

UKRAINIAN NATURE CONSERVATION GROUP

40 Hoholya, Vasylkiv, Kyiv region, Ukraine, 08601 (+38 097) 100-04-73

uncg.ua@gmail.com, www.uncg.org.ua

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Brian Nelson, Under Secretary for Terrorism and Financial Intelligence,
Department of the Treasury, US Government

Expansion of US sanctions to Russian timber imports

Dear Under-Secretary Nelson

We, leading Ukrainian environmental NGOs, are writing to you from Ukraine to request that you consider adding Russian timber imports to the next round of US sanctions on Russia <u>announced</u> by President Biden on Tuesday, in the wake of the death of Alexey Navalny.

This coming weekend will see the second anniversary of Russia's brutal invasion of our country. Further international action is required to halt Russian aggression.

We believe there are compelling reasons for adding Russian timber to US trade sanctions, as follows:

- Timber represents more than half of all remaining US imports of Russian goods, in terms of number of shipments. Since the war began, the US has imported timber from Russia worth \$1.98 billion. Timber is also one of Russia's largest industries after oil and gas.
- Some of the largest Russian producers of these continuing imports are firms connected to Russian oligarchs with close ties to Putin's regime.
- The Russian military directly controls an area of forest twice the size of New Jersey, from which it receives income from the sale of timber.
- The Ukrainian Parliament has specifically called on friendly countries to sanction Russian timber, in a Resolution passed on 2nd May 2023.² A coalition of 130 nongovernment organisations from around the world has echoed this call. Leading unions in the US such as the International Association of Machinists and Aerospace Workers (IAM) have also repeated these calls.
- The EU and UK have already sanctioned Russian timber, so for the US to follow suit would bring the country in line with its allies.

Last month, our research shows, just one vessel offloaded 5809 cubic metres of Russian plywood at the US ports of Baltimore and Houston. One of the largest suppliers of the plywood on that ship, records show, was Russian firm Sveza, which is linked to Alexei

¹ US Customs data from USITC show imports of 441,514 cubic metres of Russian plywood imports during the period March 2022 to December 2023. US dollar value of these imports is calculated from this volume using retail values for Russian birch plywood in the USA.

² RESOLUTION of the Verkhovna Rada of Ukraine, Number 3087-IX, 2 May 2023, https://zakon.rada.gov.ua/laws/show/3087-20#Text, which states that the Parliament "appeals to governments of foreign countries regarding the establishment of sanctions on the import of wood and products from it from the Russian federation and the Republic of Belarus"

Mordashov, Russia's richest man, who met with Putin on the day of the Ukraine invasion and is under US sanctions. Mordashov reduced his stake in the company to 49 per cent in order to evade those sanctions, but continues to personally profit from Sveza's sales of plywood to the USA.

The US Treasury Secretary has the power to stop this trade under Executive Order 14068. If further sanctions on Russia are being considered, then a ban on imports of Russian timber is one of the most impactful remaining steps the US could take. We urge you to take it.

The following NGOs have signed this letter:

Ukrainian Nature Conservation Group (UNCG) ICO "Environment-People-Law" (EPL) Center for Environmental Initiatives Ecoaction Bureau of Environmental Investigation Ecosociety

With kindest regards,
Olexii Vasyliuk

Chairman of the Board