

Department for Environment, Food and Rural Affairs

UK government Timber Procurement Policy

Framework for Evaluating Category B
Evidence (4th edition)

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1. Purpose

This guidance document provides practical advice to direct and indirect suppliers to the UK government on how to demonstrate compliance, other than through Category A evidence, with the criteria set out in the UK government's Timber Procurement Policy Definition of Legal and Sustainable and introduces the concept of Category B evidence. The Framework presents two Checklists which suppliers should use when submitting Category B evidence of legal and sustainable evidence for a UK government supply, including Checklist 1 – supply chain information (confirming which forest(s) the product originates from) and Checklist 2 (confirming the forest(s) of harvest meets the criteria for Sustainable).

This document should be used in conjunction with 3 other documents: the Timber Procurement Advice Note, Practical Guide to Forest Source Information and the Practical Guide to Supply Chain Information. This Category B Framework may be a useful reference document for public procurement experts. Step-by-step guidance on how to assess Category A evidence is provided in Category A Practical Guide to Checking Certificates – Procurers.

2. Introduction to the framework

2.1. The UK government TPP requires that

Only timber and wood-derived products originating from an independently verifiable sustainable source (which can include from a licensed Forest Law Enforcement, Governance and Trade (FLEGT) partner) will be demanded for use on the government estate – appropriate documentation will be required to prove it.

As an alternative to demanding timber and wood-derived products from a Legal and Sustainable source, Contracting Authorities can demand 'recycled timber'. The Government Buying Standards (GBS) set out easy to use product specifications for public procurers across a range of sectors including construction, furniture and paper and require timber and wood derived products to be purchased in accordance with the TPP. In developing the GBS, resource efficiency including quantities of scarce materials used and recycled content is carefully considered and recycled content encouraged.

If requested by Contracting Authorities, contractors are required to provide evidence that their timber or wood-derived products comply with the technical specifications. If requested by the Government Authority, independent verification that the contract requirements are met must be provided. The

provision of evidence is based on meeting the government's definitions for 'legal' and 'sustainable'.

Two types of evidence are accepted:

Contractors can choose to use forest certification schemes (Category A evidence). A list of assessed certification schemes that currently meet the government's requirements can also be found [here](#)¹. Acceptable schemes must ensure that at least 70% (by volume or weight) is from a sustainable source.

Alternatively, contractors can choose to use some other sufficiently robust form of assurance (Category B evidence) that the source is sustainable. Sources can be accepted provided that at least 70% (by volume or weight) is from a sustainable source.

2.2. The TPP and the EUTR

This section provides general information only about how the EUTR relates to the TPP². Within the UK government's TPP, 'legal' sources are defined to mean:

"harvested in accordance with the applicable legislation in the country of harvest". This definition is the same as given in Article 2 of the EU Timber Regulation (EUTR).

Evidence related to both management of the forest and the chain of custody is required under the TPP, using Category A or Category B evidence. Both categories require equally credible evidence of legality (as well as sustainability).

However, the EUTR requires that operators exercise due diligence when placing timber or timber products on the market, and the due diligence system must include a risk assessment. Except in cases where the risk identified in the risk assessment is negligible, risk mitigation procedures must be carried out to minimise the risk. Where a product is within the scope of the EUTR, the intent of the TPP in combatting illegal logging may be achieved through compliance with the EUTR.

2.2.1. Products within the scope of the EUTR

Contracting Authorities may wish to remind Contractors of the importance of complying with all relevant legal requirements, including the EUTR, but for the

¹ <https://www.gov.uk/government/publications/poster-to-check-validity-of-forest-certification-schemes>

² The contents of this document and any attachments ("information") are provided to the intended recipient for general information purposes and are not intended as a substitute for obtaining advice from a lawyer, accountant or other professional advisor. While we believe the information provided is accurate at the date of writing, it is provided on an "as is" basis without any representations or warranties as to its accuracy, suitability for any particular purpose or use as the basis of making any decision. To the fullest extent permitted by law we exclude all liability to you or any third party in respect of any reliance placed in, or other use made, of such information.

purposes of the TPP do not need to request Category B evidence of legality for products that comply with the EUTR. The requirement for Contractors to supply evidence of timber and wood derived products from a sustainable forest source remains.

2.2.2. Who can help me comply with the EUTR?

As mentioned above, where timber and wood-derived products are covered by the EUTR, suppliers and Contracting Authorities must ensure their own compliance. The UK enforcement authority, the National Measurement and Regulation Office (NMRO) can be contacted for further information at eutr@nmro.gov.uk. Contractors might also consider contacting their trade association who may be able to offer support and advice.

2.2.3. Products outside the scope of the EUTR

It should be noted that recycled timber and timber products are excluded from the scope of the EUTR, in order to encourage the use of such products.

For government procurement the most significant products outside of EUTR scope include seats (for example, office chairs and sofas), printed brochures, calendars, pencils and fencing panels. These product types may be processed in other countries where there is a variable risk of using potentially illegally harvested wood.

The scope of the EUTR was considered in the European Commission's review of the EUTR, published 18th February 2016. It was acknowledged that some stakeholders consider product coverage to be incomplete, and the Commission has indicated that, subject to an impact assessment of the various available options, the product scope may be expanded.

2.2.4. Recommendations for products with Category B evidence

- Where possible for seats and paper products the relevant Government Buying Standard should be followed. This includes working to maximise the reuse of products, or the proportion of recycled material used.
- For products that are outside the scope of the EUTR, Contracting Authorities should remind Contractors that they must be able to provide evidence of legality (as well as sustainability) on request.
- Where reuse and/or the use of recycled material cannot be achieved, for products with potentially complex supply chains such as seats, printed brochures, calendars, pencils and fencing panels, Contracting Authorities may wish to ask for independent third party verification of the forest source. Some Contractors may decide in this situation to source products with Category A evidence instead.

3. Assessment of Category B evidence

Category B evidence is all forms of credible evidence other than certification schemes. This type of evidence can vary greatly and needs to be judged on a case-by-case basis. This framework has been developed to provide support to both procurement staff and suppliers on the provision and assessment of Category B evidence.

The framework for assessing Category B evidence is in three parts, each of which is discussed below:

Part 1: Criteria for assessing evidence;

Part 2: Checklists for submission of information and evidence;

Part 3: Practical guides.

The criteria for assessing evidence are divided into two sections reflecting the main factors that determine the adequacy of category B evidence, namely:

1. The requirements for information and evidence to demonstrate supply chain management which provides traceability from the forest source to the point of supply.
2. The requirements for information and evidence to demonstrate that forest management meets UK government requirements for sustainability.

Compliance with each criterion will be assessed as either 'adequate' or 'not adequate'. Existing programmes and *ad hoc* evidence must achieve adequate compliance with every criterion in order to be acceptable.

Checklists have been developed to assist suppliers in providing all the information required in a format which can be systematically and consistently assessed by procurement staff. Two checklists are provided

Checklist 1: Supply chain information

Checklist 2: Forest source information for sustainability

Practical guides have been developed to provide background information to help both suppliers and procurement officers.

Two Practical guides are available:

TPP Practical Guides: Category B evidence, supply chain information

TPP Practical Guides: Category B evidence, forest source information

4. Criteria for evaluating supply chain management requirements

Information on the supply chain should normally be supplied by completing *Checklist 1: Supply Chain Information* for each type of timber or wood product supplied. The criteria below relate to the information provided in the checklist. *TPP Practical Guides: Category B evidence, supply chain information* provides detailed guidance on how to complete Checklist 1.

Criteria	Guidance on interpretation
<p>1.1 Is the supply chain clearly described and complete from point of supply back to the forest source(s)?</p>	<p>Each stage in the supply chain from the forest source(s) through transport and processing needs to be included for each product being supplied. If the project includes a number of different products (e.g. flooring, window frames and construction timber) information is needed for each product.</p> <p>If the product is a composite (e.g. a cupboard mainly made of plywood with a solid timber door) the supply chain details must be provided for each component.</p> <p>Please refer to <i>TPP Practical Guides: Category B evidence, supply chain information</i> for detailed guidance on interpretation.</p>
<p>1.2 Has an adequate mechanism for preventing uncontrolled mixing or substitution been described for each stage in the supply chain?</p>	<p>For each stage in the chain, it needs to be clear what controls are in place to make sure that there is no mixing or substitution – accidental or intentional – with material from other sources. There are a range of different mechanisms which may be used.</p> <p>Please refer to <i>TPP Practical Guides: Category B evidence, supply chain information</i> for detailed guidance on interpretation.</p>
<p>1.3 Has information been provided on how the mechanisms in 1.2 are checked/verified and is the approach used adequate to confirm the mechanisms described are in place and functional?</p>	<p>For each stage it must be clear how the information on control has been verified. This might include a range of different approaches such as:</p> <ul style="list-style-type: none"> • Statements from the organisation implementing the control (1st party checks) • Checks made by the supplier to government of their suppliers (2nd party verification) • Verification by an independent third party (3rd party audits)

Criteria	Guidance on interpretation
	Please refer to TPP Practical Guides: Category B evidence, supply chain information for detailed guidance on interpretation.
1.4 Is the evidence provided or available adequate to confirm the information provided is accurate?	<p>Suppliers can either supply copies of evidence, or describe where it is available.</p> <p>Evidence provided might include:</p> <ul style="list-style-type: none"> • Supplier declarations • 2nd party verification reports • 3rd party audit reports <p>Information on the location of important documents and how long they are kept.</p> <p>All documents provided as evidence must be in English or with an English translation of relevant parts.</p> <p>If there is any concern about the adequacy, robustness or veracity of the evidence provided then independent verification of the evidence will be required by the Government Authority. In these instances, independent verification must be undertaken by an individual or body whose organisation, systems and procedures conform to international standard ISO/IEC 17065:2012 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 CD 17011 or equivalent.</p> <p>Please refer to TPP Practical Guides: Category B evidence, supply chain information for detailed guidance on interpretation.</p>

5. Criteria for evaluating forest management requirements

5.1. Introducing the requirements

Information on the forest source should normally be supplied by completing *Checklist 2: Forest source information for sustainability* for each type of timber or wood product supplied. Guidance on how to complete the checklist is provided below. Information on TPP compliance is also set out for Contracting Authorities and Contractors with products outside of the scope of the EUTR and where no evidence of sustainable source is available.

5.2. Guidance on criteria

The criteria below relate to the information provided in the checklist. *TPP Practical Guides: Category B evidence, forest source information* provides detailed guidance on how to complete Checklist 2.

Criteria	Guidance on interpretation
2.1 Is the information provided on the location of the forest source adequate?	<p>The information provided about the supply chain should include the location of the forest or forests where the timber originated. The adequacy of the evidence provided should be assessed as part of the supply chain evaluation. This section deals with the level of detail.</p> <p>For claims of sustainable sourcing, the information provided must be the forest management unit or units from which the timber was sourced.</p> <p>Please refer to <i>TPP Practical Guides: Category B evidence, forest source information</i> for detailed guidance on interpretation.</p>
2.2 Has information on compliance been provided for each criterion in the relevant checklist?	For claims of sustainability, Checklist 2 must be completed for each forest source.
2.3 Has information been provided on how compliance is checked/verified and is the approach used adequate to confirm the	<p>Mechanisms might include:</p> <ul style="list-style-type: none"> 1st party checks 2nd party verification 3rd party audits <p>External programmes providing forest management</p>

Criteria	Guidance on interpretation
criteria are being met?	<p>support</p> <p>The type of mechanism which will be appropriate will depend on the type and location of the forest or forests or origin.</p> <p>Please refer to <i>TPP Practical Guides: Category B evidence, forest source information</i> for detailed guidance on interpretation.</p>
2.4 Is evidence supplied or available to support the information provided and is it adequate?	<p>This might include:</p> <ul style="list-style-type: none"> Supplier declarations 2nd party verification reports 3rd party audit reports <p>Supporting documentation may include official documentation such as permits or company documentation, but should not be provided without an accompanying Checklist.</p> <p>All documents must be in English or with an English translation of relevant parts.</p> <p>If there is any concern about the adequacy, robustness or veracity of the evidence provided then independent verification of the evidence will be required by the Government Authority. In these instances, independent verification must be undertaken by an individual or body whose organisation, systems and procedures conform to international standard ISO/IEC 17065:2012 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 CD 17011 or equivalent.</p> <p>Please refer to <i>TPP Practical Guides: Category B evidence, forest source information</i> for detailed guidance on interpretation.</p>

6. Checklists for submitting Category B evidence

Two checklists are provided and should be used to present evidence.

Checklist 1: Supply chain information

Checklist 2: Forest source information for sustainability

Checklist 1: Supply chain information

For use in demonstrating evidence of compliance under Category B with the UK government's Timber Procurement Policy.

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

Supply chain stage	Supply chain description		Controls for preventing mixing or substitution	Mechanism for verification	Evidence available or provided
	Description	Location			
Forest					
Stage 1					
Stage 2					
Stage 3					
Stage 4					
Stage 5					
Stage 6					
Stage 7					

Checklist 2: Forest source information for sustainability

For use in demonstrating evidence of compliance under Category B with the UK government's Timber Procurement Policy.

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 The definition must be consistent with a widely accepted set of international principles and criteria defining sustainable or responsible forest management at the forest management unit level.			
S2 The definition must be performance-based, meaning			

Criteria	How does the standard used comply?	Mechanism for verification	Evidence provided or available
that measurable outputs must be included and cover all the issues set out in S5 to S8.			
S3 The process of defining 'sustainable' must seek to ensure balanced representation and input from the economic, environmental and social interest categories.			
S4 The process of defining 'sustainable' must seek to ensure: No single interest can dominate the process; No decision can be made in the absence of agreement from the majority of an interest category.			

1.2 Content of standard

TPP Criteria	Requirements in standard
S5. Management of the forest must ensure that harm to ecosystems is minimised. In order to do this the definition of sustainable must	

TPP Criteria	Requirements in standard
<p>include requirements for:</p> <ul style="list-style-type: none"> a. appropriate assessment of impacts and planning to minimise impacts; b. protection of soil, water and biodiversity; c. controlled and appropriate use of chemicals and use of Integrated Pest Management wherever possible; and d. proper disposal of wastes to minimise any negative impacts. 	
<p>S6. Management of the forest must ensure that productivity of the forest is maintained. In order to achieve this, the definition of sustainable must include requirements for:</p> <ul style="list-style-type: none"> a. management planning and implementation of management activities to avoid significant negative impacts on forest productivity; b. monitoring which is adequate to check compliance with all requirements, together with review and feedback into planning; c. operations and operational procedures which minimise impacts on the range of forest resources and services; and d. adequate training of all personnel, both employees and contractors; and 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>S7. Management of the forest must ensure that forest ecosystem health and vitality is maintained. In</p>	

TPP Criteria	Requirements in standard
<p>order to achieve this, the definition of sustainable must include requirements for:</p> <ul style="list-style-type: none"> a. management planning which aims to maintain or increase the health and vitality of forest ecosystems b. management of natural processes, fires, pests and diseases; and c. adequate protection of the forest from unauthorised activities such as illegal logging, mining and encroachment. 	
<p>S8. Management of the forest must ensure that biodiversity is maintained. In order to achieve this, the definition of sustainable must include requirements for:</p> <ul style="list-style-type: none"> a. implementation of safeguards to protect rare, threatened and endangered species; b. the conservation/set-aside of key ecosystems or habitats in their natural state; and c. the protection of features and species of outstanding or exceptional value. 	
<p>S9. The forest management organisation and any contractors must comply with local and national legal requirements relevant to:</p> <ul style="list-style-type: none"> a. labour and welfare; and b. health and safety. 	
<p>Management of the forest must have full regard for: SC1. identification, documentation and respect of legal, customary and traditional tenure and use rights related to the forest</p>	
<p>Management of the forest must have full regard for: SC2. mechanisms for resolving</p>	

TPP Criteria	Requirements in standard
grievances and disputes including those relating to tenure and use rights, to forest management practices and to work conditions; and	
Management of the forest must have full regard for: SC3. safeguarding the basic labour rights and 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

7. Guidance documents

Two Practical Guides have been prepared to support the Framework for evaluating Category B evidence.

- TPP Practical Guides: Category B evidence, supply chain information
- TPP Practical Guides: Category B evidence, forest source information

Please click [here](#)³ to download a copy.

³ <https://www.gov.uk/government/publications/framework-for-evaluating-category-b-evidence>