

cpet

Central Point of Expertise on Timber

UK Government Timber Procurement Policy

**Construction Sector Project:
Policy implementation and reporting**

June 2008


	Construction Sector Project
	June 2008
	Final report

Table of Contents

Acronyms	1
1. Introduction	2
2. Methodology.....	3
3. Findings.....	5
3.1. Policy implementation	5
3.1.1. Public bodies	5
3.1.2. Construction projects	5
3.2. Reporting requirements	7
3.2.1. Existing practice	7
3.2.2. Feedback on the proposed reporting format.....	9
4. Recommendations	11
5. List of Annexes	14
Annex A: Defra draft supplier reporting questionnaire (Spring 2007).....	15
Annex B: The Building Research Establishment Environmental Assessment Method (BREEAM)	17
Annex C Revised format for reporting on timber use	18

Acronyms

BRE	Building Research Establishment
CO	Cabinet Office
CoC	Chain of Custody
CPD	Continuing Professional Development
CPET	Central Point of Expertise on Timber
CSA	Child Support Agency
Defra	Department for Environment Food and Rural Affairs
DCMS	Department for Culture Media and Sport
DCSF	Department for Children, Schools and Families
DfES	Department for Education and Skills (now DCSF and DUIS)
DfT	Department for Transport
DUIS	Department for Innovation, Universities and Skills
DVLA	Driver and Vehicle Licensing Agency
DWP	Department for Works and Pensions
FSC	Forest Stewardship Council
HMPS	Her Majesty's Prison Service
HO	Home Office
KPI	Key Performance Indicators
MoD	Ministry of Defence
MoJ	Ministry of Justice
NAO	National Audit Office
NDPB	Non-Departmental Public Body
NGO	Non-Governmental Organisation
NOMS	National Offender Management Service
OGC	Office of Government Commerce
PEFC	Programme for the Endorsement of Forest Certification schemes
SDiG	Sustainable Development in Government

1. Introduction

The UK Government timber procurement policy, announced in 2000, requires central departments in England to seek to procure wood and wood derived products from legal and sustainable sources. The policy is mandatory for all central Government departments, executive agencies and Non-Departmental Public Bodies (NDPBs). The UK Government's Timber Procurement Policy: Timber Procurement Advice Note, November 2005¹, provides detailed practical guidance on implementation of the procedures involved in purchasing legal and sustainable timber and wood derived products².

This report responds to the identified need for further information on the implementation of the UK timber procurement policy. The Environmental Audit Committee (EAC), the Sustainable Development Task Force and Ministers have all requested that better information should be made available on policy implementation, as a result of anecdotal evidence that the current level of implementation may be low. For example, the EAC noted in January 2006 that

'It seems incredible to us that the complete lack of reliable data, clearly identified as a fundamental hurdle to improving sustainable timber procurement at least four years ago, and recognised as such by the Government, has yet to be properly addressed.' They indicated that *'The Government needs to set out a clear strategy to address this lack of data for all procurement, ideally within SDiG. In the meantime the Central Point of Expertise on Timber (CPET)³ should lead the way by focusing on timber procurement and we would like to see set out in detail how this will be done.'*⁴

The Sustainable Development in Government (SDiG) annual report has, until recently, included data on timber purchasing. This was dropped in the 2005/6 period, and, at present, the timber procurement policy has no associated requirements for reporting.

During CPET's consultation on implementation of the new timber procurement policy in 2007, a number of trade and NGO representatives suggested that Government demand for legal and sustainable timber was not as evident in the market place as initially hoped. The overall message from these stakeholders was that reinforcing implementation of the policy should be the top priority, and that specific issues such as a lack of clear targets, no incentives/disincentives for contractors and a lack of spot-checking needed to be addressed to support implementation of the policy.

In order to address these issues, and to begin the process of clearly assessing the extent to which the UK Government timber procurement policy is being implemented in practice, this project was undertaken. The construction industry was selected as the focus of the project, as it is the sector where the largest proportion of timber is used within Government.

The objectives of the project were to provide an initial assessment of:

- The current level of **implementation** of the UK Government's timber procurement policy.

¹ UK Government Timber Procurement Policy: *Timber Procurement Advice Note*, November 2005.

² From April 2009 departments will only accept timber that has been verified as legal and sustainable, or licensed under FLEGT agreements. From April 2015 only legal and sustainable timber will be accepted. The Policy Note will be updated.

³ CPET was established by the Department for Environment, Food and Rural Affairs (Defra) in 2005 to offer advice and information to public sector buyers and their suppliers on how to meet the timber procurement policy.

⁴ House of Commons Environmental Audit Committee *Sustainable Timber* Second Report of Session 2004–05 Volume I, 19 January 2006, paragraphs 63 and 64.

- The feasibility of introducing requirements for **reporting** on timber purchasing including the feasibility of using a reporting format proposed by Defra⁵.

This report has been prepared by CPET for Defra and presents the project methodology (section 2), findings (section 3) and recommendations (section 4). The focus of the project was on major construction projects, and the findings and recommendations therefore reflect current practice in the construction sector.

2. Methodology

The project focused on major construction and refurbishment projects for public bodies. Projects were selected in two ways:

- Major public bodies were contacted and invited to participate in the study and, where they responded, projects were identified in collaboration with the department or agency. Fourteen public bodies responded⁶ and were involved in initial discussions.
- The ten largest construction contractors (8) and facilities managers (2) to government (contact details provided by OGC) were contacted and invited to participate and, where they responded, suitable projects were identified with the company. Eight of the ten contacted agreed to participate.

This approach of inviting voluntary participation means that the selection was not random⁷. Therefore, it is possible that the projects identified were more likely to be focused on sustainability, giving a more positive picture than may be the wider case.

Based on initial discussions with the public bodies and contractors, nine projects were identified as summarised in Table 1.

For each of these projects, discussions were held with the public body commissioning the work to:

- Obtain feedback on the timber policy itself and how it is understood;
- Discuss implementation of the policy;
- Obtain feedback on the reporting requirements proposed by Defra (see Annex A).

For each of the ongoing projects this was followed by discussions with the contractor and site visits to:

- Review company policies on timber procurement;
- Examine the extent to which the timber policy is reflected in contract requirements;
- Review implementation practices and issues, including existing site controls for timber and evidence of compliance being provided;

⁵ To address the concerns associated with reporting, Defra proposed a format for reporting on timber use as a supplier questionnaire to address the lack of data on timber procured in February 2007 (see Annex A). Discussions relating to each construction project included consultation on the feasibility of the proposed format for reporting on timber use.

⁶ Departments and agencies which responded were Highways Agency, DVLA, Defra Estates Division, Environment Agency, Natural England, British Waterways, DWP, MoD, Home Office, DfES (now DUIS/DCSF), DCMS, Royal Parks, HMPS, CO.

⁷ A random selection of projects is technically preferable. However, CPET does not have the authority to require either public bodies or contractors to co-operate with this type of study. Therefore, it was necessary to follow the approach of inviting voluntary participation.

Table 1 Construction projects selected for the project

Project	Client Department /Agency	Project type	New build or Refurbishment	Main contractor
Alnwick	Defra Estate division	Office building	New build	Appleyards/ Kier group (Northern)
Manchester	Manchester City Council/ DfES	School Gorton Education Village	New build	Laing O'Rourke
Allenby/ Connaught	MoD	Living accommodation, technical buildings, dining facilities and others	Varies, about 50% new build the remainder on refurbishment and demolition	Aspire Defense Limited (Carillion and Kellogg Brown and Root in a consortium)
HMP Bullingdon	HMPS/NOMS	Prison	New build	Galliford Try Plc, Morrison Construction
Medway	Defra/ Environment Agency	Civil Engineering/ Navigation	New build	Van Oord UK Ltd (Mackleys)
Falkirk CSA Parklands	DWP/CSA	Office building	New build (Early stage)	Not Appointed (Architects SGP)
York	Defra Estate Division	Office building	Refurbishment	Appleyards/ Kier group (Northern - Boston Spa Office)
M1	DfT/Highway Agency	Widening of the M1	Refurbishment	Balfour Beatty/ Skanska Joint venture
Swansea	DfT/ DVLA	Office building	Refurbishment	Kier Group (Western)

- Review existing reporting requirements and obtain feedback on the reporting format proposed by Defra (see Annex A).

To provide technical oversight of the project and ensure maximum input from a range of stakeholders, a Technical Review Group consisting of 15-20 representatives from the construction companies, industry associations and Government bodies was formed (numbers increased as more stakeholders were identified). The role of the group was to:

- Consider the proposed format for reporting on timber use and guidance developed;
- Advise on reporting the support used or required at project level to overcome barriers to implementation of the timber procurement policy;
- Help raise awareness of participating companies with their suppliers and sub-contractors.

The first meeting was held in June 2007 where the project was introduced and the methodology and approach was discussed. At the second meeting, held at the beginning of October 2007, the initial findings were presented by CPET, feedback was given by the group and next steps identified.

Other stakeholders were identified as key players in supporting implementation. Follow up discussions were held with the Building Research Establishment (BRE), BM TRADA Certification, the National Audit Office (NAO), the Timber Trade Federation, suppliers and other (sub) contractors to Government.

3. Findings

3.1. Policy implementation

3.1.1. Public bodies

Policy: A majority of the public bodies involved in the project (nine out of fourteen - see Table 2) were found to have a timber procurement policy in place. One agency had recently been formed and had therefore not yet developed a policy, but was intending to do so. Other bodies indicated that they would follow central government policy but did not have a policy of their own.

Not all of the policies which had been developed were fully aligned with the current detailed guidance. Four of the fourteen bodies were found to be directly compliant with central Government policy with specific reference to the Timber Procurement Advice Note (2005) without modifications. In some cases the public bodies were found to have gone beyond the current policy requirements by specifying sustainable timber only. Several policies refer to 'FSC or equivalent', or in one case 'FSC only', as evidence required. Variation between the specific requirements of different public bodies may result in some confusion for suppliers.

Contracts: The standard contract clauses used by public bodies for their construction projects varied from no specifications on timber procurement at all, to explicitly requiring certified sustainable timber only. Often the specific contract clauses were difficult to find in large contract documents, indicating that there are many other contract requirements with greater priority.

Discussions with the public bodies suggest that the requirements also vary between contracts. The focus of the study was on the construction projects only, and did not include detailed assessment of whether the policy was incorporated in all contracts.

Implementation: Responsibility for implementing the policy varied from contract specifiers, procurement or sustainability personnel and many interviewed within the public bodies highlighted a lack of resources and staff to deal with timber procurement.

Only two of the fourteen public bodies were found to have actively raised awareness with procurement personnel through training and workshops. Generally there was relatively limited knowledge of the central Government timber procurement policy amongst the personnel interviewed by CPET.

3.1.2. Construction projects

Policy: A large number of the companies involved in the study had their own policy. Therefore, despite a general lack of specific awareness of the UK Government's timber procurement policy on the actual construction sites, the proportion of projects that were subject to a timber procurement policy was high. Seven of the construction projects were found to be subject to a policy on timber procurement, as specified either by the public body or by the construction company; these were detailed in a range of documents including works information and product specifications. For two projects the timber procurement policy was framed directly around meeting Building Research Establishment Environmental Assessment Method (BREEAM) requirements⁸ and in these cases all

⁸ BREEAM is a method to assess the environmental performance of a building (BREEAM is only applicable to construction of buildings and was therefore not required for the widening of the M1 and for the civil engineering project). See annex B.

Table 2 Timber Procurement Policies of Public bodies

Department/ Agency	The public body has some kind of timber procurement policy?	The policy is the same as Central Government policy?	The policy in place is likely to deliver Central Government policy in implementation?	Notes
DfT Highway Agency	Yes For specific product groups through standard specifications	No	Yes, but go beyond the set Central Government policy	<i>Sustainable and legal timber</i>
DfT DVLA	Yes	No	Yes, but go beyond the set Central Government policy	<i>Sustainable and legal timber</i>
Defra Estate Division	Yes Not clear in standard/ model contract clauses	Yes	Yes	Policy Note 2005, but not clear in standard/ model contract clauses
Defra Environment Agency	Yes	No	Yes, but go beyond the set Central Government policy	Sustainable only except Tropical hardwood. Does not apply to 'floating stock'
Defra Natural England	Yes (currently awaiting approval)	No	Yes, but go beyond the set Central Government policy	Sustainable and legal timber (CoC holder or 1 st tier supplier only)
Defra British Waterways	Yes	No	Yes, but go beyond the set Central Government policy	FSC only or CoC approved by BW PM and BRE Consultant
DWP	Yes	No	Yes, but go beyond the set Central Government policy	Sustainable wherever possible. In practice moving towards 100% FSC
MoD	Yes	No	Yes, but go beyond the set Central Government policy	FSC or equivalent, social criteria, etc (DEFCON 691)
HO	Yes	No	Yes, but go beyond the set Central Government policy	<i>From a sustainable source</i> Reference to CPET website
DfES (now DUIS/DCSF)	No Depend on the contract that is referred to (common minimum standards, BREEAM or the UK Gov's policy)	Yes but no documents were seen	Yes	Depend on the contract that is referred to
DCMS	No But refer to Gov' policy	Yes but no documents were seen	Yes	Depend on the contract what is referred to
DCMS Royal Parks	Yes	No	Yes	FSC or equivalent, but also reference to policy note 2005
MoJ HMPS	No But refer to Gov' policy	Yes	Yes	On contract by contract basis reference to the policy note 2005/2004
CO	No But refer to Gov' policy	Yes	Yes	FM refer to Gov' policy

timber suppliers had to be CoC certificate holders. The level of policy alignment with the UK Government's detailed guidance varied between projects.

Only three of the projects had timber procurement policies that, as required by central Government policy, covered timber used temporarily on site such as scaffolding and hoardings. Timber used temporarily on site has previously been the target of NGO campaigns, highlighting that Chinese plywood, which has been demonstrated as sometimes containing illegally harvested tropical hardwoods, is often used for hoardings.

Contracts: In seven projects, the policy requirements were demonstrably passed on to suppliers. Active efforts to control compliance by sub-contractors was lower; five projects demonstrated some monitoring activities at this level.

Implementation: The project visits highlighted a number of examples of good practice where measures have been taken by the contractor to ensure elements of the policy are delivered. A selection of these are discussed below and summarised in Table 3, and will be built into future CPET guidance notes:

- **Incorporate requirements for sustainable timber at the design stage:** The level of implementation was to be enhanced where the design specifications for timber include the requirements in the procurement policy, as issues can be addressed at an early stage.
- **Inform suppliers and contractors in advance:** Where suppliers and sub-contractors were informed about the timber requirements prior to construction, awareness and implementation increased. On the two Defra projects visited the sub-contractors were made aware through an information letter and direct suppliers were asked to fill out a mission statement committing them to comply with the timber policy on site. Highlighting the timber procurement requirements with sub-contractors at the pre-start meeting encouraged implementation. Lead times for some certified products, particularly hardwoods, can be several months, therefore allowing for this contingency resulting in improved overall performance.
- **Use preferred suppliers with demonstrated track record:** A preferred suppliers list was found to be a useful tool for purchasers. Suppliers who had a track record of being able to supply certified timber were noted and re-used on several projects.
- **Include timber use in sub-contractor monitoring:** In one case, suppliers were audited by an environmental advisor through visits, and guidance was provided to the suppliers, together with the sustainable design and procurement policy. In other cases, timber use was built into regular Quality Assurance audits carried out by the main contractor on the company's sub-contractors.
- **Reporting requirements:** Where the public body has reporting requirements on timber procurement, the policy was implemented and evidence of compliance collected. BREEAM obligations were found to be a reliable driver for implementation of a timber procurement policy.

3.2. Reporting requirements

3.2.1. Existing practice

Public bodies: Over half of the public bodies visited as part of the study did not collect any data regarding timber purchases, therefore information on the level of policy compliance was difficult to

Table 3 Summary of construction project findings		
Implementation Issue	Number of projects where addressed	Notes
Policy and contract requirements		
Awareness of Government policy on construction site	2	The Timber procurement Policy Note (2005) and CPET was referred to in documents, but policy not fully compliant.
Policy/contract requirements are defined – as set by public body or construction company	7	Company due diligence or reputational risk were cited by some companies as the main reason for introducing timber procurement policies. The public body had made efforts to highlight the timber procurement policy requirement. In general, policies on site were requiring sustainable or certified timber only.
Timber used temporarily is covered by policy	3	In addition, one site, though it was not contractually required, had requested certified timber for scaffolding.
Contract requirements enforced		
Contract requirements passed on to direct contractors	7	For some projects the issue was only partially addressed, as this was covered through use of a preferred suppliers list, but not explicitly highlighted to apply to the particular project.
Control of compliance of direct suppliers and subcontractors	5	Evidence in the form of CoC certificates was collated from suppliers. On two projects, invoices and delivery notes were checked. One project conducted audits of suppliers. Awareness of how evidence was checked was however limited.
Timber purchase evidence recorded	6	Where CoC certificates, invoices and delivery notes were collected or/and where a post-construction BREEAM assessment was required the evidence was collected.

establish. Five of the public bodies however, had some reporting requirements in place: three report within the body, as part of their annual KPIs (Key Performance Indicators), through an annual report on timber procurement from the facilities managers, or through contractors on some specific projects; one agency reports back to its sponsoring department on timber spend; and another agency is a member of the WWF Global Forest & Trade Network and reports annually to WWF on timber procurement. However, accuracy and scope of what is being reported was variable and not always clear.

Contractors: Where reporting on timber procurement was required from the public body, the contractors demonstrated some evidence of compliance, e.g. collating suppliers' Chain of Custody certificates. However, the checking of documentation was not always robust. In some cases the documentary evidence being maintained was found to be insufficient to guarantee that timber used was legal/sustainable.

Six of the nine projects recorded the extent of certified timber. Three of the six sites collated data to meet the post-construction BREEAM assessment, and three recorded timber procurement as a requirement from the government body. Only one public body required detailed information on spend, timber type, country of origin for tropical hardwoods and volume. On the larger and higher profile projects, more qualified personnel were given the responsibility for collating data on timber

procurement, whereas on smaller projects procurement officers were responsible for buying, checking and monitoring.

3.2.2. Feedback on the proposed reporting format

Personnel from public bodies, the construction companies and those on site were questioned on the proposed reporting format put forward by Defra. A summary of the feedback is given in table 4. Key points were:

- The site visits indicated that reporting requirements need to be incorporated into site procedures and ideally communicated during the initial phase of the project. In general, considering the policy requirements at the design phase was more likely to ensure compliance as issues of sourcing could be addressed and rectified.
- From the consultation it is clear that a simplification of the reporting requirements, relative to what was proposed, is required. For some timber products in particular it was deemed difficult, if not impossible, to always identify the country of origin and species. At a minimum the data collected should provide information on how much timber is bought by central government bodies and to what degree the timber purchased complies with the policy requirements.
- Concerns were raised regarding the difficulty of requiring sub-contractors to report on timber spend, due to commercial sensitivity. Volume is the preferred measure and this information is in most cases available on delivery notes. Volume can also be used as a part of the BREEAM assessment. BRE have developed a formula to estimate the volume of items such as window frames and feedback from suppliers suggest that it is possible to require that the volume is given on delivery notes.
- Proof of compliance with the timber procurement policy is also required, so it will be necessary for contractors to maintain records and documents to support their claims.
- Additionally, a system to monitor site deliveries should be in place throughout the duration of the project, as obtaining information retrospectively, particularly from sub-contractors, was identified as more difficult. Project based certification is a relatively new development, but a useful tool to monitor timber purchases on project sites. Delivery notes are used to record timber as it arrives on site. There is a potential for project based chain of custody methodology to be used as a way of proving compliance with the UK Government timber procurement policy as well as BREEAM requirements.

Table 4 Feedback on proposed reporting requirements

Requirement	Number of projects of the 9 where it is currently a reporting requirement	Feedback summary
Spend/value	1 (with direct suppliers)	Difficult due to commercial sensitivity and often difficult to get from subcontractors
Evidence (Certified/ non-certified)	4	Possible if an implementation system is in place to monitor site deliveries
Country of origin for non-certified timber	1 (tropical hardwoods only)	Difficult and sometimes impossible for certain composite products
Category of timber by percentage e.g. hardwood/softwood etc.	1	Extra admin burden but could be possible depending on timber categories
Volume	2	Possible at design phase or based on delivery notes ⁹

⁹ Possible to link design phase estimates to actual evidence of compliance from certificates and delivery notes. Reporting requirements need to be clear from the outset, as it is difficult to calculate volumes retrospectively

4. Recommendations

The main recommendations together with proposed actions are outlined below.

1: Implementation of the policy by public bodies

The study indicated that there is widespread support for the timber procurement policy but that implementation of the policy by public bodies is still incomplete. This is particularly significant because the project looked only at volunteers so overall compliance may be lower than reported in this study. Some public bodies have developed their own policies which are not completely consistent with central government policy and guidance and can therefore cause confusion. Public bodies are not consistently communicating timber policy requirements to contractors.

Recommendation:

Improve the implementation of the timber procurement policy by public bodies through:

- a) **Improved awareness among procurement staff,**
- b) **Better communication with contractors (both within contracts and through contract implementation discussions),**
- c) **Regular checks to ensure that timber requirements are being delivered,**
- d) **Better reporting (see 2 below) and**
- e) **Greater consistency between the timber procurement policies adopted by individual public bodies.**

Proposed activities:

1. Develop an implementation strategy in consultation with key departments and suppliers to ensure that there is steady improvement in implementation. This will require for example:
 - a. Clarification of procurement staff responsibilities and implications if departments fail to implement the policy.
 - b. Clarification of the applicability of the policy to different types of bodies and mechanisms for procurement.
2. Ensure appropriate and up to date guidance is readily available.
3. Initiate further studies to assess compliance across other **product groups** (e.g. paper, furniture), other **procurement approaches** (e.g. *ad hoc* procurement; public-private partnerships) and other **public bodies**.
4. Continue and improve awareness raising through linking with existing professional development approaches used by procurement officers (e.g. CPET training to be made CPD compliant).
5. Encourage Local Authorities to adopt the policy.

2. Implementation of the policy by contractors

Significant variability was seen in the level of on site implementation reflecting both the differences in the levels of communication from government (see 1 above) and differences in contractors' own policies. As the study highlights, it often appears to be the companies themselves driving the delivery of the timber procurement policy rather than the public body for which they are working – often indirectly through delivery of BREEAM or their own company policies. This suggests that working directly with government suppliers may be an efficient way of increasing implementation. Nevertheless, not all contractors are delivering the policy in full and issues remain with the control of sub-contractors which form a major part of the delivery of most big contracts.

Recommendation:

Raise awareness and capacity in companies supplying public bodies through training and guidance.

Proposed activities:

1. Develop approaches for working with suppliers to government, initially in the construction sector but also in other sectors.
2. Continue and improve awareness raising through linking with existing professional development approaches used by architects, specifiers and contractors (e.g. CPET training to be made CPD compliant).

3. Reporting mechanisms to collect information on implementation of the policy

A key aim of the study was to look at the feasibility of collecting better information regarding the level of policy implementation.

Where reporting requirements existed, there was evidence of more effective policy implementation. BREEAM assessments were found to be an important driver for the implementation of a timber procurement policy. Therefore, it is important to foster maximum synergy between initiatives.

A number of approaches were identified and discussions held with participating companies to determine the most efficient mechanisms for collecting data. Based on this a proposed reporting system has been developed (see Annex C). Discussions will now be needed within government to establish whether this system will work and how it should be utilised.

Recommendation:

- a) Discuss the proposed reporting system within government to establish whether it will deliver the information required in a useful format.**
- b) Decide whether reporting should be made compulsory (i.e. a condition of contract) and, if so, how it will fit into existing reporting structures. Incorporate this into the implementation strategy.**
- c) Improve the consistency between government reporting requirements and other initiatives relating to sustainable timber, in particular BREEAM.**

Proposed activities:

1. Consult public bodies on the most feasible way of incorporating the requirements, based on recording requirements in place.
2. Maximise synergies with BREEAM and other equivalent initiatives. Discuss the possibility of incorporating a requirement for policy compliance with BRE.
3. Incorporate reporting requirements in the implementation strategy.
4. Continue to consult with contractors on options being discussed.
5. Decide whether to make reporting a condition of contract with all construction projects and other suppliers.
6. Implement revised reporting form and system across public bodies.

4. Monitoring delivery of the policy

Currently there is little monitoring of timber procurement policy delivery by individual public bodies. While some companies seem to have benefited from delivering the policy, there does not appear to be any systematic mechanism for rewarding delivery. Furthermore, there are no implications for those that fail to deliver the policy, even where lack of compliance is identified. This results in very limited incentives for companies to strive to adhere to the timber procurement policy.

Recommendation:

Government should consider how to develop ongoing oversight of policy delivery, and develop feedback mechanisms which recognise and reward compliance and react to non-compliances.

Proposed activities:

1. Discuss options for independently assessing the reporting system, and thereby compliance with timber procurement policy, with the National Audit Office.
2. Consider options for spot checking timber purchases to confirm compliance with the policy.
3. Consider mechanisms for rewarding contractors who deliver the timber procurement policy.
4. Consider mechanisms for sanctioning contractors who fail to implement the timber procurement policy.

5. List of Annexes

- A. Defra proposed supplier reporting format discussed with public bodies and contractors
- B. The Building Research Establishment Environmental Assessment Method (BREEAM)
- C. Revised proposed format for reporting on timber use

Annex A: Defra draft supplier reporting questionnaire (Spring 2007)

Supply of Timber from Legal and Sustainable Sources – Contractor’s Report.

Supplier Questionnaire: *Must* be completed when supplying wood or wood derived products under contract to Government Bodies as part of the contractual obligation. Data should relate to timber and wood covered by the Invoice identified below.

Name of Supplier

Contract Ref.

Invoice No.

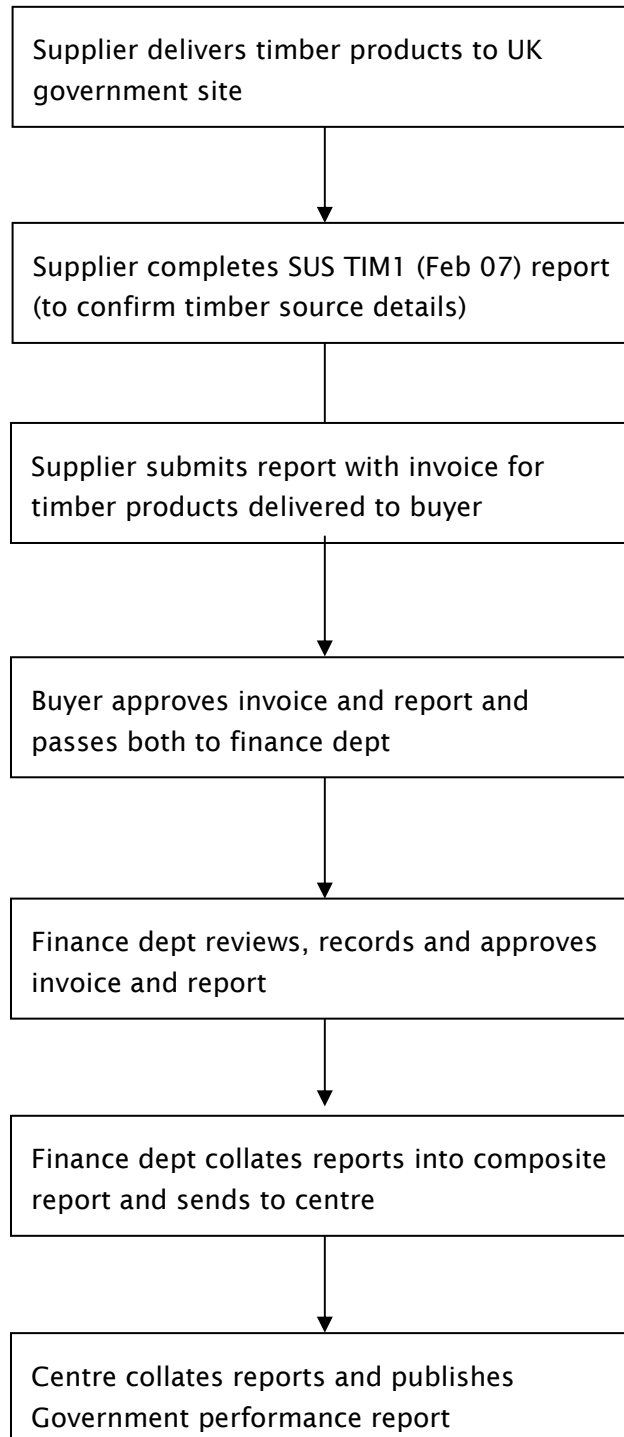
Date:

CATEGORY*: RAW WOOD (Scaffolding, construction timber..)				
Requirement tendered for	Evidence	Cost of timber in pound Sterling	Type of timber: Percentage of overall supply (Estimate)	
Legal	Certified (Cat A)	£		
	Other Evidence (Cat B)	£	TRH	%
			TEH	%
SW			%	
Sustainable	Certified (Cat A)	£		
	Other Evidence (Cat B)	£	TRH	%
			TEH	%
SW			%	
Country where timber harvested – if not known please state country of export to EU This applies to non-certified products only (Cat. B).	Product	Country of harvest	Country of export to EU	
	a)			
	b)			
	c)			
Total cost of timber in pound Sterling		£		
Quantity of timber supplied by metric volume (Estimate)		m ³		

TRH= Tropical hardwood, THE= Temperate Hardwood and SW= Softwood

*Other categories are: Non-paper wood pulp products, Wood products and Paper.

Sustainable Timber – Government Reporting process



Annex B: The Building Research Establishment Environmental Assessment Method (BREEAM)

BREEAM has been developed by the Building Research Establishment to assess the likely environmental performance of buildings, and can be used on construction or refurbishment projects. Independent certified assessors conduct assessments in several of the following categories: management, pollution, water, ecology, land use, materials, energy use, transport, and health and well-being. The credits awarded in each area are weighted to produce a single overall score, on which BRE awards a certificate for a BREEAM rating of 'Pass', 'Good', 'Very Good' or 'Excellent'. Versions of BREEAM are available for offices, homes, schools, prisons, health centres and industrial units, and bespoke versions can also be developed. BREEAM can be used to assess different stages of a building's life cycle; the design phase/ preconstruction and post construction.

Since 2002, government departments have been required to conduct a BREEAM assessment, or equivalent, on all construction and refurbishment projects and a report from March 2003 stated that all new build projects should achieve a rating of 'Excellent' and refurbishment projects 'Very Good'¹⁰. The target for the latter was raised in 2006, requiring 'Excellent' BREEAM standards or equivalent for major refurbishments as well as new builds¹¹. A recent report from the National Audit Office shows that only 10% of the Governments construction projects have a BREEAM assessment¹².

In relation to implementation of the timber procurement policy and BREEAM, CPET have identified the following issues:

BREEAM	
Issue	Action
It is not required to meet the Governments timber procurement policy as it is not mandatory to procure legal and preferably sustainable timber to attain excellent rating. The points required can be achieved through other means.	BRE is looking to set minimum standards across all areas and will work towards ensuring compliance with policy on Government projects.
It is the understanding of the majority consulted that post construction BREEAM assessments are not required. Good intentions presented for the Pre construction/design phase assessment might not be put in to practice.	It is recommended that it is clarified that a full BREEAM assessment is required. For the Governments Code for Sustainable Homes a post construction assessment is compulsory.
BREEAM assessors are not trained specifically in the technicalities of timber certification to address compliance with the policy.	CPET and BRE should raise awareness on the issue amongst assessors. BRE invited CPET to present at assessor days.
Only major projects have BREEAM requirements.	Definition of 'major' needs to be clarified and 'minor' projects must be addressed alternatively.

¹⁰ Defra's *Sustainable Development in Government* Report in 2002. <http://www.sustainable-development.gov.uk/publications/report2002/index.htm>.

¹¹ Defra, *Sustainable Operations on the Government Estate: Targets*, June 2006, <http://www.sustainable-development.gov.uk/government/estates/targets.htm>.

¹² NAO, *Building for the future: Sustainable construction and refurbishment on the government estate*, April 2007 http://www.nao.org.uk/publications/nao_reports/06-07/0607324.pdf

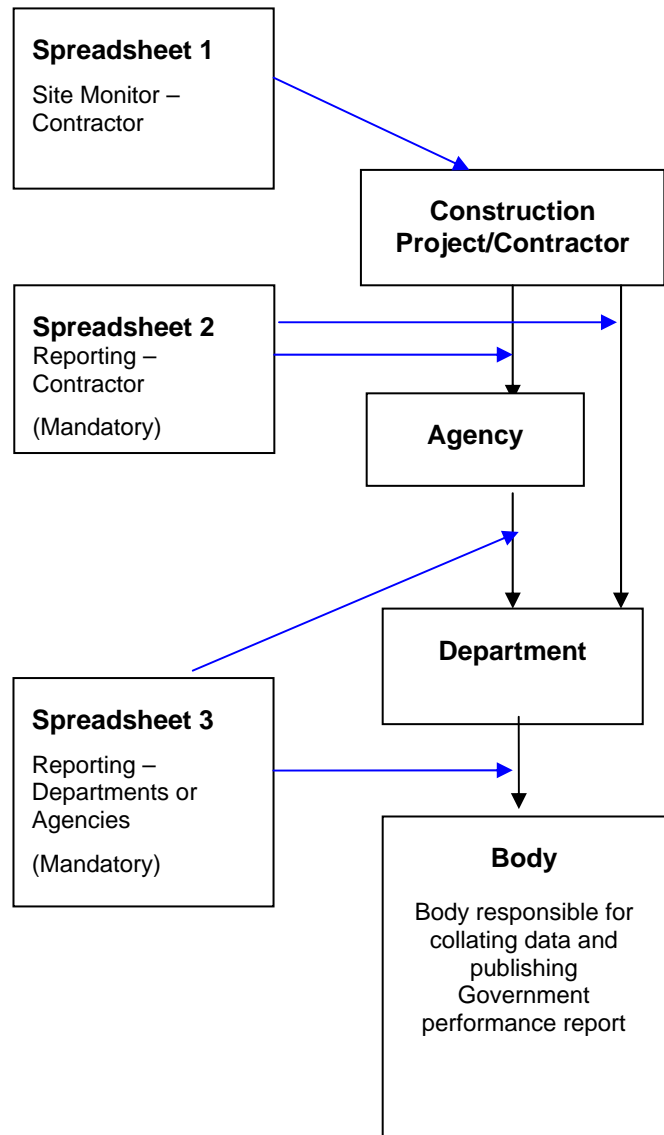
Annex C Revised format for reporting on timber use

It is essential that a reporting format is practical and minimises the administrative burden. Based on results from this study, the format for reporting on timber use has been revised to require reporting on volume. The format has been aligned with existing systems being used by the construction sector to record timber purchases, (for example for BREEAM, and for project certification). Spreadsheet 1 (see below) has been designed to provide contractors with practical tools to record traceable data. Contractors will need to ensure these requirements are incorporated with their own procedures on site. The revised format has been sent to the Technical Review Group and other stakeholders for comments and their observations incorporated.

The revised format consists of three spreadsheets which:

- 1) Monitor timber on site;
- 2) Enable collation of data for reporting to public body;
- 3) Report from the public body to the body responsible for collating data and publishing Government performance report.

This proposed system of monitoring forms an audit trail that could be spot-checked if required (see flow diagram). Project CoC or BREEAM requirements can also be met. All evidence collected, (including copies of the delivery notes, certificates and completed forms) should be filed e.g. in the Operations and Maintenance Manuals which are passed on after the project is completed. The format for reporting on timber use will need guidance e.g. on evidence categories explaining Category A and B evidence and have a reference to CPET for support. Discussions will now be needed within government to establish whether this system will work and how it should be utilised.



Flow diagram: **Proposed system of monitoring/reporting**

Proposed

Spreadsheet 1 Site Monitor – Contractor (Example)

Company:							
PROJECT: Project A					COMPLETED BY: Robert Holmes Site Manager r.holmes@construction.united.com		
DATE	SUB-CONTRACTOR	SUPPLIER	DELIVERY NOTE	COC NUMBER	PRODUCT DESCRIPTION FOR PERMENANT & TEMPORARY TIMBER	VOLUME EQUIVALENT (m3)	EVIDENCE
23-Sep	Fred Jones & Son	London merchants	2345TF	BMT-pefc-9999	25x150 5th Redwood PSE PEFC 70%	250	PEFC
27-Sep	Frank's Joinery	PT Merchants	76389	TT-coc-1444	25x100 5th Redwood PSE FSC Vol Credit	150	FSC
29-Sep	JD & Son	PT Merchants	34678	No CoC	18mm 2440x1220 MDF Board	40	Category B Checklist 1+2 checked by CPET
29-Sep	JD & Son	PT Merchants	34678	No CoC	9mm 2440x1220 Sanded Soft Ply	20	No evidence

Proposed

Spreadsheet 2 Reporting – Contractor (Example)

PROJECT/SUPPLIER: Project A				COMPLETED BY: Peter Williams Project Manager			
TIME PERIOD: Jan to Dec 07				CONTACT: peter.williams@construction.united.com			
FSC, PEFC, SFI or CSA Category A Sustainable	MTCC Category A Legal	Other evidence Sustainable Category B	Other evidence Legal Category B	No evidence available	TOTAL VOLUME M3		
400	0	0	40	20	460		

Proposed

Spreadsheet 3 Reporting – Departments or Agencies (Example)

PUBLIC BODY: MoD					COMPLETED BY: David Tyler Sustainability and procurement manager	
TIME PERIOD: Jan- Dec 07					CONTACT: david.tyler@mod.co.uk	
Type/Contract (project, direct purchases paper, furniture)	FSC, PEFC, SFI or CSA Category A Sustainable	MTCC Category A Legal	Other evidence Sustainable Category B	Other evidence Legal Category B	No evidence available	TOTAL VOLUME
Construction Project A	400	0	40	0	20	460
Robert's Furniture Supply	4	0	0	2	0	6
Best Paper A/S	14	0	0	0	0	14