

*Case No IV/M.997 -
SWEDISH MATCH /
KAV*

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**REGULATION (EEC) No 4064/89
MERGER PROCEDURE**

Article 6(1)(b) NON-OPPOSITION

Date: 18/12/1997

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COMMISSION OF THE EUROPEAN COMMUNITIES

Brussels, 18.12.1997

PUBLIC VERSION

MERGER PROCEDURE
ARTICLE 6(1)(b) DECISION

To the notifying parties

Dear Sirs,

Subject: Case No IV/M. 997 -SWEDISH MATCH / KAV

1. On 14.10.1997 the companies Swedish Match AB ("Swedish Match") and Kav Orman Sanayii AS ("Kav") have notified the conclusion of an operation in the "match business". Kav is a subsidiary of Koç Holding AS ("KOÇ").
2. The notification has been declared incomplete on 7.11.1997 according to Article 4 of Commission Regulation No. 3384/94. Complete information have been obtained on 17.11.1997. The notification became effective on 18.11.1997.

I THE PARTIES

3. Swedish Match is a Swedish company with subsidiaries world-wide. Its principal activities are the production, distribution and sale of matches and disposable lighters, and tobacco products (cigarettes, cigars, pipe tobacco, chewing tobacco and snuff).
4. Kav is the largest of four manufacturers of matches in Turkey. Kav belongs to the Koç group, which is Turkey's largest industrial group, active in a wide range of consumer and industrial products including motor vehicles, household appliances and other consumer goods.

II THE OPERATION

5. The notification concerns an agreement under which Swedish Match will acquire a 60% interest in the “match business” of Kav. Prior to completion of the proposed transaction the match business of Kav will be spun off into a newly-formed company (JVCo) in which Swedish Match and Kav will own respectively 60% and 40% interests.

III THE CONCENTRATION

Joint Control

6. By virtue of the relevant provisions of the shareholders agreement, JVCo will be jointly controlled by Swedish Match and Kav. The Board of Directors of JVCo will be composed of 5 members. Swedish Match will have 3 members. Kav will have 2 members. According to clause 5.4 of the shareholders agreement, some decisions shall require the affirmative vote of four members of the Board of Directors. Amongst these decisions, the approval of, or amendments, supplements or modifications to the Annual Budget and the approval of new product policy, brand policy, sales and price policy, advertising and promotions policy market, expansion policy. Overall, these are strategic decisions affecting the business policy of JVCo, and as such, they confer to Swedish Match and Kav joint control over the joint venture.

Full function joint venture

7. With regard to its activity, that is the manufacture and distribution of matches, JVCo will have all the financial and other resources, including finance, staff and other assets in order to operate on a lasting basis on the market. One of the parent companies, Koç, will contribute all current assets and personnel of Kav to JVCo. In addition, there will be no substantial sales or purchases between Swedish Match and JVCo, as the latter will continue to sell through independent distributors. Therefore, the JVCo is intended to operate as a full-function joint venture.

Absence of co-ordination of the parties’ competitive behaviour

8. As mentioned above, prior to the completion of the completion of the operation, Kav’s match business will be transferred to JVCo. Only one of the parents, Swedish Match, will remain active on the same market as JVCo. The other parent company, Koç, will no longer have any material interest in any relevant match business, its only remaining interest being its 54% holding in old Kav through which it will indirectly control 50% of the shares in a Kazakh match manufacturer, which only began operation this year and has total budgeted sales for 1997 of ECU 1 million. Its entire production is sold in Kazakhstan and it does not have the capacity to manufacture matches for export. Moreover, the Shareholders Agreement establishing the JVCo envisages that Kav’s 50% shareholding in the Kazakh joint venture should be acquired by JVCo. In these circumstances, the co-ordination of the competitive behaviour of the parent companies through the joint venture can be excluded.

IV COMMUNITY DIMENSION

9. The combined world-wide turnovers of all the undertakings concerned exceeds 5.000 million ECU (Swedish Match: 850 million; Koç: 10 billion). The Community-wide turnover of at least two of the undertakings concerned is more than 250 million ECU (Swedish Match: 600 million; Koç: 274 million). The undertakings concerned do not achieve more than two thirds of their turnover in one and the same Member State. Therefore, the operation has a Community dimension.

V THE RELEVANT MARKETS

A Relevant product markets

10. Both Swedish Match and Kav manufacture and sell matches. Swedish Match also manufactures and sells disposable lighters and matches for advertising, but Kav does not. Kav itself does not distribute matches in the EU, so that the primary effect of this concentration would be therefore at the producer level.
11. The vast majority of matches sold in the EU are made of wood, and to a much less significant extent of wax or cardboard; in this latter case they are mostly used for advertising purposes. In most EU countries there are two main sizes of box: the standard '5E' and the 'household box'. The household box is used mostly at home due to its bigger size, but the matches are used both for domestic purposes or by smokers. Even more so, smaller boxes are used for domestic applications and are often sold in large packages to make them more attractive for this purposes. Furthermore, packaging of matches is not relevant for the purposes of market definition in this case.
12. Disposable lighters are made mainly out of plastic. They cannot be refilled and are discarded by customers after use. There are limited sales of so-called 'semi-disposable' lighters (i.e. a refillable type of disposable lighter) which are usually slightly larger and more expensive than normal disposable lighters, but still very close in price, so that they are often discarded after use. This type of lighter is not viewed by consumers as significantly different from disposable. By contrast, more expensive refillable lighters are in a different product market. These lighters are far more expensive than disposable lighters, and are perceived by consumers as much more durable, higher value items; whereas their end use differ in the sense that they are frequently purchased as gifts; and are usually sold through different channels. Moreover, private label products are in the same market as branded products both for lighters and for matches, in line with the conclusions of previous cases in the field of utilitarian consumer products, as opposed to more sophisticated and taste distinguishable consumer products, such as spirits .
13. Furthermore, advertising matches and lighters are not in the same market as 'resale' matches, given that they are not available for purchase by end consumers and that they differ in their end use (promotional rather than functional), production, distribution and supply.
14. By contrast, the Commission rejected after investigation the parties' argument that resale matches are in the same product market as disposable lighters. In the notification, the parties based their claim basically in the following arguments: (i) both products are used for smoking and domestic use; (ii) prices are so low that 'the relative

¹ See case IV/M.633 - Kimberly Clark/Scott Paper, as opposed to case IV/M.938 - Guinness/Grand Metropolitan.

cost of a box of matches as against the cost of a disposable lighter is rarely a material factor for consumers'; (iii) wholesalers and retailers frequently buy both matches and lighters from the same suppliers; and (iv) the reaction of UK consumers when excise duty was removed in 1993 allegedly showed that they regarded both products as substitutable. In addition to that, the parties mentioned a 1992 report by the UK Monopolies and Mergers Commission (MMC) in which the said institution treated these products as one market, mainly because of use and price considerations.

15. However, these arguments cannot be sustained in the assessment of the present case, for the following reasons. Firstly, there is a clear distinction between lighters, which are mainly used by smokers, and matches which are preferred for domestic purposes. This was confirmed by the vast majority of the market players contacted by the Commission as well as by the parties' consumer market research report (NOP report, 1994), in which a large majority of smokers (more than 90 %) indicated that they usually used lighters for smoking purposes. This distinction is consistent with the approach taken by the Commission in previous cases, in which it has made clear that mere functional substitutability is not sufficient to consider that two products are in the same market² .
16. Secondly, the fact that customers buy matches and lighters from the same suppliers, cannot be regarded as significant in this case. The considerations in point (ii) above would rather militate against the idea of these products being in the same relevant market; and in fact, none of the competitors contacted fix the prices of these two groups of products relative to each other.
17. With respect to the evolution of consumption of matches and lighters after the excise duty on lighters was removed in the UK in 1993, a careful assessment showed that (i) the respective trends of increase and decrease in consumption of lighters and matches were quite similar before and after this tax removal, and that (ii) the decrease in consumption of matches between 1993 and 1996 is only to a limited extent matched by an equivalent increase in lighters' consumption, but it is coincident with an overall decrease of the total demand. This leads to other explanations apart from substitutability between these two products. In any event, matches were traditionally used by a certain number of potential lighters' consumers because the only available alternative were the relatively expensive 'gift' lighters; as soon as disposable and semi-disposable lighters became widely available, these consumers switched to them. Subsequently the markets for matches and for lighters became stable and remained distinct.
18. This is supported by the fact that prices of matches and lighters differ widely, matches being much more expensive in terms of cost by number of lights. More significantly, the analysis of the evolution of Swedish Match's average EEA prices for matches and for lighters between 1991 and 1996 also militates in favour of this distinction. The correlation index is relatively low (0.3) and is indicative of a very low relationship between movements in the two series (see Annex 1). This distinction is further confirmed by a vast majority of the answers received from customers and competitors, who considered that consumers would only switch to a very limited extent in response to a significant and permanent increase in price of one of the products.

² IV/M.190 Nestlé / Perrier; IV/M.794 Coca-Cola / ABGB

19. Finally, it has to be noted that the above mentioned MMC report recognised the existence of important differences in terms of cost, use and supply considerations, so that the MMC felt the need to evaluate these products both as a single market and as separate markets, and indeed the MMC defined in this case different geographic markets for matches and for lighters.
20. It can therefore be concluded that two different markets must be distinguished for the purposes of the assessment of this case: (i) a distinct relevant market for resale matches, and (ii) a distinct relevant market for disposable and semi-disposable lighters.

B Relevant geographic market

21. According to the notifying parties, the markets for both lighters and matches are international. They argue that transport costs are not significant for any of the two groups of products and that important transnational trade flows exist in these markets, particularly for lighters.
22. Thus, Swedish Match's transport costs as a percentage of the prices of matches are similarly low irrespective of whether these matches are sold within the countries in which they are produced (Sweden and Spain) or at EEA level:

Swedish Match Matches' transport costs as a percentage of the trade price to customers

SWEDEN	SPAIN	Average intra-EEA
[...] ³	[...] ⁴	[...] ⁵

Source: parties' estimates

23. With respect to trade flows of matches, it has to be noted that more than 30 % of consumption is imported from outside the EU. Intra-EU flows are even more important; in fact, only 5 EU Member States currently manufacture matches. These flows amounted, by far, to more than half of the total EU 1996 consumption.
24. There were, however, certain indications which, in principle, could point towards a market for matches narrower than the EEA, in particular the existence of non-negligible differences in terms of prices and market shares between member states. Besides, in its above-mentioned 1992 report, the MMC found different geographic markets for lighters and matches; in the first case, the report stated that there was a world-wide market, whereas for matches the market was defined as 'nationally based'.
25. The parties argued that this situation has changed in the last years due to the generalised rationalisation of manufacturing capacity, so that the supply of matches by producers would be now carried out on an international basis. They also explained the above mentioned price and market share differences on the basis of different factors, amongst which the most relevant would be those related to the effects of the historical legislative barriers, now disappeared in most EEA countries. These barriers included

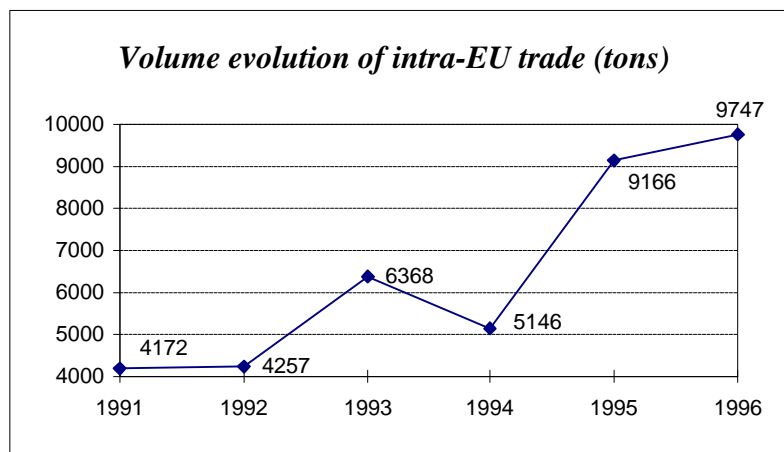
³ Deleted as business secret - between 5 to 10 %

⁴ Deleted as business secret - between 0 to 5 %

⁵ Deleted as business secret - between 5 to 10 %

former legal monopolies for the supply of matches and the existence in the past in some member states of differential taxes on matches and disposable lighters. Furthermore, the fact that matches are very low-priced items undoubtedly reduces the incentive that market players might have to reduce these price differences. The results of the Commission's investigation confirmed the validity of these explanations.

26. In addition to that, the demand characteristics are not significantly different from one country to another. Consumer brand loyalty is low throughout the EU - although some retailers may be more attached to brands; quality and presentation requirements do not vary significantly either.
27. The supply characteristics investigated by the Commission also support the consideration of the EEA as the relevant geographical market. Barriers to entry do not play any significant role in this market. There are no legal restrictions nor public monopolies (save in Italy, where there is not any addition of market shares). The parties also have reasoned and given relevant examples to prove that neither distribution nor brand loyalty constitute any significant barrier to entry. Access to distribution can be achieved either directly or more often through one of the entities which distribute matches as part of a range of low value items; finally, another way to enter the market is as a supplier of private label to a retailer (this is, for example, the case of Kav in Germany).
28. All the above is confirmed by the pattern of the evolution of intra-EU trade, as can be seen in the following graphic:



Source: Eurostat-parties

29. These figures are even more significant given the fact that the EEA market for matches is clearly in decline, so that this increase in absolute volume amounts to an even larger increase in relative terms.
30. In view of all the preceding arguments, the Commission has concluded that the relevant geographical market to be taken into consideration for the purposes of the assessment in this case is the EEA as a whole. It is however for the moment not possible to enlarge the scope of the geographic market to other areas (like for example Eastern European countries and Turkey). This is because the conditions of competition are not sufficiently homogeneous: indeed, while there are substantial imports of resale matches coming from outside the EEA, the contrary (exports from the EEA to these areas) is not true, basically because matches for resale produced in the EEA are too

expensive to be sold in these areas. Therefore, while producers from these areas do compete with EEA producers in the EEA, EEA producers do not compete in these areas with the local producers.

VI ASSESSMENT

(1) Current structure of the market

Production level (supply to wholesalers)

31. The only overlap between the activities of the parties to the proposed operation arises with respect to resale matches. Both Swedish Match and Kav produce resale matches. Swedish Match also produces matches for advertising which constitute a separate product market.
32. As indicated above, two markets are to be identified in this sector:
- (a) supply to wholesalers
 - (b) supply to retailers.
33. Both Swedish Match and Kav are active on the first market. Swedish Match distributes matches in the EEA through a network of subsidiaries based in Member States. In the EEA Member States where there are no national sales companies (Denmark, Finland, Greece, Iceland, Italy and Norway), Swedish Match sells to independent distributors. Kav sells its matches primarily in Turkey and in countries outside the EEA. It has very limited sales in the EEA, around ECU [...] million in 1996. Moreover, Kav does not distribute matches in the EEA via subsidiaries in different Member States, but relies almost exclusively on independent third party distributors who purchase matches directly from Kav and import them in the EEA.
34. The market is structured in the following scheme: Swedish Match is the clear market leader. It enjoys a strong position in most Member States. In the EEA, it enjoys a market share of [...] in value and [...] in volume. The rest of the market is split between national producers who enjoyed in the past a State monopoly, like in France, Italy and Portugal, and some producers of third countries who currently represent around 30% of matches for resale sold in the EEA. The following table shows the market shares in the EEA for resale matches, in 1996.

Resale matches - 1996 producers' EEA shares by value

<i>Company</i>	<i>Value</i>
Swedish Match	[...] ⁹
Kav	[...] ¹⁰
Italmatch	[...] ¹¹

⁶ Deleted as business secret

⁷ Deleted as business secret - between 50 - 60 %

⁸ Deleted as business secret - between 40 - 50 %

⁹ Deleted as business secret - between 50 - 60 %

¹⁰ Deleted as business secret - between 0 - 5 %

Seita	[...]12
Poland	[...]13
Fosforeira	[...]14
Croatia	[...]15
Czech Rep	[...]16
Lavaggi	[...]17
China	[...]18
Isfa	[...]19
Turkey	[...]20
Estonia	[...]21
Other	[...]22
EU Total	100 %

35. Former monopolies are stronger in their home country. For example, the French company Seita enjoys a 59% share of sales in France, Italmatch enjoys a 64.5% share of sales in Italy, Fosforeira Portuguesa enjoys a 43% share of sales in Portugal.
36. Companies located in third countries (like the Polish, the Turkish and the Croatian producers) do not have any direct sales force in the EEA. Their market shares represents sales made to wholesalers.
37. The market for matches is a market which has been in strong decline. Historically, this is due, in part, to the increased use of disposable lighters (for smoking use) and, in part, to the decline in the sale of cigarettes. As a consequence, the market has undergone a drastic restructuring with the closure of some plants. In 1996, the utilisation rate of European manufacturing capacity was 41%. On the other hand, a substantial part of the market is represented by low-cost alternatives, consisting mainly of matches coming from third countries such as Turkey, Poland, Croatia, the Czech Republic.

(2) Effects of the operation

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- 22 Deleted as business secret - between 0 - 5 %

38. On the basis of the preceding analysis, the operation has to be assessed at production level (supply to wholesalers). On this market Swedish Match is currently the market leader with about [...]³ market share. Kav currently represents less than [...]⁴ of the EEA market for matches for resale. The increased market position of Swedish Match will not change the competitive structure of the EEA market for matches for resale.
39. A valid source of competition to Swedish Match is represented by the EEA match producers. These companies currently enjoy very strong market positions in their home countries where they play a major role in the competitive environment. All these companies are well-established companies which have all the necessary technical expertise of the sector and financial resources to compete effectively on the market, as well as a substantial volume of spare production capacity as described in paragraphe 37 above. The Commission has however received some indications as to the fact that through this operation Swedish Match would be able supply the EEA market with low-cost matches. These concerns are however mitigated by the fact that other EU-based producers have also realistic possibilities to acquire low-cost foreign suppliers or to conclude co-operation/supply agreements with such suppliers. Some of the EU-based companies have already operated in this way; for example, the Italian producer Italmatch has acquired the majority of the capital of a Polish match producer, Euromatch. Similarly, the French producer Seita has concluded an agreement with the Polish producer Polmatch by which Seita has installed a production line for matches of its own.
40. A second source of competition comes from match producers of third countries. Currently about 30% of the market for resale matches in the EEA is represented by imports from these countries, mainly the Czech Republic, Poland, Croatia, Turkey. These matches meet the quality criteria required for trade and sale in the EEA (functionality -meaning that the match head should light easily and safely; and that the match should be of a sufficient strength that it does not break when struck-) and are traded in boxes whose size is suitable for sale in this market. Moreover, the investigation conducted by the Commission showed that these producers are currently operating, on average, at 40% of their capacity utilisation. Accordingly, the percentage of sales of matches in the EEA by these companies could rise up to about 44 billion splints, which would account for about the half of the EEA market for resale matches (for a table on capacities see Annex 2).
41. Kav's sales of resale matches in the EEA are mainly made to wholesalers, with a few sales made direct to major retailers. As a consequence, it has not to be assumed that all Kav's customers will necessarily continue to purchase from Kav after this operation has taken place. In addition, it has to be noted that part of this market is composed by wholesalers of tobacco products, who buy matches mainly from Eastern European producers. These wholesalers generally deal with a range of tobacco products and matches do form part of this range. The costs of entry for a wholesaler wishing to supply customers in the EEA are low because of more reasons. Amongst these, there is no need for such a supplier to invest in manufacturing plants and there is no need for

23 Deleted as business secret - between 50 - 60 %

24 Deleted as business secret - between 0 - 5 %

them to invest in expensive marketing as the importance of brands to consumers in this sector is not important and has diminished over time.

42. The investigation has indicated a source of concern expressed by some wholesalers in the EEA. As most of the matches coming from third countries are currently imported by these wholesalers, some of them (which are currently supplied by Kav) have expressed concerns as to the likelihood that Kav may cease to supply them or not to supply them on fair terms if Swedish Match were to acquire an interest in Kav. Whatever the relevance of these concerns, Swedish Match has stated to the Commission that for a time period of three years they will continue supplying to these customers on fair terms and will not refuse any reasonable additional quantities of matches other than for objectively justified reasons.

VIII CONCLUSION

43. It follows from the above that the proposed concentration will not create or strengthen a dominant position as a result of which competition will be significantly impeded in the common market or in a substantial part of it.
44. For the above reasons, the Commission has decided not to oppose the notified operation and to declare it compatible with the common market and with the functioning of the EEA Agreement. This decision is adopted in application of Article 6(1)(b) of Council Regulation No 4064/89.

For the Commission,

Swedish Match matches' average price evolution in the EEA

1991-1996

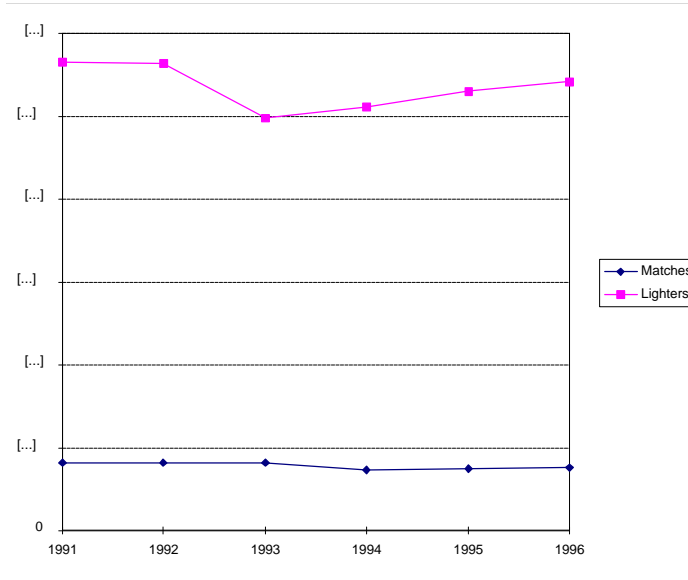
In absolute terms (ECU per standard 5E box of matches)

Product/Year	1991	1992	1993	1994	1995	1996
Matches	[...] ²⁵	[...] ²⁵	[...] ²⁵	[...] ²⁵	[...] ²⁵	[...] ²⁵
Lighters	[...] ²⁵	[...] ²⁵	[...] ²⁵	[...] ²⁵	[...] ²⁵	[...] ²⁵

Indexed (1991=100)

Product/Year	1991	1992	1993	1994	1995	1996
Matches	[...] ²⁵	[...] ²⁵	[...] ²⁵	[...] ²⁵	[...] ²⁵	[...] ²⁵
Lighters	[...] ²⁵	[...] ²⁵	[...] ²⁵	[...] ²⁵	[...] ²⁵	[...] ²⁵

Correlation index: 0,3



1996 Capacity and utilisation in the EEA matches' industry (b splints)

<i>Company / Country</i>	<i>Capacity</i>	<i>% of total capacity by country</i>	<i>Utilisation</i>	<i>% of total utilisation</i>	<i>Utilisation rate</i>	<i>Currently exporting into EEA (Yes/no)</i>
Italmatch	[...] ²⁵	53,8	[...] ²⁵	54,8	20,0	
Lavaggi	[...] ²⁵	17,9	[...] ²⁵	16,4	18,0	
Roselli	[...] ²⁵	5,4	[...] ²⁵	7,3	26,7	
Sirfa SpA	[...] ²⁵	5,4	[...] ²⁵	3,7	13,3	
Macii	[...] ²⁵	3,1	[...] ²⁵	2,3	14,3	
ISFA	[...] ²⁵	14,3	[...] ²⁵	15,5	21,3	
<i>TOTAL ITALY</i>	[...] ²⁵	<i>100,0</i>	[...] ²⁵	<i>100,0</i>	<i>19,6</i>	
Seita	[...] ²⁵	100,0	[...] ²⁵	100,0	36,0	
<i>TOTAL FRANCE</i>	[...] ²⁵	<i>100,0</i>	[...] ²⁵	<i>100,0</i>	<i>36,0</i>	
Fosforeira Port	[...] ²⁵	100,0	[...] ²⁵	100,0	29,2	
<i>TOTAL PORTUGAL</i>	[...] ²⁵	<i>100,0</i>	[...] ²⁵	<i>100,0</i>	<i>29,2</i>	
Swedish M Esp	[...] ²⁵	100,0	[...] ²⁵	100,0	30,0	
<i>TOTAL SPAIN</i>	[...] ²⁵	<i>100,0</i>	[...] ²⁵	<i>100,0</i>	<i>30,0</i>	
Swedish M Swe	[...] ²⁵	100,0	[...] ²⁵	100,0	64,8	
<i>TOTAL SWEDEN</i>	[...] ²⁵	<i>100,0</i>	[...] ²⁵	<i>100,0</i>	<i>64,8</i>	
Total EEA	217,8		88,8		40,8	
Swedish M Hung	[...] ²⁵	100,0	[...] ²⁵	100,0	71,9	yes
<i>TOTAL HUNGARY</i>	[...] ²⁵	<i>100,0</i>	[...] ²⁵	<i>100,0</i>	<i>71,9</i>	<i>yes</i>
Solo Sirkana	[...] ²⁵	86,7	[...] ²⁵	87,5	80,8	n.a.
Czech Match L.	[...] ²⁵	13,3	[...] ²⁵	12,5	75,0	n.a.
<i>TOTAL CZECH REP</i>	[...] ²⁵	<i>100,0</i>	[...] ²⁵	<i>100,0</i>	<i>80,0</i>	<i>yes</i>
Sianowskie Match F	[...] ²⁵	14,4	[...] ²⁵	n.a.	50,0	n.a.

Euromatch SP	[...] ²⁵	19,2	[...] ²⁵	n.a.	48,3	n.a.
Czestochowa M.F.	[...] ²⁵	20,8	[...] ²⁵	n.a.	50,0	n.a.
Czechowice M.F.	[...] ²⁵	19,2	[...] ²⁵	n.a.	58,3	n.a.
Omni	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
<i>TOTAL POLAND</i>	[...] ²⁵	100,0	[...] ²⁵	100,0	38,1	yes
Drava Tvornica	[...] ²⁵	100,0	[...] ²⁵	100,0	75,0	yes
<i>TOTAL CROATIA</i>	[...] ²⁵	100,0	[...] ²⁵	100,0	38,9	yes
Tekel	[...] ²⁵	33,0	[...] ²⁵	25,1	50,0	n.a.
Malazlar	[...] ²⁵	53,6	[...] ²⁵	54,5	66,9	n.a.
Bedir Agac San As	[...] ²⁵	13,4	[...] ²⁵	20,4	100,0	n.a.
<i>TOTAL TURKEY</i>	[...] ²⁵	100,0	[...] ²⁵	100,0	65,8	n.a.
Viljandi metsakom.	[...] ²⁵	100,0	[...] ²⁵	100,0	16,7	yes
<i>TOTAL ESTONIA</i>	[...] ²⁵	100,0	[...] ²⁵	100,0	16,7	yes
Cometa	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
<i>TOTAL LATVIA</i>	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Smrecina Holdings	[...] ²⁵	100,0	[...] ²⁵	100,0	50,0	yes
<i>TOTAL SLOVAKIA</i>	[...] ²⁵	100,0	[...] ²⁵	100,0	50,0	yes
Plam Bulgaria	[...] ²⁵	100,0	[...] ²⁵	100,0	66,7	yes
<i>TOTAL BULGARIA</i>	[...] ²⁵	100,0	[...] ²⁵	100,0	66,7	yes
Total East Europe and Turkey	325,2		155,0		47,7	

Notes:

The figures for Poland are approximate. Latvia's Cometa was also mentioned as a alternative supplier but the parties were not able to provide estimates.

: non applicable