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Central Point of Expertise on Timber

UK Government Timber Procurement Policy

Results of the Evaluation of Category A Evidence: Forest Certification Schemes

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Executive Summary

FSC and PEFC certified timber and wood-derived products continue to meet UK government requirements for legal and sustainable timber.

The most recent evaluation of two forest certification schemes, the Forest Stewardship Council and the Programme for Endorsement of Forest Certification against the *UK Government Timber Procurement Policy: Criteria for Evaluating Certification Schemes (Category A Evidence) Fourth Edition, October 2014* concludes that both the Forest Stewardship Council and the Programme for Endorsement of Forest Certification have achieved scores of 100% for legality criteria and over 90% for sustainability criteria and as such are recognised as continuing to deliver requirements for both legality and sustainability.

These very high scores demonstrate the significant progress made in international forest certification since the first evaluation conducted in 2004. Both FSC and PEFC have made substantial improvements to their schemes since 2010, reflected in the scores awarded.

Public sector procurers and suppliers of timber can continue to use FSC and PEFC certification as Category A evidence for demonstrating compliance with the UK government Timber Procurement Policy requirement to buy sustainable and legal timber.

1. Purpose

The UK government Timber Procurement Policy (TPP) requires that only timber and wood-derived products originating from an independently verifiable Legal and Sustainable source (which can include from a licensed Forest Law Enforcement, Governance and Trade (FLEGT) partner) will be demanded for use on the government estate – appropriate documentation will be required to prove it.

In order to demonstrate that timber and wood-derived products are from a Legal and Sustainable source different forms of evidence can be used including independent certification under a scheme recognised by the UK government as meeting the criteria set out in the document entitled *UK Government Timber Procurement Policy: Criteria for Evaluating Certification Schemes (Category A Evidence) Fourth Edition, October 2014*. This is referred to as Category A evidence.

This document presents the results of the most recent evaluation of two forest certification schemes, the Forest Stewardship Council and the Programme for Endorsement of Forest Certification against those criteria.

For practical advice on how to implement the TPP during the procurement process, including types of evidence that Contracting Authorities can request of suppliers to demonstrate compliance with the criteria set out below, please refer to the [UK government's Timber Procurement Advice Note](#) (TPAN). The TPAN is a guidance document for Contracting Authorities and suppliers to the government.

2. Previous assessments

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 was conducted in 2004 and the most recent assessment in 2010.

The results of the original assessments and reviews in 2005, 2006, 2008 and 2010 are available from CPET.

2.1. Criteria for Evaluating Category A Evidence (Certification Schemes)

The Criteria for Evaluating Category A Evidence have been updated since the last review in 2010 to reflect changes in the policy requirements including an updated definition of ‘legal’ sources and ‘sustainable’ sources, respectively. No changes have been made to the social criteria.

Specifically, the definition of “legal” was changed to reflect the definition of legally harvested timber and timber products within the EU Timber Regulation and movement of one criterion from legal criteria, to sustainable criteria (see 1.2.11 of ‘*UK Government Timber Procurement Policy: Criteria for Evaluating Certification Schemes (Category A Evidence)*’ Fourth Edition, October 2014 and S9 in the ‘*UK Government Timber Procurement Policy: Definition of Legal and Sustainable for Timber Procurement*’ Fifth Edition, June 2013).

2.2. Regular Review of Certification Schemes

Defra has committed to undertaking regular reviews of all the certification schemes already assessed. This 2015 Category A Evaluation 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.

3. Method

The UK government originally selected five forest certification schemes: CSA, FSC, MTCS, PEFC and SFI. These were chosen as the ones most commonly encountered in tenders and sales to UK central government. The 2015 review however only covers FSC and PEFC, because CSA, MTCS and SFI have, since the initial assessment, been endorsed by PEFC which operates as an umbrella scheme.

3.1. Methodology

For FSC and PEFC, information relevant to compliance with each CPET criterion (as set out in the current version of '*UK Government Timber Procurement Policy: Criteria for Evaluating Certification Schemes (Category A Evidence)*' *Fourth Edition, October, 2014*') 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. Discussions were held with scheme personnel to discuss and clarify particular issues. For details on the methodology see: '*Methodology for Reviews of Timber Certification Schemes, (Category A Evidence) Third Edition, October, 2014.*'

CPET convened and facilitated a three day physical meeting of the technical review panel in April 2015 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 information was then reviewed by the technical panel and a final score was agreed on by telephone and email discussion.

Final results from the technical review panel were then sent to the schemes for final comments before being 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.

3.2. 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 non-compliance 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.

3.3. 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 category.

3.4. 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, 100% certified products and mixed source products.

3.4.1. 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.

3.4.2. 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 according to legal and sustainability requirements and requirements related to uncertified material and sustainability.

3.4.3. 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.

3.4.4. 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.

3.4.5. 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 acceptable but any less than 70% is not.

4. Results

4.1. Summary of results

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

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 3.4 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.

4.2. Forest Stewardship Council (FSC)

4.2.1. 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.

4.2.2. 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.

4.3. Programme for the Endorsement of Forest Certification (PEFC)

4.3.1. 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.

4.3.2. 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.