

**cpet**

# **CPET Practical Guides**



## **Category B evidence** ***Forest source information***

**July 2010**



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# 1 Using the Guides

## 1.1 UK government requirements

The UK government requires suppliers to be in a position to be able to demonstrate that the wood or wood-based product supplied for a contract comes from either legal and sustainable or FLEGT-licensed or equivalent sources.. The Timber Procurement Advice Note (April 2010) instructs public sector to demand timber and wood-derived products originating from either Legal and Sustainable or FLEGT-licensed or equivalent sources using the model specification clauses and contract conditions.

If a supplier has a **contract** directly with the UK government, they will be responsible for making sure that all the evidence has been gathered and is complete. If a supplier is supplying to Government indirectly through other organisations, they will be responsible for explaining and submitting information on what their own organisation does, as well as asking their own supplier(s) to do the same.

The government recognises two types of evidence to show that the timber or wood products are from legal or sustainable sources:

- Category A evidence: claims based on certification under a certification scheme which delivers government requirements. Criteria for assessing schemes to establish whether they constitute Category A evidence are set out in *UK Government Timber Procurement Policy: Criteria for Evaluating Certification Schemes* (Category A Evidence).
- Category B evidence: all other credible evidence that material is from forests which meet the requirements for legality and sustainability. The evaluation of Category B evidence is detailed in *UK Government Timber Procurement Policy: Framework for Evaluating Category B evidence*, supported by this guidance.

## 1.2 Overview of the guides

Two Practical Guides have been prepared to support the *Framework for evaluating Category B evidence*. The Framework presents three Checklists which suppliers should use when submitting Category B evidence of legal and sustainable evidence for a UK government supply.

There are two elements to the evaluation of Category B evidence:

- Confirmation that the product being supplied actually originates from the forests in question, which requires understanding of the supply chain (Checklist 1)
- Confirmation that the forest or forests of origin were managed legally or sustainably (Checklist 2 and Checklist 3) (this document)

This guide examines Checklist 2 and Checklist 3 (Forest source information) and describes what Category B information should be presented.

This guide has been written with the **supplier** to the UK government as the main audience. This does not necessarily mean suppliers will have a direct contract with the UK government. They may be supplying a building contractor who is refurbishing a UK government building, or importing timber that will be used by a joinery company that will be supplying a UK government contract.

The second Guide, *CPET Practical Guides: Category B evidence, Supply chain information*, addresses Checklist 1, and should also be read when submitting evidence of legal and sustainable evidence for a UK government supply.

## 2 Introduction to the forest source



### In this section:

- Why a policy?
- The Government's approach

### 2.1 Why a policy?

Illegal timber poses a critical threat to world's forest resources. A World Bank report released in August 2006 suggested that USD \$10 billion a year is lost to illegal logging activities, with USD \$5 billion from that figure representing lost revenue to governments<sup>1</sup>. A recent Chatham House report estimated that illegal timber products imported into the UK in 2008 were worth 1 billion USD<sup>2</sup>.

There are a number of impacts resulting from illegal timber including deforestation and loss of biological diversity; loss of government revenue; increasingly deficient governance; direct contribution to increased poverty when people lose their resources, and indirectly as a result of a reduction in government revenues; contribution to funding of national and regional conflicts thereby exacerbating them; and distortion of forest product markets, thus reducing incentives for sustainable forest management. However, it is important to note that timber that is from a legal source is not necessarily from a sustainable source.

The UK government aims to contribute to the eradication of illegally logged timber and unsustainably logged timber. In order to do so, it has elaborated a timber procurement policy that requires all timber to be from legal and sustainable sources.

### 2.2 Forest sources and the UK Government



To confirm that a wood-based product originated in a legally and sustainably managed forest it is necessary to know how the forests it came from were managed. A definition of what 'legal' and 'sustainable' sources are for the purpose of UK government procurement of timber and wood products is set out in *UK Government Timber Procurement Policy: Definition of Legal and Sustainable*, available for download from the CPET webpage or by request.

The UK government as of April 2009 demand that all timber and wood-derived products originate from either Legal and Sustainable or FLEGT-licensed or equivalent sources.

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<sup>1</sup> August 2006. Strengthening Forest Law Enforcement and Governance: Addressing a Systemic Constraint to Sustainable Development. The World Bank, Report No. 36638-GLB.

<sup>2</sup> July 2010. Illegal Logging and the related trade: Indicators of the Global Response. Chatham House, UK

Unsustainable timber will be accepted only in very special situations where a particular type of product or timber species is needed (e.g. for use in marine defences or refurbishment of an historic building) and where no Legal and Sustainable or FLEGT-licensed or equivalent source is available. In this case, the following evidence must be provided:

- documented justification setting out why no alternative product or timber species can be used;
- evidence that the source of the timber was legally managed; and/or moving towards sustainability.

Public buyers are instructed to give preference to timber from sources that are demonstrably in an active programme to improve and certify forest management.

In the context of the UK government's timber procurement policy, legality of forest source refers to legal use rights, compliance with local and national laws, payment of royalties and taxes and respect for CITES requirements (see Box 2 on page 17). It refers to activities in the forest of origin only. Please see Checklist 2 for complete details.

The term 'illegal timber' refers to laws that have been broken in the country of origin, and up until July 2010 it has been possible to import it in to the UK without necessarily breaking any UK laws. However, in July 2010 it was agreed at the EU level to make it illegal to trade illegally harvested timber in the EU. Contact CPET for further information.

In order to demonstrate that the forest source is legal and sustainable, the forest owner or manager must have a definition of 'sustainable' in place which they are meeting through their harvesting and management activities. Many people have different ideas of what is meant by sustainable – for some, it is as simple as making sure that trees are replanted after harvesting – however, this alone would not be sufficient under the UK government's timber procurement policy.



Under the UK government's policy, the definition of sustainable must be based on a widely accepted set of international principles and criteria. The definition itself must have been developed with representation and input from economic, environmental and social interest categories and the decision making process must have ensured that no single interest was able to dominate the process and that no decision could be made without majority agreement of an interest category.

The definition that the forest manager or owner uses must include requirements that the management of the forest must ensure that harm to ecosystems is minimised, that forest productivity is maintained, that forest ecosystem health and vitality is maintained and that biodiversity is maintained. Please see Checklist 3 for complete details.

It is possible to have a forest source **certified**, which is undertaken through independent verification of each stage in the supply chain. Certification involves inspection of the forest management organisation against a set of requirements as set out by a forest certification scheme, which includes both legality and sustainability. Evidence of certification is called Category A evidence, and further information can be found on the CPET website at [www.cpet.org.uk](http://www.cpet.org.uk)

## 3 Getting started



### In this section:

- Planning your approach
- Evaluating your situation
- Gathering evidence
- Who is responsible?

### 3.1 Planning your approach

If this is the first time you are submitting Category B evidence, you should put aside time for reading and understanding the documents, following up with people in your organisation as well as following up with your suppliers. You should ask yourself:

- Am I the right person to be doing this within my organisation? *There may be someone responsible for Quality Systems who is better positioned to be responsible for putting Category B evidence together for the organisation.*
- Is there anyone else who has already had to put together 'Category B' evidence in my organisation that can help me? *If someone else has already gone through this process, you may find that some of your work has already been done for you.*

CPET has produced several documents to assist you with this process. They include:

- Framework for Evaluating Category B evidence*
- CPET Practical Guides: Category B evidence, supply chain information*
- CPET Practical Guides: Category B evidence, forest source information* (this document)

**Step 1** – Read Section 2 of both *Practical Guides* for an introduction to supply chains and forest sources.

**Step 2** – Familiarise yourself with the UK government requirements, which can be found in Section 1 of both *Practical Guides* and in the April 2010 *Timber procurement advice note*. You should read (or re-read) the *Framework for Evaluating Category B evidence* in order to understand what the *Practical Guides* are referring to.

**Step 3** - Refer to *CPET Practical Guides: Category B evidence, Supply chain information*. Forest source information is only useful if the supply chain information meets the UK government's requirements (and vice versa).

**Step 4** - Check your contract or order and if necessary clarify what the customer/client is expecting from you in terms of products and evidence, and when.

**Step 5** - If you have not done so already, investigate your forest source and identify the systems and documents available.

**Step 6** - Complete Checklists 2 and where applicable, Checklist 3 using, *Sections 4 – 7* as reference. Checklist 2 can be found at Annex 1 and Checklist 3 can be found at Annex 2.

### **3.2 Checklist 2 and Checklist 3**

To assist suppliers in providing this information on the forest source, two Checklists have been developed which provide a systematic way of presenting the information:

- forest source information for legality checklist ('Checklist 2')
- forest source information for sustainability ('Checklist 3')

Full-page versions are found at Annex 1 and Annex 2, or alternatively an editable version can be downloaded from the CPET website at [www.cpet.org.uk](http://www.cpet.org.uk).

You will need to determine whether the forest source meets the requirements for legality only (Checklist 2) or sustainability (Checklist 2 and 3). It is not necessary to complete Checklist 3 unless you are claiming to be supplying timber from a sustainable source.

Checklists must be completed for every forest source.

*Sections 4 – 7* of this guide explain what is required to complete each column of the form.

### **3.3 Evaluating your situation**



In order to complete Checklist 2 and where applicable Checklist 3, you will need to have information about the management of the forest source (see previous section Introduction to forest sources). Checklist 2 and Checklist 3 can be used as a guide for what types of information needs to be available. At this point, please consider carefully whether it is likely the forest source will meet the requirements for a legal (and where applicable, sustainable) source.

**Situations where the forest source information** is known should be straightforward cases of completing Checklist 2 and determining if the management of the forest source meets the requirements for legality, and whether the evidence available is appropriate for the level of risk of illegal timber being mixed or substituted. Completing Checklist 3 will be complex, unless it is a situation where certified products are coming from a Forest Management certificate holder, but have been sold on to a company that does not have Chain of Custody certification.

**Situations where the forest source information** is unknown should be considered carefully as there is always the risk that when you do investigate the source, you may find that it will not meet the UK government's requirements or that there will be insufficient evidence to satisfy the UK government's requirements.

On the rare occasion that a forest source supplier is contracted directly by Government, investigation of the forest source should where possible take place prior to tending for a UK government contract or accepting an order. Alternatively, if you are a supplier further away from the forest source who is relying on forest source information for a Government contract, please note that it may take some time to put together accurate forest source information. You should anticipate that companies you may be relying on for documentation may require a longer lead time than expected, and thus you should agree a timeline at the outset. If you have not yet determined who your forest source supplier(s) will be for the project/supply, you should take in to account the Category B evidence requirements when selecting a forest source supplier.

If you have already signed a contract or have already supplied a product and you are now trying to complete Checklist 2 and Checklist 3, please note the following:

- ➔ It will **not** always be possible to use your regular suppliers to meet Category B requirements
- ➔ Investigating your forest source after timber has been supplied is often difficult and time consuming and there is **no guarantee** that the timber will meet the requirements

***Failure to provide adequate evidence will result in a breach of contract or agreement to supply, which may have serious repercussions for both the supplier and the UK Government project.***

### 3.4 Gathering Category B evidence



In order to find out whether the suppliers you intend to use have evidence that they meet the requirements of the UK government's timber procurement policy, you will have to get in touch with them. You could provide them with a copy of this document, and the *Framework for evaluating Category B evidence* so they understand what is being asked of them.

You should consider asking them to complete Checklist 1, Checklist 2 and Checklist 3. Agree a timeline with your suppliers for providing you with the evidence, to ensure that you have time to check it over and where necessary, find a new supplier if what they submit is insufficient.

If you are a supplier further away from the forest source putting together Category B evidence, you will need to get in touch with the forest management organisation to find out details of their operations. You should provide them with a copy of this document, and the *Framework for evaluating Category B evidence* so they understand what is being asked of them. You should consider asking them to complete Checklist 2 and Checklist 3. Agree a timeline with your suppliers for providing you with the evidence, to ensure that you have time to check it over and where necessary, find a new supplier if what they submit is insufficient.



As you begin to put together your Category B evidence, you should consider how you will keep track of the information, and in what form you will present it to your buyer. Using a computer spreadsheet programme is a good way of summarising your supply chain for your own record keeping purposes. A ring binder (with sections for each link in the supply chain) may be a good way of starting, though you should focus on making sure the Checklists are complete rather than amassing large quantities of paper. You should expect to keep the information on file for 6 years after the contract has been signed or order fulfilled.

### **3.5 Roles and responsibilities**

UK government personnel will make the final decision when it comes to deciding whether the evidence submitted is adequate.

- ➔ As a forest manager or owner, you will need to know what types of information you should be preparing for the UK government, and how they will be assessing it.
- ➔ If you are a supplier further away from the forest source, you will have to decide whether the evidence you have about the management of the forest source is adequate under the UK government's requirements.



If you work for a forest management organisation, you should prepare appropriate Category B evidence as per this guide for customers who indicate that the supply is destined for a UK government project. If you are a supplier buying from a forest source (e.g. sawmill), you should request that the forest management organisation prepare appropriate Category B evidence as per this guide for orders that are destined for a UK government project.

In the process of investigating your forest source you will need to gather information and evidence, complete Checklist 2 and Checklist 3, as well as decide whether the evidence is adequate (this is addressed in *Sections 4 – 7* of this document).

When assessing whether information provided about the forest source is adequate, there are three questions which will be asked. The three questions are:

1. Has information on compliance been provided for each criterion in the relevant checklist (*Section 4 – legality, Section 5 – sustainability*)?
2. Has information been provided on how compliance is checked/verified? Is the approach used adequate to confirm the criteria are being met (*Section 6*)?
3. Is evidence supplied or available, and is it adequate to confirm the information provided is accurate (*Section 7*)?

Guidance on what should be provided to satisfy each of these questions is provided in the following *Sections 4 – 7*.

It is very important to ensure that the information provided is appropriate because if it is not, the contracting UK Government authority may demand independent verification of both the forest source and the supply chain (as set out in the supplementary condition of contract).

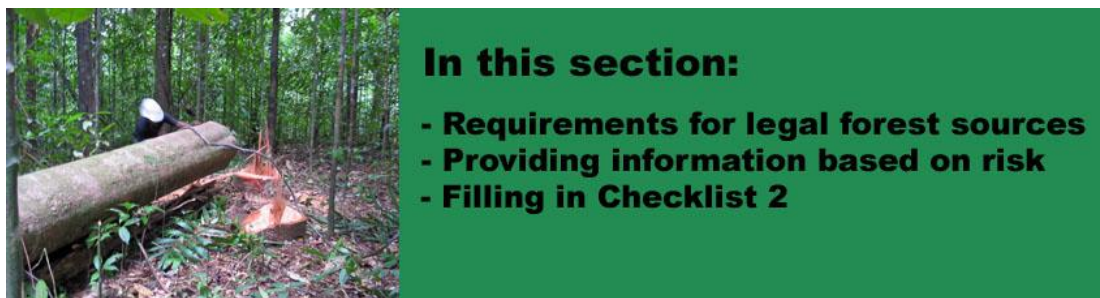
### **Box 1. UK government requirements for submitting evidence**

3.1 [The Contracting Authority] reserves the right to decide whether the evidence submitted to it demonstrates legality and sustainability, or FLEGT-licence or equivalent, and is adequate to satisfy [the Contracting Authority] that the Timber and wood-derived product complies with [the Contract Specification]. [The Contracting Authority] reserves the right to decide whether the evidence submitted to it is adequate to satisfy [the Contracting Authority] that the Timber and wood-derived products comply with the requirements of the social criteria defined in section 1.2 above. In the event that [the Contracting Authority] is not satisfied, [the Contractor] shall commission and meet the costs of an "independent verification" and resulting report that will (a) verify the forest source of the timber or wood and (b) assess whether the source meets the relevant criteria.

3.2 In [this Contract], "Independent Verification" means that an evaluation is undertaken and reported by an individual or body whose organisation, systems and procedures conform to *ISO Guide 65:1996 (EN 45011:1998) General requirements for bodies operating product certification systems* or equivalent, and who is accredited to audit against forest management standards by a body whose organisation, systems and procedures conform to *ISO 17011: 2004 General Requirements for Providing Assessment and Accreditation of Conformity Assessment Bodies* or equivalent.

**For assistance with Category B evidence at any point during the process, please contact the Central point for Expertise on Timber procurement (CPET) on 01865 243 766 or by email on [cpet@proforest.net](mailto:cpet@proforest.net).**

## 4 Compliance with requirements for legality



### 4.1 Requirements for a legal forest source

It is necessary for the owner or forest management organisation to show that they are meeting requirements that ensure the wood from the forest source is harvested legally. Information on the requirements that need to be met is covered by the second column in the checklist.

Remember that Legal timber will be accepted only in very special situations where a particular type of product or timber species is needed and where no Legal **and** Sustainable or FLEGT-licensed or equivalent source is available. Documented justification setting out why no alternative product or timber species can be used and that no Legal and Sustainable source is available must be provided. Evidence that the source of the timber was legally managed; and/or 'moving towards' sustainability will be required. Checklist 3 can be used to show that forest management is 'moving towards' sustainability.

There are four criteria which must be met in order for the timber or wood-derived product to be considered legal:

1. The forest owner/manager holds legal use rights to the forest
2. There is compliance by both the forest management organisation and any contractors with local and national laws including those relevant to:
  - a. Forest management
  - b. Environment
  - c. Labour and welfare
  - d. Health and safety
  - e. Other parties' tenure and use rights
3. All relevant royalties and taxes are paid
4. There is compliance with the requirements of CITES (see Box 2, p. 17)

### 4.2 Information required

For claims of legality, the Forest source information for legality Checklist (see Annex 1) must be completed. When sourcing from multiple forests, each forest must be described through completion of one Checklist per source. Checklist 2 follows the format below:

Criteria	How does the forest source comply?	Mechanism for verification	Evidence provided or available

In order to determine how much detail needs to be provided on the legality criteria, an evaluation can be undertaken to determine the risk that the timber has been harvested illegally. Please see *Section 6.4.1* for details on how to assess this risk.

#### **4.2.1 Very low risk of illegally harvested timber**

Where the forest governance is robust and there are mechanisms for monitoring of compliance and public reporting of non-compliance, information (and evidence) may not need to be explicitly provided. It may be adequate to base evidence on the absence of any substantive claim of non-compliance. This means that a forest owner or forest management organisation who has been asked to submit Category B evidence on the legality of their forest source may not need to provide detailed information for each criterion in Checklist 2. If you are making a claim as described above, you should have available written justification of your evaluation and risk assessment, as per issues detailed in *Section 6.4.1*. When completing Checklist 2, you should indicate that the source is at ‘low risk of illegally harvested timber’ in the column, ‘How does the forest source comply?’.

This situation will only be acceptable if the previous stage in the supply chain has robust evidence that links them to a forest source as described above.

#### **4.2.2 Risk of illegally harvested timber**

Where it is not possible to demonstrate that the risk of illegally harvested timber is very low, that forest governance is robust, that there are mechanisms for monitoring of compliance or public reporting of non-compliance, information must be provided for each criterion.

## **Box 2. CITES**

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), aims to protect certain plants and animals by regulating and monitoring their international trade in order to prevent it reaching unsustainable levels.

CITES includes three Appendices that list various plants and animals. Appendix I species can only be imported for scientific, breeding, propagation or educational purposes that will not harm the survival of the species in the wild. Appendix II species can be traded provided they have the appropriate export and import licenses. Appendix III species can be traded, provide they have the appropriate export permit. Further information is available from <http://www.defra.gov.uk/animalhealth/cites/>.

A guidance note has been produced specifically for timber importers and traders. See 'Additional Guidance for Timber Importers and traders' at <http://www.defra.gov.uk/animalhealth/cites/guidance/GN15.htm> which includes timber species currently covered by CITES.

CITES is part of UK legislation, and is controlled at the border.

### 4.3 Filling in the form

In the context of the UK government's timber procurement policy, legality refers to all the points covered in Checklist 2. Suppliers should note that unless the issues covered in the checklist are all addressed, they should not accept claims of legality. Forest management organisations should note that if they are unable to complete Checklist 2, they should not claim to be able to supply timber from a legal source.

Criteria	How does the forest source comply?	Mechanism for verification	Evidence provided or available
L1 The forest owner/manager holds legal use rights to the forest	ABC Harvesting purchased the area covered by Concession 15A in 2003 from John Brown, a private landowner. ABC Harvesting has a valid harvesting permit issued on June 14, 2004.		
L2 There is compliance by both the forest management organisation and any contractors with local and national laws including those relevant to: <ul style="list-style-type: none"> <li>• Forest management</li> <li>• Environment</li> <li>• Labour and welfare</li> <li>• Health &amp; safety</li> <li>• Tenure and use rights</li> </ul>	ABC Harvesting put together a forest management plan that incorporates forest management, environment and tenure and use rights legislation, and this management plan has been approved by the Government. Management plans are not approved unless that addresses these laws. The company administrator is responsible for the labour and welfare of the staff.		
L3 All relevant royalties and taxes are paid	ABC Harvesting has to pay the Federal Forest Department 10% of the value of the logs that leave the forest. This calculation is done of monthly income, and paid on a quarterly basis.		
L4 There is compliance with the requirements of CITES.	None of the timber being supplied is CITES listed.		

## 5 Compliance with requirements for sustainability



### In this section:

- Requirements for sustainable sources
- Development of the definition
- Filling in Checklist 3

### 5.1 Requirements for a sustainable forest source

There is no definition for sustainability that is globally agreed upon, but it is generally accepted that there are a number of critical requirements that must be broadly followed and that must also be locally appropriate.

Achieving sustainability will always depend on finding a balance between interests. The most appropriate way to do this is to balance representative input to the process of defining sustainability, as a proxy.

There are three sections of the sustainability Checklist, each containing a number of criteria which must be met in order for the timber or wood-derived product to be considered sustainable:

- Development process
- Content of standard
- Implementation in the forest

For claims of sustainability, the Forest source information for sustainability Checklist (see Annex 2) must be completed. When sourcing from multiple forests, each forest must be described through completion of one Checklist per source.

#### 5.1.1 The development process for the definition

A locally applicable definition of sustainability is required. This may be a standard, a set of criteria, a code of practice or some other similar document which sets out in detail the requirements for forest management. The term 'standard' is used to cover all of these approaches. The first section of Checklist 3 (S1 – S4) addresses these requirements related to the development of the 'standard'.

The first section of Checklist 3 follows the format below:

Criteria	How does the standard used comply?	Mechanism for verification	Evidence provided or available

Please note that it is not acceptable to rely on a country's legal requirements for the definition of sustainable. Legislation (either in the UK or elsewhere) should not be assessed against the requirements for sustainability.

### 5.1.2 *Adequacy of the content of the standard*

Information indicating that the definition of 'sustainable forest management' being used is acceptable must be provided. The second section of Checklist 3 (S5 - S12) addresses these requirements related to the details of the 'standard'.

It must be possible to show that the definition used has addressed each requirement S5 - S12. The second section of Checklist 3 follows the format below:

CPET Criteria	Requirements in standard

### 5.1.3 *Implementation of the definition in the forest*

Information indicating that the forest meets the acceptable definition must be provided. This includes providing information showing that the requirements outlined in the previous section are being implemented in practice, and what controls are in place to ensure this. The third section of Checklist 3 addresses these requirements related to of implementation. The number of rows used should be the same as the number of requirements noted in S5 - S12. The third section of Checklist 3 follows the format below:

Requirement from the standard	How does the forest comply?	Mechanism for verification	Evidence provided or available

## **5.2 Filling in the form**

For claims of sustainability, the Forest source information for sustainability Checklist 3 (see Annex 2) must always be completed for each forest source. Suppliers should note that unless the issues covered in the checklist are all addressed, they should not accept claims of sustainability. Forest management organisations should note that if they are unable to complete Checklist 3, they should not claim to be able to supply timber from a sustainable source.

While it is possible that Category B evidence could be used to demonstrate sustainability, **in practice it is unlikely** and thus suppliers should not agree to supply a UK Government Authority with sustainable timber unless they are sure of their source and have complete evidence of verification.

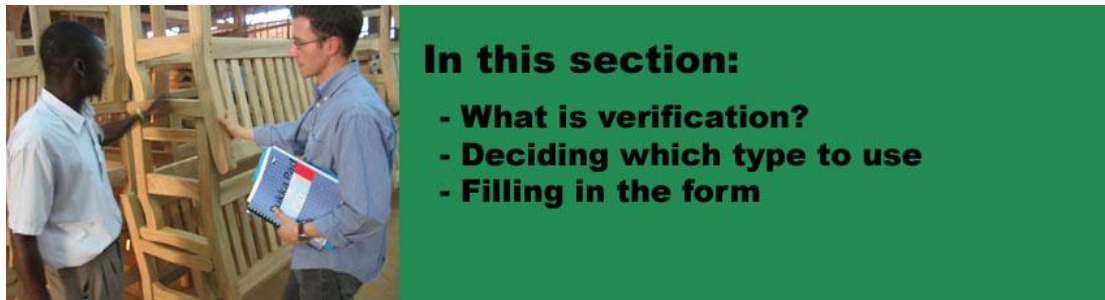
## **5.3 Government standards**

Government-defined standards for 'legal and sustainable' may be acceptable as part of Category B evidence; as clarified above the definition of sustainable requires that a local definition of 'sustainable' is developed through an inclusive, multi-stakeholder process. Standards defined by governments or other groups constituting a single stakeholder group (e.g. an industry standard or an NGO standard) do not meet this requirement. However, if a single-stakeholder standard can be evaluated against a relevant multi-stakeholder standard which does meet the UK government requirements and which has been developed for the same geographical area, and can be shown to be broadly equivalent in terms of outputs, then it may be acceptable. Contact CPET for further details on this.

### **5.3.1 UK Forestry Commission**

The UK Forestry Commission is at the very final stage of finalising guidance to accompany the protocol which will guide small (<100 ha) non-certified forests in how to show legality and sustainability via the category B route. The protocol is based on the current UK Forestry Standard and the English Woodland Grants Scheme. Please contact CPET for guidance on specific cases in the interim.

## 6 Verification of forest source information



### 6.1 Information required

For claims of legality, information on how forest source information is being verified is covered by the second column the *Forest source information for legality* Checklist 2 (see Annex 1). This information must be completed for each forest source, and for each criterion. The criteria for legality are addressed in *Section 4*.

For sustainability, information on how forest source information is being verified is covered by the second column the *Forest source information for sustainability* Checklist 3 (see Annex 2). This information must be completed for each forest source, and for each criterion. The criteria for sustainability are addressed in *Section 5*.

Both Checklist 2 and Checklist 3 follow the format below:

Criteria	How does the forest source/standard used comply?	Mechanism for verification	Evidence provided or available

These methods of verification will be used to confirm information about the forest source, including description of the forest management organisation's requirements and the controls in place to ensure they are met. This section focuses on explaining the different types of verification available and providing guidance on when they should be used.

### 6.2 Types of verification

There are three approaches to verification which are often referred to as first, second and third party verification: In this case, the 'first party' is the supplier, the 'second party' is the customer and the 'third party' is someone who is independent from both supplier and customer.

- **First party verification:** this is when suppliers check themselves and provide information to confirm that they are complying with customer requirements. In the case of forest source information, this would be done by the forest

management organisation. The most common form of first party verification is a **supplier declaration**.

- **Second party verification:** this is when customers check their suppliers to confirm that they are complying with requirements
- **Third party verification:** this is when an independent organisation (the ‘third party’) checks that the supplier is complying with requirements. The most rigorous form of third party verification is forest certification. This is addressed through Category A evidence. However, there are other third party options which are not full certification but are based on independent verification.

Each of these approaches is discussed below.

### **6.2.1 Supplier declarations (first party verification)**

Supplier declarations need to set out in appropriate detail how the supplier is ensuring that the wood product being harvested is from a legal or sustainable forest source. Supplier declarations have the advantage of being very straightforward and cost-effective. However, they are also the least reliable form of verification since it is not in the interest of the supplier to admit to any problems. Therefore, they are most appropriate where the risk of material coming from an illegal or unsustainable source is low (see *Section 6.4.1* below for further information regarding risk). Some companies may refer to their own internal audit process, which while being a useful exercise, still remains a type of first party verification.

#### **It is NOT sufficient to provide:**

- A signed letter simply stating that all wood is from a legal or sustainable source: this does not provide sufficient information on the supply chain and control mechanisms in place;
- Confirmation of membership of an organisation or subscription to a voluntary code of practice: this does not provide sufficient information on the supply chain and control mechanisms in place.
- ISO 9000 or ISO 14001 certificates: unless the scope of these certifications *explicitly and demonstrably* includes control of wood raw material to ensure it is from a legal or sustainable source, certification to either of these schemes is not sufficient on its own because neither normally requires this type of control.

However, all of these can form *part* of a supplier declaration.

Supplier declarations do not have to be long and complex (though they may be if the supply chain is complex or high risk), but they do have to contain the information required by the UK government.

**In general a supplier declaration should include:**

1. Where applicable, the definition of sustainability used by the forest management organisation (as described in *Section 5*).
2. Details of how the requirements for legality, and where applicable the definition of sustainability, used by the forest management organisation are being met (as described in *Sections 4 and 5*).
3. The controls that are in place to prevent mixing or substitution:
  - Details of the control mechanisms in place to ensure that for legality, and where applicable the definition of sustainability are being followed (as described in *Sections 4 and 5*).
4. Management of the implementation and adequacy of these mechanisms:
  - Details of any verification in place to ensure that the control mechanisms are functioning. This may include details of systems operating procedures, internal audit programmes etc. This will not usually include any checks by external parties.
5. Confirmation of information
  - Supplier declarations should be dated and include a signature of a senior manager to confirmation that the information provided is accurate and complete.
6. Additional information:
  - It may also be useful to include other background information about the organisation such as relevant policy commitments, but this must not replace or confuse the core information required above.

### **6.3 *Second party verification***

Second party verification refers to checks carried out by the customer or an agent of the customer on a supplier. Many organisations routinely undertake supplier audits or other similar activities to check a range of issues related to implementation of commitments by their suppliers.

Second party verification can be used to look at the entire way a forest source is managed, to verify the information in a supplier declaration or to follow up on specific concerns or issues.

A feature of second party verification is that it can be very variable in terms of personnel, methodology and independence:

***Who undertakes the verification:*** personnel undertaking second party verification range from professional auditors (either contractors or staff of the customer) to purchasing staff with no knowledge of the issues they are verifying. The quality of the verification exercise will depend on the technical ability and experience of the people doing the work.

**Methodology followed:** the way in which second party verification is undertaken can range from a formal audit to a very informal chat. The way in which information is collected, and the extent to which it is checked, will have a strong influence over the rigor of the results.

**Degree of independence:** the person or team undertaking the verification can range from a professional auditor who, though hired by the customer to work on their behalf, is almost independent to a buyer with a long, close relationship with the supplier being verified. The greater the independence of the verification, the more reliable the results are likely to be.

As a result, second party verification can range from a rigorous and credible exercise to a rather sketchy and unsubstantiated report of what is occurring. Clearly, the latter is much less likely to be acceptable, so it is important when relying on second party verification, particularly for complex or high risk supply chains, to provide information on how the verification was undertaken and by whom.

### **6.3.1 Third party verification**

A third party is one that performs the role of an independent, neutral entity in conducting evaluations/ verifications for use by the first or second party. As with second party verification, third party verification can be used to look at the entire way a forest source is managed, to verify the information in a supplier declaration or to follow up on specific concerns or issues.

For third party verification of supply chain information, the organisation undertaking the verification must be able to demonstrate their independence as well as their capacity to undertake supply chain verification. For example, the verification organisations' systems and procedures conform to ISO Guide 65 or equivalent though it may not always be necessary.

Under the UK government timber procurement policy, it is the supplier who must provide the Authority (e.g. government department) with appropriate evidence. Thus it is the supplier who must organise and take on the costs of the verification. If you are supplying indirectly to Government, you may have to invest in third party verification for your company, depending on the risk and complexity of the supply chain.

**Please note** where the Government Authority is not satisfied with the evidence presented, they can request third party verification as evidence of compliance with the UK government's timber procurement policy. In this case, it must be undertaken by a body whose organisation, systems and procedures conform to ISO Guide 65 or equivalent and who is accredited to audit against timber production standards by a national or international body whose organisation, systems and procedures conform to ISO 17011 or equivalent.

A third party verification exercise could be based on the Category B criteria and Annexes. It would be the report or verification statement that would then become the evidence, and would be acceptable only if it satisfied all the relevant Checklists. Verification reports or statements are usually considered valid for up to a year after

completion, at which point systems should be checked again. A report generated as a result of third party verification could be used by other organisations as evidence, provide the sponsoring organisation put it in the public domain.

#### **6.4 Which approach to verification is appropriate?**

It is important to be able to demonstrate that the type of verification that has been undertaken for a forest source is appropriate. This means that the approach to verification is appropriate to the level of risk that the forest source does not comply with the UK government's requirements for legality and/or sustainability.

This is an important issue to consider before beginning the process of compiling and presenting Category B evidence. The level of risk of illegal or unsustainable forest management is not the same everywhere. In some places, forest management practices and control processes are known to be unreliable, while in others, the sector is relatively well managed and regulated.

Determining the **adequacy** of the information and evidence that is available is based heavily on the risk of illegal or unsustainable forest management practices, in the locality of the forest source. A higher level of risk will mean that a more formal and robust approach to verification should be ensured (*Section 6.2*, above), and will also affect the information requirements (*Section 4* and *Section 5*), and the evidence requirements (*Section 7*).

##### **6.4.1 Assessing risk**

If there is known to be little possibility of illegal and/or unsustainable forest management practices in the locality of the forest source, then the risk is low. If there is a realistic possibility of the forest source being illegally or unsustainably managed, then there is a much higher risk.

- For example, a forest source is located in central Sweden. There are no reports of illegal activities in the region, and a robust supply chain information system has been accepted as reliably defining the forest of origin. In this case there is a very low risk that the forest source is illegally managed.
- For example, a forest source is located in Indonesia. Official estimates indicate that at least 40% of logs in the province come from illegal forest sources, and systems for controlling the origin of logs are not robust. In this case there is a very high risk that the forest source is illegally managed

Robust forest governance, meaning that levels of illegality are low, is necessary for a forest source to be categorised as low risk for illegality. This is defined as the following:

1. The existence of forestry legislation
2. Clear legal use rights for forest areas
3. Evidence that the law is effectively enforced (e.g. evidence that prosecutions are carried out)

4. No substantive claims of corruption against local, regional or national forestry officials.

Correspondingly, forest sources may be considered high risk if:

1. The country of origin has forest sector laws that are unclear or conflicting.
2. The country of origin has a reported significant incidence of illegal practices in the forest sector, or where is a significant level of trade with countries where illegal practices are reported as likely.
3. The country of origin is currently or has recently been politically unstable. Political instability includes civil war, military coups, failure of democratic elections, areas with guerrilla conflict and areas only recognised by some governments.
4. The country of origin has substantive claims of corruption against local, regional or national forestry officials. The reliability of official documentation can therefore be very low.

There is a considerable amount of available information on identifying high risk forest sources. Useful references include the following:

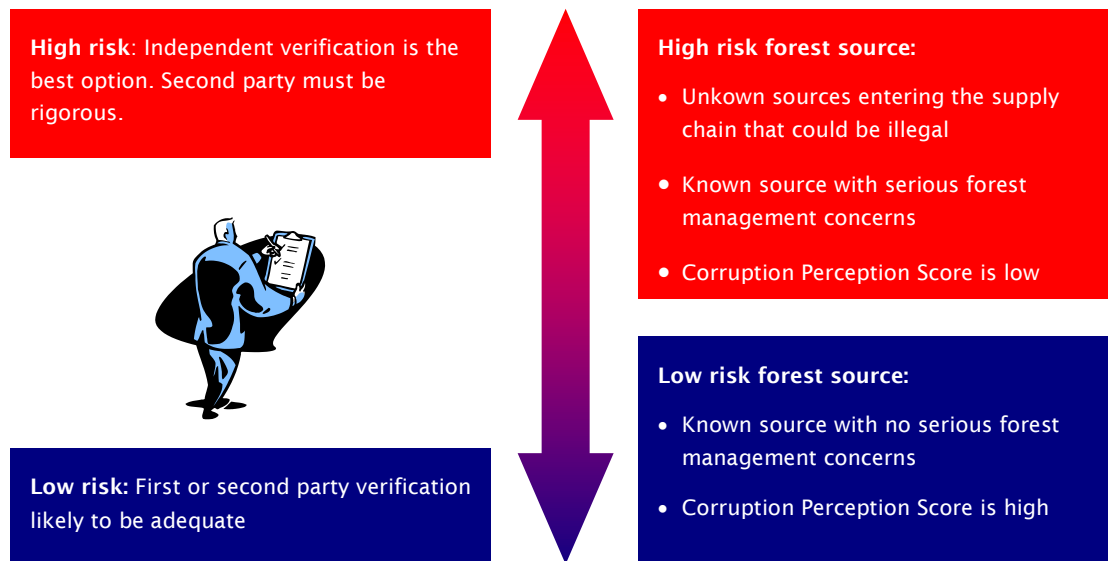
- The illegal logging website maintained by Chatham House, [www.illegal-logging.info](http://www.illegal-logging.info), funded by the UK government's Department for International Development.
- The Corruption Perceptions Index (CPI) of Transparency International (TI) can be used as an indicator of the reliability of official forest source documentation. The CPI is available on the TI website [www.transparency.org](http://www.transparency.org).
- UK Timber Trade Federation's Responsible Purchasing Policy (RPP) does include a risk assessment method, which require members to rate and assess the risk of their suppliers. WWF has developed a Interactive Guide to Legal and Responsible Sourcing for companies who wish to assess and rate the risk of possible trade in illegal timber and timber products. The guide provides detailed guidance on how to assess and rate risk of suppliers. The guide is available on the Global Forest and Trade Network's website: <http://www.panda.org/gftn>
- FSC Global forest risk registry provides information about the risk of sourcing controversial wood and other forest products from more than 150 countries. This tool is targeted towards companies (producers, retailers, distributors, wholesalers), auditors/verifiers, NGOs and other parties wishing to conduct due diligence on the risks of sourcing raw material from forests and forest products operations in various countries. The registry is available here: <http://globalforestrisk.nepcon.net/>
- Other useful resources are available at the websites of organisations such as Environmental Investigation Agency ([www.eia-international.org](http://www.eia-international.org)); Global Witness: ([www.globalwitness.org](http://www.globalwitness.org)): and ELDIS ([www.eldis.org](http://www.eldis.org)) regional and country profiles.

- And the Central Point of Expertise (CPET) can always be contacted for an evaluation of specific cases see [www.cpet.org.uk](http://www.cpet.org.uk) free of charge.

#### 6.4.2 *Appropriate verification approach*

Suppliers have to take account of the level of risk, in terms of the information and evidence that is available to demonstrate that the forest source meets the UK government requirements for legality and/or sustainability. The approach to verification required will depend on the situation. Suppliers should be able to justify why they have used a particular verification approach.

As a general rule, the greater the risk in a supply chain, the greater the rigour needed for the verification (see **Figure 1**).



**Figure 1. Assessing risk**

For claims of legality, the approach to verification depends on the level of risk of illegality. For a low risk forest source, which is located in a country where forest governance is considered to be robust, it may be adequate to base evidence on the absence of any substantive claim of non-compliance. Provided the sawmill or the merchant purchased all timber directly from areas where forest governance is robust, and was able to provide supply chain documentation to support this (see *Meeting UK government Requirements for Supply Chain Information: A Practical Guide*), no further evidence would be required. **Adequate supply chain information will always be required.**

For claims of legality, where there is a high risk of illegal or unsustainable wood entering the supply chain because the country of origin is considered to be high risk, it is highly advisable to ensure the involvement of third party verification if possible, or at least some form of technically competent second party audit. If there is information available that the specific forest management operation has prior fines or convictions relating to the points covered in the checklist, and/or or there are substantiated claims to that extent, then third party verification or technically competent second party audit is also advisable.

For high profile projects, it is likely that the UK government procurement personnel will ask for evidence, and thus is if there is any uncertainty then you should ensure that independent verification has been undertaken.

**For claims of sustainability, you should assume that third party verification of the forest source's compliance is necessary because of its complex and demanding requirements.**

### ***6.5 Filling in the form***

As a supplier filling in the checklist, you should state what the mechanism for verification was used for each stage in the supply chain:

- First party verification
- Second party verification
- Third party verification

You should note who undertook the verification (individuals/organisation as appropriate). Information should be provided on the frequency and most recent date of the verification, the requirements which were checked and the methodology followed. Depending on what type of evidence you are supplying (see *Section 7*) you may wish to refer to certain pages or sections of attached documents, rather than writing out in detail.

Criteria	How does the forest source comply?	Mechanism for verification	Evidence provided or available
L1 The forest owner/manager holds legal use rights to the forest		<p>Third party verification</p> <p>Undertaken by Forest Auditing Ltd. on July 5 - 8, 2006.</p> <p>Please see attached report, pages 2 and 3 for details on methodology.</p>	
<p>L2 There is compliance by both the forest management organisation and any contractors with local and national laws including those relevant to:</p> <ul style="list-style-type: none"> <li>• Forest management</li> <li>• Environment</li> <li>• Labour and welfare</li> <li>• Health &amp; safety</li> <li>• Tenure and use rights</li> </ul>		As above.	
L3 All relevant royalties and taxes are paid		As above.	
L4 There is compliance with the requirements of CITES.		As above.	

## 7 Evidence



### **In this section:**

- **Types of acceptable evidence**
- **Requests for independent verification**

### **7.1 Information required**

The final stage in providing information is setting out what evidence there is to substantiate the claims being made. Information on evidence being provided or available is covered by the fourth column in each of the checklists.

For claims of **legality**, the *Forest source information for legality* Checklist 2 (see Annex 1) must be completed.

For claims of **sustainability**, the *Forest source information for sustainability* Checklist 3 (see Annex 2) must be completed. Both parts of the checklist, relating to the definition of 'sustainable forest management' being used, and the compliance of the forest source, must be completed.

The evidence available or provided must substantiate the information presented so far in Checklist 2 and Checklist 3.

In some instances, it may be possible to provide information on the location of important documents and how long they are kept, rather than attaching all the relevant documents to the Checklist.

Criteria	How does the forest/standard used comply?	Mechanism for verification	Evidence provided or available

## 7.2 Types of evidence

The type of evidence that is provided will be directly related to the type of verification used (please refer to *Section 6* for types of verification available). The three types of evidence are as follows:

- First party report/Supplier declaration
- Second party verification report
- Third party/Independent audit report or certificate

**First party reports/supplier declarations** and **Second party reports** should confirm that the forest source complies with the requirements for legality, and where applicable sustainability (*Section 4 and 5*). The report or supplier declaration must be consistent with the information provided for that stage in the ‘mechanism for verification’ column, in terms of individual/organisation who undertook the check, the date of verification, etc. (refer to *Section 6*). To clarify and strengthen the credibility of a report or supplier declaration, suppliers can refer to supporting documentation (which they may wish to include as part of the Category B evidence submitted). Examples include:

- Official documents (Harvesting license, land tenure agreement)
- Internal documents (Compartment map, harvest plan)
- System documents (Operating procedures, Quality systems procedures, etc.)

Supporting documentation should *never* be submitted without an accompanying Checklist 2 and where applicable Checklist 3. Both Checklists must refer to the supporting documentation.

An **Independent audit report/ third party verification report** should confirm that the forest source complies. No supporting documentation is required for a third party verification report.

A **certificate of third party verification** from one of the schemes approved by the UK government should either be attached to the Checklist, or the Forest Management certificate number should be indicated in the ‘evidence’ column. The use of approved third party certification means that no further information is required on the stages between the certificate holder and the forest source. For further information on

Sustainable Forest Management Certification Schemes, you should refer to the UK government's most up-to-date assessment of Category A evidence (available from [www.cpet.org.uk](http://www.cpet.org.uk)). A number of third party verification schemes for legality are being assessed under the Category B requirements, which may be used as evidence. Please refer to the CPET website ([www.cpet.org.uk](http://www.cpet.org.uk)) for guidance.

A **certificate of third party verification** from a scheme or initiative that has not been assessed by CPET must be supported by additional information including reference to the requirements against which the certificate was issued, qualifications of the auditing organisation and executive summary of what was checked. This information can be provided by the organisation that issued the certificate.

All documents provided as evidence must be in English or with an English translation of relevant parts.

### **7.3 Filling in the form**

As a supplier filling in the checklist, you should state what evidence is available or provided for each stage in the supply chain:

- First party **report/Supplier declaration**
- Second party verification **report**
- Third party/Independent audit **report or certificate**

Please note whether the evidence is attached, or whether it is available upon request. You may wish to refer to certain pages or sections of the evidence, rather than writing out in detail how the evidence supports the claim. If supporting documentation is not being submitted with the Checklist, information should be provided on where it is kept, and how long it will be kept for (e.g. invoices are stored at the main office and kept on file for 7 years).

Criteria	How does the forest source comply?	Mechanism for verification	Evidence provided or available
L1 The forest owner/manager holds legal use rights to the forest			Third party audit report, attached. For confirmation of legal use rights, please refer to page 9 of the attached report, and Appendix 2 of the report (copy of the harvesting permit).
L2 There is compliance by both the forest management organisation and any contractors with local and national laws including those relevant to: <ul style="list-style-type: none"> <li>• Forest management</li> <li>• Environment</li> <li>• Labour and welfare</li> <li>• Health &amp; safety</li> <li>• Tenure and use rights</li> </ul>			Third party audit report, attached. For confirmation of compliance with the forest management organisation and any contractors with local and national laws please see pages 15 and 16 of the attached report.
L3 All relevant royalties and taxes are paid			Third party audit report, attached. For confirmation of paid royalties and taxes, please see page 12 of the attached report.
L4 There is compliance with the requirements of CITES.			Third party audit report, attached. For confirmation that none of the timber supplied is CITES listed species, please see page 14 of the attached report.

## **7.4 Right to require independent verification**

It is important to ensure that the evidence provided is appropriate. The UK government reserves the right to demand independent, third party verification of the forest source and supply chain if it is not considered adequate as set out *Section 3.5* above.

Requirements are set out in the recommended supplementary conditions of contract relating to independent verification of evidence, as per the July 2010 Timber procurement advice note and reproduced below.

### **Box 3. UK Government requirements for submitting evidence**

3.1 [The Contracting Authority] reserves the right to decide whether the evidence submitted to it demonstrates legality and sustainability, or FLEGT-licence or equivalent, and is adequate to satisfy [the Contracting Authority] that the Timber and wood-derived product complies with [the Contract Specification]. [The Contracting Authority] reserves the right to decide whether the evidence submitted to it is adequate to satisfy [the Contracting Authority] that the Timber and wood-derived products complies with the requirements of the social criteria defined in section 1.2 above. In the event that [the Contracting Authority] is not satisfied, [the Contractor] shall commission and meet the costs of an "independent verification" and resulting report that will (a) verify the forest source of the timber or wood and (b) assess whether the source meets the relevant criteria.

3.2 In [this Contract], "Independent Verification" means that an evaluation is undertaken and reported by an individual or body whose organisation, systems and procedures conform to *ISO Guide 65:1996 (EN 45011:1998) General requirements for bodies operating product certification systems* or equivalent, and who is accredited to audit against forest management standards by a body whose organisation, systems and procedures conform to *ISO 17011: 2004 General Requirements for Providing Assessment and Accreditation of Conformity Assessment Bodies* or equivalent.

## Annex 1. Checklist 2: Forest source information for legality

Product			
Name of supplier		Government dept	
Contact person		Contract number	
Contact Details		Date	

Criteria	How does the forest source comply?	Mechanism for verification	Evidence provided or available
L1 The forest owner/manager holds legal use rights to the forest			
L2 There is compliance by both the forest management organisation and any contractors with local and national laws including those relevant to: <ul style="list-style-type: none"> <li>• Forest management</li> <li>• Environment</li> <li>• Labour and welfare</li> <li>• Health &amp; safety</li> <li>• Other parties' tenure and use rights</li> </ul>			
L3 All relevant royalties and taxes are paid			
L4 There is compliance with the requirements of CITES.			

## Annex 2. Checklist 3: Forest source information for sustainability

Product			
Name of supplier		Government dept	
Contact person		Contract number	
Contact Details		Date	

*This checklist is in two parts. Firstly, evidence that the definition of ‘sustainable forest management’ being used is acceptable, and secondly that the forest meets the acceptable definition.*

### **1. Definition of sustainability**

*A locally applicable definition of sustainability is required. This may be a standard, a set of criteria, a code of practice or some other similar document which sets out in detail the requirements for forest management. The term ‘standard’ is used to cover all of these approaches.*

#### **1.1 Development process**

Criteria	How does the standard used comply?	Mechanism for verification	Evidence provided or available
S1 There must be a definition of sustainable based on a widely accepted set of international principles and criteria defining sustainable or responsible forest management at the forest management unit level.			
S2 The definition of sustainable must be performance-based and cover all the issues set out in S5 – S8.			
S3 The process of defining ‘sustainable’ must seek to ensure balanced representation and input from the economic, environmental and social interest			

Criteria	How does the standard used comply?	Mechanism for verification	Evidence provided or available
categories.			
<p>S4 The process of defining 'sustainable' must seek to ensure:</p> <ul style="list-style-type: none"> <li>• No single interest can dominate the process;</li> <li>• No decision can be made in the absence of agreement from the majority of an interest category.</li> </ul>			

### **1.2 Content of standard**

CPET Criteria	Requirements in standard
<p>S5 Management of the forest must ensure that harm to ecosystems is minimised. In order to achieve this there must be:</p> <ol style="list-style-type: none"> <li>Appropriate assessment of impacts and planning to minimise impacts;</li> <li>Protection of soil, water and biodiversity;</li> <li>Controlled and appropriate use of chemicals and use of Integrated Pest Management wherever possible.</li> <li>Proper disposal of wastes to minimise any negative impacts.</li> </ol>	
<p>S6 Management of the forest must seek to ensure that productivity of the forest is maintained. In order to achieve this the definition of sustainable must include requirements for:</p> <ol style="list-style-type: none"> <li>Management planning and implementation of management activities to avoid significant negative impacts on forest productivity.</li> <li>Monitoring which is adequate to check compliance with all requirements, together with review and feedback into planning.</li> <li>Operations and operational procedures which minimise impacts on the range of forest resources and services.</li> </ol>	

CPET Criteria	Requirements in standard
<p>d. Adequate training of all personnel, both employees and contractors.</p> <p>e. Harvest levels that do not exceed the long-term production capacity of the forest, based on adequate inventory and growth and yield data.</p>	
<p>S7 Management of the forest must seek to ensure that forest ecosystem health and vitality is maintained. In order to achieve this the definition of sustainable must include requirements for:</p> <p>a. Management planning which aims to maintain or increase the health and vitality of forest ecosystems</p> <p>b. Management of natural processes, fires, pests and diseases.</p> <p>c. Adequate protection of the forest from unauthorised activities such as illegal logging, mining and encroachment.</p>	
<p>S8 Management of the forest must seek to ensure that biodiversity is maintained to achieve this the definition of sustainable must include requirements for:</p> <p>a. Implementation of safeguards to protect rare, threatened and endangered species.</p> <p>b. The conservation/set-aside of key ecosystems or habitats in their natural state.</p> <p>c. The protection of features and species of outstanding or exceptional value.</p>	
<p>S10 Management of the forest must ensure that appropriate mechanisms are in place for resolving grievances and disputes including those relating to tenure and use rights, to forest management practices and to work conditions.</p>	
<p>S11 Management of the forest must ensure that the basic labour rights of forest workers are safeguarded. In order to do this the standard must include requirements concerning the following:</p> <ul style="list-style-type: none"> <li>- freedom of association and the effective recognition of the right to collective bargaining;</li> <li>- the elimination of all forms of compulsory</li> </ul>	

CPET Criteria	Requirements in standard
or forced labour; - the effective abolition of child labour; - the elimination of discrimination in respect of employment and occupation.	
S12 Management of the forest must ensure that appropriate safeguards are put in place to protect the health and safety of forest workers.	

**2. Implementation in the forest**

*Evidence is required that all of the requirements from the standard outlined above are being implemented in the forest.*

Requirement from the standard	How does the forest comply?	Mechanism for verification	Evidence provided or available