

Central Point of Expertise on Timber

Evaluation of Category A Evidence

Review of forest certification schemes Results

December 2010

1. Introduction

UK Government's Procurement Policy on Timber

The UK Government's procurement policy on timber and timber products was announced in July 2000. This policy initially required only legality with a preference for sustainably harvested timber, but as of April 2009 the policy required Central government departments, their executive agencies and non-departmental public bodies only to procure timber and wood-derived products originating from either legal and sustainable or FLEGT licensed or equivalent sources.

Evidence of Compliance - Forest Certification Schemes

One of the most straightforward forms of evidence is to supply products from certified sources¹, provided that the certification scheme involved delivers the Government's requirements for legality or sustainability. As there are a number of different timber certification schemes available, the Government recognised that it needed a framework for assessing which ones deliver its timber policy, incorporating the requirements contained in model specification text and contract clauses.

Therefore, a study was carried out through the Central Point of Expertise on Timber (CPET) to assess certification schemes identified by procurement staff as the most commonly encountered in the UK wood supply chain to establish which of them deliver UK Government requirements for legal and sustainable timber. The first assessment of was conducted in 2004 and covered the following five schemes:

- The Canadian Standards Association scheme (CSA), which is applicable in Canada.
- The Forest Stewardship Council system (FSC), which is international in scope.
- The Malaysian Timber Certification Council scheme (MTCC), which is applicable in Malaysia.
- The Programme for the Endorsement of Forest Certification schemes (PEFC), which is international in scope.
- The Sustainable Forestry Initiative (SFI), which is applicable in the US and Canada.

The results of the original assessments and reviews in 2005, 2006 and 2008 are available in 'Archive' on the CPET website.

Criteria for Evaluating Category A Evidence (Certification Schemes)

The Criteria for Evaluating Category A Evidence have been updated since the last review in 2008 to reflect changes in the policy requirements. After stakeholder consultations new criteria were added in April 2010 and the latest version of the Criteria contains new social criteria (criteria 1.2.7-1.2.10), a general update and the addition of two new assessment criteria on 'Conversion' (criteria 2.7); and 'National level application' (criterion 5). The addition of the new criteria addresses stakeholder

¹ It is important to note that the UK Government has no intention of requiring suppliers to supply only certified products. It is simply one of the ways in which evidence of legality or sustainability can be delivered. Any other adequate form of evidence will be equally acceptable.

concerns and also further aligns UK government policy with Denmark and the Netherlands' timber procurement policies.

Regular Review of Certification Schemes

Defra has committed to undertaking regular reviews of all the certification schemes already assessed. The 2010 Review of forest certification schemes was undertaken to ensure the currently assessed schemes continue to provide assurance of legality and sustainability, particularly in light of the new criteria.

2. The methodology for assessing schemes

As discussed in the introduction, the UK Government originally selected five forest certification schemes: CSA, FSC, MTCC, PEFC and SFI. These were chosen as the ones most commonly encountered in tenders and sales to UK central government. The 2010 review however only cover FSC and PEFC, because CSA, MTCS and SFI have since the initial assessment been endorsed by PEFC which operate as an umbrella scheme.

2.1. Methodology

For FSC and PEFC, information relevant to compliance with each CPET criterion (as set out in the current version of 'Criteria for assessing certification schemes (Category A evidence)') was identified and collated by CPET. This included information from scheme documentation together with relevant input received from the stakeholder consultation process. The main emphasis was on the six new criteria, changes from previous reviews and comments challenging previous findings.

The draft results were then sent to the respective scheme with an invitation to review the information collected and, wherever appropriate, to provide further information or comment. If necessary, discussions will be held with scheme personnel to discuss and clarify particular issues. For details on the methodology see: <u>Methodology for</u> reviews of timber certification schemes (March 2008)².

CPET convened and facilitated a two day physical meeting of the technical review panel in May and September 2010 to finalise the results of the reviews for each scheme. Each member of the panel was provided with the information collected for each of the two schemes being reviewed. Based on this information each member of the technical review panel was asked to judge, for each criterion, whether it constituted inadequate, partial or full compliance with the requirements. The panel members reached consensus on all criteria, but identified a few cases where further information and clarification was needed. The relevant certification schemes were contacted and asked to provide further information and clarification. This

² Available for download on the CPET website here: <u>www.cpet.org.uk/files/Category%20A%20Review%20Methodology%20March%2008.pdf</u>

information was then reviewed by the technical panel and a final score was agreed on by email discussion.

Final results from the technical review panel were then discussed with the CPET Reference Board. The outcome of the discussion and the following final scoring by the technical panel was reviewed by Defra who made a final decision on the results.

2.2. Information sources

As discussed above, the assessment for each scheme was carried out based on publicly available documentation from the scheme, together with direct discussions with some scheme personnel. Objective verifiable evidence relating to noncompliance with the documented scheme requirements that was submitted by stakeholders during the consultation period was also considered. No assessments of the actual outcome of certification in the forest were made, as this was not part of the terms of reference for the review.

2.3. Scoring system used

For each scheme compliance with the requirements of each criterion was scored on a 3-point scale:

0: Inadequately addressed and not acceptable.

- 1: Partially addressed.
- 2: Fully addressed.

As a result of having only three possible scores, the score of 1 applied to a wide range of situations, but this was considered a better option than trying to divide partial compliance into a number of different levels which carries a significant risk of becoming subjective.

To achieve recognition as delivering requirements for legality the scheme must achieve a score of at least 1 for each criterion applicable to legality.

To achieve recognition as delivering requirements for sustainability the scheme must achieve a score of at least 1 for each criterion applicable to sustainability as well as an overall score equal to 75% of the total possible.

Therefore, a score of zero for any criterion prevents a scheme from being recognised for the category³.

2.4. Addressing products containing certified and uncertified material

All of the certification schemes examined allow mixing of certified and uncertified raw material in certified products. As a result, two types of certified product exist:

³ With the exception of Criteria 4.4 and 4.6.

100% certified products: these products contain only material which originated in certified forests. For these products it is only necessary to assess the control of certified material.

Mixed source products: these products contain material from a range of sources including certified forests, uncertified forests and recycled. Therefore, it is necessary to assess the control not only of certified material, but also of uncertified and recycled material to establish whether it meets the contract conditions and variant specification.

Therefore, although the bulk of the analysis deals with the control of certified material, it is also necessary to decide what controls are adequate for the uncertified material, in a mixed source product. This was determined as follows:

Legal compliance: the requirements of the certification scheme must be adequate to ensure that there is a verifiable system in place to check that all uncertified material is from a legal source. It is recognised that this is less rigorous than the requirements for the certified material and provides less of a guarantee that the material is from a legal source. However, it is considered that this is adequate to demonstrate due diligence provided the certification schemes included mechanisms to enforce the requirement.

Sustainability: the UK Government requirements for sustainable timber do not require that 100% of the product is from a source meeting the requirements for sustainability, but specifies a minimum of 70% of the product must be from a sustainable source while the remainder must meet the contract requirements for legality.

Uncertified material and sustainability: both FSC and PEFC allow the use of uncertified material in certified products, but have a number of requirements for the control of this uncertified material. These control mechanisms focus on ensuring that the material is not from illegal, controversial and un-controlled sources. The controls are generally adequate to deliver UK Government requirements for legal timber. However, none of the schemes has requirements which are sufficiently rigorous to ensure that the uncertified material is from a sustainably managed source as defined in Section 1.2 of the criteria. This means that a certificate for a composite product identifying that a minimum of 70% of the wood used came from sustainably managed forests is acceptable⁴ but any less than 70% is not.

3. Results

3.1. Summary of results

The full findings, scores and results for each scheme can be found in Appendix 1. The results are summarised below indicating which schemes deliver government requirements for legality and sustainability.

⁴ The UK Government sustainable variant requires that to qualify as sustainable 70% of the content of a product must meet the criteria for sustainable. See Section 2.4.

N.B. The UK Government sustainability criteria requires that to qualify as sustainable 70% of the content of a product must meet the criteria for sustainable. See Section 2.4 above.

	Legal* (100% from legal sources)	Sustainable (>70% from sustainable sources)
FSC	All certified products	Products containing >70% certified or recycled raw material
PEFC	All certified products	Products containing >70% certified or recycled raw material

* The policy requires legality and sustainability or FLEGT licensing. Only where no Legal and Sustainable or FLEGT-licensed or equivalent source is available and where there is a documented justification setting out why no alternative product or timber species can be used will legal timber only be accepted.

3.2. Forest Stewardship Council (FSC)

3.2.1.Legal

The assessment indicated that the FSC system is adequate to ensure that certified forests meet UK Government requirements for legal timber. In addition, the requirements for control of uncertified material in mixed source products are adequate to deliver legality. Therefore, all FSC-certified products deliver UK Government requirements for legality.

3.2.2. Sustainable

The assessment indicated that the FSC system is adequate to ensure that certified forests meet UK Government requirements for sustainable timber. In common with PEFC, uncertified material cannot be guaranteed as coming from sustainable sources. Therefore, FSC-certified products containing 70% or more material from certified forests deliver UK Government requirements for sustainability.

3.3. Programme for the Endorsement of Forest Certification Scheme (PEFC)

3.3.1.Legal

The assessment indicated that the PEFC system is adequate to ensure that certified forests meet UK Government requirements for legal timber. In addition, the requirements for control of uncertified material in mixed source products are adequate to deliver legality. Therefore, all PEFC-certified products deliver UK Government requirements for legality.

3.3.2. Sustainable

The assessment indicated that the PEFC system is adequate to ensure that certified forests meet UK Government requirements for sustainable timber. In common with FSC, uncertified material cannot be guaranteed as coming from sustainable sources. Therefore, PEFC-certified products containing 70% or more material from certified forests deliver UK Government requirements for sustainability.

Appendix 1 Full results of the assessments for each scheme

This appendix contains the full results of the assessments of the two forest certification schemes against the UK Government criteria. They are set out sequentially in alphabetical order:

Appendix 1a FSC

Appendix 1b PEFC

The results are presented in the form of a table with five columns containing the following information:

- Criteria: This sets out the UK Government criteria for assessing forest certification schemes which a scheme must meet.
- Findings: This contains notes from the assessment process summarising the objective evidence compiled from the scheme documentation to justify the score given. It should be noted that the text in this column is in the form of notes to summarise the information to be used in making an assessment and may in some cases be ambiguously or imperfectly worded. It was not designed to replace original scheme wording or to be quoted in isolation.
- Score: This sets out the score given for the degree of compliance with the scheme with each criterion. See Section 2.3 for notes on the scoring system used.
- L: A tick in this column indicates that the criterion relates to meeting UK Government requirements for legality.
- S: A tick in the column indicates that the criterion relates to meeting UK Government requirements for sustainability.

Guidance on interpretation, which provides notes on the origin of each criterion and how it should be interpreted can be found in the document <u>Criteria for Evaluating</u> <u>Category A Evidence (April 2010)⁵</u>.

⁵ Available for download here <u>http://www.cpet.org.uk/files/Category%20A%20Criteria%20April%202010.pdf</u>