

cpet

Central Point of Expertise on Timber

Evaluation of Category A Evidence

*Review of forest
certification schemes*
Results

November 2008

1. Introduction

The UK Government's procurement policy on timber and timber products was announced in July 2000. This policy requires all Government departments and their agencies to actively seek to buy timber products from legal and sustainable sources. In 2003 the Government issued a model contract specification for the supply of timber and timber products which required timber to come from legal sources. The model contract also included a variant specification for timber from sustainable sources.

A key requirement of the contract and variant specification is that suppliers must be able to provide evidence to the Government that the wood or wood products they supply are from legal and, if promised by the supplier, sustainable sources. The policy will change from April 1 2009, when the policy will demand, that all timber and wood-derived products must be from independently verifiable legal and sustainable sources or FLEGT-licensed timber. Timber which only meets the legality criteria will be accepted in very special cases only. For further information on the new policy see [UK Government April 2009 Policy Timber Procurement Advice Note \(August 2008\)](#)¹.

One of the most straightforward forms of evidence is to supply products from certified sources², 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 the new contract and variant specifications.

Therefore, a study was carried out through the Central Point of Expertise in Timber (CPET) to review the contract and variant specifications and to assess the five 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. These five schemes were:

- 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.

¹ Available for download here <http://www.proforest.net/cpet/uk-government-timber-procurement-policy/resolveuid/5ab65f0014e7a5a4a500799bc33c1e8b>

² 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.

- The Sustainable Forestry Initiative (SFI), which is applicable in the US and Canada.

The results of the original assessments (together with several re-assessments) were finalised as procurement guidance for public sector buyers in August 2005.

Defra has committed to undertaking regular reviews of all the certification schemes already assessed. The 2008 Review of forest certification schemes was undertaken to ensure the currently assessed schemes continue to provide assurance of legality and sustainability.

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 and for continuity all five were included in the current review. However, it is intended that for future reviews, national schemes which are members of PEFC will not be individually assessed.

2.1. Methodology

For each of the five schemes, 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 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.

A technical review panel of four experts was convened. The technical review panel members were selected on the basis of their certification expertise and experience, independence from individual certification schemes, and their international input to the process. The selection of the technical review panel members and the decision-making rules for the physical meeting were discussed with the CPET Reference Board. Based on these discussions Defra made the final decision on methodology and selection of review panel members. For details on the methodology see: [Methodology for reviews of timber certification schemes](#) (March 2008)³. Each member of the panel was provided with the information collected for each of the five 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.

³ Available for download here:

<http://www.proforest.net/cpet/resolveuid/9ca9528e5601c801fa247d5b8f1cfd5>

CPET then convened and facilitated a three day physical meeting of the technical review panel to finalise the results of the reviews for each scheme. The meeting was to consider the draft results from each panel member, comments from schemes, and stakeholder comments. The panel members reached consensus on most 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 email discussion.

Final results from the technical review panel were then discussed with the CPET Reference Board. Recommended changes to scores, and their implications for assurance of legality and sustainability, were specifically discussed.

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 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.

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 category⁴.

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:

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.

Meeting the sustainable variant: the UK Government requirements for sustainable timber set out in the variant specification do not require that 100% of the product is from a source meeting the requirements for sustainability. The variant specification 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: all five schemes assessed allow the use of uncertified material in certified products. Most schemes have a number of requirements for the control of this uncertified material. These control mechanisms generally focus on ensuring that the material is not from illegal (and in some cases other controversial) sources. Where this is the case 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

⁴ With the exception of Criteria 4.4 and 4.6.

a minimum of 70% of the wood used came from sustainably managed forests is acceptable⁵ 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 legal compliance and for the sustainable variant.

N.B. 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 above.

	Legal (100% from legal sources)	Sustainable (>70% from sustainable sources)
CSA	All certified products	All certified products
FSC	All certified products	Products containing >70% certified or recycled raw material
MTCC	All certified products	Once the transition to new requirements is fully implemented then any products containing >70% certified or recycled raw material ^a
PEFC	All certified products	Products containing >70% certified or recycled raw material
SFI	All certified products	Products containing >70% certified or recycled raw material ^b

^a MTCC is currently introducing new requirements for the scheme. The review found that once these are fully implemented the MTCC scheme will deliver requirements for sustainability. Once the transition to the new requirements is complete and this has been verified by CPET the new status of MTCC will be reported on the CPET website. This is currently expected to be in early 2009 as the timetable for the transition is for completion at the end of 2008.

^b Only the SFI Chain of custody system will provide assurance of sustainability. The procurement system and wood flow approach do not meet the requirements for sustainability.

3.2. The CSA scheme

3.2.1. Legal

The assessment indicated that the CSA scheme 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

⁵ 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.

adequate to deliver legality. Therefore, all CSA-certified products deliver UK Government requirements for legality.

3.2.2.Sustainable

The assessment indicated that the CSA scheme is adequate to ensure that certified forests meet UK Government requirements for sustainable timber. In common with all schemes, uncertified material cannot be guaranteed as coming from sustainable sources. Therefore, CSA-certified products containing 70% or more material from certified forests deliver UK Government requirements for sustainability. In practice, the CSA scheme only allows up to 30% uncertified material in certified products so all CSA-certified products should meet UK Government requirements for sustainability.

3.3. The FSC system

3.3.1.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.

3.3.2.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 all schemes, 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.

3.4. The MTCC scheme

3.4.1.Legal

The assessment indicated that the MTCC scheme 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 MTCC-certified products deliver UK Government requirements for legality.

3.4.2.Sustainable

The MTCC has made substantial changes to their scheme since the previous CPET review in 2006 which are currently being phased into operation. The assessment indicated that once this transition to the new requirements is complete the MTCC system will be adequate to ensure that certified forests meet UK Government requirements for sustainable timber. In common with all schemes, uncertified material cannot be guaranteed as coming from sustainable sources. Therefore, once the transition is complete and this has been confirmed to the CPET Reference Board,

MTCC-certified products containing 70% or more material from certified forests will deliver UK Government requirements for sustainability.

3.5. The PEFC system

3.5.1. 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.

3.5.2. 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 all schemes, 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.

3.6. The SFI scheme

3.6.1. Legal

The assessment indicated that the SFI scheme 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 SFI-certified products deliver UK Government requirements for legality.

3.6.2. Sustainable

The assessment indicated that SFI forest management standards are adequate to ensure that certified forests meet UK Government requirements for sustainable timber. In common with all schemes, uncertified material cannot be guaranteed as coming from sustainable sources. Therefore, SFI-certified products containing 70% or more material from certified forests deliver UK Government requirements for sustainability. However, SFI allows the use of two approaches to product traceability wood flow accounting and chain of custody. The wood flow accounting approach does not provide information on the proportion of material from SFI certified forests and therefore cannot be accepted. Only the chain of custody approach provides adequate information on the proportion of certified material from independently certified forests and therefore meets the 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 five forest certification schemes against the UK Government criteria. They are set out sequentially in alphabetical order:

Appendix 1a CSA

Appendix 1b FSC

Appendix 1c MTCC

Appendix 1d PEFC

Appendix 1e SFI

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 nor 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 [Criteria for Evaluating Certification Schemes \(May 2006\)](#)⁶.

Note: that to score 2 for criteria 2.5, it is, following this years assessment, no longer required that the summary of the results of the certification audit must be *electronically* available. Only that the summary is available to any interested party on request within a defined timescale.

⁶ Available for download here <http://www.proforest.net/cpet/resolveuid/f2b430d40317c7e13e41e0e22b89caeb>