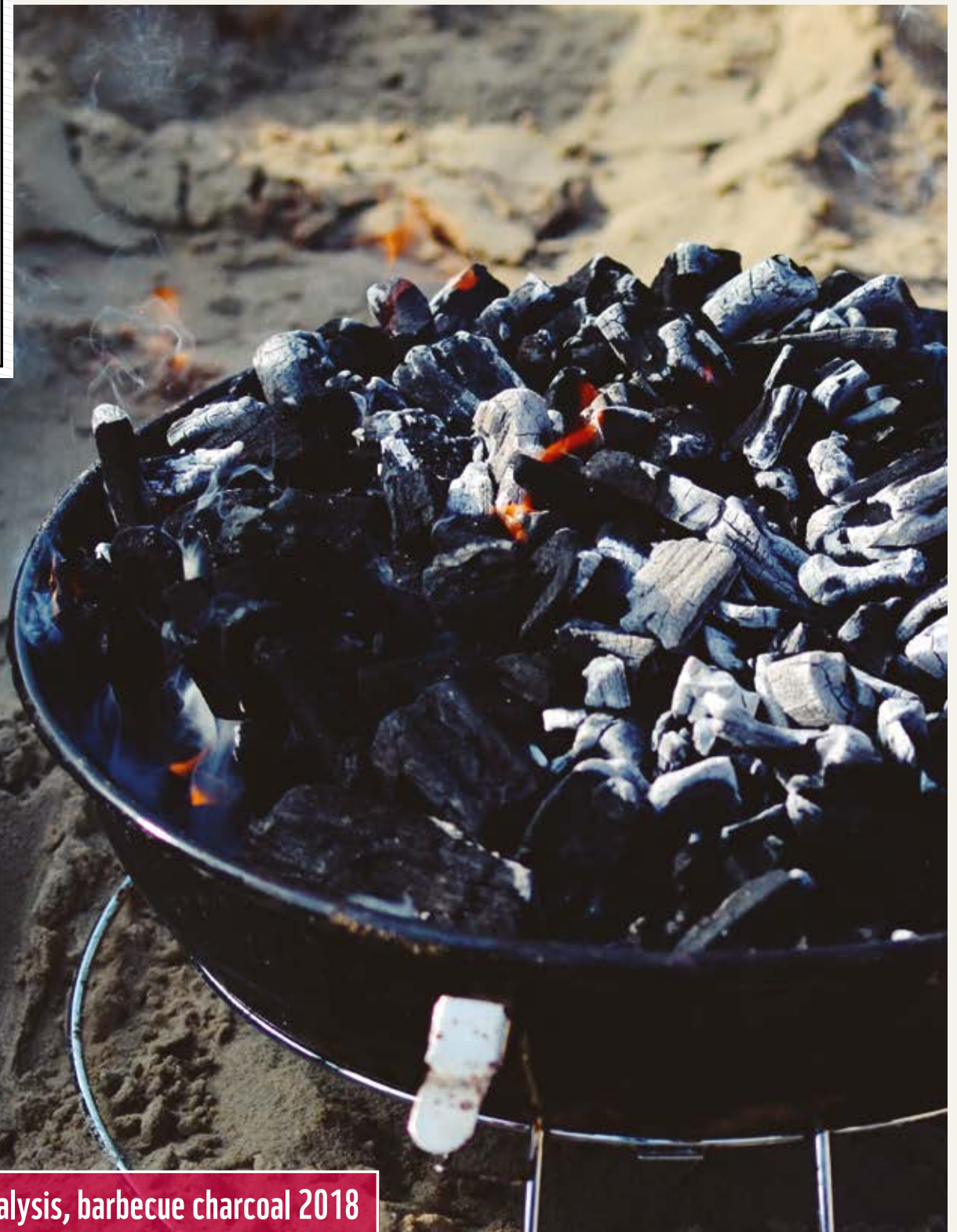




ANALYSIS

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2018



Market analysis, barbecue charcoal 2018

# The dirty business of barbecue charcoal

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Hardly any barbecue fans in Germany realise that the barbecue charcoal sold in Germany is mostly imported, with over 70 % originating from Poland, Ukraine, Nigeria and Paraguay.

# 1 Introduction

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Hardly any barbecue fans in Germany realise that the barbecue charcoal sold in Germany is mostly imported, with over 70 % originating from Poland, Ukraine, Nigeria and Paraguay. The barbecue charcoal from Poland is itself imported – and itself largely comes from Ukraine and Nigeria (84 %).

As in 2017\*, the WWF again conducted market research on barbecue charcoal in Germany in 2018.

In 2018, the WWF market research was conducted in close cooperation with an ARD television production (first broadcast on 2 July 2018: “Die Story im Ersten – Das schmutzige Geschäft mit der Grillkohle”<sup>1</sup>).

The research conducted by ARD and the WWF showed how high the risks of over-exploitation and even illegal charcoal production with a link to Germany continue to be.

One Polish supplier, Dancoal, which delivers direct and via intermediary dealers to several major German chain stores, stood out in particular during the research, since this company purchases the lion’s share of the charcoal exported from Nigeria to Poland – which the Nigerian environment ministry claims is illegal.

Despite the warnings and information provided by the WWF last year, German customers continue to be supplied with a great deal of “dirty goods”. The industry itself remains silent on the issue. There is neither a label on packages referring to endangered forests in high-risk countries, nor was the BIAG (Barbecue Industry Association Grillverband e. V.) prepared to provide the WWF with information on request.


And what about official inspections? In most cases, they’re no use at all! Charcoal does not fall within the European Timber Regulation. For this reason, neither the German Federal Agency for Agriculture and Food (BLE) nor the customs authority have been able to manage the situation.

In most cases, the legality of the barbecue charcoal sold in Germany is a voluntary choice!

Despite the questions even raised by some certified products, this report fortunately not only contains upsetting stories of destruction, but also includes several positive developments in this area.

\* [www.wwf.de/2017/august/auf-regenwald-gegrillt](http://www.wwf.de/2017/august/auf-regenwald-gegrillt)





## Current examples:

- As well as the case documented in April 2018 by ARD of illegal logging in the Uzansky National Park, just a few meters away from a UNESCO natural world heritage site<sup>21</sup> (see also the ARD barbecue charcoal report,<sup>22</sup>), WWF Ukraine also documented a further example of
- illegal logging in Ukraine (12.06.2018): Via the “Forest Watch” internet platform operated by WWF Ukraine, the WWF was alerted to illegal logging in an FSC-certified forest. When they inspected the site, the WWF and the environment inspector involved saw evidence of deforestation, although approval had been given only to fell individual, diseased trees. Not only that, the forestry work was conducted during the summer months, when it is completely forbidden. The police on site did not support the environmental inspector in their work, however, but instead delayed the investigations.<sup>24</sup> The company’s FSC certificate was very quickly suspended (21.06.2018)<sup>25</sup>. This case is an example of how difficult the situation in Ukraine is. Corruption and illegal logging are part of everyday life. Environmental organisations are implementing painstaking measures to fight against this trend. When the FSC responds quickly and firmly, as was the case here, there is a chance of improvement.  
The FSC must develop this high-impact approach itself (see Chapter 9).

## 2 Why is the WWF investigating barbecue charcoal?

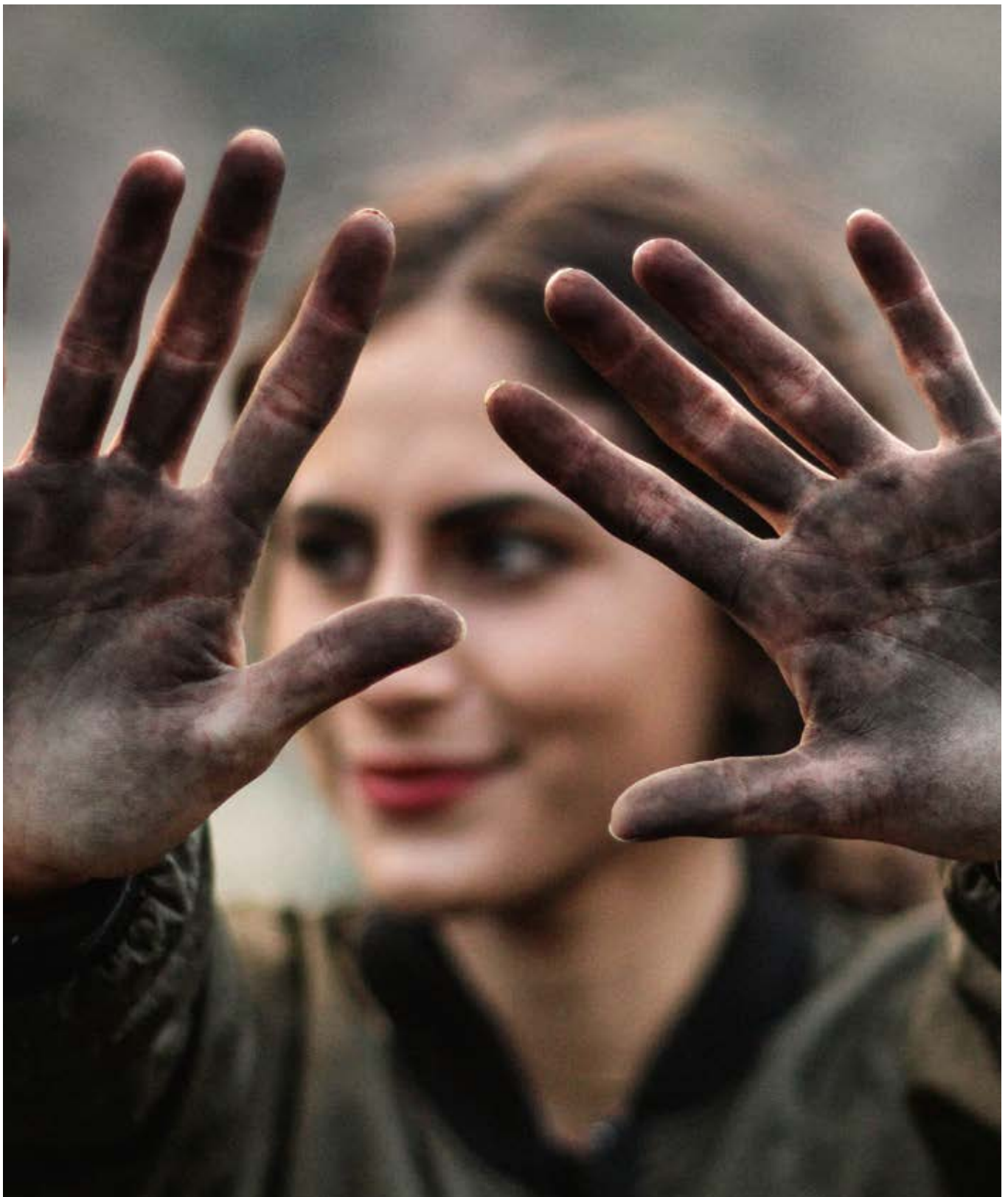
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Around half of the wood used worldwide is burned, usually for cooking, but also for heating. 17% of the wood used for cooking and heating is first turned into charcoal. According to the forecasts, charcoal production will continue to grow over the coming decades.<sup>2</sup> Germany uses charcoal mostly for barbecuing. These quantities are also relevant, since in Europe, Germany is the largest consumer in the EU, with around 250,000 tonnes annually. In order to produce this quantity, double to ten times the amount of wood is required – in other words, between 0.5 million and 2.5 million tonnes of wood. In relation to the volume of wood<sup>3</sup> and the wood harvest in Germany (approx. 70 million m<sup>3</sup> in 2015)<sup>4</sup>, this roughly corresponds to between 1% and 5% of the annual amount of wood harvested in Germany (note: this is just a theoretical example, since German forests do not consist solely of deciduous trees, which are preferred for the production of charcoal).

Only a small proportion (around 40,000 tonnes) of the barbecue charcoal consumed in Germany is produced in Germany. The rest is imported. However, there are major risks involved with almost all the important supplier countries of German charcoal.<sup>5, 6, 7</sup> List of the most important charcoal source countries in descending order of relevance in relation to volume:

- **Poland:** Imports charcoal itself from the following three (risk-prone) countries (particularly from Ukraine and Nigeria), which are then repackaged before being sent to Germany.
- **Nigeria:** Very high deforestation rate, corruption, illegal logging, over-exploitation in forests.<sup>8</sup> Second-largest charcoal producer in the world; according to an FAO report, charcoal production is contributing to deforestation to a particularly large extent.<sup>9</sup> The Nigerian environment ministry determined last year that there are significantly fewer forests than had already been feared.<sup>10</sup> When contacted by the WWF, the Nigerian environment ministry replied in January 2018 that the production of charcoal is illegal in Nigeria.
- **Paraguay:** Very high deforestation rate, corruption, illegal logging, over-exploitation in forests. The government is pursuing the goal of converting the country into an intensive agricultural state, since a large amount of money can be made through soybean cultivation. It is therefore good when the forests disappear quickly in order to make way for agriculture. According to “Der Spiegel” magazine: “... In this region of the world forests are being converted into fields faster than anywhere else ...”<sup>11, 12</sup> In 2017, the environmental organisation Earthsight published a detailed report on the destruction of forests in Paraguay – with a link to Aldi and Lidl.<sup>13</sup> The president (who owns forest himself) issued a decree in 2017 that permits the 100% conversion of forest. However, this decree conflicts with the valid forestry legislation, and an appeal has been submitted to the Supreme Court.<sup>14, 15, 16</sup>
- **Ukraine:** Corruption, illegal logging<sup>17</sup> – even in protected areas and in the last virgin forests in Europe, there is over-exploitation of the forests. In order to take at least some steps against illegal logging and timber trading, the Ukrainian parliament put a stop to the export of round logs in 2015.<sup>18, 19</sup> Since then, exports of charcoal have increased considerably, from 100,000 tonnes in 2014 to over 170,000 tonnes in 2017<sup>20</sup>.





4. Dezember 2017 um 07:45

Aw: AW: charcoal  
An: Johannes.Zahnen@ewf.de Kopie: [redacted]  
Antwort an: [redacted]

Dear Johannes,  
Thanks so much for following up on the charcoal matter.  
Yes, charcoal production in Nigeria, especially from Cross River State is illegal, as we have a total ban on logging backed by law.  
I really appreciate your efforts in assisting us in this crusade against deforestation.

Best regards  
[redacted]  
Ministry of Climate Change and Forestry  
Cross River State, Nigeria



### 3 Aren't products that are offered for sale in Germany always legal and are subject to monitoring?

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**Even the WWF was shocked to discover that charcoal is subject to almost no checks whatsoever!**

Naturally, everyone assumes that products sold in Germany are legal and have been subject to monitoring. However, when contacted by WWF Germany, the customs authority revealed that charcoal is only monitored in rare special cases:

1. Charcoal from Indonesia (approx. 5 % of the charcoal imported into Germany): There is an agreement between the EU and Indonesia which classifies wood products from Indonesia as being legal. Imports from Indonesia may be monitored by customs.
2. The customs authority is also responsible for inspecting types of wood that fall within the Washington Convention on International Trade in Endangered Species (CITES<sup>26</sup>). However, since according to the German Federal Agency for Nature Conservation (BfN) there has never been an application for the import of charcoal made of felled protected trees listed in CITES, this case appears to play a subordinate role in practice.
3. The European Timber Regulation (EUTR): This regulation, which has been in force since 2013, aims to keep illegal timber out of the European market. This could in theory be a lever in order to make charcoal subject to comprehensive checks and at least to secure legality. Unfortunately, charcoal (like many other timber and paper products) is not included in the list in the appendix of the EUTR, so that no EUTR authority can monitor charcoal for legality on the basis of this regulation.

The Federal Republic of Germany (according to the legal information provided by the German parliament) regards the import of charcoal from Nigeria and Paraguay as being „per se legal“.<sup>27</sup>

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In this country, the issue of the legal origins of charcoal is therefore largely left (and on a voluntary basis!) to the importers - regardless of how illegal the destruction of the forest and the production of charcoal has been in the country of origin. And this applies even though there are major concerns in Nigeria and Paraguay with regard to legality.

- a) When contacted by WWF Germany, the Nigerian environment ministry classified charcoal production in Nigeria as being illegal.

And

- b) in 2017, the president of Paraguay issued a decree, which conflicts with the forestry legislation, and which permits 100% conversion (see Chapter 2).

Knowing that a large proportion of the charcoal consumed in Germany originates from these countries, where there are problems of legality and illegal logging, in the view of the WWF, the current situation is indefensible!

Unsuspecting customers in Germany are as if they were buying illegal forest destruction in 3 kg bags for EUR 1.99, and are more or less being let down by the German government and the authorities.



## 4 The barbecue charcoal market analysis 2018

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For the market analysis, the WWF purchased products from the following companies:

1. Aldi
2. Basic
3. Bauhaus
4. Edeka
5. Getränke Hoffmann
6. Globus
7. Hellweg
8. Kaufland
9. Lidl
10. Netto
11. Penny
12. Real
13. Rewe
14. Esso

The following charcoal producers or traders were specified on the packaging or were named as suppliers by the retailers:

1. Boomex GmbH (Bauhaus AG; Globus)
2. Dancoal (Edeka, Lidl)
3. DHG (Rewe)
4. Grill-Country/Profagus (Penny)
5. Gryfskant (Edeka, Netto)
6. Holzkohlenwerk Lüneburg/IB Holzkohlengesellschaft (Edeka, Rewe, Esso)
7. Mecklenburger Holzkohlewerk/Alschu-Chemie; (Globus; Getränke Hoffmann)
8. Pol-Gartenholz GmbH & Co KG (Aldi)
9. Profagus (Penny, real, Rewe)
10. real,- Handels GmbH (Real)
11. Rothmann (Hellweg)
12. RV Rheinbraun (Real)
13. Schönbacher (Hellweg, Netto)
14. TOPO Accente (Hellweg)
15. Weber (Real)

**According to which criteria were the companies selected?**

The selection of products was based on the WWF market research on barbecue charcoal 2017<sup>28</sup>. In most cases, the products come from typical locations where barbecue charcoal is offered and purchased in Germany: discount stores, full-service grocery stores, DIY stores, petrol stations and drinks retailers.



## The results of the barbecue charcoal market research 2018 in detail

Purchased at	Product	Certificates	Manufacturer	Stated wood types	Comments, promises made on the packaging	Test result
Aldi	GRILLTIME! Barbecue charcoal briquettes, 3kg, 998		Pol-Gartenholz GmbH & Co KG, Am Siedlerplatz 1, 33014 Bad Driburg			Ash, birch, white oak, pine, wood from tropical and sub-tropical regions
Aldi	Grill-Time; Barbecue charcoal					Wood from tropical and sub-tropical regions.
Amazon	Barbecue charcoal, beech, 9 kg		Eurohandel GmbH, Wandweg 1, 44149 Dortmund — from: TOV Krok Wood, Robitnicha 2, 89300 Svaljava, Ukraine	Beech		Beech
Amazon	Solva GRILL, Barbecue charcoal, beech, 10 kg		Eurohandel GmbH, Wandweg 1, 44149 Dortmund — from: TOV Krok Wood, Robitnicha 2, 89300 Svaljava, Ukraine	Beechwood	Natural product	Beech
Bauhaus AG	Flash Barbecue Season – 3 kg barbecue charcoal, barbecue lumpwood charcoal	DIN EN 1860-2	BOOMEX GmbH; Ostufestr. 4, 45356 Essen; www.boomex-germany.de		“No tropical wood”	White oak, ash, birch, wood from tropical and sub-tropical regions

Product image	WWF brief analysis	Statement / responses of companies when questioned by the WWF and NDR (some abbreviated)
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The non-FSC-certified product consists partially of tropical and sub-tropical wood types; high risk of illegality and/or over-exploitation.

In relation to the Earthsight study on charcoal from Paraguay, Aldi-Nord replied in 2017 that it is taking the Earthsight research very seriously. It last purchased products from there via Boomex at the start of 2016.<sup>29,30</sup>

“... we obligate all suppliers ... to use ... only wood ... that does not come from protected forests (e.g. nature conservation areas, national parks, nature reserves or primary forests) ... in the interim, all products are FSC-certified.”



When contacted by the WWF, Aldi-Nord reported that until March 2018, non-FSC-certified products from Paraguay had been purchased via the Holzkohlewerk Lüneburg.



The product is non-FSC-certified and comes from Ukraine. A high risk of illegality and/or over-exploitation of the last remaining virgin forests of Europe.

“... All Amazon sellers must observe our sales conditions, including the relevant laws and regulations ...”



The product is non-FSC-certified and comes from Ukraine. A high risk of illegality and/or over-exploitation of the last remaining virgin forests of Europe.

“... All Amazon sellers must observe our sales conditions, including the relevant laws and regulations ...”

Product from 2016/2017



The non-FSC-certified product consists partially of tropical and sub-tropical wood types; high risk of illegality and/or over-exploitation.

The Hamburg District Court ruled that competition regulations had been breached due to the false statement made on the packaging (“no tropical wood”) following a submission made by the “Verband sozialer Wettbewerb e.V.”.

According to the manufacturer, production of the non-FSC-certified goods was terminated on 07/2017 in this form.

“... Flash Barbecue Season barbecue charcoal is made of European wood types such as white oak, ash, birch, hornbeam and wood types from the fabaceae and sapotaceae families [note by the WWF = wood from tropical and sub-tropical regions].”

The product was certified by the FSC in 2018 ...”

## The results of the barbecue charcoal market research 2018 in detail

Purchased at	Product	Certificates	Manufacturer	Stated wood types	Comments, promises made on the packaging	Test result
<b>Bauhaus AG</b>	Kingstone, 2.5 kg premium barbecue charcoal / FSC-C095154 GFA	FSC/ DIN EN 1860-2	BAHAG AG MANNHEIM/ BOOMEX GmbH; Ostuferstr. 4, 45356 Essen; www.boomex-germany.de	From European forests		White oak, ash, birch, hornbeam, softwood (PINACEAE)
<b>EDEKA</b>	Edeka barbecue charcoal, 2.5 kg / FSC-C011554 SGS	FSC/ WWF/ DIN-plus	Produced by GRYFSKAND Sp. z.o.o.; Poland for EDEKA	The wood comes from Europe		Beech, ash, birch, alder, oak/chestnut
<b>EDEKA</b>	Edeka zuhause – barbecue charcoal, 2.5 kg, mein Erlebnis / FSC-C011554 SGS	FSC/ WWF/ DIN-plus	Produced by GRYFSKAND Sp. z.o.o.; Poland for EDEKA			Beech, birch, white oak
<b>Globus Fachmärkte GmbH</b>	Flash Barbecue Season – 2 kg barbecue charcoal / FSC-C095154 GFA	FSC/ DIN EN 1860-2	BOOMEX GmbH; Ostuferstr. 4, 45356 Essen; www.boomex-germany.de	From European forests When contacted, Boomex claims 85% beech.		White oak, birch
<b>Globus Fachmärkte GmbH Globus</b>	favorit QUALITY BARBECUE CHARCOAL, 10 kg		Mecklenburger Holzkohlewerk 19386 Lübz/Headquarters+plant I ALSCHU GmbH, Industriestr. 6–8, 67368 Westheim		Conforme Qualite Européenne	Wood from tropical and sub-tropical regions
<b>Globus Fachmärkte GmbH Globus</b>	favorit BRIQUETTES DE CHARBON DE BOIS, 5 kg		Mecklenburger Holzkohlewerk 19386 Lübz/Headquarters+plant I ALSCHU GmbH, Industriestr. 6–8, 67368 Westheim		Conforme Qualite Européenne	White oak, Woods that are largely common in tropical and sub-tropical regions.



Product image	WWF brief analysis	Statement / responses of companies when questioned by the WWF and NDR (some abbreviated)
	<p>The woods identified in the laboratory can be found in Europe. In the view of the WWF, the list of wood types provided in the FSC database by the supplier, Boomex/GFA, does not conform to the FSC requirement that this list be kept up to date. In the view of the WWF, this list is not to be trusted, and places companies and certifiers in a dubious light</p>	<p>“The product was certified by the FSC in 2018 ...”</p>
	<p>The woods identified in the laboratory can be found in Europe.</p>	<p>“EDEKA promotes wood, paper and tissue products made of certified sustainable materials such as recycled materials or FSC. This is also a fundamental principle at EDEKA with regard to charcoal and briquette products; they are entirely FSC-certified.”</p>
		<p>“EDEKA promotes wood, paper and tissue products made of certified sustainable materials such as recycled materials or FSC. This is also a fundamental principle at EDEKA with regard to charcoal and briquette products; they are entirely FSC-certified.”</p>
	<p>The woods identified in the laboratory can be found in Europe. Beech was not identified.  In the view of the WWF, the list of wood types provided in the FSC database by the supplier, Boomex/GFA, does not conform to the FSC requirement that this list be kept up to date. In the view of the WWF, this list is not to be trusted, and places companies and certifiers in a dubious light</p>	<p>“... At Globus specialist retailers, environmental protection is a priority of our daily activity, and with this in mind, so is conformity with the law and maintenance of sustainability ...”</p>
	<p>Non-FSC-certified wood from tropical or sub-tropical regions. High risk of illegality and/or over-exploitation.</p>	<p>“... At Globus specialist retailers, environmental protection is a priority of our daily activity, and with this in mind, so is conformity with the law and maintenance of sustainability ...”</p>
	<p>The wood types named by the producer on request (oak, pine, eucalyptus) do not in some cases match the (tropical) woods identified in the laboratory. Eucalyptus is a member of the myrtaceae family. However, the laboratory identified (sub-) tropical types from the fabaceae family. As a result, it is questionable whether the woods came from Spain, as claimed.  Very high risk of illegality and/or over-exploitation.</p>	<p>“... At Globus specialist retailers, environmental protection is a priority of our daily activity, and with this in mind, so is conformity with the law and maintenance of sustainability ...”</p>

## The results of the barbecue charcoal market research 2018 in detail

Purchased at	Product	Certificates	Manufacturer	Stated wood types	Comments, promises made on the packaging	Test result
Hellweg	MAX; 3 kg; Premium wood charcoal; Kohlen Union B. Schönbacher GmbH		Kohlen-Union B. Schönbacher GmbH; Saarbrücken			The identified woods are largely to be found in tropical and subtropical regions. Unknown types were also identified.
Hellweg	Rothmann Grill charcoal briquettes, 7 kg		Produced for Hellweg, die Profibaumärkte GmbH & Co. KG			Birch, ash, white oak
Hellweg	Rothmann barbecue Charcoal, 5 kg		Produced for Hellweg, die Profibaumärkte GmbH & Co. KG			Birch, ash, white oak, maple, hornbeam
Kaufland	aufland Classic; Countryside – barbecue charcoal; Charcoal; 3 kg FSC-C021221		Produced for Kaufland; country of origin: Ukraine			Beech, ash, white oak, hornbeam
REWE	Flammenco Quality barbecue charcoal briquettes		DHG Vertriebs- und Consulting-ges. mbH; Kempen		“Ecological production” and “from nature, for nature	Birch, ash, maple, poplar, softwoods
Lidl	GRILL MEISTER; GRILL charcoal briquettes, 3 kg, 11817 / FSC-107188 SGSCH	FSC 100%	Dancoal Sp. z o.o., 72–100 Goleniów, ul. Prost 35, Lozienica, Poland		FSC: from controlled forests	Birch, beech, white oak. The identified woods are largely to be found in tropical and sub-tropical regions. These also include unknown wood types.
Lidl	GRILL MEISTER; GRILL charcoal briquettes, 3 kg, 11817 / PEFC-32-31-069 Packaging FSC-117334 SGSCH	PEFC/ FSC	Dancoal Sp. z o.o., 72–100 Goleniów, ul. Prost 35, Lozienica, Poland		PEFC: wood comes from sustainably managed forests and monitored sources; Dancoal Sp. z o. o.; SGS	Ash, birch, alder, white beech, other woods that are largely to be found in tropical and sub-tropical regions. These also include unknown wood types.

Product image	WWF brief analysis	Statement / responses of companies when questioned by the WWF and NDR (some abbreviated)
	<p>Non-FSC-certified wood from tropical for sub-tropical regions. High risk of illegality and/or over-exploitation.</p>	<p>Online:  “ ... protecting nature and the environment and retaining it for future generations – that’s sustainability. This is the standard we set ourselves. For this reason, we offer our customers a broad range of environmentally friendly products ...”</p>
		<p>Online:  “ ... protecting nature and the environment and retaining it for future generations – that’s sustainability. This is the standard we set ourselves. For this reason, we offer our customers a broad range of environmentally friendly products ...”</p>
		<p>Online:  “ ... protecting nature and the environment and retaining it for future generations – that’s sustainability. This is the standard we set ourselves. For this reason, we offer our customers a broad range of environmentally friendly products ...”</p>
		<p>Online:  “ ... An important aspect of our company policy is taking responsibility for our environment. In the light of climate change, the scarcity of natural resources and the loss of species, this is more important than ever before ...”</p>
		<p>“ ... The REWE Group promotes the protection of forests and the animal and plant species that live in them. It supports environmental-friendly, socially beneficial forest management by increasingly purchasing the wood and paper used for its products and packaging from sustainably managed sources...”</p>
	<p>In the view of the WWF, the list of wood types provided in the FSC database by the producer, Dancoal, does not conform to the FSC requirement that this list be kept up to date. In the view of the WWF, this list is not to be trusted, and places the supplier (Dancoal) and the certifying agency (SGS) in a dubious light.</p> <p>See also chapters 7 and 8.</p>	<p>Online:  “ ... only if we act responsibly when it comes to the environment can we obtain natural resources and protect the environment ...”</p>
	<p>Tropical and sub-tropical species – including unknown species – represent a high risk of illegal logging and/or over-exploitation. The wood types declared by PEFC do not match those identified in the laboratory.</p> <p>See also Chapter 8.</p>	<p>Online:  “ ... only if we act responsibly when it comes to the environment can we obtain natural resources and protect the environment ...”</p>



## The results of the barbecue charcoal market research 2018 in detail

Purchased at	Product	Certificates	Manufacturer	Stated wood types	Comments, promises made on the packaging	Test result
Netto	Best of BBQ; Barbecue charcoal, 2.5 kg, PLU 283, / FSC-C023343; SGSCH	FSC/ WWF/ DIN EN 1860-2	Imported by Cavelli GmbH Worms from Kohlen-Union B. Schönbacher GmbH Saarbrücken			The identified woods are largely to be found in tropical and sub-tropical regions. Unknown types were also identified.
Netto	Best of BBQ; Charcoal briquettes, PLU 7227, 3 kg / FSC-C011554 SGSCH	FSC/ WWF	Produced by Cavelli GmbH Worms by GRYFSKAND Sp zoo; Poland			Beech, ash, birch, white oak
Penny	Grill Country Barbeque Charcoal Briquettes, 3 kg		Grill-Country Vertriebsgesellschaft mbH (Profagus)			The identified woods are largely to be found in tropical and sub-tropical regions. Unknown types were also identified.
Penny	Grill Country; Barbecue charcoal, 3 kg		Grill-Country Vertriebsgesellschaft mbH (Profagus)			The identified woods are largely to be found in tropical and sub-tropical regions. Unknown types were also identified.
real,-	Weber WOOD CHARCOAL, 3 kg; discover the perfect barbecue experience / FSC-107240	FSC/ TÜV SAAR/ DIN EN 1860-2	Weber	Guaranteed hornbeam, beech, oak and birch	100% natural, from European FSC-certified wood, produced in the EU	Birch, white oak, hornbeam, ash
real,-	Weber BRIQUETTES, 3 kg; discover the perfect barbecue experience/ A2270 / FSC-107240 SGSCH	FSC/ TÜV SAAR/ DIN EN 1860-2	Weber	Guarantee: ... 100% natural recycled raw materials ...	FSC MIX, from responsible sources, guaranteed 100% natural, recycled raw materials and free of all impurities	eech, birch, white oak, hornbeam

Product image	WWF brief analysis	Statement / responses of companies when questioned by the WWF and NDR (some abbreviated)
	<p>When contacted by the WWF, Schönbucher reported that the company imports from Poland, Namibia, Ghana and Ukraine, and also that the Polish FSC goods come from Ghana and elsewhere.</p> <p>The veracity of this statement is doubted by the WWF, since in 2017, there was no imports from Ghana to Poland.</p> <p>Initially, no wood types for the charcoal product group were listed in the FSC database. During the period of the ARD/WWF research, an almost identical list of wood types to that of Dancoal was entered into the FSC database by SGS for Schönbucher. This does not meet the FSC requirement that this list of wood types should be kept up to date. In the view of the WWF, the very long list of wood types is not to be trusted, and places suppliers and certifiers in a dubious light.</p>	<p>“Netto Marken-Discount promotes wood, paper and tissue products made of certified sustainable materials such as recycled materials or FSC.</p> <p>This is also a fundamental principle at Netto with regard to charcoal and briquette products; they are entirely FSC-certified.”</p>
		<p>“Netto Marken-Discount promotes wood, paper and tissue products made of certified sustainable materials such as recycled materials or FSC.</p> <p>This is also a fundamental principle at Netto with regard to charcoal and briquette products; they are entirely FSC-certified.”</p>
	<p>Non-FSC-certified wood from tropical or sub-tropical regions. High risk of illegality and/or over-exploitation.</p>	<p>“ ... The REWE Group is working continuously to make its supply chain more socially and ecologically sustainable. Here, the REWE Group uses internationally recognised certification standards and formulates its own standards as part of its guidelines ...”</p> <p>“ ... both PENNY products are ... now FSC-certified (old stock without certification is still being sold off ) ...”</p>
	<p>Non-FSC-certified wood from tropical or sub-tropical regions. High risk of illegality and/or over-exploitation.</p>	<p>“ ... The REWE Group is working continuously to make its supply chain more socially and ecologically sustainable. Here, the REWE Group uses internationally recognised certification standards and formulates its own standards as part of its guidelines ...”</p> <p>“ ... both PENNY products are ... now FSC-certified (old stock without certification is still being sold off ) ...”</p>
	<p>The woods identified in the laboratory do not entirely match the wood types guaranteed by Weber.</p>	
		

## The results of the barbecue charcoal market research 2018 in detail






Purchased at	Product	Certificates	Manufacturer	Stated wood types	Comments, promises made on the packaging	Test result
real,-	Grill profi; Barbecue charcoal, 3kg	DIN	RV Rheinbraun Brennstoff GmbH, Stüttgenweg 2, 50935 Köln			The identified woods are largely to be found in tropical and sub-tropical regions. Unknown types were also identified.
real,-	ProFagus GRILLiS; Premium beech Barbecue charcoal briquettes 3 kg / PEFC/04-31-2030	PEFC/ DIN- plus/ TÜV Berlin	proFagus GmbH, Uslarer Straße 30, 37194 Bodenfelde	Beech	Our promise: produced in an environmentally sustainable way  ECOTEST very good, since 1896 Production in Bodenfelde	Beech
real,-	real,-QUALITY; Beech barbecue charcoal briquettes, 2.5 kg / FSC-011554 SGSCH	FSC 100%, DIN- plus	Produced for real,- Handels GmbH, Schlüterstr. 5, 40235 Düsseldorf	100% beech- wood, premium quality, made in Europe		Beech, birch, white oak, hornbeam (all listed with the FSC, but deviation from promise made on the packaging)
REWE	Barbecue charcoal, 2.5 kg		Holzkohlewerk Lüneburg, Plan 6, 20095 Hamburg			The identified woods are largely to be found in tropical and sub-tropical regions. Unknown types were also identified.
Esso; Tank- stelle	ECHTE GRILL KETTS, 3 kg		Holzkohlewerk Lüneburg, Plan 6, 20095 Hamburg			The identified woods are largely to be found in tropical and sub-tropical regions. Unknown types were also identified.
REWE	Profagus; Sommerhit beech barbecue charcoal; PEFC/04-31-2030		Profagus GmbH, Uslarer Straße 30, 37194 Bodenfelde	Beech		Beech
EDEKA	Der Grillgenuss – Beech barbecue charcoal; 2.5 kg; FSC C011554 (Gryfskand) SGSCH	FSC; WWF		100 % Beechwood	100% beech- wood – produced from European deciduous trees – FSC-certified	Beech (50%) White oak (36%) Beech (14%)

Product image	WWF brief analysis	Statement / responses of companies when questioned by the WWF and NDR (some abbreviated)
	<p>Non-FSC-certified wood from tropical or sub-tropical regions High risk of illegality and/or over-exploitation</p>	<p>Online:  “... real is facing up to its responsibility for the present and the future, and is constantly expanding its commitment to maintaining socially and environmentally sustainable standards ...”</p> <p>... With a comprehensive range of products that are produced in an environmentally friendly and socially viable way, real offers customers the opportunity of making sustainable purchases ... “</p>
		<p>Online:  “... real is facing up to its responsibility for the present and the future, and is constantly expanding its commitment to maintaining socially and environmentally sustainable standards ...”</p> <p>... With a comprehensive range of products that are produced in an environmentally friendly and socially viable way, real offers customers the opportunity of making sustainable purchases ... “</p>
	<p>Deviation from the “100% beechwood” promise made on the packaging</p>	<p>Online:  “... real is facing up to its responsibility for the present and the future, and is constantly expanding its commitment to maintaining socially and environmentally sustainable standards ...”</p> <p>... With a comprehensive range of products that are produced in an environmentally friendly and socially viable way, real offers customers the opportunity of making sustainable purchases ... “</p>
	<p>Non-FSC-certified wood from tropical or sub-tropical regions High risk of illegality and/or over-exploitation</p>	<p>“ ... The REWE Group promotes the protection of forests and the animal and plant species that live in them. It supports environmentally-friendly, socially beneficial forest management by increasingly purchasing the wood and paper used for its products and packaging from sustainably managed sources...”</p>
	<p>Non-FSC-certified wood from tropical or sub-tropical regions High risk of illegality and/or over-exploitation</p>	<p>“ ... In our contracts, we always demand that all laws are observed on site and in some cases go beyond our legal obligations with our own standards ...”</p> <p>Holzkohlewerk Lüneburg:  “ ... In Paraguay, we have been working for years to encourage our supplier to have their own forests certified according to the FSC standard ...”</p>
		<p>“ ... The REWE Group promotes the protection of forests and the animal and plant species that live in them. It supports environmentally-friendly, socially beneficial forest management by increasingly purchasing the wood and paper used for its products and packaging from sustainably managed sources...”</p>
	<p>Deviation from the “100% beechwood” promise made on the packaging</p>	<p>“EDEKA promotes wood, paper and tissue products made of certified sustainable materials such as recycled materials or FSC. This is also a fundamental principle at EDEKA with regard to charcoal and briquette products; they are entirely FSC-certified.”</p> <p>The product was reviewed last year and the statement was changed. The old stock was sold off at the end of 04/2018.</p> <p>Our own subsequent test showed a positive result for the new product for 2018 → 100 % beech.</p>



## The results of the barbecue charcoal market research 2018 in detail

Purchased at	Product	Certificates	Manufacturer	Stated wood types	Comments, promises made on the packaging	Test result
<b>EDEKA</b>	Edeka zuhause; Barbecue briquettes; 2.5 kg; FSC C107188 (Dancoal) SGSCH	FSC; WWF	imported for Edeka; certification no.: Dancoal Sp. z o.o., 72–100 Goleniów, ul. Prost 35, Lozienica, Poland; Packaging: Fagro Poland			Beech, ash, white oak, birch, hornbeam
<b>EDEKA</b>	Edeka zuhause; Barbecue briquettes; 2.5 kg; FSC C111364 (IB Holzkohlever- triebsgesellschaft mbH) BV	FSC; WWF	imported for Edeka; certification no.: Holzkohlewerk Lüne- burg; IB Holzkohle- vertriebsgesellschaft mbH, Plan 6, 20095 Hamburg — Packaging: Fagro Poland			Beech, ash, white oak, birch
<b>Getränke Hoff- mann</b>	Hubert's quality barbecue charcoal, 2.5kg		Alschu-Chemie GmbH Holzkohle; Grill- und Be- feuerungsprodukte; Industriestrasße 6–8; 67368 Westheim		Screened and packaged in Germany	The identified woods are largely to be found in tropi- cal and sub-tropical regions. Unknown wood types were also identified.
<b>Hellweg</b>	Barbecue charcoal from deciduous trees, 10kg; Art. no. 339111		Retailer: TOPO Accente GmbH & Co. Kg, Frankenstraße 12, 20097 Hamburg		Produced in conformity with DIN EN 1860-2; Produced from deciduous trees such as oak, horn- beam, beech and ash from controlled cultivation. As a result, we guarantee easy burning and long barbecuing at even, high temperatures.	Maple, beech, ash, white oak, hornbeam
<b>basic Märkte; Köln</b>	Saarland charcoal, "Naturland"				Regional – from the Saarbrücken urban forest; Processed in Gyé-sur-Seine	Beech, birch, maple, poplar, oak

Product image	WWF brief analysis	Statement / responses of companies when questioned by the WWF and NDR (some abbreviated)
	<p>In the view of the WWF, the list of wood types provided in the FSC database by the producer, Dancoal, does not conform to the FSC requirement that this list be kept up to date. In the view of the WWF, this list is not to be trusted, and places the supplier (Dancoal) and the certifying agency (SGS) in a dubious light.</p>	<p>“EDEKA promotes wood, paper and tissue products made of certified sustainable materials such as recycled materials or FSC. This is also a fundamental principle at EDEKA with regard to charcoal and briquette products; they are entirely FSC-certified.”</p>
		<p>“EDEKA promotes wood, paper and tissue products made of certified sustainable materials such as recycled materials or FSC. This is also a fundamental principle at EDEKA with regard to charcoal and briquette products; they are entirely FSC-certified.”</p>
	<p>Non-FSC-certified wood from tropical or sub-tropical regions. High risk of illegality and/or over-exploitation.</p>	<p>Online: “ ... Sustainability is written large ...”</p>
	<p>The connection between controlled cultivation and long barbecuing times suggested on the packaging is not clear.</p>	<p>Online: “ ... protecting nature and the environment and retaining it for future generations - that's sustainability. This is the standard we set ourselves. For this reason, we offer our customers a broad range of environmentally friendly products ...”</p>
	<p>The wood types named by the producer when contacted (beech, hornbeam, oak, red oak, maple and ash) do not entirely match the woods identified in the laboratory. Due to the origin of the wood, however, there is only a low risk in the view of the WWF.</p>	<p>“According to the information provided by the producer, the [Nero charcoal] consists of regional hard woods (beech, hornbeam, oak, red oak, maple and ash). The wood comes from the Saarbrücken urban forest, which is Naturland-certified.”</p>





## 5 Assessment summary

	Number	In
Number of products tested	36	100
Number of products without declaration of wood type or wood source country	28	77
Number of products with a precise declaration of the wood types used or wood source country	8 (6 x wood type; 2 x source country)	22
Number of products for which the declaration regarding wood types used was not correct, or only partially correct	4 (4 of 6)	57
Products without declaration of wood type or with incorrect or incomplete declarations	32	89
Assessed by the WWF as being a strongly increased risk of over-exploitation or illegal wood	22	61
Tropical wood in tested products	15	42
Non-certified products	19	53
Certified products	17	47
FSC-certified products	13	36
Deviation from the FSC database, or questionable entry in the FSC database	6 (re. 13 FSC products)	46
PEFC-certified products	3	8
Deviation from the PEFC database	Declared wood types not public; in one case information provided at the request of the WWF	False information was provided in this case
Naturland-certified products	1	3





## 6 Lack of transparency

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**In general, the assessment of the previous year remains valid, that the entire industry is unwilling to divulge the related background information and content of its products.**

### Wood types

On just six of the 36 products (17%) was precise information provided about the types of wood used (usually “beech”). However, with four of these six products, the laboratory result did not entirely match the declared wood types.

The most obvious deviation – as was the case last year – was with Bauhaus AG. The “Flash – barbecue charcoal” product sold there (produced in 16/17) which was labelled as containing “no tropical wood” did in fact contain tropical wood – again. The Hamburg District Court then again ruled that there had been a breach of competition rules.

### Origin of wood

The origin was declared for just two products. Once on the package of the Naturland-Nero barbecue charcoal (Saarland) and once with Kaufland (“Origin: Ukraine”). Otherwise, there is clearly embarrassment over the fact that (tropical) charcoal is being imported from all over the world. The very vague information, “From European deciduous trees” could be found for just five products. This is vague because it suggests that the product originates from the EU. However, since Ukraine is the main supplier for both Germany and Poland, this information remains too imprecise to offer any real orientation to customers.

No producer or dealer in tropical charcoal appears to feel so comfortable with their own product that they are willing to divulge this information to their customers. There is no trace of “Country of origin: Nigeria” or “Country of origin: Paraguay” on packaging.

When it comes to transparency, the entire industry clearly needs considerable support. The WWF is of the view that information must be provided with regard to wood types and the origin of wood, so that consumers can assess the risk of forest destruction in the countries involved and make a decision as to whether or not to purchase the product.





## 7 The Polish supplier Dancoal

This wholesale trader based in Poland supplies several German trading companies either directly or indirectly. The company trades in non-certified charcoal, as well as in FSC- and PEFC-certified goods. Since Dancoal immediately provoked a whole series of questions among the press and the WWF, the focus here will be on this company and its FSC- and PEFC-certified products as an example.

Since Dancoal does not produce charcoal itself, but simply trades in it, it is worth taking a look at the origin of the product. As well as the goods purchased in Poland, Dancoal, according to its own information, imports from the following countries (without weighting):

List of countries from which Dancoal imports charcoal, according to its own information. According to Dancoal, the order of sequence does not reflect importance in relation to quantities.

- Ukraine
- Latvia
- Estonia
- Namibia
- Ghana
- Paraguay
- Greece
- Indonesia
- Nigeria – according to the company’s own information, however, only “when heavy charcoal is needed” – although it remains unclear what this means. Dancoal:  
“... We are trading charcoal from tropical and subtropical countries if this is requested ...”

Since Dancoal was not willing to provide the WWF with an ordered list of the most important countries, particular importance is ascribed to the Polish import statistics:

Countries from which Poland imported charcoal in 2017 (Source: Eurostat)	■ Ukraine	77.676 t
	■ Nigeria	41.559 t
	■ Germany	9.097 t
	■ Russia	8.749 t
	■ Norway	4.849 t
	■ Namibia	2.781 t
	■ Spain	1.369 t
	■ Belarus	1.335 t
	■ Paraguay	1.309 t
	■ Slovakia	632 t
	■ ...	
	■ Latvia	170 t
	■ Estonia	26 t
	■ Indonesia	17 t
■ Ghana	0 t	
■ Greece	0 t	



When the information provided by Dancoal on its own wood imports is compared with the Eurostat import statistics for Poland, questions arise, since Indonesia, Estonia and Latvia only supplied very small quantities of charcoal to Poland in 2017; in that year, no charcoal at all was imported from Ghana and Greece.

When it contacted Dancoal, the WWF discovered that imports from Namibia did not begin until May 2018 - in other words, after ARD and the WWF started asking questions about the origin of FSC charcoal. Goods from Namibia could not therefore be included in the tested products for reasons of time.

Information presented to ARD leads one to assume that the import ranking list produced by Dancoal looks entirely different. According to these figures, Dancoal is by far the biggest Polish importer of Nigerian charcoal, at 35,000 t per year.

When the information provided by Dancoal itself on the source countries is combined with the Polish import statistics, the following possible order of importance arises for Dancoal imports at the point in time of the ARD/WWF research, aside from Poland as a source country:

- Ukraine
- Nigeria
- Paraguay
- Estonia
- Latvia
- Indonesia (max. 17t)

When again contacted by the WWF, Dancoal repeatedly provided new information, which in part contradicted itself – particularly in relation to certified products (see also Chapter 8).

Just a few minutes before going to print, Dancoal suddenly determined that both the PEFC- and FSC goods originated from Spain. Dancoal claimed it had forgotten to report this to the WWF. The company said it was surprised to learn, however, that the laboratory had found tropical and sub-tropical wood types in the Lidl product.

A note by the WWF: Dancoal initially reported to the WWF that it imported FSC goods from Ghana, Greece and Indonesia, although there were no imports, or none of any relevance, from these countries. The claim that the FSC goods came from Namibia also turned out to be false. Just before going to print, Dancoal was still convinced that its PEFC-certified products originated not from Spain, but from Paraguay and Poland. After the WWF expressed its surprise over the sudden FSC origin in Spain, Dancoal then also determined that it had only just realised that the PEFC-certified products came from Spain and Poland. Since there is no PEFC-certified forest in Paraguay and the wood types named by the PEFC in the PEFC-certified products were incorrect according to the laboratory findings, the WWF – after so many contradictory statements – upholds its suspicion that the tropical and sub-tropical charcoal found in FSC- and PEFC-certified Dancoal/Lidl products could come from Nigeria.

## 8 Certification

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As part of the WWF market analysis of barbecue charcoal in Germany, 17 certified products in total were investigated:

- 13 with FSC certificate
- 3 with PEFC certificate
- 1 with Naturland certificate

As in the previous year, there were also deviations and cases of lack of clarity this year with regard to the certified products.

### FSC

First, the positive news: Of the 13 products tested, seven showed no cause for concern. However, six of the 13 products led to doubts raised and questions asked. Two products produced by Dancoal and Schönbucher contained tropical wood.

- The Polish producer Dancoal has entered a very long list in the FSC database of various critically endangered wood types from all over the world. These include: many tropical woods from all tropical wood regions in the world; precious woods (such as teak, wenge), species entered onto the “red list”, classified as “endangered” or “critically endangered”, CITES species (Washington Convention on International Trade in Endangered Species, e.g. real mahogany, afrormosia, rosewood).
- If CITES-listed woods had actually been contained in the charcoal, the importer would have had to submit a separate application with the German Federal Agency for Nature Conservation (BfN) before being permitted to transport the goods into Germany at all (see also the section “Aren’t products that are offered for sale in Germany always legal and are subject to monitoring?”)
- In the view of the experts, this list is so complex that it can no longer be used, i.e. monitored, by a certifying body. This is exacerbated by the fact that in the view of the WWF, the list does not fulfil the FSC requirements, according to which the wood types entered must be kept up to date, i.e. coordinated with the wood types already used or those planned for use in the foreseeable future. A year ago, just six European wood types had been listed by Dancoal in the FSC database.
- An FSC-certified dealer of the other FSC tropical wood product (Schönbucher) had initially **noted no wood types in the FSC database**, and had thus clearly not kept the list up to date. Later, when it became known that its products were being investigated by ARD and the WWF, Schönbucher copied the long list of dubious wood types entered by Dancoal (certifying body responsible: SGS).

- For one FSC product containing European wood types this same long list of wood types from all over the world was also entered into the FSC database by the company (Boomex) and the certifying body (GFA). A year ago, just six European wood types had been listed by Boomex in the FSC database.
- The particularly dubious aspect of this extremely long list of wood types is that the lists of wood types entered for each product group in the FSC database are maintained not by the company itself, but by the responsible FSC certification company. This means that the certification companies should by all means be aware of the fact that they cannot in practice monitor these complex lists of wood types in any meaningful way (in connection with this market analysis, these were 1 x GFA and 2 x the SGS company as certifying bodies). This procedure rekindles a suspicion long held by the environmental protection organisation, that FSC certification bodies may be subject to a **conflict of interest**, since certifiers are financially dependent on the companies.
- For three charcoal products, **more wood types than those declared**
- were identified. According to the FSC regulations and standard practice with charcoal and charcoal briquettes, the description of the product group has to correlate with the wood types of the FSC product.

**Dancoal:** The FSC-certified goods supplied by Dancoal throw up a large number of questions. One of the products that was a particular focus of investigation is called “Grill-Meister”. It is sold by Lidl and supplied by Dancoal.

- To date, no conclusive declaration has been obtained by the WWF regarding the **origin** of the FSC-certified charcoal at Dancoal that could be harmonised with the analysis result from the laboratory. The import countries listed by Dancoal, which supply the FSC-certified charcoal and which might match the analysis reports either do not count, because
  - a) Dancoal, according to its own information, purchases no FSC-certified charcoal from them (Paraguay), or
  - b) they contain no FSC-certified forests (Nigeria), or
  - c) Dancoal has only imported goods from there since May 2018 (Namibia), or
  - d) the quantities that are exported from these countries to Poland are themselves so low for Poland as an entire country that the FSC-certified exports by Dancoal to Germany are very difficult to explain (see Chapter 7).

This is compounded by the fact that the analysis results for the Lidl goods from Dancoal suggest the same content for the FSC-certified goods and PEFC-certified goods. There is no plausible explanation for this either (see PEFC).

**On the basis of the information provided by Dancoal and Eurostat presented here, the suspicion arises that the origin of the tropical and sub-tropical woods, of which evidence was found in the FSC-certified charcoal, could be Nigeria.**

- **Wood types:** In recent years, the FSC and the monitoring body, the ASI (Accreditation Services International)<sup>31</sup> have begun in practice to check charcoal and charcoal briquettes for a precise description of the wood types used for these product groups. Even after being contacted by the WWF several times, Dancoal was unable to provide this information. The explanation received by the WWF on persistent pressing of Dancoal is as follows: *“...We still see some suppliers have not updated their data even in FSC system and not sharing wood types used for production. Our company ask and updates system according to certification standards ...”*

An important step would be for the FSC to formalise the practice now implemented by the ASI (precise listing of wood types and documentation of the origin of the wood used in charcoal and charcoal briquettes), and for some companies to operate in a transparent manner, without first being forced to do so as a result of external research.

- **Legality:** Since Dancoal (and also Boomex and Schönbucher) was able to adopt a list covering 150 species, with critically endangered woods, into the FSC database with the aid of its certifying bodies – and Dancoal was forced when questioned to admit that some suppliers provided no information about which types of wood were contained in their products, the impression is created that a) the list of wood types is random. Furthermore, it can be assumed that b) the certifying bodies do not keep the list of wood types up to date, contrary to FSC practice, and can only work in a fragmented way with such poorly managed data. Also, it appears that c) adequate implementation of e.g. CITES regulations is not at all possible.
- When, on the basis of the FSC database, Dancoal assumes that afrormosia, mahogany and rosewood are contained in the charcoal, but is not able in the case of a specific delivery to state whether these wood types are included or not, neither Dancoal nor its German customer has the possibility of reporting this to the German Federal Agency for Nature Conservation (BfN).

Accordingly the BfN also reports that no CITE reports have been submitted in Germany in connection with charcoal. Here, it becomes clear that Dancoal (aside from the enormous concerns with regard to the legality of the goods coming from Nigeria) has not to date maintained any adequate operational practice that enables it to ensure legality, if only in relation to CITES, and even within the FSC-certified product groups.

- **Separate handling:** If a company operates with FSC-certified and non-certified product groups, it is necessary, according to the FSC regulations, to ensure that the woods originating from FSC sources are not mixed with non-certified products. If, however, only a small number of Dancoal suppliers are able to state which woods are contained in their products, and thus the certifying body or the ASI (Accreditation Services International)<sup>32</sup> no longer has the opportunity in cases of doubt to check that products are being handled separately, e.g. through laboratory analyses, how safely can products be handled separately in practice, and how reliably can this be monitored? This is particularly doubtful when – as in the case of Dancoal – a significant proportion of the charcoal imports comes from Nigeria.



- **Policy for Association:** This FSC regulation stipulates that companies may not be FSC certified if they contribute to over-exploitation of forests beyond FSC-certified product groups. Every company that obtains an FSC certificate must sign a statement confirming that it is observing the Policy for Association. Since Dancoal imports and re-sells large quantities of non-certified charcoal from Nigeria and Paraguay, which are potentially illegal and which have contributed to over-exploitation, the following questions are of interest to the WWF:
  - a) How does Dancoal evaluate its own activity, and how does the company harmonise this behaviour with the FSC Policy for Association regulation?
  - b) How is it possible that the certification body responsible for Dancoal (SGS) has clearly not noticed, despite the mandatory audits required to be conducted every year, that entire container-loads of charcoal from Nigeria might constitute a problem?
  - c) Why has the FSC not noticed this violation of its own regulations?
  
- The WWF regards this as being a highly fundamental problem, but one that involves not only Dancoal. **Comparable procedures** apply among other charcoal dealers investigated in this market analysis (e.g. Schönbacher, Boomex, Holzkohlewerk Lüneburg). There, precisely the same questions arise. Why does it take a television team and an environmental protection organisation to uncover and condemn these FSC violations? Should these questions not be asked by the FSC inspectors, who are the ones responsible on the ground, during the audit (for which they are paid by the companies) or by FSC stakeholders such as environmental protection organisations (funded by donations)? At the end of the day, is it a convenient way of externalising monitoring costs when these questions are not asked during a regular audit, but are instead left to NGOs? Is there a potential conflict of interest here?

## PEFC

In this market analysis, a total of three PEFC-certified products were investigated. One of these – the “Grill- Meister” sold by Lidl and supplied by Dancoal, contains tropical wood.

According to Dancoal, the company imports charcoal from the following countries:

List: countries from which Dancoal imports charcoal according to its own information, and comparison with the PEFC country list

- Ukraine (no PEFC-certified forest)
- Latvia
- Estonia
- Namibia (no PEFC-certified forest)
- Ghana (no PEFC-certified forest)
- Paraguay (no PEFC-certified forest)
- Greece (no PEFC-certified forest)
- Indonesia
- Nigeria – “only in special cases” (no PEFC-certified forest)

The claim by Dancoal that the PEFC-certified goods originate from Paraguay, is of necessity open to doubt, since Paraguay is not included in the PEFC country list<sup>33</sup>.

The only country in the PEFC country list that correlates with the list of Dancoal import countries, and which may be a source of tropical wood, would be Indonesia. However, in 2017, Indonesia exported just 17 t of charcoal to Poland overall. From the perspective of the WWF, there is therefore reason to severely doubt the veracity of the statements made by Dancoal and the PEFC in relation to PEFC-certified charcoal sold by Lidl.

Furthermore, however, there is an additional level of complexity. Since the PEFC-certified “Grill - Meister” product sold by Lidl is similar in appearance to the FSC-certified “Grill Meister” product produced by Dancoal, and since according to the laboratory, the sacks contain the same charcoal, as it were, the suspicion arises that the woods used in both Lidl products come from the same forest. This suspicion is not unfounded, since in the interim, there are now whole series of forests that are both FSC- and PEFC-certified.

With regard to double certification, the FSC and PEFC announced jointly in a statement published in January 2018 that there are forests in 31 countries in the world with double certifications. These include the following countries, in which tropical or sub-tropical wood types are prevalent, and which could match the analysis result:

List: countries in which there are forests with double FSC- and PEFC certification

- Australia
- Brazil
- China
- Malaysia
- Spain
- Uruguay

The only country in which double-certified FSC-/PEFC areas are to be found, and from which the woods might match the laboratory result, would be Spain. While Spain was named by the PEFC, according to its own information, Dancoal does not import any charcoal from that country – and also not from the other countries where there are FSC- and PEFC-certified forests.

Paraguay and Namibia, where FSC-certified charcoal is produced, have no PEFC certification, however. Furthermore, Dancoal has only been importing from Namibia since May 2018.

A further contradiction arises when the wood types are considered. The wood types reported by the PEFC from tropical or sub-tropical trees (according to the PEFC, from Spain) are so-called “prosopis” wood types. However, in the laboratory, there was clearly no evidence of the prosopis wood types in the Lidl product under investigation.

Therefore, significant doubts arise as to both the declared origin and the declared wood types.

These doubts are underpinned by the closing comment by Dancoal on the PEFC:

**“ ... As of PEFC wood species this is a failure PEFC system. There was no requirements on wood species used for production and many suppliers are not providing these data ... ”**

Where might the charcoal from the two FSC- and PEFC-certified Lidl products come from, which are so similar not only in terms of their packaging, but also the laboratory result?

Information presented to ARD leads one to assume that the import ranking list produced by Dancoal looks entirely different to the one reported by the company. According to this information, Dancoal is by far the largest Polish importer of Nigerian charcoal, with an estimated 35,000 t per year.

The source countries of the charcoal named by Dancoal appear questionable, since not all of them appear in the Polish import statistics. In terms of quantity, Nigeria is one of the main countries of origin for the FSC- and PEFC-certified products. However, in Nigeria, there are neither FSC- nor PEFC-certified forests, let alone a double-certified forest, but only illegal charcoal production – as the WWF knows from the environment ministry in Nigeria.

**On the basis of the information provided by Dancoal, the PEFC and Eurostat presented here, the suspicion arises that the origin of the tropical and sub-tropical woods, of which evidence was found in the PEFC-certified charcoal (Lidl; “Grill - Meister”), could be Nigeria.**



## Naturland

Naturland is a certificate used in Germany which is applied to agriculture and also forest management. Its standards are regarded as being more stringent than those of the FSC. Since Naturland focuses on regional provenance, the question of imported barbecue charcoal does not arise here. The Naturland barbecue charcoal investigated comes from Saarland and is processed into charcoal in France using a particularly effective method.

However, if with the Naturland charcoal, there were deviations between the declared wood types and those found in the laboratory. However, due to the regional sources, the risk of illegality and over-exploitation is extremely low.





A close-up photograph of a person's hand holding a small bouquet of colorful flowers (yellow, red, and orange) in a forest. The hand is positioned in the lower right foreground, with the fingers gently cupping the flowers. The background is a soft-focus forest with tall, thin trees and a hazy sky. The overall mood is serene and natural. A red rectangular overlay is present on the left side of the image, containing text.

## Ukraine

WWF Ukraine confirms that there is corruption and illegal logging there – including in FSC-certified areas. The ARD film crew witnessed illegal logging in a national park, and shortly after filming, WWF Ukraine reported illegal logging in an FSC-certified forest (see Chapter 2). As a result of its many years of work in the forest, WWF Ukraine has issued a clear statement, however, saying that in recent years, the FSC has had a positive influence on the way forests are managed in Ukraine. WWF Ukraine continues to regard the FSC as being an important tool for counter-acting corruption and over-exploitation in Ukraine.

However, a precondition is that customers really do only buy charcoal from FSC-certified areas. Furthermore, this positive development can only unfold in the area when the FSC inspectors are sufficiently stringent on site and at the companies in order to preclude the possibility of fraud and the mixing of certified and non-certified charcoal.

## 9 Positive approaches

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**After reporting in detail on the problems with charcoal available for purchase, we want to mention the positive developments in this area here, taking Namibia, Paraguay and Ukraine as examples.**

### Namibia

A project managed by the German Agency for International Cooperation (GIZ) on its charcoal project in Namibia: *“The GIZ has been working with Namibia on behalf of the German Federal Ministry for Economic Cooperation and Development (BMZ) and the Federal Ministry for the Environment, Nature Conservation and Nuclear Safety (BMUB) since the country became independent in 1990 ... Against the background of non-adapted land ownership framework conditions and a rapidly growing population, there are conflicts over unequal distribution of land and over-exploitative management systems. There is a threat of over-use and a scarcity of natural resources, particularly water. Large areas are threatened by desertification ...”*<sup>34</sup>

*“ ... In Namibia, the scrub encroachment of grazing land is causing massive economic and ecological damage. This affects between 30 and 45 million hectares – at least 30 % of the total land area. In recent decades, measures have primarily been aimed at combating the spread of shrubs and trees. While commercial farmers primarily use chemical agents with unclear long-term consequences, the government is funding small-scale, work-intensive shrub removal on state-owned farms. Despite these efforts, the annual growth rate of the shrubs far exceeds the area in which shrubs are removed ...”*<sup>35</sup>

The total amount of charcoal produced in Namibia is currently 160,000 t. Of these, between 22,000 and 25,000 t are currently FSC-certified.

A **precondition** for the positive impact of this approach to develop on the ground and increase further is that the FSC monitoring is sufficiently stringent. Only then can fraud and the mixing of certified and non-certified charcoal be prevented.

### Paraguay

Clearly, the government in Paraguay is in a great hurry to convert the forests in Paraguay into agricultural fields for growing e.g. soya as quickly as possible. In this, the president is clearly also not averse to issuing shady decrees (see Chapter 2). The FSC certification is preventing the conversion of forest for other forms of use through its standard specifications. The FSC could therefore be a useful tool in Paraguay for retaining forest and doing something to counteract the dubious programme of the government there.

However, a **precondition** is that customers really do only purchase charcoal from FSC-certified areas, since the non-certified charcoal probably comes from precisely such converted areas. A further precondition for enabling this approach to develop its positive impact in the area and grow further is that the FSC monitoring is sufficiently stringent. Only then can fraud and the mixing of certified and non-certified charcoal be prevented.

**FSC-certified charcoal from Namibia can contribute to the removal of shrubs in the most environmentally sensitive way possible and without chemicals**

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#### EXAMPLE 1

##### **Company 1:**

Name: M.A.P. LTD

Address: Nezavisimost Avenue, 55;  
10029 Zhitomir; Ukraine

Status: Terminated

Date of Termination: 30.06.2017

Authorised persons: HUDAWSKY VLADIMIR  
IVANOVICH

##### **Company 2:**

Name: DEREVNO-VUHILNYY ALLIANCE LTD  
(ДЕРЕВНО-ВУГІЛЬНИЙ АЛЬЯНС“) =  
“Charcoal Alliance”

Address: bld. 55, prospekt Nezavisimosti; 10029  
Zhitomir; Ukraine

Founded by: HUDAWSKY VLADIMIR IVANOVICH

Date of issue of FSC certificate: 24.08.2017



## 10 WWF demands

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### Demands made by the WWF of the German federal government

The European Timber Regulation has to date only covered a portion of wood and paper products. Relevant sections of the wood and paper market remain unmonitored with regard to legality.

Currently, the Appendix of the EUTR, i.e. the list of products covered, is being revised. In the past, the federal government has stressed multiple times that it is promoting the “all in” option in the ongoing discussion – in other words, the demand that all wood and paper products should be covered by the EUTR. The WWF welcomes this stance!

- The WWF requests that the German federal government convinces other EU member states and the EU Commission to also adopt this position

### Demands made by the WWF of the FSC

Through the development of standards for forest management, taking equal account of all interest groups, which are higher than the minimum statutory requirements, the FSC has the potential to positively influence forest management. However, practice can only be changed as a result of stringent monitoring.

The multiple market research conducted by the WWF has shown that cases of negligence and even active misconduct have also occurred among FSC-certified companies and FSC certifying bodies. For this reason, the WWF demands the following of the FSC:

- Since there is a whole series of charcoal producing companies that trade in both FSC-certified and non-certified products, which come from dubious sources such as Nigeria or Paraguay (among the most important supplier countries to Germany), the WWF demands of the FSC that it **inspect all charcoal companies**. The trade in products created from over-exploitation and/or illegal products is a violation of the FSC's Policy for Association – and it cannot be the task of environmental organisations such as the WWF to constantly monitor all companies on behalf of the FSC, or to submit a complaint regarding each individual company.
- Auditors should have the mandate and the obligation to **actively check the Policy for Association during their audits**.
- Companies from which the FSC certificate has been withdrawn should not have the option of **having their FSC certificate returned within a short period of time under a new name (see Example 1)**.



- **Transparency:** The FSC database must be kept up to date. False lists are not acceptable and obfuscate the actual behaviour of the companies. Such lists bear the risk that the FSC can no longer ensure the legality of FSC-certified products.
- **Certifying bodies:** The FSC should check whether certifying bodies, which (at the request of the companies?) enter inaccurate lists or lists that can no longer be monitored into the FSC database, are in violation of the basic principles and the spirit of the FSC (since as a result of these lists, e.g. the legality of the products can no longer be secured – see Chapter 8).
- Furthermore, the question arises as to whether there might be a conflict of interest between certifying bodies and companies.<sup>36</sup> The uploading of long, implausible and almost identical lists of wood types for several companies (and by several certification companies - in one case, directly after the company was contacted by the WWF during the course of charcoal research in 2018) casts the certification companies responsible in a poor light. The WWF demands of the FSC that such behaviour be checked and sanctioned.
- **Strengthening of the FSC monitoring structures:** The FSC should strengthen and expand the monitoring structures available in such a way that they have sufficient power to act in order to be able to effectively cover the risks accordingly (legality, violations of FSC regulations). Specifically, the ASI (Accreditation Services International)<sup>37</sup> and the FSC-internal Fiber Testing programme<sup>38</sup> should be strengthened. In cases of increased risk, the number of tests using forensic methods<sup>39</sup> by the FSC itself should be sufficiently high to enable the FSC to proactively filter out the “black sheep” among the FSC-certified companies – before others do.
- **Formalisation of the now established ASI practice of keeping lists of wood types up to date:** The charcoal industry has demonstrated over many years that despite the great risks involved, it is not able to independently create sufficient transparency in order to reduce the risk of over-exploitation and illegal wood. The FSC should formally require the now established practice by ASI of demanding more precise information regarding wood types and source countries from the companies.

### Demands made by the WWF of the companies operating in the charcoal industry

- **More transparency:** information about wood types and the origin of wood should be provided on the packaging, so that consumers can make a free choice.
- Trade must never be allowed in charcoal from at-risk countries such as Nigeria, Paraguay or Ukraine – unless the goods are at least FSC-certified.
- Overall, a conversion to FSC-certified products must take place.

## 11 What should consumers do?

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Countless questions arose during the course of the research conducted this and last year with regard to FSC-certified barbecue charcoal. Since the WWF market analysis of 2017, countless certificates owned by trading or producing FSC-certified charcoal companies have been withdrawn by the certifying bodies responsible (e.g. the certifying body Nepcon) in Ukraine alone, a country with a difficult environment (see Chapter 2).

Even if transparency leaves much to be desired, there are other possibilities available to consumers:

- an environmentally friendly alternative to barbecuing on charcoal obtained through over-exploitation is barbecuing with an electric barbecue (naturally with “green electricity”) or a gas barbecue.
- Buyers who still want to use charcoal on their barbecue should continue to opt for FSC-certified charcoal.
- The WWF website contains tips on barbecuing (including what should go on the barbecue) under “get active”.<sup>40</sup>





## 12 Summary

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Despite the attempts at increasing awareness in recent years, the charcoal industry remains largely characterised by intransparency and ignorance when it comes to the destruction of forests.

- The current research conducted by ARD and the WWF proves that the risks arising from charcoal are ongoing - particularly from supplier countries such as Ukraine, Nigeria and Paraguay.
- Charcoal from high-risk countries without at least FSC certification is not acceptable in the view of the WWF.

Countless companies from the charcoal industry are contributing to over-exploitation, climate warming and the destruction of species through their behaviour.

From the legal perspective, there is currently no possibility at either EU or German level to at least check the legality. Even the knowledge of the illegal production of charcoal in Nigeria, which is later exported to Germany, appears not to interest anyone in this country (cf. the Scientific Service of the German federal parliament: *“The importing of charcoal [explanation, Zahlen: this refers to Nigeria and Paraguay] cannot be regarded per se as being illegal ...”*).

Legality is not enough in the fight against the destruction of forests, since there are also perfectly legal cases of forest destruction and conversion. The overriding goal of the EU-FLEGT programme of action<sup>41</sup> and the EUTR<sup>42</sup> is for sustainability to become the yardstick for activity.

Naturland-certified charcoal from Germany is setting a positive standard, although the quantities that can be produced will not be able to fully serve the German market.

The FSC has the potential to create greater security and better protect the forests. Several FSC-certified products, including those that use tropical wood, raised questions during this test, however (as was the case last year) and must be checked by the FSC using separate monitoring measures. The results of this market analysis indicate that more stringent monitoring is required on the part of the FSC.

The combination of thoroughly inspected FSC certificates and a shrub removal project funded by the German federal government in Namibia could be a sensible option for the future. In Paraguay and Ukraine, too, the WWF is promoting the option of positively influencing the difficult situation – on the precondition that the FSC monitoring measures are conducted in a stringent manner.

PEFC-certified products were also found to contain tropical wood, a situation that throws up further questions. The information provided by the FSC- and PEFC-certified companies gave no clear explanation for the laboratory result, however. In general, the PEFC certification is considered to be insufficient among environmental protection organisations.

The European Timber Regulation (EUTR) should apply to all wood and paper products (including charcoal). Fortunately, the German federal government shares the “all in” demand. Now, it is important that the German federal government actively represents this position in the ongoing process at the EU Commission regarding the EUTR, and that it also convinces other countries to support this view.



For consumers, the FSC remains a good point of orientation.

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