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Senate Standing Committee on Foreign Affairs, Defence and Trade

Senator the Hon Sarah Henderson
Chair
Senate Standing Committee on Foreign Affairs, Defence and Trade
Committee Secretary
PO Box 6100
Parliament House
Canberra ACT 2600

Via email: fadt.sen@aph.gov.au

Re: Senate Inquiry into the "Effectiveness of Sanctions against the Russian Federation"

We write this submission to you as the Australian Timber Importers Association (ATIF), the peak representative body of Australian timber importers.

1. Background 2
1.1. Terms of Reference 2
1.2. The Sanctions Framework as opposed to Tariffs 2
1.2.1. Australia's Autonomous Sanctions Framework 3
1.2.2. Russia-Specific Autonomous Sanctions 3
1.3. Australia's Tariff Measures Against Russia 5
1.3.1. How the Tariff Works 5
1.3.2. Duration of the Measure 5
1.3.3. Relationship with Sanctions 5
1.4. Country of Origin Rules. 6
1.5. ATIF's position on the Inquiry 7
2. Executive Summary 7
3. ATIF and its position on the inclusion of Russian fibre in timber and forest products 9
4. Sanctions regime – purpose and effectiveness 9

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4.1. Domestic pressures and international supply 10
4.2. Species in the spotlight 11
5. Responding to the submissions pertaining to LVL 11
5.1. International context 11
5.2. Australian Importers 13
6. So, what is the best approach here? 16

1. Background

1.1. Terms of Reference

We note the Terms of Reference and purpose of the Senate Inquiry into the effectiveness of sanctions against the Russian Federation (Inquiry) as follows:

a) the scope of sanctions imposed by the Commonwealth against the Russian Federation since February 2022, including but not limited to:
   (i) curtailing the importation into Australia of fuels derived from Russian crude oil,
   (ii) identifying, seizing, freezing and liquidating Russian financial assets, including Russian central bank assets in Australia, and
   (iii) personalised restrictions against specific individuals and organisations;
b) the intended effects of sanctions imposed;
c) the effectiveness of Australia's sanctions, including in comparison to overseas measures;
d) the extent of efforts by Russia and other affected entities to evade Australian sanctions;
e) the extent of Russian retaliation and other responses to Australia's sanctions;
f) the attitudes and responses towards Australia's sanctions regime from Ukraine, North Atlantic Treaty Organization, European Union and other partners in the Coalition of the Willing; and
g) any other related matters.

1.2. The Sanctions Framework as opposed to Tariffs

As you will no doubt be aware, but an important point of clarification considering the submissions sent to you from other timber related associations, the Terms of Reference of this Inquiry limits the level of discovery that is possible. Simply, if the Sanctions have never included timber imports, then it is impossible for this Inquiry to consider how effective they are.

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1.2.1. Australia's Autonomous Sanctions Framework

Australia operates two distinct sanctions systems:

1. **United Nations sanctions**, which implement binding decisions of the UN Security Council through the *Charter of the United Nations Act 1945*; and

2. **Autonomous sanctions**, which are imposed independently by the Australian Government to advance Australia's foreign policy, national security, and international law objectives. These are primarily governed by the *Autonomous Sanctions Act 2011* and the *Autonomous Sanctions Regulations 2011*.

Autonomous sanctions allow Australia to impose restrictions even where no UN Security Council sanctions exist. The framework is administered by the Australian Sanctions Office within the Department of Foreign Affairs and Trade (DFAT). It provides legal authority for measures including:

a) targeted asset freezes;
b) prohibitions on making assets available to designated persons or entities;
c) travel bans;
d) restrictions on trade in specified goods;
e) restrictions on the provision of services; and
f) restrictions on specified commercial and financial activities.

The framework operates through a combination of:

a) primary legislation (the Act);
b) regulations;
c) country- or issue-specific legislative instruments that identify sanctioned goods, activities, persons and entities.

1.2.2. Russia-Specific Autonomous Sanctions

Australia's sanctions against Russia were introduced in 2014 following Russia's actions in Ukraine and have been expanded several times, particularly following the full-scale invasion of Ukraine in February 2022. The stated purpose of these sanctions is to respond to threats posed by Russia to Ukraine's sovereignty and territorial integrity.

The Russia sanctions regime currently includes:

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Targeted Financial Sanctions and Asset Freezes

Australian persons and entities are prohibited from:

a) dealing with the assets of designated Russian individuals and entities; and
b) making assets available to designated persons or entities.

These measures apply to numerous Russian government officials, military figures, businesspersons, financial institutions and organisations designated by Australia.

Travel Bans

Declared individuals are prohibited from entering or remaining in Australia. These restrictions are commonly applied alongside targeted financial sanctions.

Export Restrictions

Australia prohibits the export, supply or transfer to Russia of specified categories of goods, including:

a) arms and related materiel;
b) certain machinery and industrial equipment;
c) luxury goods;
d) alumina, bauxite and related products; and
e) goods and technologies relevant to certain oil exploration and production projects.

Import Restrictions

Australia prohibits the import, purchase or transport of certain Russian-origin goods, including:

a) oil and petroleum products;
b) natural gas;
c) coal and other energy products; and
d) Russian-origin gold.

Restrictions on Financial and Commercial Activities

The framework prohibits certain dealings involving:

a) specified Russian banks;
b) state-owned enterprises;
c) defence and military-industrial entities; and
d) companies involved in the Russian energy sector.

Restrictions can include limits on lending, investment, dealing in securities, and other forms of commercial engagement.

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Restrictions on Services

Australia also restricts the provision of certain services connected to sanctioned goods, industries and persons. These measures are intended to prevent circumvention of trade and financial sanctions.

1.3. Australia's Tariff Measures Against Russia

In April 2022, following Russia's invasion of Ukraine, Australia withdrew Russia's entitlement to Most-Favoured-Nation (MFN) tariff treatment under the rules of the World Trade Organisation and imposed an additional 35 percentage point customs duty on goods originating in Russia and Belarus. This additional duty came into effect on 25 April 2022.

The measure operates through section 18A of the *Customs Tariff Act 1995* (Cth) and applies to goods that are the produce or manufacture of Russia or Belarus. The additional duty is imposed on top of any ordinary customs duty that would otherwise apply.

1.3.1. How the Tariff Works

The legislation provides that:

a) where the normal tariff rate is 0%, Russian-origin goods are subject to a 35% duty;
b) where the normal tariff rate is 5%, Russian-origin goods are subject to a total duty of 40% (5% + 35%);
c) the additional duty applies broadly to goods produced or manufactured in Russia or Belarus; and
d) the measure applies regardless of whether the importer is Australian or foreign.

1.3.2. Duration of the Measure

The additional 35% duty was initially introduced as a temporary measure but has been extended several times. It currently applies until 24 October 2027. The Australian Government extended the measure in 2025 for a further two years, citing Russia's continuing aggression against Ukraine and Belarus' support for those actions.

1.3.3. Relationship with Sanctions

The tariff is separate from Australia's autonomous sanctions regime.

In practice, some Russian goods are:

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a) completely prohibited under sanctions laws (for example, certain energy products and sanctioned goods); while
b) other Russian goods may still be legally imported but are subject to the additional 35% customs duty.

As a result, Australia's economic measures against Russia comprise both:

a) sanctions-based prohibitions and restrictions; and
b) a punitive tariff regime designed to increase the cost of importing Russian-origin goods into Australia.

1.4. Country of Origin Rules.

Country-of-origin rules are a foundational element of international trade law and customs administration. These are derived from the rules of the World Customs Organisation and the World Trade Organisation frameworks and also are often emanating from free trade agreements.

Essentially, where goods are produced using inputs sourced from multiple countries, origin is generally determined by the country in which the goods undergo their last substantial transformation rather than by the origin of all constituent materials. What follows is a plethora of law surrounding the eventual labelling, the duties that apply and the like.

Under the principle of substantial transformation, a product acquires the origin of the country in which processing results in a new and commercially distinct product. Minor operations such as repackaging, sorting or labelling are generally insufficient to confer a new origin. Customs authorities commonly assess substantial transformation through tests such as changes in tariff classification, value-added requirements or specified manufacturing processes.

As a consequence, goods containing Russian-origin raw materials may not necessarily be regarded as Russian-origin goods if those materials have been substantially transformed in a third country. This distinction is particularly relevant to sanctions and tariff measures directed at Russian-origin products, as the legal country of origin of a finished product may differ from the origin of its constituent inputs.

It is not for the Australian Government to make the changes to country of origin labelling requirements without reference to the global impact this change will create. There is an international framework in place for good reason.

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1.5. ATIF's position on the Inquiry

Whilst ATIF absolutely holds as a central tenet of its organisation that there shall be no Russian fibre in products imported by members, it will only put forward suggestions that make legal sense.

The Senate Committee cannot evaluate the effectiveness of sanctions (the boundary of which is dictated by its terms of reference), when sanctions against Russian timber as a 'product type' simply do not exist. There are applicable autonomous sanctions against particular individuals and companies in the Consolidated List, but none of these relate to the timber trade.

The tariff environment is not a sanction pursuant to the *Autonomous Sanctions Act 2011* and is therefore arguably out of scope. Even if the Senate Committee wishes to examine the tariff's, it ought to do so with the international law pertaining to country of origin labelling and the existing legislative powers of the Department of Agriculture, Fisheries and Forestry in mind. As you will see below, ATIF is, in this submission wanting to alert the Senate Committee as to the unworkability of some of the submissions that have been lodged. Instead, we put forward what we consider is a legally workable, reasonable and proportionate approach to what we consider to be an issue worth resolving. Our members want Russian and Belarusian fibres kept out of timber imported into Australia.

2. Executive Summary

ATIF is a long standing and well reputed Industry Association representing some of the largest timber importers into Australia. ATIF supports the actions taken by the Australian Government in response to Russia's war with Ukraine and prohibits fibre of Russian origin in the supply chains of its members.

ATIF ultimately recommends to the Australian Government that:

1. Section 14 of the *Illegal Logging Prohibition Act 2012* confers broad regulation-making and rule-making powers enabling the Commonwealth to prescribe due diligence requirements and country-specific risk assessment mechanisms. Through those powers, the Commonwealth may require importers to treat timber harvested in particular jurisdictions as presenting elevated legality risks and to undertake enhanced due diligence before importation. This could be done broadly in three ways:

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i. DAFF could issue guidance indicating that timber harvested in Russia presents heightened legality risks because of sanctions, governance concerns, conflict-related issues, or verification difficulties; or
ii. The Minister could recommend amendments to the *Illegal Logging Prohibition Rules* requiring enhanced due diligence for timber harvested in specified jurisdictions; or
iii. Parliament could amend the Act to create a formal country-classification system similar to the EU model (high-risk, standard-risk, low-risk countries). Unlike the European Union's Deforestation Regulation, Australia's Illegal Logging Prohibition framework does not currently contain an express country benchmarking mechanism that classifies jurisdictions as low-, standard- or high-risk. Rather, it relies on a due diligence system under which importers assess legality risk having regard to prescribed factors, including the country of harvest and the reliability of legality information.

Consequently, if the Commonwealth wished to require Russian timber to be treated as presumptively high risk, it would likely need to do so through amendments to the Rules or through legislative amendment creating an explicit country-risk classification mechanism,

2. Create a 'safe harbour provision' through amendment to the *Illegal Logging Prohibition Act* to encourage industry to report actors in the supply chain who have misrepresented the origins of fibre in products for investigation. A statutory mechanism is needed that protects a person from liability or regulatory consequences where they have complied with specified conditions designed to achieve the policy objective of the legislation, and where, in the context of global trade in composite products, the importer can prove they have been mislead or deceived by another actor in the supply chain despite conducting due diligence to a reasonable standard as required by section 8(7) of the *Illegal Logging Prohibition Rules 2024*;
3. Create a low cost 'fibre testing service' that can be used under the safe harbour provision for importers to routinely test the composition of imported products and the fibre origins in the safe harbour environment described in paragraph 2 above;
4. Educate all importers of all Regulated Timber Products and implement a widespread campaign through industry associations and by writing directly to importers of Regulated Timber Product's informing them of the ILPA and the applicable tariff regime; and
5. Support importers who are contributing to the Australian economy by supplying needed materials and products where the domestic production capacity is insufficient, expensive or unable to supply.

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3. ATIF and its position on the inclusion of Russian fibre in timber and forest products

ATIF represents the pre-eminent and largest timber importers into Australia and estimates that this represents approximately 70% of all timber imported into Australia, which is in the order of $4.5 billion. Our members also on sell many domestically manufactured timber products. Accordingly, ATIF is well aware of the need for both domestically produced and imported timber products and will not engage in an 'anti-domestic, pro-import' stance.

Our Committee of Management is comprised of representatives of industry leaders. They have executed this submission. Importantly, ATIF's objectives are the same as the Government's stated objectives in implementing the *Illegal Logging Prohibition Act* and *Rules* – ATIF has long supported its' introduction and has a central tenet of its membership Code of Ethics (visible here) that members shall not deal in any way with illegally logged timber or conflict timber, and in fact goes further than the law and prohibits fibre of Russian origin in the supply chains of its members.

The membership at the 2024 Annual General Meeting reaffirmed its commitment to eradicating Russian fibre from its supply chains which is visible here for your reference.

Despite ATIF's policy position, the importation of Russian fibre is not illegal if it can be shown to be low risk of being illegally logged. Simply, if it has not been substantially transformed elsewhere, an additional 35% tariff will be applied to timber imports.

We are acutely aware of the realities of the Australian forest products sector and that the volume, material types and products are unable to be supplied exclusively domestically. Our members do both. Therefore, our position on this matter is not one of 'imports vs domestic' sources. It is sensible and looks to what is needed and how that can be achieved in the macro environment we find ourselves in.

We have always sought to be constructive and collaborative in our approach and are seeking to drive the education and training of the importing industry across all Regulated Timber Products.

4. Sanctions regime – purpose and effectiveness

The sanctions regime imposed by the Australian Government is not about one type of product from one country, as has been espoused in other submissions to this Inquiry. When considering the effectiveness of such a broad measure, a holistic view must be taken to gain a complete perspective.

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When a sanction or tariff is put into effect in a globalised economy, the natural and obvious response by organisations and governments impacted is to divert around the 'problem' and find a new way into the same markets.

Important to recognise in this context is the fact that some of the countries from which Australia are major imports from rank low on the global corruption perception index. Despite the enquiries of purchasers across the world regarding the sources of the timber in products, substitutions can occur unbeknownst to the importer. From food and packaging to glass and computers, this happens in relation to any form of composite commodity comprising of any number of inputs. Russian timber is laundered through the Eastern Bloc and through central Asian countries in the same way that many other commodities are.

The sanctions regime is therefore designed to place the most significant and serious penalties upon Australians who are importing product over which they have direct control. To place a sanction against an entire product class as has been suggested by others would mean the same sanctions would need to apply to others. For example, the current sanctions environment applies to Russian Oil. This will be used to turn into plastics and other products in other manufacturing countries. There is no way in which the oil in a plastic product can be traced. To do what is purported for a product not in the current sanctions regime requires it to be done to those that are in the current sanctions regime. Purchasers in Australia have no control over a ubiquitous and unidentifiable product like oil and thus the sanctions environment is specific – it is about directly purchased items, of a class, and also a prohibition on payment of particular individuals or companies.

The sanctions list also talks to direct and indirect payment to countries, people and companies. As the penalties are significant, it is important to consider from a policy perspective the extent to which Australian importers of *anything* should be punished for the things that they have little to no control over. This is especially in the environment where slight changes to existing laws can be implemented to achieve the same ends.

4.1. Domestic pressures and international supply

In response to the ongoing housing crisis, both the Federal Government and State Governments around Australia have implemented policies to drastically increase the number of new homes being built. Naturally, this has led to increased demand for forest products, both domestically sourced and imported where local markets are not able to meet the demand.

It is well known that Australia has not historically invested in the plantation resources needed to meet the demand.

As one example (used due to the AFPA submission expressly referencing it), structural Laminated Veneer Lumbar ("LVL") is being increasingly used in recent years as a substitute

for framing timbers. The market is increasingly (like many others) receiving heavy international subsidies. You will see in this submission that Australia's largest LVL importers have not decreased their prices. They are directly quoted in this submission (with their full written consent) to attest to the fact that they do not use Russian fibre in their products.

There are a number of smaller importers or 'pocketbook traders' who are importing LVL from markets in the Eastern Bloc and Central Asia that clearly contain Russian fibre. ATIF advocates for measures to be put in place to make it clearly illegal to do so – through some suggestions above.

4.2. Species in the spotlight

While Larch, Spruce, and Pine are commonly harvested in Russian forests (which are the largest in the world), it would be disingenuous to suggest that most of the Larch, Spruce, and Pine within global supply chains must therefore be Russian of origin. All three are grown across Central and Northern Europe, Canada, USA, Japan, China and Mongolia in significant numbers.

5. Responding to the submissions pertaining to LVL

5.1. International context

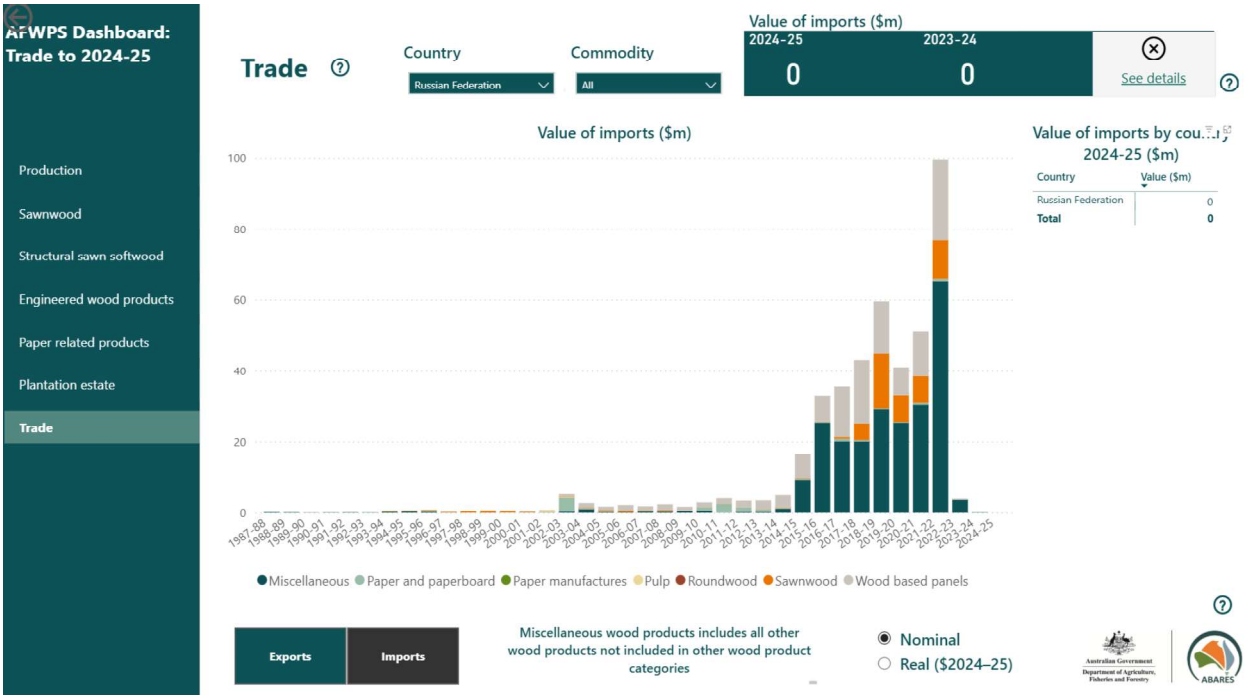
Whilst we don't believe that the Senate Committee can review the effectiveness of sanctions that have not been applied to the timber industry, we have reviewed a number of submissions to this Inquiry which are seeking to draw a direct correlation between the increased import volumes and reduction in FOB prices of LVL from China with the inclusion of Russian Fibre.

There is a difference between a correlation and causation.

Statistics do show that with the introduction of Russian Sanctions in 2022 volumes from Russia dropped to zero (see below table from the Department of Agriculture, Fisheries and Forestry). This is a remarkable change from the peak in the financial year of 2021-22.

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It is abundantly clear that the imposition of the 35% tariff has had a marked effect on Russian timber being imported into Australia.

Conversely, volumes from Lithuania and China have increased. It has been implied that this was merely Russian LVL being shipped through other countries.

In the case of Lithuania, the increased volumes exported was in large part due to a new LVL plant of some 120,000/m3 per annum being commissioned. When considering the long geopolitical history in the region, we reject the notion that Lithuanian companies would, en-masse, work to assist their Russian counterparts to circumvent global tariffs.

As for China, the price and volume movements are better explained by structural features of Chinese export manufacturing, by global oversupply, a lower cost base and heavy subsidies. Further, lower energy, input and labour costs, deep vertical integration, and large and growing domestic overcapacity (in plywood and LVL, where Chinese supply capacity now exceeds domestic consumption) exerts strong downward pressure on export prices – independently of fibre origin – resulting in prices remaining steady despite inflationary pressures. Add to this China's increased press capacity using veneer rather than buying finished LVL.

ATIF accepts that some of the inputs could likely be Russian of origin (in supply chains outside its membership), however China's own domestic processing has increased to such a degree that we do not consider this a major driving factor behind price changes.

Add to this the surplus of European beetle affected logs being bought by China for use in composite products and the increased preference for using lower grade LVL within

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Australia as a substitute for structural framing timber, and the increased levels of import from these countries are more simply explained.

5.2. Australian Importers

We address the assertions made by AFPA directly. The overwhelming majority of imported LVL (a crucial material needed in construction) is imported by the four largest importers Dindas, Meyer Timber, Tilling Timber and ITI Australia. It is estimated that these four companies represent some 70% of all LVL imported. Three of the four of these companies have had their supply chains audited by the Department of Agriculture, Fisheries and Forestry on these imports. Those companies have advised that the inputs do not include fibre from Russian origins.

In fact, at the beginning of the conflict, David Meyer, proprietor of Meyer Timber led the ATIF Committee of Management and together with Glenn Tilling, proprietor of Tilling Timber orchestrated an enormous change within their supply chains that are deeply connected, exclusive and trusted. There is simply too much business transacting in the supply chains for the suppliers to substitute material into them and to risk losing the business that is so important to the supply chains.

"The cheapest buy options through the period [at the start of the conflict], and today, remain LVL produced with species that can be brought in from Russia. Although cheaper, we did not buy them because we felt that it presented too much of a risk of conflict timber." – David Meyer, Managing Director at Meyer Timber

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Tilling Timber is a founding member of ATIF and has always been a strong voice in the industry, pushing for technological advancement to increase the reliability of structural timber. The current proprietor's parents started Tilling and have built the company to what it is today.

"We have in place a special program where each LVL is able to be traced back to the exact source it came from. This is unlike anyone else on the market and demonstrates our founding belief – as an ATIF member, we do not want any Russian fibre in our supply chains. We are confident that there is no Russian fibre in our LVL supply chain and invite anyone to fibre test our LVL at any time. We conduct routine checks and audits, tracing

products and have three people employed full time conducting due diligence" – Glenn Tilling, Managing Director at Tilling Timber

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Dindas Australia, one of Australia's largest LVL importers, and has maintained a strict procurement policy since the commencement of the Russia–Ukraine conflict, choosing not to source LVL from manufacturers where fibre origin cannot be confidently verified. Regardless of price or commercial advantage, they do not purchase products from supply chains that present an unacceptable risk of Russian or conflict timber, or of non-conforming structural LVL, entering the manufacturing process.

"As a significant participant in the Australian LVL market, Dindas has extensive knowledge of global manufacturing supply chains and is aware of manufacturers supplying products into Australia, where Russian fibre risks remain a concern. While these products may be available at attractive price points, Dindas has deliberately chosen not to engage with such suppliers, prioritising traceability, legality, and supply chain integrity over cost." – John Cannard, COO at Dindas Australia

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Germano Tomassetti, CEO of ITI Australia and another member of the board of ATIF, likewise employs three full-time staff (and is actively recruiting for a fourth) dedicated solely to illegal logging due diligence and maintaining their FSC and PEFC chain-of-custody certification. This represents a significant and ongoing cost to the business that cannot be recovered through pricing.

"[hiring staff for this sole purpose] is the cost of doing this properly, and we carry it willingly because we believe in what the framework is trying to achieve. Our compliance team has the authority to say no to any source they cannot verify — regardless of the commercial pressure to fill supply gaps — and when they say no, I say no." – Germano Tomassetti, CEO at ITI

Importantly, despite the data that has been displayed and collated, all four are very clear on one thing. They **have not received any cut price substitute and placed them on the Australian Market**.

China has clearly taken the market that was previously occupied by Russia. Now there are approximately 25 mills in China producing significant volumes, up from 4 at the start of the conflict. The plants are buying log now instead of just veneer – as a result, lower grade LVLs can be created at a price point that is competitive with domestic structural lumber. This doesn't mean it is Russian. Masson Pine, radiata pine, eucalyptus or spruce are all commonly used.

Further, the price of E13, 14 and 15 has not gone down. The only LVL type that has reduced in price is E10. This is due to the dramatic change in volume. This was a rarely used LVL type historically. There is now a significant volume being imported into NSW in particular through small and sometimes new importers, buying it as a substitute for MGP 10 framing.

This argument is further supported by the fact of the closure or substantial reduction of volume being produced and exported by Russian companies driven by global trade restrictions.

MLT (Modern Lumber Technologies), a huge player in the market has reduced its production substantially to a formwork product. We know it is being shipped through Turkey and sent to Europe. In contrast, in 2023 VMG commenced in Lithuania – approximately 120,000m3 of LVL being produced annually.

So, with the four biggest importers making these statements, supported by DAFF audit and qualitative data pointing to different reasons, shouldn't there be a proper review of cause and effect prior to making drastic changes that could sink the economy?

ATIF asked these exact questions as early as February this year and reported the responses back to FWPA – who agreed that this warranted further investigation. Their public bulletin in fact says this, that has been referred to by AFPA. What was discovered was:

1. That a single importer (Tilling) tripled an order quantity that was imported in the period which represented a significant reason for the spike, substantially increasing the basic statistic of "total amount imported".
2. That there needed to be an investigation as to how LVL is coded at import – there are many non-structural products that are being coded as structural when they are not, inflating the import figures of structural LVL.
3. The data and HS codes that apply do not differentiate between *types* of LVL. These are international. It is a broad category. LVL for bed slats are put in the same place that structural LVL is. The same with internal door skins. This drags down the average price of imported LVL as a broad category as these lower grade, cheaper products are all caught in the same category.

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4. There is a proliferation of non-professional or smaller importers being approached and bringing in product without conducting due diligence at all, and those products also often do not meet Australian Standards. This will cause an even more significant issue in defective building work than even is being experienced now with these unsuitable products being utilised.
5. Increasingly form working companies, builders and the like are bringing in product directly and are, in an inflationary environment, focussed on price. They simply do not know about the ILPA.

ATIF whole heartedly supports a sensible approach, using existing and underutilised mechanisms to reduce instances of Russian fibre entering Australia, but in such a way that should importers find that they are the victims of fraud of someone up the supply chain, that they can address it without being the subject of a greater compliance regime than is already in existence.

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6. So, what is the best approach here?

A better approach is to fully utilise the laws that already exist and the fibre testing powers of DAFF to assist with the identification of this fibre together with multi-lateral pressure to be applied to intermediary countries. Further, if any one of the potential three amendments were made to the ILPA as contemplated in recommendation 1 in the above executive summary, together with the other recommendations, could curtail the problem quickly.

ATIF is concerned that Russian Fibre is being processed in other intermediary countries and ending up in composite products being imported into Australia. It is also concerned about the lack of awareness of non-ATIF member importers about the types of forest fibre, fibre flows and the masking that occurs in intermediary countries, despite the best efforts of those importers who are aware and are trying to eradicate Russian fibre from supply chains.

Production facilities who, despite the due diligence conducted by ATIF members are found to have substituted material and therefore falsified documentation need to be held

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accountable. We cannot punish those doing everything possible and who are in fact the victims of fraud themselves.

So many importers (mostly those who are not professional importers and certainly not members of ATIF) are not aware that Russian fibre is even an issue. They can be misled, can operate based on price alone, and often are not even aware of the ILPA. We strongly advocate for a broad education campaign about the breadth and scope of the ILPA, and if it is the case that there is a ban placed on Russian fibre in imports, a campaign directed at all importers of affected products educating them how to check, what to look out for and importantly, how they can report being misled by a supplier without facing significant penalty.

We further advocate for a fibre testing service and safe harbour provision to be made available to importers generally in order to support the identification of rogue suppliers, their naming and shaming and the eradication of timber of Russian origin entering into the Australian market.

We thank the Inquiry for accepting our submission and hope that the strong concerns expressed in this document will be considered in the final report produced.

Kind regards,

[redacted]

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Forest One Australia Pty Ltd

[redacted]

Germano Tomassetti
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ITI

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Robert Cairns
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NLG Timber Pty Ltd

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Robert Sansotta
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Glenn Tilling
Managing Director
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