

Живе Беларусь!  
FREE BELARUS!

# Rubber-stamping Repression

How EU governments and a  
global green label made European  
furniture buyers complicit in torture



EU CLEARED

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## EarthSight

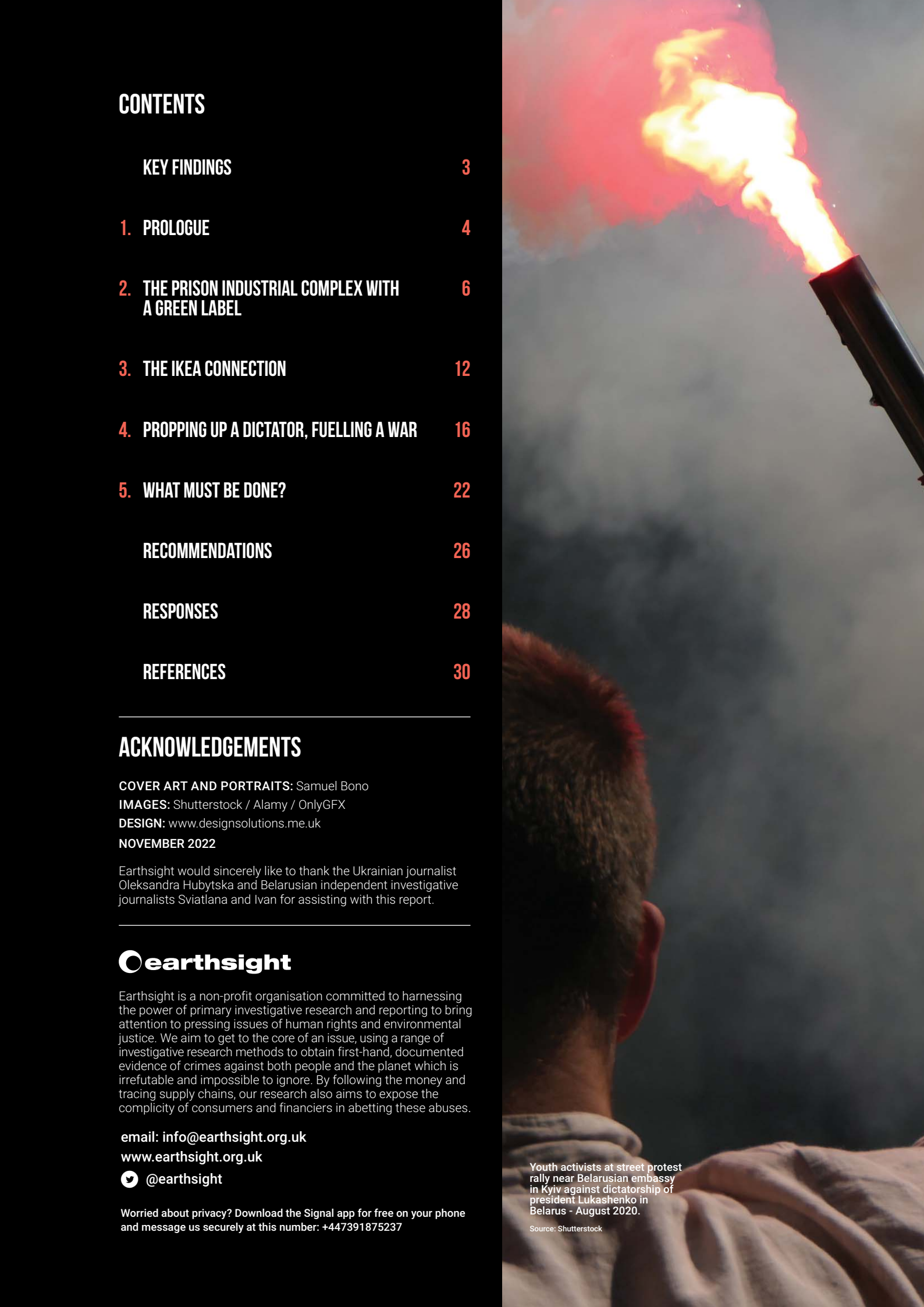
EarthSight is a non-profit organisation committed to harnessing the power of primary investigative research and reporting to bring attention to pressing issues of human rights and environmental justice. We aim to get to the core of an issue, using a range of investigative research methods to obtain first-hand, documented evidence of crimes against both people and the planet which is irrefutable and impossible to ignore. By following the money and tracing supply chains, our research also aims to expose the complicity of consumers and financiers in abetting these abuses.

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Youth activists at street protest rally near Belarusian embassy in Kyiv against dictatorship of president Lukashenko in Belarus - August 2020.

Source: Shutterstock

# KEY FINDINGS

- For years, Earthsight can reveal, Europe's largest furniture retail chains have been profiting from the torture of political prisoners in Belarus, while their purchases have also served to personally enrich the country's brutal dictator, Alexander Lukashenko, at the expense of some of Europe's last primal forests. The continuing trade is helping aid Russian terror in Ukraine, in which Belarus is heavily complicit. Self-interested European governments refused for years to implement the sanctions which could end the scandalous trade, and are now even breaking their own laws in allowing it to continue.
- Earthsight has connected the use of forced prison labour to furniture sold at almost every major furniture retail chain in Europe, including IKEA, leading French furniture retail chain BUT, and Austrian-headquartered furniture group XXXLutz, the second largest furniture retailer on the continent. IKEA furniture linked to the scandal has also been sold in the USA.
- Belarus's prison service, Earthsight found, is the country's largest timber company. It uses the forced labour of 8000 inmates to harvest trees and process them into a wide range of wood products, including furniture, for export.
- These exports are being fed in part by logging taking place within Belarus's National Parks, which are under the direct control of the Presidential Property Management Directorate (PPMD). The PPMD is Lukashenko's private slush fund, and was until recently being run by his right-hand man, Viktor Sheiman, who has long stood accused by the EU of arranging the 'disappearance' of the President's political opponents. Earthsight uncovered documents revealing that over 1 million cubic metres of logs are being cut in these protected areas each year, and that such logging is leading to deforestation of the Belarusian portion of the world famous Bialowieza Forest, home to rare European bison, lynx and wolves.
- Earthsight interviewed past and current political prisoners at some of the penal colonies where wood processing takes place. They testified to torture and maltreatment of political prisoners, to the compulsory nature of the work in the woodshops, and the terrible working conditions.
- Prisoners and multiple sources inside government told Earthsight that the prisons are closely connected to two large state-owned timber mills, providing them with semi-processed wood, raw materials and with cheap forced labour. Both our sources and other documentation we uncovered show that these state-owned timber mills, in turn, supply the big European furniture retailers, either directly or indirectly.
- Despite plentiful red flags, the world's largest green wood labels, the Forest Stewardship Council and PEFC, gave their stamp to both the PPMD forests and the prisons. Some of the prisons had their certificates issued in late 2020 despite the widespread imprisonment and torture of pro-democracy protestors in Belarus having made worldwide headlines shortly beforehand. Torture and maltreatment of two of Belarus's most prominent human rights activists and political dissidents at one prison had been well publicised before it nevertheless received an FSC certificate. One of these prisoners was recently awarded the Nobel Peace Prize.
- After Belarus's complicity in the Russian invasion of Ukraine led to its being isolated internationally, IKEA voluntarily halted all purchases from Belarus or use of Belarusian timber in March 2022. The EU also banned imports of timber from Belarus, and FSC and PEFC pulled all their certificates. Were it not for the war, however, none of this would have happened. Despite these actions, imports of furniture are still allowed into the EU, and timber also is still free to enter the UK and US. European companies continue to import millions of euros a week of Belarusian wood furniture and furniture parts. Earthsight has linked these continued imports, including products connected to the prisons, to all of IKEA's biggest European competitors.
- An EU law, the EU Timber Regulation, demands importers conduct due diligence to ensure their wood product purchases were legally sourced. In April, the European Commission announced that compliance with this law with regard to Belarus was now 'impossible', and said that EU firms must halt imports, regardless of whether they were covered by sanctions. Yet 20 different EU member states, Earthsight found, have continued to register imports of Belarusian wood furniture since, with the largest volumes destined for Poland, Lithuania, Germany and France.
- The scandal is also potentially in breach of an ethical supply chain law in force in France, and a similar law due to take effect in Germany next year. EU-wide supply chain due diligence legislation is currently being debated in Brussels.
- Earthsight is calling on the EU, UK and US governments to act urgently to address this scandal, and prevent others like it, including by expanding existing sanctions on Belarus, improving enforcement of existing laws banning imports of wood sourced illegally, and passing additional legislation forcing companies to conduct due diligence to prevent human rights and environmental abuses throughout their supply chains. Earthsight is also calling for urgent reform of the green labels FSC and PEFC, whose failings contributed to the scandal.



## 1. PROLOGUE

As news of the violent repression of pro-democracy protests in the little-known eastern European country of Belarus hit the headlines worldwide in the late summer of 2020, one of the most chilling moments was captured by the BBC. Their cameras recorded the sounds of students being violently beaten in the back of a police van.<sup>1</sup> Their screams and cries for help make for painful listening.

Western politicians queued up to decry such events and promise tough action against those responsible. Sanctions were duly imposed. The world's attention moved on. Meanwhile, the young people in that

police van, and thousands like them, were sent to penal colonies and put to work.

Fast forward 18 months, and Belarus was in the news again, its government made even more of a pariah for its role in aiding and abetting Russian war crimes in neighbouring Ukraine. Fresh sanctions followed.

Western citizens, meanwhile, quietly assumed that they and their governments had done everything they could to help, short of forcing regime change. The truth, Earthsight has discovered, could not be more different.



**WESTERN CITIZENS  
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DISCOVERED THE  
TRUTH WAS DIFFERENT**

Taken during the 2020–2021 Belarusian protests, a series of political demonstrations against President Lukashenko and his administration. Protesters faced violent persecution by the authorities.  
Source: Shutterstock



## 2. THE PRISON INDUSTRIAL COMPLEX WITH A GREEN LABEL

THE PRISON SERVICE IN BELARUS IS BY SOME MEASURES THE COUNTRY'S LARGEST TIMBER COMPANY

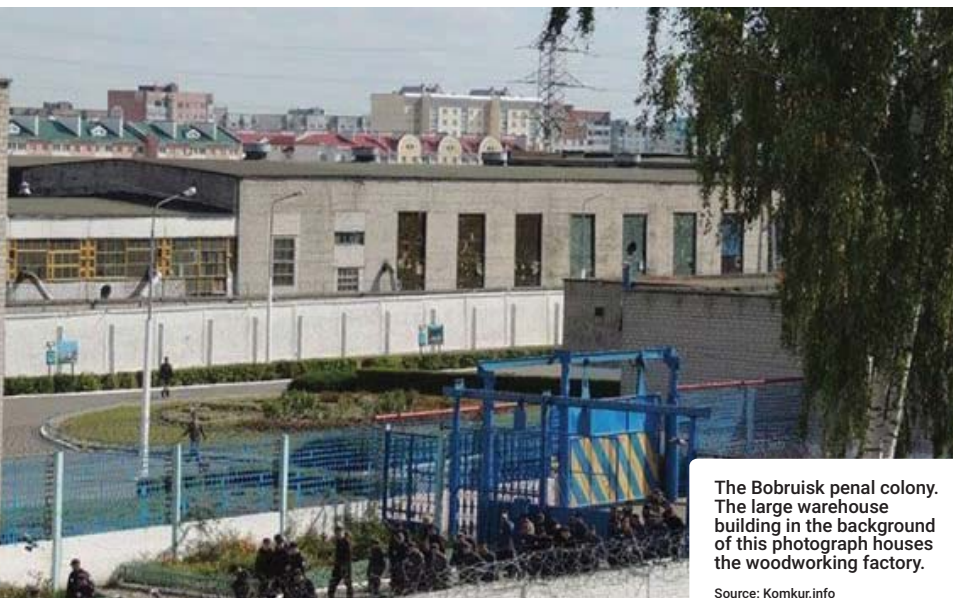
### SLAVE LABOUR

Bobruisk, on the Berezinsky river in the heart of Belarus, is one of the country's oldest cities. Its most prominent landmark and tourist attraction is its 200-year-old fortress, built on the instructions of Tsar Alexander I during the Napoleonic Wars. A different fortified facility, however, has played an even greater role in the city's development, and this one is no tourist attraction.

When it was opened in 1965, Bobruisk's Penal Colony No.2 – known to locals simply as 'Two' – lay surrounded by fields and forests just beyond the bounds of the city. It was built to provide a ready supply of forced labour for a large new tyre factory in the town. Its small army of thousands of forced labourers didn't only work there, however. They worked in factories across the city and played a key part in its construction. The population has more than doubled since the prison arrived, and its 17-hectare razor wire-topped walls have now been subsumed into the suburbs which the captives themselves helped build.<sup>2</sup>

The prison's more than 2000 inmates are obliged to work, to pay for their keep. Those who refuse are labelled 'parasites' and thrown into the punishment cells.<sup>3</sup> These days, the biggest sources of employment lie within the prison's walls. For Bobruisk is part of a hidden Belarusian 'prison-industrial-complex'.

At 27 large penal camps scattered across the country, the Belarus Department of Corrections employs forced labour to produce a wide and profitable array of goods.<sup>4</sup> There are military uniforms, ammunition boxes



The Bobruisk penal colony. The large warehouse building in the background of this photograph houses the woodworking factory.

Source: Komkur.info



Prisoners of a Belarusian jail taking an outdoor walk.

Source: ZUMA Press, Inc. / Alamy Stock Photo

and leather gun holsters. There are more unexpected products such as barbecues, tractor parts, children's climbing frames, sledges and pasta. By far the biggest income source for the Belarus-prison-industrial-complex, however, is wood.

The prison service in Belarus is by some measures the country's largest timber company. Its wood processing facilities employ 8000 people. Prisoners are employed in all stages of production, including conducting their own harvesting of trees in state-owned forests. The prisons consume around half a million trees a year, and churn out more than 800 different products, including office furniture, windows, doors and souvenir items such as chess boards.<sup>5</sup>

Covering an area greater than five football fields, the workshops at Bobruisk are among the busiest.

## TORTURE

In addition to being one of the largest prisons in Belarus, Penal Colony No.2 is also one of the most notorious. One of Belarus's most famous political dissidents is even an alumni. These days a regular guest on international news items regarding the country,

former Presidential candidate Andrei Sannikov was imprisoned and tortured at Bobruisk after he protested the rigged re-election of President Lukashenko in 2010. His testimony following his release led the EU to issue targeted sanctions against the prison's top officials in 2013.<sup>6</sup> Ales Bialiatski, the Belarusian human rights activist awarded the Nobel Peace Prize in October 2022<sup>7</sup>, was also once imprisoned and subjected to forced labour and maltreatment at Penal Colony No.2.<sup>8</sup>

Bobruisk holds many more victims of political repression. Human rights groups have thus far identified 94 political prisoners among the current inmates<sup>9</sup>, though the real figure is likely significantly higher. They are mostly young, and the majority found their way there in the wake of the anti-regime protests which swept the country in August 2020, after Lukashenko's latest fraudulent re-election. As of October 2022, 1351 people had been recognised as political prisoners across the whole of Belarus.<sup>10</sup>

The violent repression of the pro-democracy movement in Belarus in late 2020 hit the headlines worldwide. The violent abuse of young protestors

**THE EVIDENCE OF  
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**GREEN LABELS LIKE FSC ARE INCREASINGLY BECOMING A NECESSITY FOR THOSE WISHING TO SELL WOOD PRODUCTS IN WESTERN EUROPE**



detained and imprisoned by the Belarusian state was a matter of common knowledge internationally.

The evidence of torture of political prisoners at Bobruisk was hardly a secret either. The evidence was outlined in all 24 official languages on the EU’s website. Further details could be found in Sannikov’s autobiography, published in 2015.<sup>11</sup> His imprisonment even triggered interventions from celebrities, including Mick Jagger and Steven Spielberg.<sup>12</sup>

But it is amazing what can be ignored or forgotten when there is money to be made.

**GREENWASH**

With \$100m in revenues, SCS Global is a leader in ‘sustainability certification’, the growing business of stamping the products of globalisation as ethical. The multinational company’s President claims his team wakes up every day with one question on their minds: ‘How can we make things better?’<sup>13</sup> It is impossible to know what the SCS auditors who visited Bobruisk penal colony in late 2020 were thinking over their breakfast. But as the 15-foot blue electric gates slid open at Penal Colony No.2 later that morning, it is hard to imagine they weren’t aware that what they were visiting was a prison. Neither is it plausible that they were ignorant of the events which had swept Belarus since the election earlier that year. They certainly weren’t about to make anything ‘better’.

The Director of Bobruisk prison’s industrial production, Lt Colonel Sergey Kozlov, wanted to increase the profitability of its wood processing. So did his boss, the head of Belarus’s prison service (and therefore also CEO of Belarus Prisons Inc), Oleg Matkin, whose face adorns the service’s glossy 120-page corporate brochure.<sup>14</sup> Making wooden pallets for local tractor factories was bad business. Doing better would involve expanding sales of its products in the most lucrative markets of the EU and UK.

But there was a problem. Laws in both jurisdictions demanded that importers

of wood products conduct ‘due diligence’ to ensure that their goods were legally harvested and traded. In an effort to comply with those laws, more and more companies were demanding extra paperwork, and asking awkward questions. Matkin and Kozlov needed a cheap, simple and easy way to get them off their backs. Fortunately for them, they had one to hand.

The biggest name in sustainability certification is the Forest Stewardship Council, or FSC. Set up in the early 90s by a coalition of environmental groups and progressive industry in response to growing scandals regarding destructive logging in the tropics, FSC’s aim was to enable consumers to buy wood and paper products with a clean conscience. Since then it has grown to become the world’s largest ethical label. Its tree-tick logo adorns tissue paper, furniture and books everywhere. Around a quarter of the world’s timber production – including forests from as far afield as Russia, Brazil, Ghana and Australia – now bears its imprimatur.<sup>15</sup> Its systems and procedures have been replicated for green labels for a range of other goods, including fish. It is the poster-child of ‘ethical’ consumerism.

FSC sets ethical standards for the wood industry. Damage to wildlife must be minimised; the most precious forests left alone. Taxes must be paid, and workers respected. Profit-making companies then compete to audit the firms involved in cutting and processing wood against these standards. As concern over illegal and unsustainable wood from individual consumers, major retailers and western governments has grown, labels like FSC’s are increasingly becoming a necessity for those wishing to sell their products in sensitive markets like Western Europe.

This was the reason for SCS’s visit to Bobruisk. The prison had paid for them to come. Their job: to give it a green label.

On 2nd October 2020, Matkin was sanctioned by the EU, which judged him responsible for ‘inhumane and degrading treatment, including torture’ inflicted on citizens detained in



facilities under his control.<sup>16</sup> Bobruisk's prison chief must have wondered if this would put a spanner in the works. But just six weeks later, SCS's auditors duly delivered. A shiny new FSC certificate, in the name of Bobruisk Penal Colony No2, was issued on 12th November 2020.<sup>17</sup> The door to the EU for the products made with the forced labour of its political prisoners now stood open.

## NOT THE FIRST TIME

Bobruisk wasn't the only part of the Belarusian prison-industrial-complex to be rubberstamped by the world's largest and most respected green label. Nor was it the first.

In fact, Earthsight's investigation reveals that FSC was greenwashing the products of prison labour – including by political prisoners – for over nine years. The first prison granted permission to use the green 'tick' logo lies some 300km due west of Bobruisk, in the small city of Ivatsevichy. Another approved FSC auditing firm, US-based Rainforest Alliance, issued an FSC Chain-of-Custody certificate to Penal Colony No.5 in the town on 31st January 2013.<sup>18</sup> Rainforest Alliance told Earthsight that at the time, its auditing

services in Europe were subcontracted to another auditing firm, Denmark-headquartered multinational NEPCon (since renamed Preferred by Nature). The non-profit firm, with more than 270 staff in more than 40 countries<sup>19</sup>, promises that the FSC Chain-of-Custody certificates it offers will "enhance your market access" and "build your brand".<sup>20</sup> According to Rainforest Alliance, NEPCon took full responsibility for this and all its other European certificates in 2014.

IK5's timber operations dwarf those of Bobruisk, and include a wider range of products. The prison's wood product factory has its own snazzy website.<sup>21</sup> There is a showroom and shop. There is even an Instagram account, with over 1300 followers.<sup>22</sup> And unlike

**THE DIRECTOR OF ONE THEN-FSC-CERTIFIED  
BELARUSIAN PRISON IS ACCUSED OF ACCEPTING  
OVER €200,000 IN BRIBES FROM A FRENCH  
FURNITURE FIRM**



Prisoners preparing logs for sawing at IK-22 in Belarus, 2017.

Source: Intex Press

**“POLITICAL PRISONERS HAVE FEW MEETINGS WITH THEIR FAMILIES, NO SKYPE CALLS AND OTHER THINGS THAT ‘ORDINARY’ PRISONERS HAVE ENOUGH OF. THEY ARE SIMPLY DEPRIVED OF EVERYTHING FOR UNBUTTONING A BUTTON, OR BEING A SECOND LATE FOR EXERCISE”**

TESTIMONY FROM EX-PRISONER TO EARTHSIGHT

Bobruisk, IK5 openly brags of exporting its products to the West, including to Germany, France and Poland.<sup>23</sup> IK5’s timber business has been doing so well that it set up a subsidiary prison and wood workshop – IK22 – right in the heart of a nearby tract of forest. Together, the prisons’ wood processing complexes cover an area of over 13 football pitches.

We know for sure that IK5 has exported its products to the EU, because Belarusian prosecutors have said as much. After a lengthy back and forth in the courts the prison’s former director was charged in 2018 with accepting over €200,000 in bribes from a French company for privileged contracts to supply furniture for export.<sup>24</sup> The allegations encompass the period March 2009 to March 2013 – the last two months of which, the prison was FSC-certified.

Shortly after Belarusian prosecutors publicised the charges in June 2018, local independent media were able to track down an ex-prisoner who had worked at the prison’s wood factory. He confirmed that a French firm was by far their largest customer.<sup>25,26,27</sup> NEPCon’s auditors saw nothing amiss, however, and re-certified the prison in January the following year.

Earthsight spoke with an ex-inmate of IK5, who worked in the prison’s furniture factory until his release in early 2022. During his time there (and while the prison had its green

label) he told us the factory’s products were sold in the Netherlands and UK as well as France, while the prison also sold lumber and pallets to Poland, sawn wood to the Czech Republic and France, and pallets and wood waste to Latvia and Lithuania. Another ex-inmate Earthsight interviewed told us the colony also produced charcoal, with packaging in Polish, presumably destined for Polish consumers.

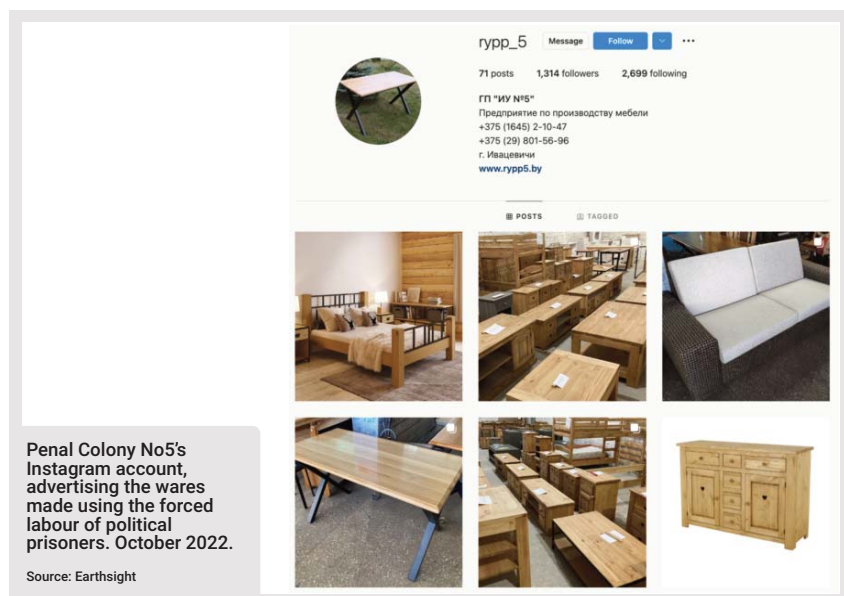
Three other penal colonies received green labels from FSC during 2020, all issued by NEPCon. Penal Colony No.17 in Shklov was certified in July 2020<sup>28</sup>, despite its top officials also having been the subject of EU sanctions as a result of maltreatment of political prisoners.<sup>29</sup> The last prison to get a certificate – Penal Colony No.15 in the town of Mogilev, which produces a wide range of office furniture – had its permit issued on 19th August 2020<sup>30</sup>, just five days after international media, including the BBC, had reported on ‘widespread torture’ inflicted on jailed protestors.<sup>31</sup>

### TRUNCHEONS AND TASERS

Earthsight spoke with a number of Belarusian political prisoners with recent experience of the country’s prison-wood-industrial-complex. As well as providing additional evidence about these prisons’ connections to Europe, the prisoners testified to torture and abuse inside the prison system, including at prisons with FSC certificates, as well as the appalling conditions in which workers are expected to toil.

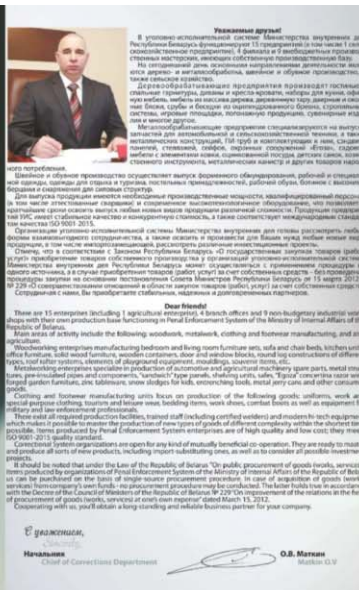
A prisoner who worked at the woodworking shop at IK3, in eastern Belarus close to the Russian border, told of how the unheated factory was freezing cold in winter. He told of an elderly prisoner who was maimed by one of the factory’s decrepit machines. Another prisoner who dared to complain of conditions, we heard, was rewarded with a visit to the punishment cell.

All of the prisoners we spoke with confirmed that work was compulsory. “Refusal to work was a violation”, one told us. If you refused you would “get



Penal Colony No5’s Instagram account, advertising the wares made using the forced labour of political prisoners. October 2022.

Source: Earthsight



The first three pages of the Belarusian prison service's 120-page sales brochure includes a preface by its Director, the subject of EU sanctions, and helpful map showing which prisons produce what.

Source: Earthsight

your kidneys knocked off and spend a couple of days in a punishment cell". "We were obliged to work", another, released in December 2021, told us, before adding a macabre reference to the past: "as the saying goes: Arbeit Macht Frei".

Wages are technically paid, but – after deductions for bed and board – the amounts are laughable. We were shown one payslip giving a total salary of 15.18 Belarusian roubles – six US dollars – for an entire year's work.

Political prisoners must wear special yellow bibs, to distinguish them from ordinary criminals. They are treated particularly harshly by the guards. They are systematically accused of trivial 'violations' such as untidy appearance and failing to greet a prison officer, with these violations then used to justify spells in solitary confinement, withdrawal of parcels and visitation rights, and extensions to sentences.

"Political prisoners have few meetings with their families, no Skype calls and other things that 'ordinary' prisoners have enough of. They are simply deprived of everything for unbuttoning a button, or being a second late for exercise," one ex-prisoner told us.

Such deprivations weren't the worst stories we heard. Inmates also testified to numerous cases of beatings of political prisoners, including with the use of truncheons

## THE HEAD OF ONE COLONY WHICH RECEIVED AN FSC CERTIFICATE WAS DESCRIBED BY A CURRENT PRISONER WE SPOKE WITH AS A "SADIST".

and tasers. Top officials of the prisons, we were told, took part in such beatings. The head of one colony which received an FSC certificate was described by a current prisoner we spoke with as a "sadist".

The systematic abuse of political prisoners was said to have been directly ordered by Oleg Matkin himself, the CEO of Belarus Prison Inc.

While they have online shops, showrooms and Instagram accounts, the factories of Belarus Prison Inc are still fairly basic. They are certainly not geared up to supply the biggest and most discerning Western retailers. But as it turns out, the involvement of prison labour in the Belarusian economy and exports goes far beyond the finished goods the penal colonies sell abroad directly. Its biggest role is an indirect one: supplying semi-finished goods and raw materials, and providing cheap labour, to larger Belarusian firms. Such firms' ultimate Western customers are much bigger and better known. And they don't get much bigger than IKEA.



### 3. THE IKEA CONNECTION

**IKEA'S DEMAND FOR BELARUSIAN WOOD HAS CONTRIBUTED TO A WIDER BOOM IN BELARUSIAN TIMBER AND WOOD EXPORTS TO THE EU**

#### **THE IMPORTANCE OF BELARUSIAN WOOD FOR IKEA**

In the last two years, Earthsight has revealed the shocking truth behind IKEA's playful branding and bright primary colours. We found that the Swedish furniture giant is the biggest consumer of wood on the planet, churning through one tree every second. To feed its growing needs, IKEA has become heavily dependent on forests in Russia and the former Eastern Bloc. But its supplies from these countries are highly suspect. In 2020, we exposed how IKEA was using illegally cut beech from the Carpathian forests of Ukraine to make cheap foldable chairs. The following year, we found wood linked to the biggest illegal logging case in recent Russian history being used to make IKEA children's furniture. In both cases the wood concerned had been greenwashed by FSC.

Belarus is an even larger supplier to IKEA than either Russia or Ukraine. By 2021 it had grown to become its

second largest source of wood, after Poland. That year, our research shows, it consumed 1.7 million cubic metres of Belarusian logs – almost double the volume of three years earlier. That is the remains of more than 2.4 million trees.<sup>32</sup>

IKEA's demand for Belarusian wood has contributed to a wider boom in Belarusian timber and wood product exports to the EU. Two thirds of Belarus's wood exports are to the EU. These shot up by 48 per cent in 2021 alone, hitting €1.64 billion (see Chart). Exports to the UK, meanwhile, rose even faster, driven in part by demand from controversial power station Drax for biomass to burn. Demand from IKEA (which has an FSC-only wood purchasing policy) has also turned Belarus into a poster-child for the international green label. It was the first country in the world to have its entire forest estate certified – all 9 million hectares of it.

Belarusian wood has been used to make many IKEA products. Earthsight found 26 different furniture products

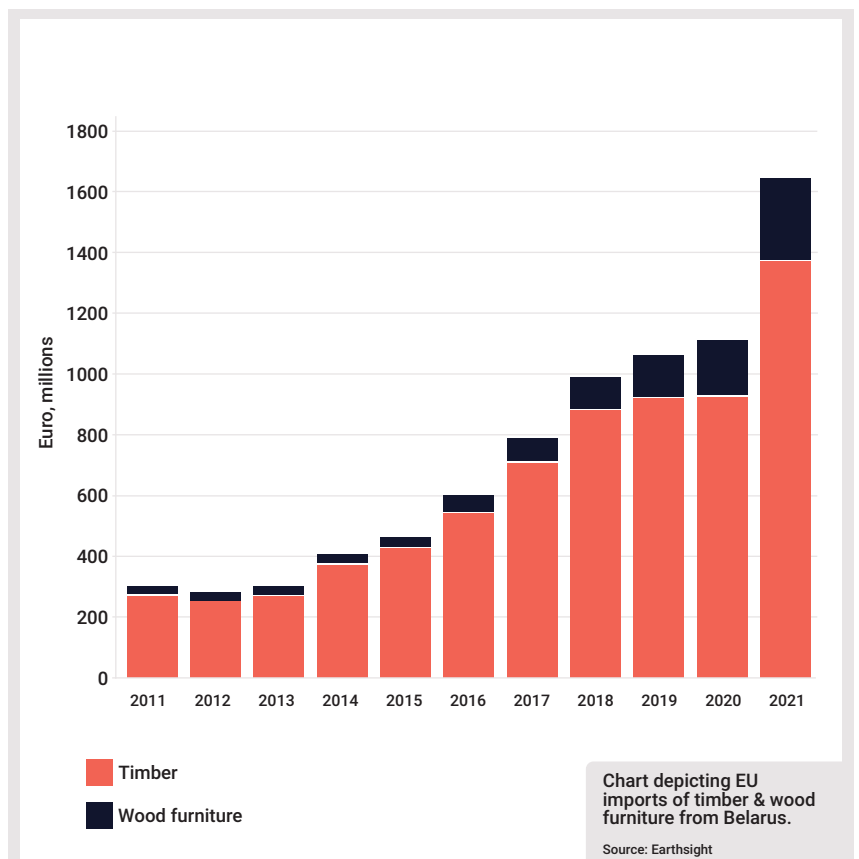


IKEA store in Saint Petersburg, Russia on March 2022. The final day before temporary closure of the stores in the country.

Source: Natalya On / Shutterstock

on sale at an IKEA store in the UK in early 2022 which had been made in Belarus, including the popular 'Brimnes' white chest of drawers, and 'Strandmon' upholstered armchair. In the past even iconic 'Billy' bookshelves were being made there (as President Lukashenko saw for himself on a factory visit in 2013). Many more IKEA products made elsewhere in Europe use Belarusian raw material. We even found IKEA furniture from Belarus being used in venues for the COP26 climate conference in Glasgow in November 2021, an event for which the Swedish firm was an official partner.

We traced the finished IKEA furniture made in Belarus to factories within the country owned by a handful of Polish and Lithuanian furniture multinationals. But these firms don't carry out the primary processing of the trees themselves. This, we found, is done instead by large Belarusian state-owned enterprises. These same firms also export plywood and furniture panels for finishing into IKEA products elsewhere.



The locations of the two most important such second-tier suppliers will, by this point in this story, be familiar. One is in the town of Bobruisk. Another is in Ivatsevichy.

### A POLLUTED SUPPLY CHAIN

Earthsight spoke to two insiders in the Belarusian civil service whose roles give them privileged access to information relevant to wood and other supply chains connected to the prison system. Speaking on condition of anonymity, they explained that the prisons have for years been deeply and systematically intertwined with IKEA's supply chains, but that these connections have been hidden behind a complex web of intermediaries.

A women's prison, IK4, in the city of Gomel, specialises in sewing and production of garments and other textile goods, and is its leading producer of uniforms. Our sources told us that the prison has a long-standing relationship with Mogotex, a

state-owned firm which is the largest manufacturer of textile products in the country. Prisoners there help turn raw cloth into covers for upholstered furniture made for IKEA, the sources claimed. They also said that a second, smaller prison in Bobruisk which houses juveniles was also connected to IKEA supply chains.

Mogotex is certainly a long-standing IKEA supplier, having been supplying it with textiles since 2002. Earthsight found confirmation of commercial relations between Mogotex and the main prison in the city in official records, though these did not reveal the nature of the relationship.

The most important relationship our sources told us about, however, relates to a company called Ivatsevichdrev, the largest woodworking enterprise in Belarus. The state-owned firm is one of the country's largest producers of laminated chipboard, a key raw material in the manufacture of cheap

**INSIDERS TOLD  
EARTHSIGHT PRISONS  
IN BELARUS HAVE FOR  
YEARS BEEN DEEPLY  
INTERTWINED WITH  
IKEA'S SUPPLY  
CHAINS**



Some of the IKEA products made in Belarus. Clockwise from top left: Strandmon wing-back chair in 'kvillsfors' dark blue, made by Polish-owned Delkom; Brimnes chest of drawers, made by Lithuanian-owned VMG; 'Ivar' corner shelf, made by German-Belarusian joint-venture MMZ; 'Alex' desk in grey-turquoise, made by Lithuanian-owned SBA Mebelain.

Source: Earthsight



Ivatsevichdrev, where we learned that prison forced labour is used to produce goods for sale in the EU.

Source: idrev.by

furniture. Though chipboard production and sales are its principal business, the firm is involved in all stages of the production cycle, from logging through transportation to the production of some finished products.<sup>33</sup> It churns through three-quarters of a million trees a year.<sup>34</sup> Until the recent sanctions on Belarus, Ivatsevichdrev was exporting a quarter of its chipboard to the EU. It continues to export finished furniture and furniture parts.<sup>35</sup>

Ivatsevichdrev has proudly boasted of its own FSC certificate as proof that its products are environmentally friendly.

The senior officials we spoke with told us that Ivatsevichdrev's supply chain (and therefore also IKEA's) is intimately connected to the nearby prisons, though this is carefully disguised, they explained, through multiple intermediaries. But perhaps even more important than the processing taking place at the prison is the labour it provides.

We were able to speak with a current prisoner at IK5, who told us that Ivatsevichdrev has long used the labour of prisoners from the penal colony, and that this is known not only

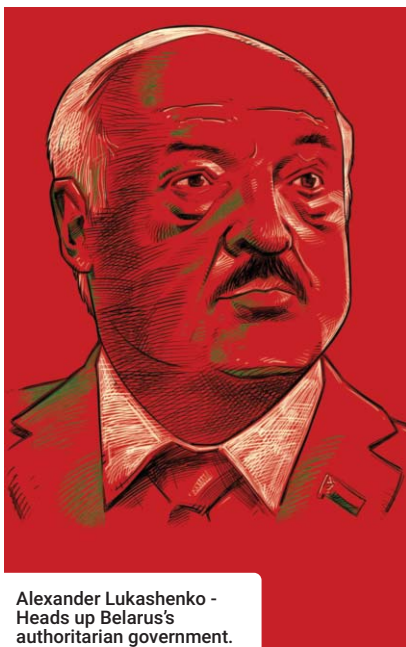
by prisoners and Ivatsevichdrev employees, but also by all the local people in the town. The company's use of cheap forced labour, the prisoner told us, causes resentment for local residents because "the management of Ivatsevichdrev blackmails workers with the fact that in case of any disagreement they will be fired and replaced with a free ZEK (prisoner). This is practiced here all the time."

The largest employer in the city of Bobruisk, on the other hand, is also a big state-owned sawmill, called FanDOK. Like Ivatsevichdrev, it is part of the wider state-run wood processing grouping Bellesbumprom. Until recently it was supplying some 4000 cubic metres a month of pine and birch plywood parts to IKEA's factories in Romania and Poland, for use in production of upholstered and cabinet furniture and chairs.<sup>36</sup>

Our inside sources told us that FanDOK's supply chains, like Ivatsevichdrev's, are connected to the prisons through multiple intermediary firms. Given IK2's proximity to the factory, and what we now know about the systematic use of prison labour within private companies, it may well have been using prison labour as well.



## 4. PROPPING UP A DICTATOR, FUELLING A WAR



Alexander Lukashenko - Heads up Belarus's authoritarian government.

### THE WORLD HERITAGE SITE AND THE 'GREY CARDINAL'

"You really feel here like you travelled back in time some hundreds or thousands of years", Lukasz Mazurek, a local guide and author, told Mongabay about visiting Bialowieza.<sup>37</sup> The forest, which spans the border between Poland and Belarus, is the most precious tract of ancient woodland in Europe. Covering an area twice the size of Greater London, it is the last remaining part of a primeval forest which once covered much of the continent. Wolves and lynx still prowl these woods, which are also home to the largest remaining population of the critically endangered European bison.

Asked by Mongabay about the top three threats to Bialowieza, Mazurek answered "logging, logging and logging". He was mostly referring to the Polish part of the forest, plans for the logging of which caused international uproar in the late 2010s. But while outrage over those plans eventually led to a U-turn by the Polish authorities, the threat of logging to the much larger portion of the Bialowieza forest on the Belarusian side of the border has kept quietly growing.

Like many other countries of the former Soviet Union, all of Belarus's forests are state-owned. While most fall under the aegis of the forest agency, as one might expect, a large chunk are under the control of a more surprising entity, however. Some eight per cent of Belarus's forests, including those with the most valuable timber, are under the direct control of the Presidential Property Management Directorate (PPMD).<sup>38</sup> They are quite literally the direct property of autocrat Alexander Lukashenko.

The PPMD has been characterised as Lukashenko's personal slush fund. From 2013 until mid-2021 it was operated by his right-hand-man of more than 25 years, Viktor Sheiman. Sheiman is a notorious, sinister figure in Belarus. Nicknamed the 'grey cardinal', and widely considered the most powerful person in the country after the President, he has been the continuous subject of EU sanctions since as far back as 2004. The EU holds him personally responsible for the 'disappearance' (and suspected murder) of three leading opposition figures in 1999-2000.<sup>39</sup>

As well as being the largest commercial real-estate owner in

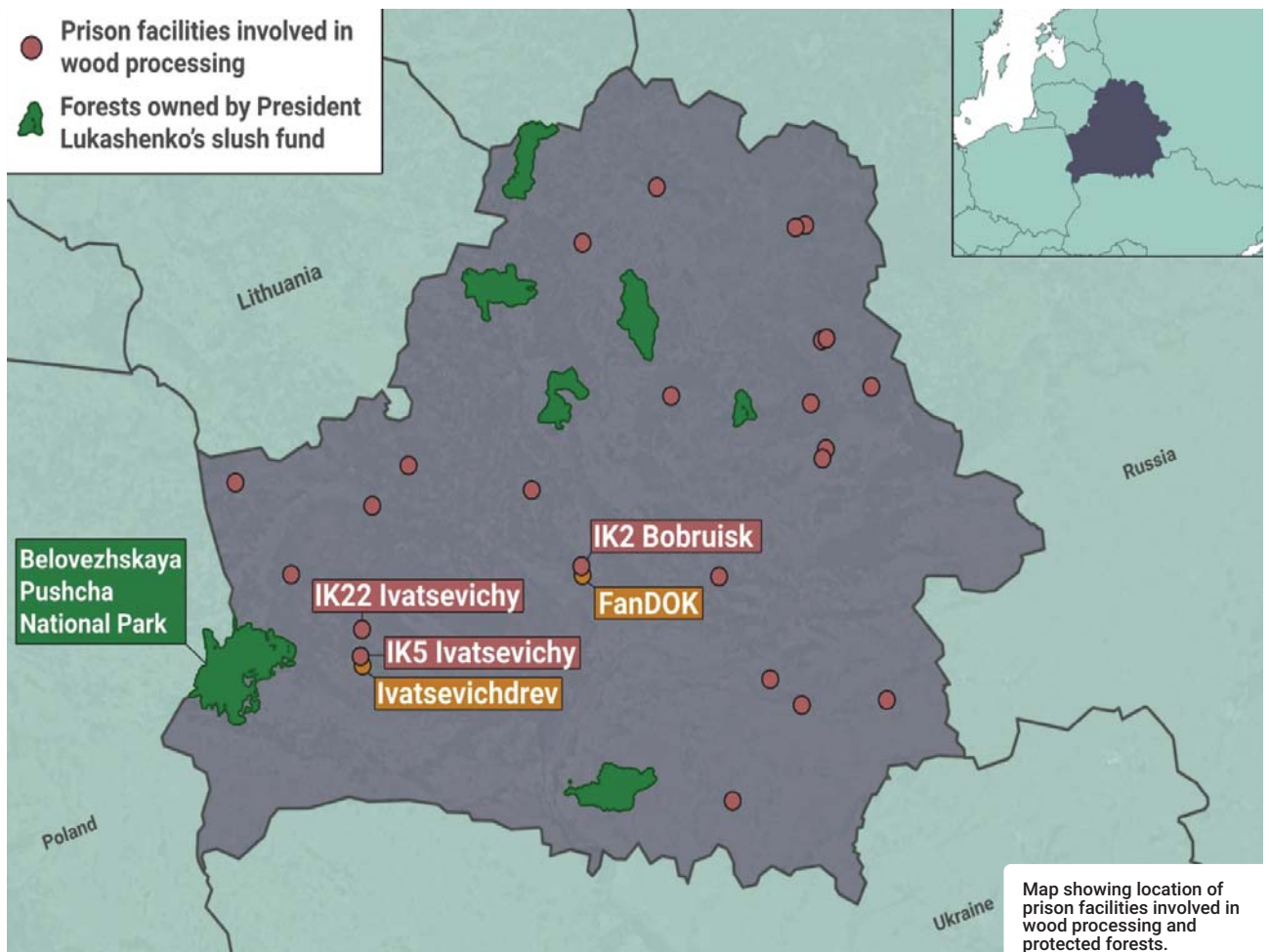




Logging in the Bialowieza forest.

Source: Alamy

**LUKASHENKO’S SLUSH FUND ADMITS THAT LOGGING IN THE NATIONAL PARK IT OWNS WILL LEAD THE AMOUNT OF FOREST THERE TO “DECREASE SOMEWHAT”**



Map showing location of prison facilities involved in wood processing and protected forests.



Wolves in Belovezhskaya Pushcha National Park in Belarus, which Lukashenko's personal slush fund is profiting from logging, until recently with FSC certification

Source: Mateusz Szymura

## BELARUS'S PPMD AND PRISON SERVICE WERE NOTORIOUS FOR GRAFT — BUT STILL RECEIVED FSC CERTIFICATES

Belarus, the PPMD also owns all of the country's national parks, and some neighbouring forests. Despite their mostly protected status, these forests are nevertheless subject to logging, from which the PPMD profits handsomely. Earthsight has obtained and collated data showing that over a million cubic metres of logs are cut in these forests each year – including almost 200,000 cubic metres of pine, spruce, oak and birch within the Belarusian portion of Bialowieza, Belovezhskaya Pushcha National Park.<sup>40</sup> Bans on commercial logging are systematically circumvented on the grounds that the trees harvested are damaged or infected with pests and need to be removed to protect the rest of the forest. Such 'sanitary' felling is a loophole widely abused in neighbouring Russia and Ukraine in order to fell healthy trees illegally, and it is very likely the same is true of Belarus's protected areas.<sup>41</sup> That it is leading to deforestation appears to be in little doubt.

Earthsight was able to obtain a copy of the long-term logging plan for a large chunk of the Belovezhskaya Pushcha National Park, covering the 10-year period to 2025. The plan, it turns out, involves deliberately exceeding the 'annual allowable cut' – the volume of logging considered to be sustainable. As a result, the document rather offhandedly admits, "the lands covered with forest will decrease somewhat".<sup>42</sup>

Both the PPMD and the prison service in Belarus have been granted profitable exemptions from government systems. While all other state-owned timber producers are forced to sell their products via transparent, government-run online auctions, the PPMD and the prisons do not. The loophole appears to be an open invitation to graft. The prisons actively brag of this exemption when advertising their wares – the implication being that it is advantageous to customers, who can get away with paying less than true market rates.

In spite of all the above being a matter of public record, all of Belarus's national parks controlled by the PPMD received FSC certificates, allowing them to market their products as 'green' goods. The first of these parks received its FSC certificate in December 2014. Belovezhskaya Pushcha's certificate was issued in August 2015 by NEPCon, the Danish firm also responsible for certifying a number of penal colonies. The most recent PPMD-owned forest to be certified (not in this case a national park) was audited by yet another FSC-approved firm, Swiss-headquartered auditing multinational SGS. It issued the certificate in January 2020.<sup>43</sup>

Given the trust placed by buyers on FSC certificates, we can be sure that wood from these National Parks has been making its way into EU supply chains, including IKEA's. Ivatsevichdrev, the state-owned firm and erstwhile IKEA supplier we found using prison labour, even has a subsidiary with a mill right next to Belovezhskaya Pushcha National Park, supplied with timber from it.

## THE END OF THE STORY?

On 24th February 2022, the world looked on in shock as large-scale ground war returned to Europe for the first time in a generation. Belarus, with its long, relatively lightly defended border with Ukraine and its proximity to its capital, Kyiv, provided a crucial staging post for Putin's invasion. Lukashenko's support for the war continues to undermine global efforts to punish Russia's aggression.

In response to Belarus's complicity, Western governments have expanded sanctions on the regime dramatically. Its banks are cut off from global financial systems. The list of individuals subject to punitive travel bans and asset seizures has swelled. And finally, belatedly, following calls from Ukrainian and Belarusian civil society groups that Earthsight played a key role in amplifying<sup>44</sup>, the European Union has expanded its trade sanctions to include timber.<sup>45</sup> Such sanctions had been considered before by the European Council following the violence in 2020, but rejected at the time – as a result, some said, of concerted lobbying by the European wood industry, which had grown increasingly dependent on Belarusian raw materials.<sup>46</sup>

Under pressure from a large coalition of advocacy groups in Europe, who were responding to the desperate pleas of their friends in Ukraine, companies in the wood sector, including the green labels, also began cutting ties with Russia and Belarus. On 3rd March 2022, IKEA announced that it was pausing all imports from both countries and shutting down its factories and sales there. Three days later, FSC announced the termination of all its certificates in Belarus. FSC claimed (somewhat implausibly, given the timing) that this decision was independent of the conflict, and instead because its auditors could no longer assess 'certain FSC social requirements' because of risks to their safety and livelihoods, risks which FSC had documented before the war commenced.

The FSC certificates of the four prisons, meanwhile, had been quietly revoked some time before. Two were

terminated in May 2021. IK5 in Ivatsevichy lost its certification on 1st September. The last, Bobruisk No.2, on 26th November 2021. The reasons for these terminations remain secret. Some may simply have expired, the prisons' directors perhaps deciding they were not worth the cost. Certainly the prisons were not found to have significantly breached FSC rules, since this would have led to a different outcome known in FSC parlance as 'terminated and blocked'. The prisons were not blacklisted. They remained welcome inside the FSC tent, should they wish to return. Ivatsevichdrev, meanwhile, only lost its certificate when FSC withdrew entirely after the invasion.

Presented with Earthsight's findings in advance of publication, FSC stated that "forced labour is not an inherent issue of all penal colonies" and that FSC audits in the prisons had confirmed that prisoners were not forced to work, and were paid, "even if at a low rate". It stated that "certification bodies terminated the FSC certificates of penal colonies in Belarus in 2021 due to concerns about human rights violations (following the 2020 elections)", but did not explain, if this was the case, why the terminations were not listed as 'terminated and blocked', or why they took so long to occur. Preferred by Nature stated that it had "seen no evidence of political prisoners at (IK5) at the time of certification", and that after speaking to 'local stakeholders'



Demonstrators protest against the Russian invasion of Ukraine outside the European Parliament - 2022.

Source: Shutterstock

following the receipt of our information they found “no indication that forced labour had been used at the Ivatsevichdrev factory during the time of certification”. SGS said that all its certificates were issued in full compliance with relevant standards, and that it has not issued certificates to entities or persons under international sanctions. Rainforest Alliance said that the protection of human rights in global supply chains is “at the core of [its] mission”. Further details of these company responses can be found at the end of this report. SCS did not respond to requests for comment.

The EU’s trade sanctions came into full effect on 3rd June 2022. All exports of Belarusian timber to Europe have now ceased. But a big loophole was left wide open: exports of furniture were made exempt. The EU’s reasons for this remain opaque. But it is hard to escape the suspicion that it was related to the largest furniture exporters in Belarus, unlike the exporters of raw timber, all being European-owned.

European firms have certainly been happy to profit from this loophole. While IKEA’s voluntary withdrawal has led to a substantial reduction in the trade, none of its competitors in Europe have followed their lead. As a result, wood products worth millions of euros continue to flood across the border. In July 2022 alone, European firms purchased wood furniture and furniture parts from Belarus worth €13.9 million.<sup>47</sup> And as Earthsight has discovered, these include products likely produced with forced labour.

### COMFORTABLE SEATS, UNCOMFORTABLE TRUTHS

Twenty different EU Member States have continued to import wood furniture from Belarus since the sanctions on raw timber took effect. By far the largest buyers, however, are Poland, Germany and Lithuania. Poland and Lithuania are mostly importing furniture parts, to be constructed into finished products for onward trade to unknown destinations. Germany, on the other hand, is buying finished goods direct.

Germany has long been a leading buyer of Belarusian wood, including both raw timber and finished furniture. This role has continued. At the time of writing, German firms are importing Belarusian wood furniture worth around €1 million every week.

Perhaps the biggest such importer is a German company called Polipol, headquartered in the city of Diepenau, in the north of the country. A large multinational with a €0.5bn turnover and some 8500 employees, Polipol specialises in sofas and comfy armchairs, which it manufactures at facilities in eastern Europe, and sells right across the continent. It claims to be ‘among the leading upholstered furniture manufacturers in Europe’.

The prisoners from IK5 being bussed into the large campus of Ivatsevichdrev, erstwhile supplier to IKEA, will most likely know the name Polipol... because it has a furniture factory right next door.

In 2018 Polipol did a deal with the Belarusian government to set up a new manufacturing facility in the country. The deal involved the firm renting space from state-owned Ivatsevichdrev, and using chipboard produced there in the construction of its sofas. It now employs 600 people at the facility in three shifts, producing one million euros a month of upholstered furniture, all of it for export.<sup>48</sup> Its Belarusian factory churns out a sofa or armchair roughly every 15 minutes. Until the recent sanctions, Ivatsevichdrev was also supplying raw materials for Polipol’s factories in Poland and Romania.<sup>49</sup>

Unlike IKEA, and in spite of the withdrawal of FSC, Polipol has refused to halt its activities in Belarus in response to the war in Ukraine. On 25th April 2022, Polipol’s Managing Director, Marc Greve, told a German furniture industry magazine that while “we condemn this terrible war”, they are continuing to produce furniture in Belarus “as usual”.<sup>50</sup> The chipboard furniture panels being made with the slave labour of abused political prisoners at Ivatsevichdrev may no longer be being used by IKEA, but they continue to be used to make products on sale in furniture showrooms across

**IKEA’S EUROPEAN  
COMPETITORS DID  
NOT FOLLOW ITS  
VOLUNTARY  
WITHDRAWAL FROM  
BELARUS FOLLOWING  
RUSSIA’S INVASION  
OF UKRAINE**

Europe. As Ivatsevichdrev's CEO boasted in July 2022, after a brief pause at the war's outset, its "European partners are now ready to cooperate with us again".<sup>51</sup>

Polipol's furniture is on sale in hundreds of stores across Europe, including in 19 of the 27 EU Member States.<sup>52</sup> Stockists include Austrian-owned XXXLutz group, one of the largest furniture retailers in the world. Nicknamed 'the Austrian IKEA', and famous in much of Europe for the giant red chairs outside its huge stores, the firm is second only to the Swedish brand in terms of sales on the continent<sup>53</sup> and claims to have '10 million regular customers'.<sup>54</sup> Polipol's furniture is sold by XXXLutz's subsidiary POCO, a prominent furniture discounter with 125 stores and over €1.6bn of annual sales in Germany. Polipol furniture is also sold by most of XXXLutz's nearest competitors in the German furniture market, including Porta Möbel/Mobel Boss, Hoffner and Roller. In France, Polipol's sofas are on sale at branches of its largest home-grown furniture chain, BUT.<sup>55</sup> IKEA is pretty much the only one of the top 10 furniture retailers in Europe which does not stock the firm's products.

Ivatsevichdrev's own furniture is also being sold in Germany. Contacting the company in the guise of prospective customers in November 2022, Earthsight learned that Ivatsevichdrev is selling furniture to German company Bega Group. Bega, which has carved out a lucrative niche in the European furniture market in recent years by specialising in prices lower than any competitor can match<sup>56</sup>, had €622m in turnover in 2021. The firm distributes furniture to retailers across Europe, including branches of XXXLutz.<sup>57</sup>

Polipol and Ivatsevichdrev are not the only conduits by which Belarusian wood linked to abuse in the country's prisons continues to enter the EU. FanDOK, the big state-owned mill in Bobruisk which we were told is intimately connected with the nearby penal colony, is now exporting furniture directly to Germany. In September 2022 its Director bragged that while the firm could no longer export raw timber to the EU due to



sanctions, it had responded by ramping up production of furniture of its own. "Last year we produced 5-6 models of solid wood furniture for the German market. Now we have 21" he said.<sup>58</sup> The company used to have one German customer for its furniture, but now, he claims, it has three.<sup>59</sup>

European consumers are now not only complicit in the torture of political prisoners and directly feathering the nest of a nasty dictator. By propping up Lukashenko's regime, their furniture purchases are also providing support to Russia's criminal war in Ukraine.

XXXLutz told Earthsight that its purchasing and that of its subsidiaries Poco and BUT is carried out through a third party, German company GIGA International, and referred us to them for a response. GIGA stated that it had terminated all cooperation with direct suppliers in Belarus in February 2022. They stated that they had asked their (indirect) suppliers Polipol and Bega for a detailed statement. GIGA stated that it "obliges all suppliers to observe all valid regulations and laws" and that this forms a "central component of supplier contracts". It stated that its own and third party audits of its supply chains in Belarus in 2021 had "found no irregularities", including in relation to human rights. IKEA said it had no comment. Bega Gruppe, Roller and Porta Möbel/Mobel Boss did not respond to requests for comment. Neither did Ivatsevichdrev or FanDOK.

## EUROPEAN FURNITURE BUYERS HAVE PROVIDED FUNDS FOR BELARUS'S DICTATOR AND RUSSIA'S CRIMINAL WAR IN UKRAINE



## 5. WHAT MUST BE DONE?

### EU SANCTIONS MUST BE EXPANDED TO COVER WOOD FURNITURE, PULP AND PAPER FROM BELARUS

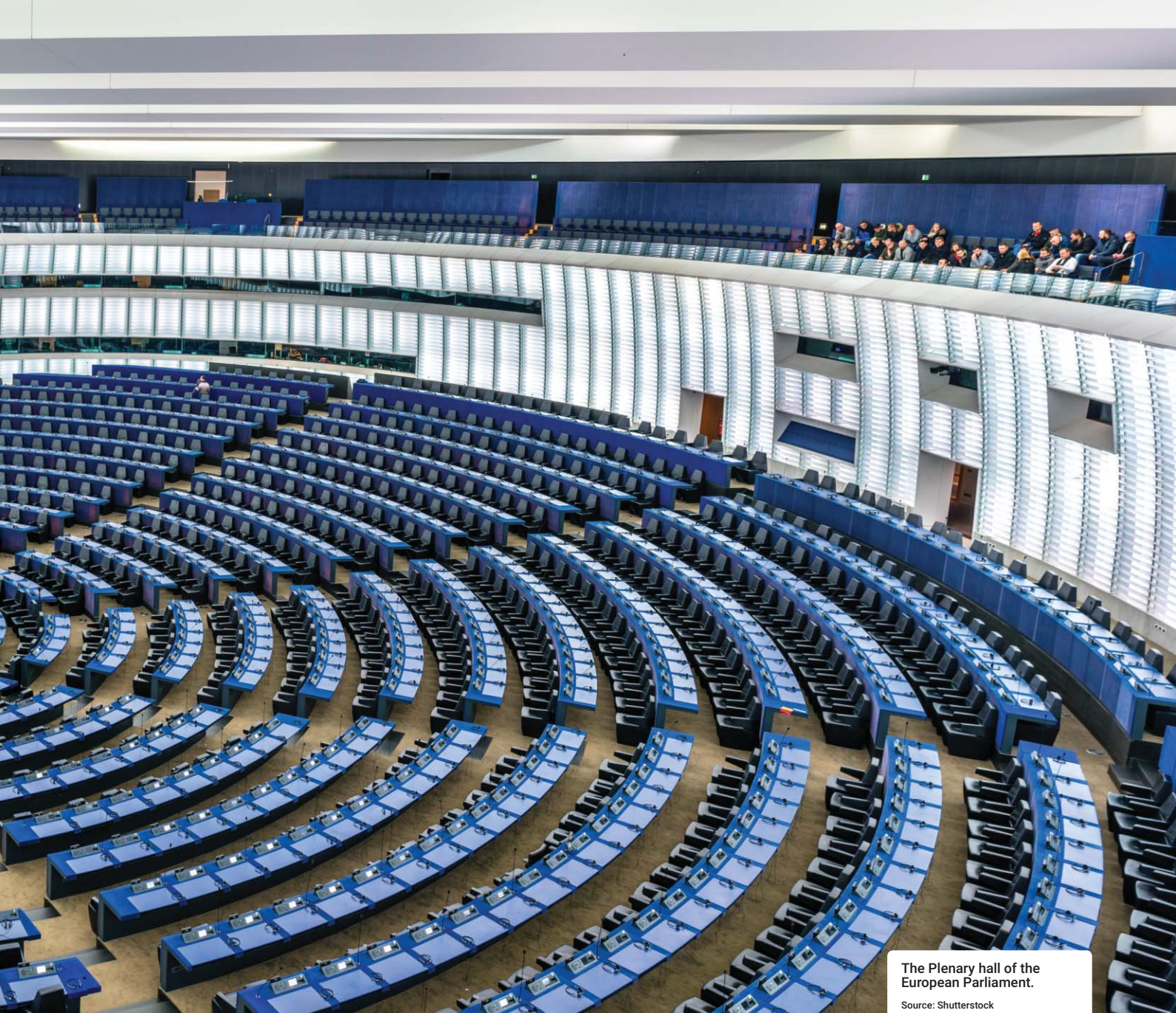
#### GOVERNMENT ACTION

This is not a problem that can be put down to one poor certifier. Four different companies proved willing to issue FSC certificates to Belarusian prisons and/or to PPMD-owned National Parks despite their reputations and the EU sanctions aimed at their top management. Nor can it be put down to one lax European retailer. Every major big-box furniture store on the European continent is implicated. It cannot even be laid solely at FSC's door. The green label's biggest global competitor, PEFC, also merrily rubberstamped the PPMD forests and at least one prison in Belarus (it also cancelled all certificates after the invasion of Ukraine).<sup>60</sup> The trade has also continued, albeit at a lower level, despite the withdrawal of both of these green labels from the country.

What is needed most is stronger action by governments.

Existing EU sanctions must be urgently expanded to cover wood furniture, pulp and paper from Belarus. This should be justified based not only on Belarus's complicity in the conflict, but on the abuses by the Lukashenko regime which existed before that. The sanctions should not be lifted until such time as those abuses are halted.

In the meantime, the EU must use its existing powers to prevent such imports. An EU law, the European Timber Regulation (EUTR), requires importers to ensure that the risk of their supplies of timber and wood products being tainted with illegality is 'negligible'. In light of the recent events in Belarus, in April 2022 the European Commission declared that it is now



The Plenary hall of the European Parliament.

Source: Shutterstock

'impossible' for companies to do this, and that they should therefore cease importing wooden goods from Belarus or made with Belarusian wood, even if these are not yet covered by sanctions.<sup>61</sup> But they have not. Twenty different EU countries have continued to record imports from Belarus supposedly subject to EUTR rules, with Poland, Lithuania and Germany the biggest culprits.<sup>62</sup> Those responsible for implementing the law are blatantly failing to enforce it.<sup>63</sup>

The UK and US must also enact sanctions against Oleg Matkin, head of the prison service, and ban all wood product imports from Belarus. At present, their doors remain open even to raw timber.

More broadly, this case shows the need for action in Western consumer countries which goes beyond

sanctions and specific categories of risky goods like timber. There is an urgent need for new laws to be passed which force European companies to conduct due diligence on their supply chains, to ensure that they are not contributing to abuses overseas, including such things as environmental destruction, forced and child labour, and other human rights abuses. A new German law intended to achieve this was severely weakened following industry lobbying. It would not have prevented this case, because the checks it demands of supply chains only apply to a company's direct suppliers.<sup>64</sup> Now the buck passes to the EU, which is considering its own due diligence legislation.<sup>65</sup> EU lawmakers must stand up more firmly than German ones did to corporate power, pass a meaningful law and implement it rigorously.

### RESCUING THE WORLD'S LEADING GREEN LABEL FROM ITSELF

Until such time as they are forced to, companies in the EU, UK and US must voluntarily cease all purchases of timber and wood products from Belarus. They must also interrogate their supply chains to ensure they are not purchasing furniture made elsewhere with parts imported from Belarus – as could well be the case for anything bought in Poland or Lithuania. European-owned multinationals making these products in Belarus, including prominent Polish, Lithuanian and Austrian firms, must follow the lead of their biggest customer, IKEA, and pull out.

Governments and companies also need to learn the wider lessons of this story, however, as they relate to greenwashing. FSC's failures are not

restricted to Belarus.<sup>66</sup> EU authorities must stop considering FSC certification as proof of EUTR compliance. Companies handling FSC-certified goods – which includes all the biggest retailers on the continent – must throw their weight behind efforts to force the green label to reform.<sup>67</sup> As it stands, FSC just keeps staggering from scandal to scandal, blithely denying that there is any major problem. At its latest biennial powwow in lush Bali in October 2022, none of the most important flaws identified by critics were addressed.

FSC's spectacular failures in Belarus are not due to individual oversights, nor can they be prevented with minor amendments to its rules. They are the result of a toxic culture within the organisation, one which promotes growth over common sense. It comes down to a blind following of rules. There is no specific rule saying you



Piles of logs waiting to be processed.

Source: Shutterstock



cannot certify a prison where torture has occurred, or political prisoners are locked up. But there surely shouldn't have to be. There is, as always, a built-in assumption – no matter what obvious red flags may appear – that those being certified are honest. FSC's insistence on sticking to a model where multiple auditing firms compete for business from those they are meant to police is increasingly bizarre in the face of mounting evidence that it can lead only to a race to the bottom and beyond.

FSC's excuses about having to follow its own rules to the letter, regardless, also ring increasingly hollow. Proof that it can move much more quickly where an obvious, overwhelming need arises was demonstrated in its response calls from civil society following the invasion of Ukraine. Action on Belarus which was supposedly in the pipeline already was rushed forward, while in Russia FSC

bent over backwards, inventing a whole new type of certificate overnight in order to somehow cancel and not cancel its operations there at the same time.

FSC must initiate an independent inquiry of how the green label managed to fail so spectacularly in this case, publish the findings and act on any recommendations made. The green label must also acknowledge and seek to address the underlying cultural and structural flaws within it which continue to enable scandals like this to occur – including the way in which its audits are financed. Those who rely on its certificates – including EU governments as well as FSC's biggest cheerleaders, IKEA and WWF, must demand it take these steps.

If they don't, yet another scandal will most assuredly be just around the corner.



## COMPANIES HANDLING FSC-CERTIFIED GOODS MUST BACK REFORMS AT THE GREEN LABEL

**FSC hall of shame: The ethical wood label's long line of scandals**

25.10.2021 Credit: Matt Hall for Earthsight (after KC Green)

FSC has a long history of scandals, as documented by Earthsight in November 2021.  
Source: Earthsight

# RECOMMENDATIONS



## GOVERNMENTS

### The European Commission, European Council and European Parliament

#### Regarding sanctions

- The EU must act urgently to extend existing trade sanctions on Belarus to include furniture, doing so on the basis of the ongoing internal repression within the country as well as its complicity in the Russian invasion of Ukraine. MEPs must make public calls for such action.
- The EU must make public the reasoning behind the exemption given to wood furniture in the existing sanctions on Belarus, as well as any documents relating to lobbying for that exemption by EU Member States, companies or trade associations.

#### Regarding EUTR and its planned replacement, the EU Regulation on Deforestation-Free Products

- The European Commission must enforce its own formal guidance, which indicates compliance with EUTR for Belarus at present is effectively 'impossible' for wood products not already covered by sanctions and says companies must halt imports. It must investigate compliance with this guidance by EU Member States that Earthsight's investigation shows have continued to import Belarusian furniture, and take action against those countries found to be in breach.
- In the 'trilogue' debates currently ongoing regarding the finalisation of the text of the EU Regulation on Deforestation-Free Products (which is set to subsume EUTR), the EU must ensure that wood seats are added to the scope, thereby closing a loophole in the law which has existed since 2013.
- The European Commission must engage with the 'green labels' which continue to undermine the effectiveness of the EU Timber Regulation (and risk undermining the

effectiveness of its replacement the EU Regulation on Deforestation-Free Products), expressing concern and backing necessary improvements.

#### Regarding supply chain due diligence legislation

- The European Council and European Parliament must push for the strengthening of the draft Directive on Corporate Sustainability Due Diligence published by the European Commission in February 2022, and then ensure the strengthened legislation takes effect as soon as possible.
- The Regulation needs to ensure that international human rights abuses that occur at all stages of manufacturing – from primary and secondary processing to export of products – are covered within its scope.

#### EU Member States

- EU Member State governments must push at the EU level for the actions needed to address this trade, including the expansion of EU sanctions.
- EU Timber Regulation Competent Authorities (EUTR CAs) in EU Member States, especially those in Germany, France, Poland and Lithuania, must follow official EU guidance and act to halt EUTR-non-compliant imports of wood furniture from Belarus, pending the expansion of sanctions.
- EUTR CAs must not give any preference when enforcing the law to wood 'certified' as legal and sustainable by labels such as FSC and PEFC, unless and until those labels improve their systems.

#### Germany

- In advance of the German supply chain law taking effect in January 2023, relevant German authorities should write to the German furniture retailers highlighted in this report, alerting them to the risk that continued imports risk breaching that law.

## France

- Investigate the French furniture chain BUT for failure to comply with the Loi De Vigilance.

## United Kingdom

- Add Belarusian timber and wood furniture to existing trade sanctions, on the basis of the ongoing internal repression within the country as well as its complicity in the Russian invasion of Ukraine.
- Make public the reasoning behind the exemption given to wood in the existing trade sanctions on Belarus, as well as any documents relating to lobbying for that exemption by companies or trade associations.

## United States

- Add Belarusian and Russian timber and wood furniture to existing trade sanctions.
- In the meantime, investigate whether continued imports of Belarusian and Russian timber and wood products are compliant with other laws, including the Lacey Act.

## COMPANIES

### IKEA

- IKEA must urgently commission an external investigation into this case from Ernst and Young or similar third parties with no links to it, who have previously been commissioned by IKEA to investigate its connections to prison labour in other countries. The investigation must explore how its and FSC's systems failed and why, and IKEA must take urgent action to ensure no such situation can develop again in future. The scope of the investigation must include its links to prison labour in Belarus prior to its temporary withdrawal from the country and the rationale that allowed this to happen for years. The results of this investigation must be made public to its consumers. The company should aim to take further actions about its longer-term presence in Belarus based on the findings of such a report.
- IKEA must press FSC to make the changes and improvements necessary to prevent such cases recurring in future. Fundamental among these is publicly urging it to reform its systems to break the direct relationship between auditee and auditor.
- IKEA must extend its actions in response to the war in Ukraine, by acting to ensure that products made for it elsewhere, such as in China, do not use Belarusian or Russian raw materials.

### Other furniture retailers in Europe

- Retailers of furniture in Europe must take urgent action to ensure that they are not selling products made with wood originating in Belarus or Russia, whether these products are imported directly from Russia or Belarus or made with such wood in third countries such as China. They must follow IKEA in publicly renouncing the use of such wood.

## European companies continuing to operate in Belarus

- EU-owned companies in the timber and wood sector which continue to operate in Belarus must end their engagement in the country on moral grounds, regardless of whether this is demanded by sanctions.

## FSC

- FSC must initiate an independent inquiry of how the green label managed to fail so spectacularly in this case, publish the findings and act on any recommendations made.
- FSC must also acknowledge and seek to address the underlying cultural and structural flaws within it which continue to enable scandals like this to occur.
- Among other things, FSC must act to remove the fundamental conflict of interest at the heart of its system, whereby certifying companies compete for business from timber firms. A report by Mike Reed Associates, presented at last year's virtual FSC General Assembly, briefly looked into this issue but it remains unaddressed. In response to a growing number of voices demanding this fundamental flaw at FSC be permanently rectified, it must act urgently to change the way auditors are financed.
- This is not the only conflict of interest FSC has. FSC's oversight body (Assurance Services International) is a 100% owned subsidiary of FSC itself, calling into question its ability to oversee or investigate FSC's actions with impartiality. This relationship must be changed.
- More details and a full list of essential reforms needed from FSC are contained in a joint letter, signed by 34 NGOs and published in October 2021.

## PEFC

- PEFC must also initiate an independent inquiry of how the green label managed to fail so spectacularly in this case, publish the findings and act on any recommendations made.
- Since it suffers from the same conflicts of interest as seen at FSC, it must urgently remedy this flaw by implementing an alternate financing model.

## OTHER

### WWF

- WWF's continued support for FSC is vital to its reputation and credibility with retailers. Without that support and that credibility, FSC's industry members would be forced to reconsider the veto they continue to wield on actions needed to improve the green label. WWF must take firm action to force such change.

**Preferred by Nature** stated that “we have seen no evidence of political prisoners at (IK5) at the time of certification”, and that after speaking to ‘local stakeholders’ following the receipt of our information they found “no indication that forced labour had been used at the Ivatsevichdrev factory during the time of certification”. Regarding the PPMD forests, Preferred by Nature stated that “there is no such thing as ‘Presidential forest’ in Belarus”, that it does not consider logging in National Parks but outside conservation zones as questionable, and that its audits in these parks, which included participation of local environmental NGOs, found no issues. It further stated that “certification has an important role in countries with weak governance”, where it provides a “tool to ensure (human rights) standards are introduced where none are provided by local legislative frameworks.” I would need to speak to the manufacturer. But I can say that we are in contact with them about this report.

**SGS** said “we contest strongly your statements which are totally inaccurate”. It said all certificates issued by SGS were issued in “full compliance with international standards accredited by the relevant accreditation body” and that it had “not issued any FSC certificates to entities or persons which were at the time under international sanctions”. It further stated that its audits in Belarus “were not subject to any form of pressure or influence from the Belarus government”. It stressed that the PPMD-owned forest it certified in 2020 represented “less than 0.5% of the forested area of the country”.

**Rainforest Alliance** said that the protection of human rights in global supply chains is “at the core of [its] mission”. It stressed that prior to 2014, the certificates being issued in Europe under its FSC accreditation were being issued under subcontract by the Danish firm NEPCo.

**SCS** responding after this report was first published, said “We adamantly disagree with the characterization in this report of our actions and motives, and of our fellow certification bodies. SCS has been dedicated to combatting greenwashing and providing transparency and validation of environmental claims for four decades. The quality and reliability of our certification services have been independently accredited by numerous national and international bodies, who have delved deeply into our processes.” SCS further stated: “For Penal Colony #2, SCS engaged a qualified local auditor to conduct the on-site inspection consistent with the requirements of the FSC Chain of Custody Standard. The certificate, issued in November 2020, was based on the audit report completed in August, two months before the EU sanction of Mr. Matkin. SCS only learned of this sanction after the certificate was issued, and sought to remedy this situation, undertaking an investigation which led ultimately to termination of the certificate and SCS’ complete withdrawal from certification work in Belarus.” Finally, SCS stressed that: “It consistently and strongly condemns the mistreatment of workers, slave labor, and human rights violations.”

**FSC** stated that certificate holders must sign up to its Policy of Association, which includes respect for human rights, and compliance with the ILO Conventions. It stated that “in 2020, after the elections, FSC took note of the growing concerns about the upholding of social rights in Belarus, especially with respect to the core conventions of the International Labour Organization (ILO) which address essential workers’ rights” but went on to confirm that the decision to withdraw from Belarus was based not on violations of such rights but an inability to safely assess compliance. FSC stated that “forced labour is not an inherent issue of all penal colonies” and said FSC audits had confirmed that prisoners were not forced to work, and were paid, “even if at a low rate”. FSC stated that it was “deeply concerned when reports about human rights abuses came out as a result of violence and repression in the country since 2020” and that “certification bodies terminated the FSC certificates of penal colonies in Belarus in 2021 due to the said concerns about human rights violations.” It did not explain, if this was the case, why the terminations were not listed as ‘terminated and blocked’. Regarding Belovezhskaya National Park, it stated that the park includes areas where logging is permitted, and that audits found no forestry-related non-conformities with the FSC standards. It stated that it could not confirm if Ivatsevichdrev had obtained wood from National Parks as it did not have access to the company’s business transactions and could only access this data in cases of systems integrity investigations.

**XXXLutz** and its subsidiaries **Poco** and **BUT** stated that they do not purchase their goods directly, but together with other dealers do so via the joint ‘purchasing association’, **GIGA International**. GIGA told Earthsight that our allegations “will be investigated by us immediately”. They stated that they had terminated all cooperation with direct suppliers in Belarus in February 2022. They stated that they had asked their (indirect) suppliers Polipol and Bega for a detailed statement. GIGA stated that it “obliges all suppliers to observe all valid regulations and laws” and that this forms a “central component of supplier contracts”. It stated that its own supply chain audits and those of FSC auditor NEPCon (Preferred by Nature) – which included checks on compliance with human rights – in Belarus last year had “found no irregularities”. The company stated that “should any of (Earthsight’s) assumptions prove to be true, GIGA International will immediately discontinue its cooperation with regard to the products concerned”, and that the company will “never tolerate practices that violate human rights or the law”.

**SCS, Bega Gruppe, Roller** and **Porta Mobil/Mobel Boss** did not respond to requests for comment. Neither did **Ivatsevichdrev** or **FanDOK**.

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