



Madinter Trade, S.L.

Proveedor de madera para instrumentos musicales

Agente nº4: Importador; comerciante; transformador


Volumen de **importación** 2022: 95 toneladas / 1,5€ millones

Sistema de Diligencia Debida Independiente basado en LegalSource by NepCon

Responsable de Implementación: Luisa Fiona Willsher

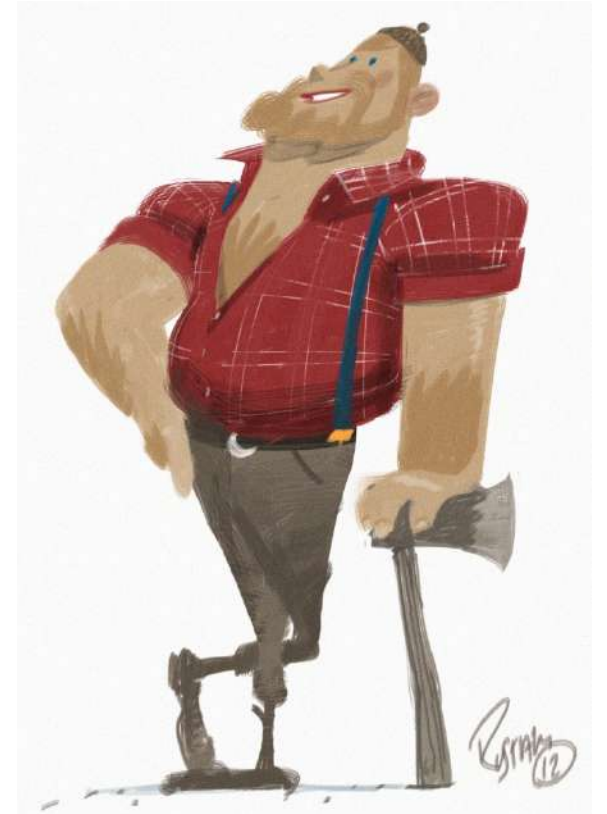
Responsable de la “Declaración Responsable”: Beatriz Serrano





Como amantes de la madera
y expertos de su valor estético y ecológico,
en Madinter somos muy comprometidos
con el comercio responsable,
y con promover la gestión forestal sostenible.

Es muy importante para Madinter asegurar que todos los productos que ofrecemos a nuestros clientes son legales.



Hoy en día hay leyes en varios países consumidores para combatir el talado ilegal



EUTR - Reglamento Europeo de la madera



Lacey Act



Swiss Timber Trade Ordinance



UK Timber Regulation



Illegal Logging Prohibition Act



Clean Wood Act

EUTR

Reglamento Europeo de la Madera



Este Reglamento es para evitar el comercio de la madera ilegal, y de productos derivados de esa madera, imponiendo tres obligaciones principales:

1.

Prohibir la comercialización
en la Unión Europea
de madera ilegal
y de productos derivados de
esa madera.



2.

Exigir a las empresas
que comercialicen por
primera vez
productos de la madera
en la Unión Europea, que
ejercen la
«**diligencia debida**».

3.

Obligar a esas empresas
a mantener registros
de sus proveedores y
clientes.



¿En qué consiste la «diligencia debida»?

Investigación

Los tres elementos clave del «sistema de diligencia debida» son los siguientes:



1. Información

La empresa debe tener acceso a la información que describa:

- La madera
- El país de aprovechamiento
- La cantidad
- Los datos del proveedor
- El cumplimiento de la legislación nacional aplicable.





Madinter exige a su proveedor que indique siempre en su factura y otros documentos:

- Nombre comercial de la madera
- Nombre botánico de la madera
- TARIC
- Volumen
- País de recolección
- Área de recolección
- Nombre y dirección del “fabricante” (si no es el mismo que el vendedor)

Ejemplo:



Taylor Listüg Madinter S.L.
 C/ Granito 5, Pol. Ind. Puente Madrid Cerceda
 Madrid 28412 Tel: 918463679
 info@tlim-ebony.com Fax: 918574839

Invoice / Factura
 Nº: A/ 44
 Date: 08-05-13
 Nº Albarán 65

C.I.F./N.I.F.: ESB-86306305

CLIENT: 000001	NAME: MADINTER TRADE SL
VAT Nº / N.I.F.: B82974726	ADDRESS: MERCURIO 11
Transport Co: Bollore Africa Logistics	TOWN: COLMENAR VIEJO
Nº bundles:	POST CODE: 28770
Dimensions / Weight: See Pcking List	PROVINCE: Madrid
Form of payment: PAYMENT AGAINST DOCUMENTS	Spain 918463679

REF	DESCRIPTION	QUANT	PRICE	DNT	VAT	AMOUNT
EB4800709	AB Quality Ebony (Diospyros crassiflora Hiern) 50x7x6mm	25.000				
EB48004515	AB Quality Ebony (Diospyros crassiflora Hiern) 36x4x15mm	12.500				
P.V.TAX	Export Tax Art. 3 of the Cameroonian Law nº 2012/014 of 21/12/2012	1				
PO Madinter TRADE 734 - Invoice A/44 Ebony (Diospyros crassiflora Hiern); Area of Harvest: South, Center, East, South-West, Littoral zone ; Manufacturer: Crelicam s.a.r.l., Quatier Odza Borne 12 Yaoundé BP 35080 Ydé; HTSUS# 4407.99.0193 TARIÇ# 44079998 Net/Gross Volume: 10.91m3/18.80m3 Net /Gross Weight: 13.638Kg/14.108Kg						

Sp. Dnt	VAT base	% VAT	VAT	Transport
P.P. Dnt	127.424,81			Net
				Total VAT

Clients have a period of 15 days in which to make a demand.
 Any damage made during transport must be claimed within 24 hours of the receipt of the goods

TOTAL INVOICE EUR

PO Madinter 734; Country of Harvest: Cameroon; PO Martin 113656; HTS# 4407.99.0193; IRS#24-0654



2. Evaluación del riesgo

Basándose en la información mencionada y teniendo en cuenta los criterios definidos en el Reglamento, la empresa debe evaluar el riesgo de que se introduzca en su cadena de suministro madera ilegal.





Madinter estudia toda la documentación aportada teniendo en cuenta las leyes del país de recolección.

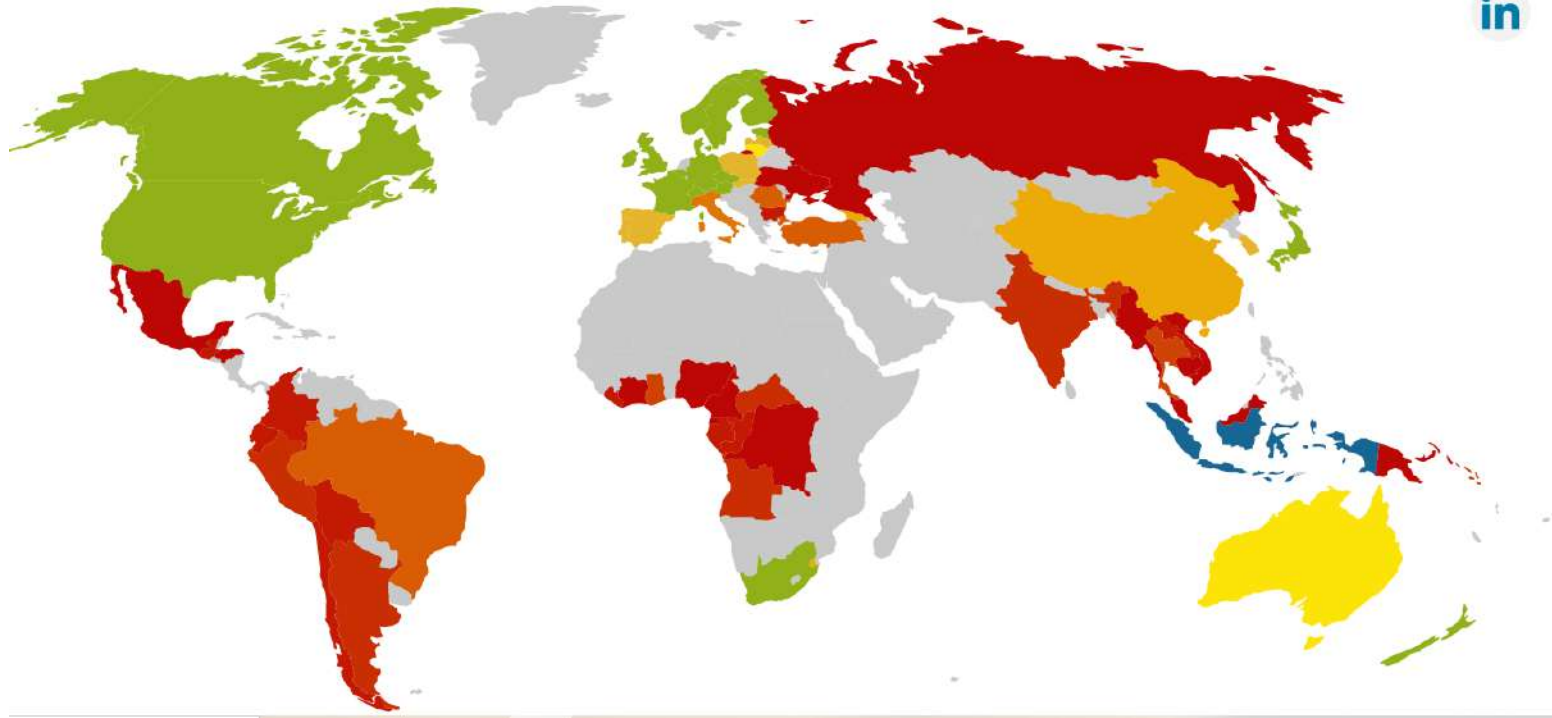
Usamos herramientas para conocer las leyes de origen:



Tools for Due Dilligence



Click on the map to access country risk information and tools



Toolbox



[Timber Risk Assessment](#)



[List of applicable legislation](#)



[Risk Mitigation Guide](#)



[Document Guide](#)

Timber Risk Score: 42 / 100 in 2017. The [Timber Legality Risk Assessment](#) contains an evaluation of the risk of illegality in Brazil for five categories and 21 sub-categories of law. We found:

- Specified risk for 11 sub-categories.
- Low risk for 8 sub-categories.
- No legal requirements for 2 sub-categories.

This page provides an overview of the legality risks related to timber produced in Brazil.

Brazil has 463 million hectares of forest. 98.5% of this is natural forest, while the rest is plantation (FAO, 2015).

Brazil is a leading producer, processor and consumer of wood-based products. Roundwood production totalled 254.4 million cubic metres in 2015, and the forestry sector contributed USD 22.5 billion to the economy in 2011, which is approximately 1.1% of the GDP.

Brazil has experienced rapid deforestation, and while the deforestation rate fell significantly between 2004 and 2012, it has risen more recently (Wellesley, 2014). Illegal logging has long been an extensive problem in Brazil, and corruption, illegality and fraud remain widespread in the forest sector (Wellesley, 2014).

Several legality risks are present in Brazilian timber supply chains. The risks are wide-ranging and appear across all categories of law. If you are sourcing timber from Brazil you should take care to ensure the extensive risks identified are not present in your supply chains, or have been sufficiently mitigated.

Corruption Perceptions Index

Score: 38 / 100 in 2021

Rank: 96 out of
180 countries in 2021



Bans and restrictions

Export ban: Logs from natural forests; all *Swietenia macrophylla* exports (moratorium since 2001)

Other bans / restrictions: Exploitation of the Atlantic Forest Biome is prohibited; certain exports (e.g. *Imbuia*, *Virola*) are subject to specific requirements, including prior authorisation from IBAMA



Armed conflict

There are currently no armed conflicts in Brazil according to the Council on Foreign Relations' [Global Conflict Tracker](#).



CITES species

[CITES](#) appendix I:
Dalbergia nigra,

[CITES](#) appendix II: *Alsophila acantha*, *Alsophila adspersa*, *Paubrasilia echinata*, *Bulnesia sarmientoi*, *Dalbergia* spp, *Swietenia macrophylla*, *Cedrela* spp,



Certification

[FSC Certified Forest](#)
Area:
7,266,896 hectares (4 December 2019)

[PEFC Certified Forest](#)
Area: 4,390,384 hectares (31 December 2019).



1

INFORMATION GATHERING

2

RISK ASSESSMENT

3

RISK MITIGATION

Timber source type	Description of source type
Natural forests	<p>Timber from natural forests on both state and privately owned land. The following must be in place and complied with:</p> <ul style="list-style-type: none"> • A concession contract, an AUTEF/AUTEX – Authorisation of Forest Exploitation • Sustainable Forest Management Plan (Plano de Manejo Florestal Sustentável - PMFS) • Approved Annual Operational Plan (Plano Operacional Anual - POA) <p>In order to be legal, trade and transport must be accompanied by:</p> <ul style="list-style-type: none"> • DOF/GF – Document of Forest Origin (<i>Documento de Origem Florestal</i>) • Fiscal Bill of Sale (<i>Nota Fiscal</i>) • Invoice
Plantations	<p>Timber from plantations on privately owned land, including both native and exotic species. The following must be in place and complied with:</p> <ul style="list-style-type: none"> • AUTEF/AUTEX – Authorization of Forest Exploitation • Planting license • Forest Voucher • Environmental license for the management of plantations (required in some states only) <p>In order to be legal, trade and transport must be accompanied by:</p> <ul style="list-style-type: none"> • DOF/GF – Document of Forest Origin (<i>Documento de Origem Florestal</i>) • Fiscal Bill of Sale (<i>Nota Fiscal</i>) • Invoice



Risk Tool

A tool to help companies buy legal forest products

The Risk Tool, a project of the Forest Legality Alliance in cooperation with partners around the world, helps users ask informed questions about where their forest products come from and what issues a buyer might encounter. Information about forest products and legality is presented by country and by species.

[Countries](#)

[Species](#)

[Forest Legality Basics](#)

[About the Tool](#)

[Sponsors + Partners](#)

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Bolivia

Jatoba, Ipe, Rubber Tree, Bigleaf mahogany, Argentine cedar, Cedro, Parlatore, Palo Santo, Spanish cedar



Brazil

Jatoba, Ipe, Cumaru, Rubber Tree, Brazilian rosewood (essential oils), Bigleaf mahogany, Argentine cedar, Pau Brasil, Cedro, Brazilian rosewood (timber), Parana pine, Spanish cedar, Elliotis Pine, Caribbean pine



Cambodia



Cameroon

3. Reducción del riesgo

Cuando la evaluación revele un riesgo de que se introduzca en la cadena de suministro madera ilegal, podrá mitigarse ese riesgo pidiendo al proveedor informaciones y comprobaciones adicionales.





Visitamos a cada proveedor como mínimo una vez al año.

Así, para cada madera que compramos controlamos su trazabilidad desde el bosque hasta nuestra fábrica en Madrid.





Después de la visita se realiza un informe



Todos nuestros proveedores deben comprometerse,
por contrato, cumplir todas las leyes de su país.

Se somete el informe a estudio.

Si no quedamos satisfechos de que todas las leyes se cumplen, por mucho que hayan firmado nuestro contrato, elegimos no comprar a ese proveedor.





Casos de la Ley Lacey



Gibson Guitars (Ébano de Madagascar)

Lumber Liquidators (Revestimiento de Suelo Hecho en China)

Young Living Essential Oils (Aceites de Palosanto de Perú y Nepal)

Global Plywood and Lumber Trading (Perú)

Harold Kupers (Arce Duro de EEUU)

Justin Andrew Wilke (Arce Duro de EEUU)

Luisa Fiona Willsher
Directora Comercial



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