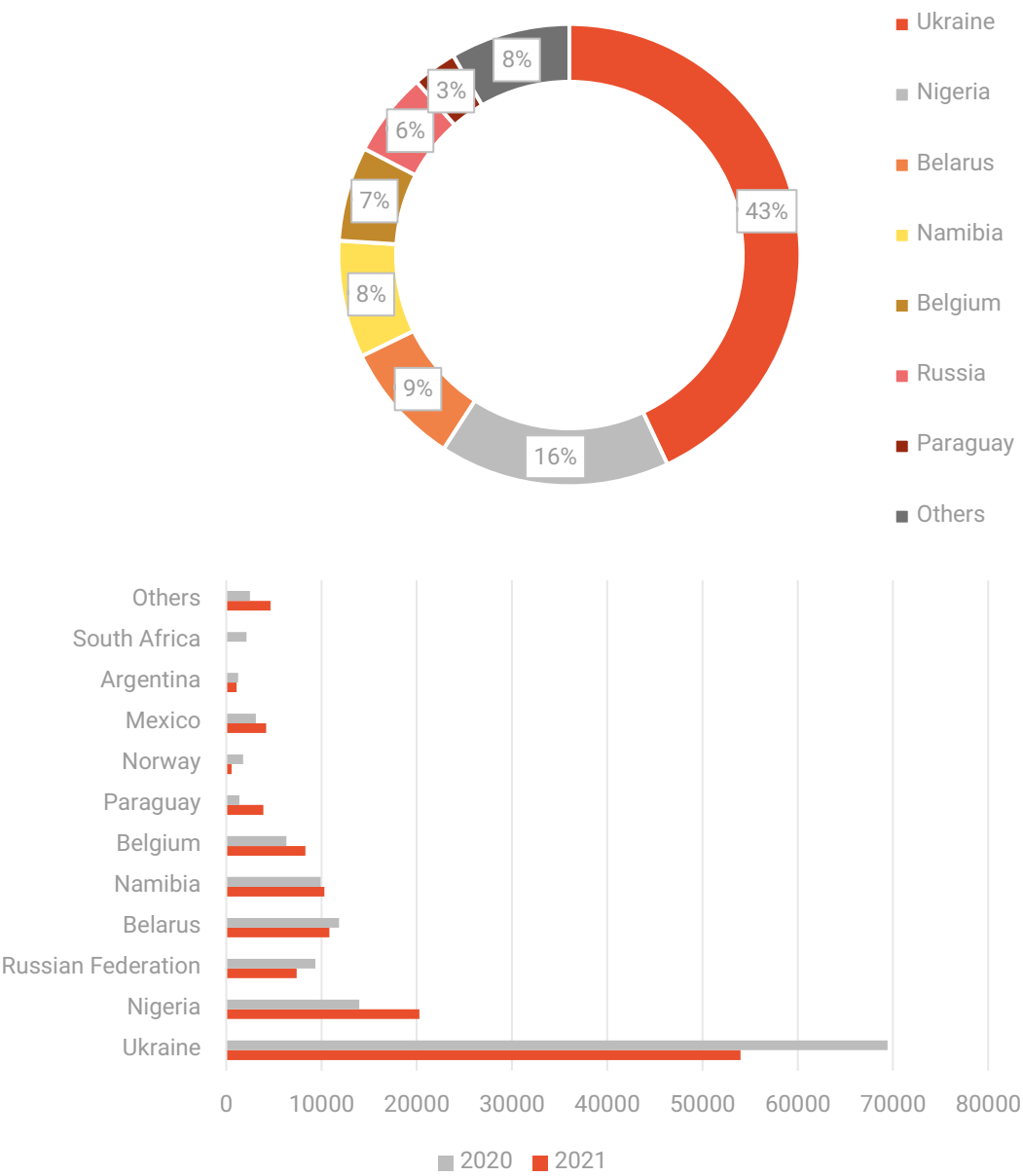
Poland is the EU's largest European producer and exporter of wood charcoal. EF's custom analysis shows that almost all of Poland's domestic production is destined for exportation to markets like Germany or Scandinavian countries.

Poland hosts a technically advanced and competitive charcoal producing industry. However, the domestic production capacities are not sufficient to meet demand and charcoal is often imported, repacked in Poland and sold to other European markets. In 2020, Poland produced 95'000 tonnes but imported In 2021 125'520 tonnes, mainly from Ukraine (43%), Nigeria (16%), Belarus (9%) and Namibia (8%), **all countries that contain either social, legal or environmental risks linked to charcoal production.**

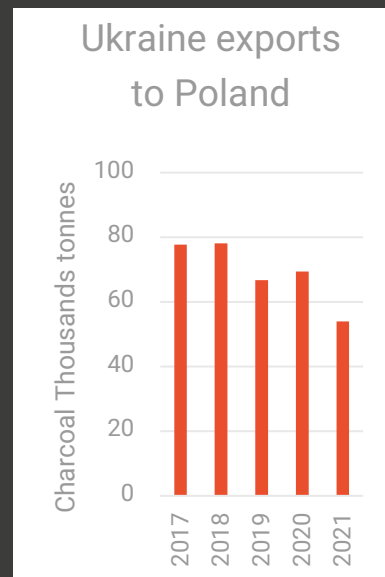
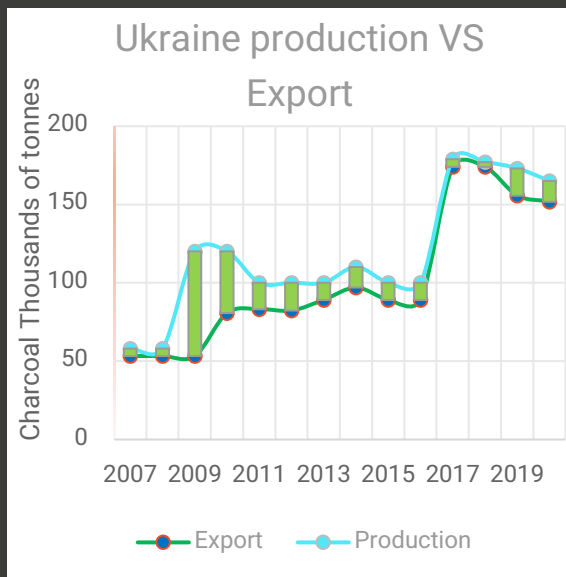
Comparing 2021 to 2020, we can see that total imports decreased by 6% following the steady decrease since 2018. In addition:

- Imports from Ukraine, Russia and Belarus decreased by approximately 22%, 21% and 8% respectively
- Imports from Nigeria and Namibia increased by approximately 45% and 4% respectively

2021 charcoal imports to Poland



Before the Russian war on Ukraine, Ukraine was Europe's largest Charcoal producer.



Sources: ITC & FAOstat

Ukraine remained up until 2021 the biggest producer of charcoal for the EU, producing an estimated 165'000 tonnes in 2020 (FAOstat). Contrarily to Poland, Ukraine produced more than it exported in 2020 but the war has halted exports this year and will have unknown consequences for the future.

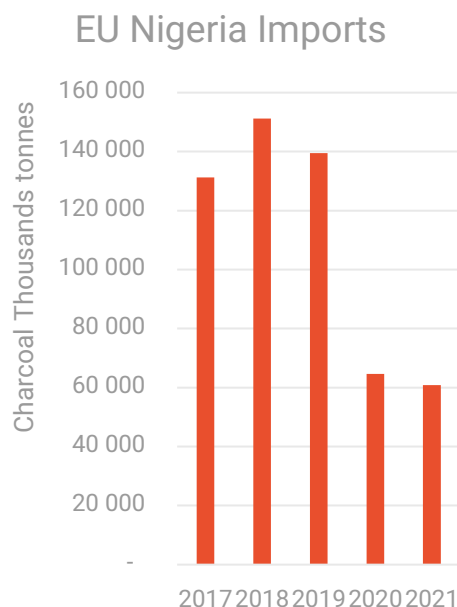
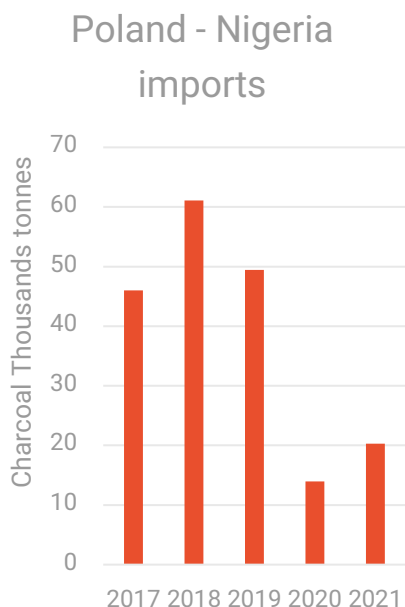
Following the general decrease in charcoal imports to Poland over the last few years, imports from Ukraine have also decreased by 12% between 2020 and 2021

Earthworm Foundation has visited and assessed many sites in the country and has found that Ukraine remains high risk for illegal logging and low working condition standards in the charcoal industry. Indeed, Earthsight revealed in its 2018 report „[complicit in corruption](#)“ how illegal timber from Ukraine enters Europe's timber and charcoal supply chains. This is still true today.

EF advocates for traceable and legal supply chains. We notably work with local NGOs in Ukraine who are specialised in detecting illegal logging cases and bringing them to the authorities.

| Nigeria

Charcoal from Nigeria contains significant social and environmental risks associated, including deforestation leading to desertification.



Sources: ITC & FAOstat

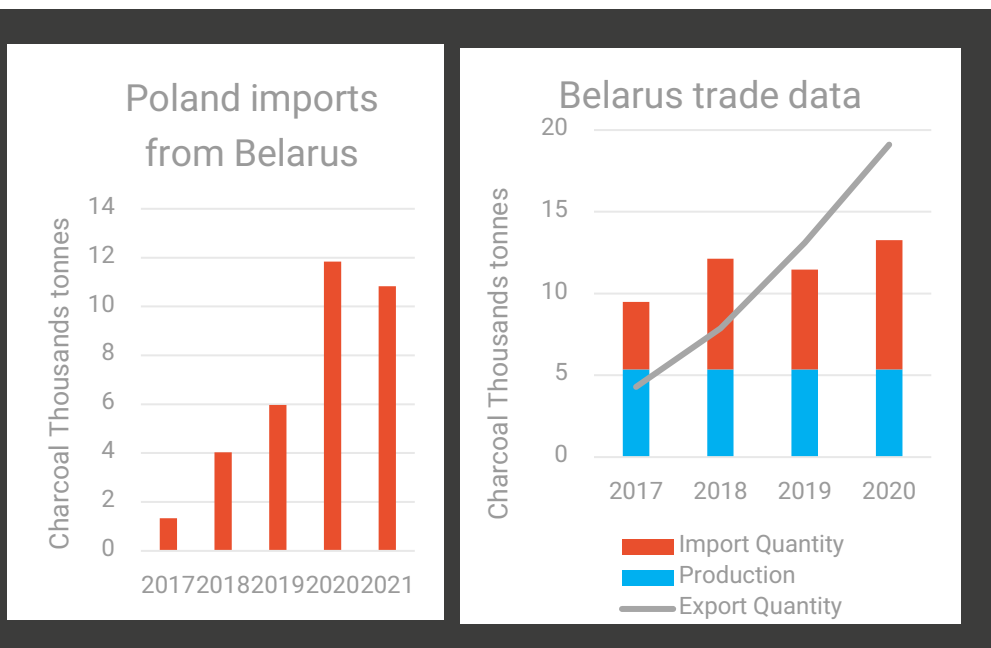
Nigeria officially banned charcoal exports in 2017 to preserve their forests. Despite the ban, Nigeria continues to export charcoal to the EU and notably Poland, though these have been steadily decreasing since 2018.

Charcoal production in this country is often done informally by workers receiving low income for hard manual labour. In addition, the wood can be logged illegally, leading to deforestation and desertification of certain landscapes. Locals are often aware of the damage they are causing to their environment and subsequent risks to their own survival long term. But short term, the need for income forces them to produce and sell charcoal to traders, who usually exploit this demand and the cheap labour force. The export of charcoal also means less resources for locals which use charcoal to cook their everyday meals.

Nigerian charcoal tends to be repacked in Poland into bags where no traceability / product origin can be found and sold mostly to Polish supermarkets and other European markets to unknowing consumers.

EF advocates for a traceable and fair charcoal supply chain where workers are paid fairly and wood harvesting is not from areas of deforestation or forest degradation.

Charcoal from Belarus has been increasing on the Polish market



Sources: ITC & FAOstat

Between 2017 and 2021, imports from Belarus to Poland have increased by 800% making Belarus Poland's third most important charcoal supplier in 2021.

According to FAO data, production quantity has remained constant over the last 4 years while imported quantity has almost doubled and export quantity has quadrupled. EF believes that the import and export data on FAOstat for Belarus are correct (official data) but that they underestimate the production quantity (estimated data). **This would mean that charcoal exports, imports and production have seen significant increases over the last few years.** However, the recent war in Ukraine has caused many countries to stop importing goods from Belarus and the long-term effects on the charcoal market are unknown.

Belarus' charcoal imports (which account for about 50% of charcoal exports) are mainly from Russia (81%) and Indonesia (15%).



EARTHWORM'S CHARCOAL BAGS ANALYSIS





| Earthworm Foundation Charcoal Bags Analysis

The EF Charcoal bags analysis was developed in 2015. It aims at monitoring the level of transparency on key European consumer markets. The charcoal bags analysis is a monitoring tool, following a strict protocol including visual wood species recognition and density measurements as well as verification of transparency indicators written on the charcoal bags. EF does not have a specialised laboratory, the charcoal bags analysis was developed to engage the charcoal industry on more responsible practices. Recently, laboratories have started to offer more detailed technical bags analysis & wood recognition services.

Process:

1. Collection of Charcoal Bag information: Name, Producer, origin, Wood species, Certification etc.
2. Measurement of apparent density
3. Visual inspection of charcoal pieces
4. Analysis of results



Indicators:

1. Declared Country of origin
 - Is information about the product's origin indicated on the bag?
2. Type of wood
 - What are the wood/tree species inside the bag? (temperate/tropical/mixed)
3. Certification status
 - Is the product certified under FSC/PEFC/other?

Since 2018 EF is conducting charcoal bags analysis on a yearly basis in Poland as well as other European countries (France, Germany...). The results of this report present the trends of the indicators.

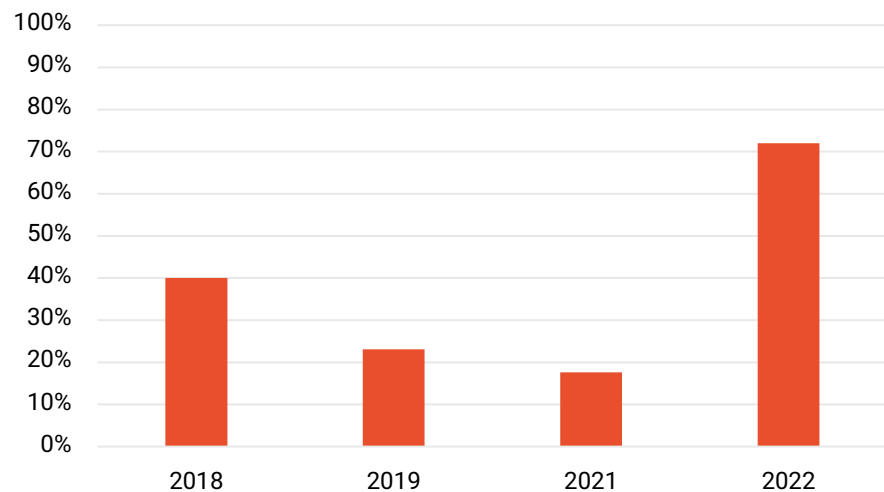


I Results Poland: Declared Country of origin

This indicator analysis if the place or country in which the product (charcoal bag, not necessarily the charcoal itself) is produced is printed on the charcoal bag.

This indicator reveals the level of transparency which is key to limit imported deforestation

Poland: Evolution of % declared origin



The country of origin (of the production) allows for an initial risk and sustainability analysis. However, an indication of the country of origin of the charcoal bag does not ultimately provide the country of production of the charcoal itself. Charcoal imports are often not declared as such and are repacked in Europe with missing information of the actual charcoal origin.

Poland:

Between 2018-2021, EF charcoal bags analysis found fewer and fewer products with declared origins. However, in 2022, there was a massive increase, with 72% of the samples providing either country of origin of the charcoal bag or wood, even though the numbers of samples tested was the same in 2021.

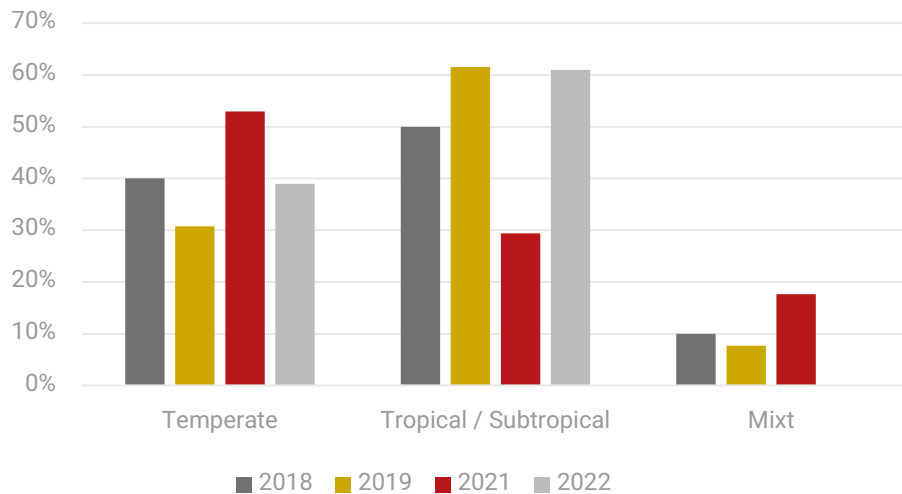
In our samples for the 2022 bags analysis, 61% of the bags had Poland, 6% had Europe and 5% had Namibia as declared origins. The remaining 28% had no declared origin. However we will see in the next page that over 60% of the bags contained tropical or subtropical wood, showing indeed that origin of production (Poland) of the charcoal bag does not mean real timber origin (tropical countries).



| Results Poland: Tropical vs. Temperate vs. Mixed Samples

This indicator analyses what type of wood is found inside the charcoal bag; Tropical, Temperate or Mixed wood species.

Evolution of type of wood found in samples



The type of wood and information about its origin are key indicators for a product's transparency. Similarly to a food product, **the consumer should be given the opportunity to know *the ingredients* of a charcoal product**; meaning if the charcoal is made of e.g. beech wood from Poland or tropical wood species from Nigeria. **Often species and origin information are not present and sometimes false declarations can mislead customers' purchasing decisions.**

Through the bags analyses methodology, EF is able to analyse if a piece of charcoal is from tropical/sub-tropical or temperate origin through a visual analysis as well as density measurements.

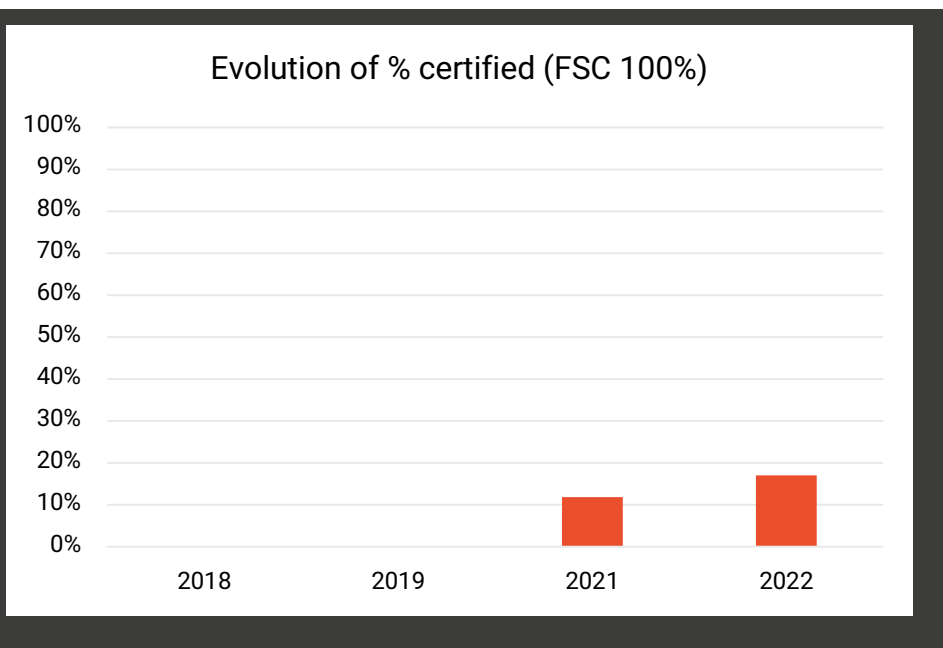
Poland:

After a drop in 2021 where tropical wood was only found in 30% of the bags, the 2022 results are back to 2019 levels with **61% of the samples containing tropical or subtropical species** (and only 5% declaring a tropical country: Namibia). **95% of the samples containing tropical charcoal did not indicate wood or production site origin which means high deforestation risks.**

The samples that contained only temperate charcoal comprised 39%, from which 17% did not indicate the wood or production site origin.

| Results Poland: certification

This indicator analyses if the product is certified under any sustainability certification scheme. The results for FSC are displayed below.



The level of certification is a first indication of if a product can be considered sustainable and if the supply chain behind it is transparent.

FSC and PEFC are the leading forest product certification schemes. However, repeated criticisms about the robustness and effectiveness of these schemes have been mentioned by NGOs all over Europe and the certification of charcoal supply chains often lack effective control and enforcement. **EF's view is that certification is a good tool for a more responsible product but should not be considered fool proof as fraud still exists, especially in the charcoal sector.** Over the last few years, EF has repeatedly addressed issues regarding FSC certification. Although some progress has been made, a lot still needs to be done, particularly related to traceability back to real origin of the wood.

Poland:

The graph shows how certification has never been a requirement for most shops or customers as the quantity of certified products has always been low. However, 17% of the samples were certified FSC 100% in 2022, against 0 certified bags 2 years before, indicating that certification is slowly becoming more present.

No PEFC certified charcoal was found amongst the samples.

| Summary and Recommendations

Since last year, charcoal imports to Poland have decreased. However the country maintains imports from high risk countries, especially Nigeria. **Despite Nigeria's charcoal export ban, Poland continues to buy and consume Nigerian charcoal. This charcoal can be considered as illegal.**

EF's charcoal bags analysis has shown that the proportion of charcoal from undeclared origins has been decreasing but that the proportion of tropical wood species in charcoal bags has increased even though the declared country of origin was often Poland for these samples. At the same time, more and more charcoal bags contain charcoal certified under FSC.

These results indicate that Poland's increasing level of declared origin is a false indication of transparency due to unknown wood origins (mostly probably from Nigeria), thus exposing its unknowing consumers to the risks of deforestation, forest degradation and social exploitation that is prevalent in some regions.

EF advises all charcoal market players to once again fight opacity for the good of transparency and demand that :

- Wood species
- Real wood origin
- Production site exact location

Should be written on all charcoal bags so that consumers can make an informed decision regarding their purchases.

EF strongly recommends to include charcoal within the **EU law proposal against imported deforestation & degradation to regulate European charcoal imports.**

**Demand
transparency for
more responsible
supply chains**