



INTERNATIONAL TROPICAL TIMBER ORGANISATION / FLEGT INDEPENDENT MARKET MONITOR (IMM)

A study of EU public timber procurement policies, private sector policies and related guidance

AN IMM STUDY – SEPTEMBER 2021



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This report has been produced with financial assistance of the European Union

The views expressed herein are those of the consultant and the IMM and do not necessarily reflect the official opinion of the European Commission

Executive Summary

The first IMM special study to consider purchasing policies was published in 2018 and the most recent in 2020. This study seeks to draw together all of the initiatives previously assessed and to update the previous analysis.

This report has its primary focus on the EU27+UK market and the relevance of Forest Law Enforcement, Governance and Trade (FLEGT) Licensing and related processes. It has identified 116 initiatives that seek to influence private sector policies. The key aspects of the initiatives that have been assessed include:

- Does the source of influence specifically and positively refer to FLEGT Licensing?
- Does the source of influence promote or advocate forest certification?

The range of initiatives considered within the analysis typically each seek to ensure that their point or points of view are incorporated within the purchasing policies of the private sector, or indirectly they are driving the inclusion of their view points within a policy. This acceptance of market driven mechanisms to drive change within sectors and in the forest is well established and is a result of the processes discussed at length in an earlier IMM study.

The **private sector** is constantly buffeted by these influences, each seeking to impose its point of view or opinion upon others. This study also draws together government **public procurement policies** that can play an important role in encouraging trade in legal and sustainable timber and which in turn are potentially a source of influence on the private sector. Government purchasing of timber can account for a significant

proportion of all timber purchasing in a given country, and therefore has considerable potential to influence buying practices and to promote good business practices across the timber market as a whole.

The study highlights the fact that different initiatives are evolving their policy at different paces. Those initiatives developed by or aimed at the private sector are moving very fast and their policies are frequently reviewed and adapted. Public procurement policies are, by contrast, far more slowly developing and in many cases yet to realise their full potential in terms of product or end use scope. The results correlate to the results of the IMM annual survey conducted in 2018 and 2019¹ which assessed a much broader range of over 100 companies across EU markets. FLEGT Licensing is becoming more widely adopted as an element of timber and timber product purchasing policies.

Out of 116 initiatives assessed 74 are positive towards certification, with 40 identified as positive towards FLEGT Licensing. Since 2018 acceptance of FLEGT Licensing has grown within the private sector led or focused initiatives and a small sample of private sector timber and timber product purchasing policies indicates that companies value such licensing and are willing to favour it by inclusion in their policy.

EU Member States' green procurement policies continue to make only a modest demand for FLEGT-Licensed material and their true potential remains to be unleashed. Lagging far behind are the green building rating systems – with almost no recognition of FLEGT Licensing coupled with relatively low levels of recognition of certification.

ACRONYMS AND ABBREVIATIONS

CoC	chain of custody
CSO	civil society organisation
DIY	do-it-yourself
EU	European Union
EU27	European Union Member States post January 2020
EU27+UK	European Union Member States and UK
EUTR	European Union Timber Regulation
FLEGT	Forest Law Enforcement, Governance and Trade
FSC	Forest Stewardship Council
IMM	Independent Market Monitor
ITTO	International Tropical Timber Organization
NGO	non-governmental organisation
PEFC	Programme for the Endorsement of Forest Certification
UK	United Kingdom of Great Britain and Northern Ireland
VPA	Voluntary Partnership Agreement

TERMINOLOGY

In this report, all the products identified above (wood, wood furniture, pulp and paper) are referred to collectively as “**timber and timber products**”. This definition aligns with usage of the term “Timber and Timber Products” in the FLEGT Action Plan and EU Timber Regulation.

Wood and wood furniture, when dealt with separately from pulp and paper, are referred to collectively as “**wood products**”.

ABOUT THE IMM

Co-funded by the European Union and managed by the International Tropical Timber Organization (ITTO), the IMM's role is to use trade flow analysis and market research to independently assess trade and market impacts of FLEGT Voluntary Partnership Agreements (VPAs) in the EU and partner countries.

ABOUT THE ITTO

The International Tropical Timber Organization (ITTO) is an intergovernmental organization promoting the conservation and sustainable management, use and trade of tropical forest resources. Its members represent the bulk of the world's tropical forests and of the global tropical timber trade. ITTO develops internationally agreed policy documents to promote sustainable forest management and forest conservation and assists tropical member countries to adapt such policies to local circumstances and to implement them in the field through projects. In addition, ITTO collects, analyses and disseminates data on the production and trade of tropical timber and funds projects and other actions aimed at developing sustainable forest industries at both the community and industrial scales.

1. Storck, S., Oliver, R. (2021) *FLEGT VPA Partners in EU Timber Trade 2019: Main Report – November 2020*. Independent Market Monitor, International Tropical Timber Organization, Yokohama, Japan https://www.flegtimm.eu/images/2019_Ann_Rep/IMM-VPAPartners-EU_TimberTrade2019-Nov20St4F3_update_Feb21.pdf

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Preferred citation: White, G. A study of the EU public sector timber procurement policies, private sector policies and related guidance. (2021). Independent Market Monitor, International Tropical Timber Organization, Yokohama, Japan.

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May 2021

1 Background

Since 2018 the FLEGT Independent Market Monitor (IMM²) has commissioned a number of special studies which have considered the role of purchasing and procurement policies across a range of sectors and their interaction with the FLEGT process and especially their relationship with FLEGT Licencing.

Previously published studies have included:

- IMM study of EU private sector procurement policies and FLEGT (2018)³
- IMM study of EU Member States green public procurement policies and FLEGT (2019)⁴
- IMM study of EU architects' perceptions and experience with FLEGT (2020)⁵

All three studies have taken a snapshot relevant at the time of publication of a range of initiatives and specific policies and guidance. Whilst the analyses in each report has focused on the sector in question, in all cases the analysis itself commonly considered the role of FLEGT Licencing and its relationship with the policy or initiative under consideration.

In the three years since the first analysis there has been sufficient time elapsed to consider if anything has changed. This study therefore focuses primarily on the content of policies and any changes identified since they were first assessed. This report does not repeat the wider commentary of the previous studies and the reader is referred to the original study for wider context or background.

2. <https://www.flegtimm.eu/>

3. White, G (2018) *EU voluntary private sector timber procurement policies & the role of FLEGT Licencing - An IMM Study – December 2018.*
https://www.flegtimm.eu/images/procurement/IMM_Procurement_Study_December_2018_ST3.pdf

4. White, G (2019) *A study of EU public timber procurement policies, related guidance and reference to FLEGT - An IMM Study – May 2019.*
https://www.flegtimm.eu/images/IMM_Public_Procurement/IMM-EU-Public-Timber-Procurement-Report---Final.pdf

5. White, G (2020) *A study of EU architects' perceptions and experience with FLEGT Licences - An IMM Study – November 2019.*
https://www.flegtimm.eu/images/imm_indicators/IMM_Study_of_EU_Architects_Report_Dec19_st3.pdf

Overview of new analyses

As discussed at length in previous studies there are a wide range of influences driving private sector companies to introduce policies and to potentially drive a wide range of policy content. The “sources of influence” themselves vary enormously, from international organisations rating performance of private sector companies, to trade associations offering advice and guidance, to membership programmes requiring compliance to retain membership through to freely available guidance in the public domain.

The following tables identify *some* of the potential influences on an individual company’s purchasing policy and its contents. The potential range of influential sources of information which might shape a given policy is huge: in 2011 *Tropenbos*⁶ identified 127 such sources of influence. In 2018 *World Resources Institute* identified around 75 such sources⁷.

The limitation of this report and its primary focus on the EU27+UK market, FLEGT Licencing and related processes has identified a list of 116 individual influential sources. Unlike the broad approach of the above three studies, this review has focused on each influential source through a narrower filter.

The key aspects which have been assessed include:

- Does the source of influence specifically and positively refer to FLEGT Licencing?
- Does the source of influence promote or advocate forest certification?

The range of influences and initiatives considered within the analysis typically each seek to ensure that their point or points of view are incorporated within the purchasing policies of the private sector or indirectly they are driving the inclusion of their view points within a policy. This acceptance of market driven mechanisms to drive change within sectors and in the forest is well established and is a result of the processes discussed at length in the 2018 IMM study⁸.

The **private sector** is therefore constantly buffeted by these influences, each seeking to impose its point of view or opinion upon others. Some mechanisms rely on providing rational arguments and tools. Others rely on more discrete influence, the “threat” of reporting answers justified by a perceived public right to complete transparency thereby driving many companies to adopt policies to ensure that they perform well under scrutiny. This study also draws together **public procurement**

policies that can play an important role in encouraging trade in legal and sustainable timber. Government purchasing of timber can account for a significant proportion of all timber purchasing in a given country, and therefore has considerable potential to influence buying practices and to promote good business practices across the timber market as a whole⁹.

The importance of public procurement¹⁰ to the marketplace makes government procurement policy a key instrument in attaining the vision set out in the Europe 2020 Strategy – the 10-year strategy proposed by the European Commission in 2010 for advancement of the economy of the European Union. It aims at “smart, sustainable, inclusive growth” with greater coordination of national and European policy.

Sustainable procurement is therefore about using public spending to achieve social and environmental objectives, and to strategically use the public sector’s economic power to catalyse innovation in the private sector.

In total 116 initiatives have been compiled and re-assessed for this study during March and April 2021. The assessed total also includes twenty individual company purchasing policies. These companies are the same as those originally assessed in 2018.

Table 1: The range of initiatives considered within this study

Initiatives	Number analysed
Trade association initiatives	4
Non-EU Public sector instruments & guidance	3
‘Green Building’ Rating systems	29
Certification & Verification systems	11
Private sector initiatives	12
CSO led Rating systems	6
CSO led initiatives & Others	20
Selected private sector companies	20
EU27+UK Public procurement policies	31
Total	136

The following sections cover each set of initiatives in more detail and where possible will follow the format of the previous report to facilitate comparisons.

6. Tropenbos International (2011) *Enhancing the Trade of Legally Produced Timber, a Guide to Initiatives*

7. World Resources Institute (2018) *Sourcing Legally Produced Wood: A Guide for Businesses*

8. White, G (2018) *op. cit.*

9. Brack, D. (2014) *Promoting Legal and Sustainable Timber: Using Public Procurement Policy*. Chatham House

10. Simula, M. (2006) ‘Public procurement policies for forest products – impacts’, presentation at UN Economic Commission for Europe/Food and Agriculture Organization policy forum on public procurement policies for wood and paper products and their impacts on sustainable forest management and timber markets 5 October 2006.

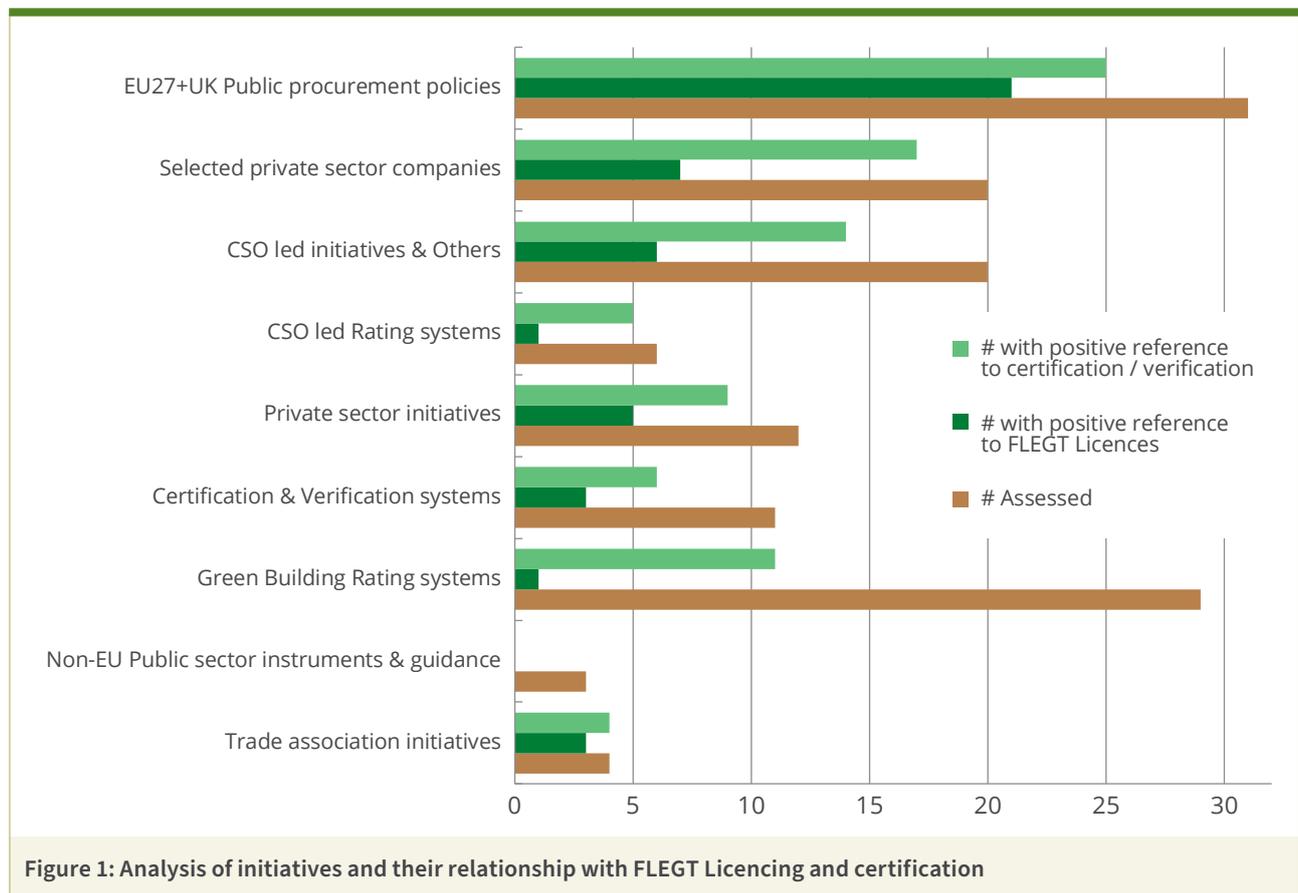
3 Detailed analyses of initiatives

The *table* below summarises the results of the current analysis focusing on their relationship with both FLEGT Licencing and certification.

The following sections include an update of the analysis for each type of initiative, a synopsis of the previous results and a summary to highlight any significant points of difference.

Table 2: Summary of the analysis of initiatives and their attributes

Initiative	# Assessed	# Requiring some form of compliance	# Offering guidance	# Currently known to be operational	# with positive reference to FLEGT Licences	# with positive reference to certification / verification
Trade association initiatives	4	3	1	4	3	4
Non-EU Public sector instruments & guidance	3	1	1	2	0	0
Green Building Rating systems	29	18	2	23	1	11
Certification & Verification systems	11	9	0	9	3	6
Private sector initiatives	12	0	11	9	5	9
CSO led Rating systems	6	1	5	4	1	5
CSO led initiatives & Others	20	4	17	13	6	14
Selected private sector companies	20			20	7	17
EU27+UK Public procurement policies	31	20	5	25	21	25
Total	136	56	42	109	47	91



Green Building Ratings systems

A number of green building initiatives give credits for the use of certified timber; encouraging the use of sustainable timber in buildings and construction projects, and notable examples¹¹ include: Green Building Initiative (GBI), Green Globes (ANSI Standard), Energy Star & Leadership in Energy and Environmental Design (LEED).

The *table* below provides an overview of over 30 of the main ratings tools and standards. Where a programme offers multiple tools or standards (for example a set of criteria for residential buildings and also for other project types) the standard most applicable to residential buildings has been accessed.

Table 3 (part 1): Summary of green building rating programmes				
Name of programme	Description	Date of last review	References to FLEGT	Attitude to timber certification
GLOBAL PROGRAMMES				
UN Environment Programme, Sustainable Buildings and Climate Initiative	UNEP launched the Sustainable Buildings and Climate Initiative (SBCI) in 2006. It promotes and supports sustainable building practices on a global scale with a focus on energy efficiency and GHG emission reduction. The initiative develops tools and strategies to better evaluate and implement sustainable building practices.	Unknown	No reference	No reference
Source: www.unenvironment.org/explore-topics/resource-efficiency/what-we-do/cities/sustainable-buildings				
World Green Building Council	The World Green Building Council is a network of national GBCs in more than one hundred countries, making it the world's largest international organization influencing the green building marketplace. These GBCs strive to empower industry leaders to transform the local building industry.	Unknown	No info	No info
Source: www.worldgbc.org				
EDGE	An innovation of IFC, EDGE ("Excellence in Design for Greater Efficiencies") is an online platform, a green building standard and a certification system for over 150 countries. The EDGE application helps to determine the most cost-effective options for designing green within a local climate context.	Unknown	Unknown	Unknown
Source: www.edgebuildings.com/marketing/edge/				
Green Key Eco-Rating Program	The Green Key Eco-Rating Program is a graduated rating systems designed to recognize a wide range of hotels and lodging facilities for their commitment to improving environmental and fiscal performance.	Unknown	Standard not available	Unknown
Source: –				
GRESB	GRESB assesses and benchmarks the Environmental, Social and Governance (ESG) performance of real assets, providing standardized and validated data to the capital markets.	2019	No reference	Positive
Source: gresb.com/gresb-real-estate-assessment/&documents.gresb.com/generated_files/real_estate/2019/real_estate/reference_guide/complete.html				
ICP	The Investor Confidence Project (ICP) defines a clear road-map from retrofit opportunity to reliable Investor Ready Energy Efficiency™. With Commercial and Multifamily Energy Performance Protocols in place, ICP reduces transaction costs by assembling existing standards and practices into a transparent process that promotes efficient markets by increasing confidence in energy efficiency outcomes.	Unknown	Standard not available	
Source: www.eepformance.org/ & www.eepformance.org/files/theme/ICP_Protocol_NA_Standard_Multifamily.pdf				
International WELL Building Institute™ (IWBI™)	The International WELL Building Institute™ (IWBI™) is a public benefit corporation whose mission is to improve human health and well-being in buildings and communities across the world through its WELL Building Standard™ (WELL™).	undated	No reference	No reference
Source: v2.wellcertified.com/v/en/materials				

11. The Green Building Initiative www.thegbi.org/about-gbi/

Table 3 (part 2): Summary of green building rating programmes				
Name of programme	Description	Date of last review	References to FLEGT	Attitude to timber certification
NATIONAL PROGRAMMES				
Australia GBC Green Star	Green Star certification is a formal process during which a building, fit out, or precinct is awarded a rating by an independent, third party assessment panel of sustainable development experts through a documentation-based assessment. A Green Star certified rating provides independent verification that a building or community project is sustainable.	2019	No reference	Positive
Source: new.gbca.org.au/green-star/certification-process/ & www.gbca.org.au/green-star/materials-category/revised-timber-credit/?_ga=2.90922906.129503900.1573386596-1929328975.1573386596				
China Assessment Standard for Green Building	Under development	2019	Unknown	Unknown
Source: www.worldgbc.org/sites/default/files/Introduction%20to%20China%20Green%20Building%20Assessment%20Standard%203rd				
France HQE	HQE™ is the French certification awarded to building construction and management as well as urban planning projects. HQE is managed by a group of stakeholders within a recognised public service organisation called, HQE Association.	Unknown	Unknown	Unknown
Source: -				
Germany DGNB System	The DGNB system is intended to be used both as motivation and as a planning tool, to enable demonstrably better buildings to be built and managed.	2018	No reference	Positive
Source: www.dgnb-system.de/en/system/version2018/ & https://static.dgnb.de/fileadmin/dgnb-system/en/buildings/new-construction/criteria/02_ENV1.3_Sustainable-resource-extraction.pdf?m=1573216253&				
Hong Kong BEAM Plus	The Hong Kong Green Building Council Limited (HKGBC) is a non-profit, member led organisation established in 2009 with the vision to help save the planet and improve the wellbeing of the people of Hong Kong by transforming the city into a greener built environment.	2019	Reference to Known Licensed Sources	Positive
Source: www.hkgbc.org.hk/eng/beam-plus/beam-plus-new-buildings/				
Indonesia GreenShip	For the green building benchmarks in Indonesia, GBC Indonesia issued a rating tool titled GREENSHIP. GREENSHIP was developed by Green Building Council Indonesia (GBC Indonesia) by considering the conditions, natural character and regulations as well standards that apply in Indonesia.	undated	Unknown	Unknown
Source: www.gbcindonesia.org/greenship				
Ireland Home Performance Index	“From design to build, the Home Performance Index represents a first in Irish residential development certification. For developers and buyers the HPI is a trusted seal of quality based on crucial indicators, because both makers and takers need to know that their house is a home.”	2016	No reference	No reference
Source: -				
Italy GBC Italy (GBC Home / GBC Quartieri)	The Italian chapter of the Green Building Council.	Unknown	Standard not available	Unknown
Source: -				
Japan CASBEE	Comprehensive Assessment System for Built Environment Efficiency (CASBEE) is a method for evaluating and rating the environmental performance of buildings and the built environment.	Unknown	Standard not available	Unknown
Source: www.ibec.or.jp/CASBEE/english/				
Korea Korea Green Building Certification		Unknown	Standard not available	Unknown
Source: https://www.esci-ksp.org/archives/project/korea-green-building-certification-kgbc				

Table 3 (part 3): Summary of green building rating programmes				
Name of programme	Description	Date of last review	References to FLEGT	Attitude to timber certification
Latvia BREEAM - LV	Latvian Sustainable Building Council (LSBC) uses an adapted version of BREEAM.	Unknown	Standard not available	Unknown
Source: –				
Malaysia Green Building Index	GBI is designed specifically for the tropical climate (hot and humid) and Malaysia's current social, infrastructure and economic development.	2013	No reference	Positive
Source: new.greenbuildingindex.org/Files/Resources/GBI%20Tools/GBI%20RNC%20Residential%20Tool%20V3.0.pdf				
The Netherlands BREEAM-NL	BREEAM-NL comprises four different labels. First BREEAM-NL New Construction and Renovation. This label is operational since September 2009. It is used to determine the sustainable performance of new buildings. The second label is BREEAM-NL In-Use. The third label is BREEAM-NL Area Development (2011) and assesses the sustainability performance of an area development. In 2013 BREEAM-NL Demolition was launched.	2014	No direct reference	Positive
Source: www.breeam.nl/				
New Zealand Homestar (GBC New Zealand)	Homestar rates whole buildings, rather than building components such as products and materials. Under Homestar, materials that have certain attributes can receive points that contribute to the overall score of a rated home.	Unknown	No reference	Positive
Source: www.nzgbc.org.nz/ & https://12253-console.memberconnex.com/Attachment?Action=Download&Attachment_id=2120				
Norway BREEAM-NOR	An adapted version of BREEAM developed for Norway.	2019	No direct reference.	Positive
Source: –				
Philippines BERDE	In 2009, the BERDE Program was established by the Philippine Green Building Council (PHILGBC) as an appropriate response to the Philippine building industry's need to proactively address the negative impacts of climate change.	Unknown	Standard not available	Unknown
Source: berdeonline.org/				
Sweden BREEAM-SE	Not available in English.	2017	Unknown	Unknown
Source: www.sgbc.se/certifying/breeam-se/				
Turkey CEDBIK-Konut Green building certification system (BREEAM)	Not available in English.	Unknown	Unknown	Unknown
Source: –				
United Kingdom BREEAM	BREEAM is an international scheme that provides independent third party certification of the assessment of the sustainability performance of individual buildings, communities and infrastructure projects.	2018	No direct reference.	Unknown
Source: www.breeam.com/discover/how-breeam-certification-works/				
United States Green Building Council - Leadership in Energy and Environmental Design (LEED)® v4.1 Building Design and Construction Beta Guide	Leadership in Energy and Environmental Design is the most widely used green building rating system in the world. Available for virtually all building, community and home project types.	2019	No reference	Positive
Source: https://www.usgbc.org/sites/default/files/2021-03/LEED%20v4.1%20BD%2BC%20Guide%2004092019.pdf				

Table 3 (part 4): Summary of green building rating programmes

Name of programme	Description	Date of last review	References to FLEGT	Attitude to timber certification
United States Green Building Initiative's Green Globes Rating System	Green Globes® is a web-enabled, fully interactive green building assessment and certification programme. It includes an on-site visit by a third-party assessor and comprehensive customer support.	2018	No reference	Positive
Source: www.thegbi.org/green-globes-certification				
Viet Nam LOTUS	No information available	Unknown	Unknown	Unknown
Source: vgbc.vn/en/lotus-en/rating-systems/				

Where the *table* states that a standard is not available this is either due to access to the standard being charged for (i.e. it is not freely available) or the standard was not identified via the host website. It should be noted that many of the programmes listed have multiple standards ranging from demolition to residential construction, and these range in page length from 20 to 400 pages. The table focuses primarily on the standard's references to *timber* (if any) and specific references to timber *sustainability* or *legality* (if any). It should also be noted that where criteria exist within the studies standards, it perhaps represents perhaps only a tiny fraction of the total weighting of the complete set of criteria.

Synopsis of the 2020 results

The previous study noted that it is clear that forest certification has made some progress in influencing the development of standards with a number of the programmes assessed making direct reference to forest certification and CoC as a positive indicator of the sustainability of wood-based materials within an assessed project.

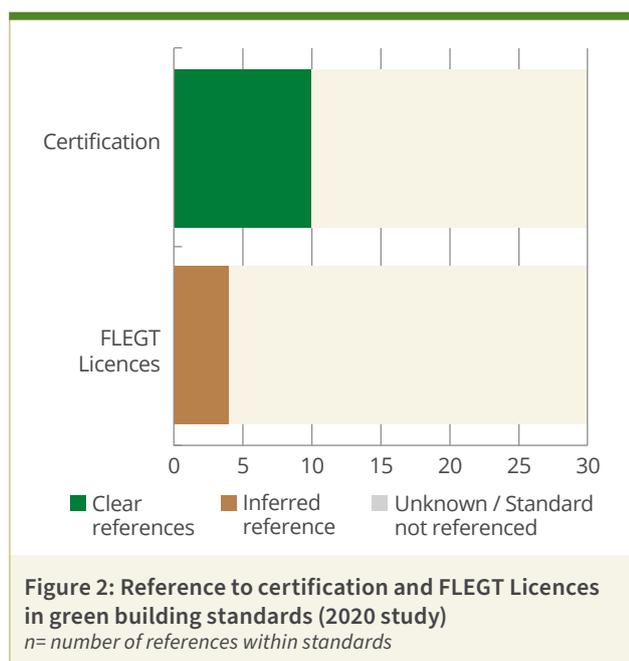


Figure 2: Reference to certification and FLEGT Licences in green building standards (2020 study)
n= number of references within standards

The number of programmes making any direct or even inferred reference to FLEGT was very modest. The German DGNB standard specifically excluded any tropical timber that is not certified – the only example of this type found in this sample. The study results resonate with the thoughts of architect Michael Green who believes too that greater credit for building with wood should be given by green building schemes, such as LEED and BREEAM, which ‘formed their mind-sets and criteria at a time when chopping down any trees was considered bad’¹².

Comparison with 2020

In overall terms with respect to the criteria of this study there has been no change over the past 12 months. Ten of the 30 programmes continue to provide a positive appraisal for the inclusion of certified timber and timber products within assessed projects. With respect to FLEGT Licencing four schemes continue to infer that such licencing is acceptable though there continues to be no direct reference to the FLEGT process or FLEGT Licencing directly. Typically these programmes state a preference for certified material followed by material that is from a legal and verified source.

The German DGNB programmes continues to not accept any timbers that are not certified under one of the leading certification schemes, such as FSC or PEFC: “the use of tropical, subtropical or boreal woods that lack certification constitutes a failure to meet this minimum standard. In this case, no points will be awarded.”

The Norwegian and UK BREEAM standards are examples of programmes that do not directly reference FLEGT Licences, but do *infer* it being acceptable. The inference arises through the examples of compliance which include “legally harvested” where “evidence of compliance with the EUTR (EU’s Timber Regulation)”. Whilst not a clear reference to FLEGT-Licensed material, such material would clearly be acceptable due to its acceptability within the EUTR as “authorities responsible for enforcing the EU Timber Regulation in EU Member States recognise FLEGT licences as proof of legality”¹³.

12. Interview conducted by Mike Jeffree for the 2020 study. [White, G. (2020) Op. Cit.]

13. <https://www.flegtlicence.org/about-the-flegt-licence>

Of the 30 programmes considered it has been possible to assess the revision dates of 13 of them and the average revision date is circa 2018. On 15th November 2016, Indonesia started issuing FLEGT licences to verified legal products it exports to the EU. To date FLEGT Licencing has not made any in roads regarding specification or inclusion within any of the green building standards.

Certification & Verification standards

Synopsis of the 2018 results

The 2020 analysis included 11 standards including the two main certification schemes. It identified that four of the standards were positive to FLEGT Licencing and made reference within the standards.

Table 4 (part 1): Summary of certification and verification standards

Initiatives	Publication / edition date	Summary	Refers to FLEGT Licencing	Attitude to Certification
ASTM D7612 - 10 (2015) Standard Practice for Categorizing Wood and Wood-Based Products According to Their Fiber Sources ¹⁴	2015	The Standard is applicable to non-controversial products of known origin, including SFM certified products, legally-verified products, or products with chain of custody certification. The Standard seeks to provide a framework to help differentiate products in the marketplace, based on qualities and values important to the buyers, and beyond the variability of forestry certification systems. The Standard is applicable only to products that originate from jurisdictions with low risk of illegal activity, or from controlled wood standards, step-wise standards, legality assessments, or other proprietary standards.	No direct reference	Positive
British Standards Publicly Available Specification (PAS) #2021 Exercising due diligence in establishing the legal origin of timber and timber products – Guide to Regulation (EU) No 995/2010 ¹⁵	2012	The PAS provides guidance on Regulation (EU) No 995/2010 laying down the obligations of operators who place timber and timber products on the market. was sponsored by WWF-UK Global Forest & Trade Network (GFTN-UK). Its development was facilitated by BSI Standards Limited and it was published under licence from The British Standards Institution.	Positive	Positive
Bureau Veritas Origine et Légalité des Bois (OLB) GP01 V-3.5 2010 ¹⁶	2010	The OLB system requirements are defined in the OLB standard for Forestry Companies and in the OLB Chain of Custody standard. The former includes legality elements to be evaluated related to forestry activities and conformity with the requirements is evaluated in the field. The CoC system includes requirements and the elements to be evaluated in order to ensure the control of the traceability of the OLB certified wood products. At the end of OLB audit, Bureau Veritas Certification can provide an independent guarantee that all the OLB requirements are respected and can deliver a certificate which allows the use of the OLB trademark.	No reference	
Certisource Standard v4.04 ¹⁷	2017	CertiSource provides 'Verified Legal Timber' certification in Indonesia.	No reference	No reference
Climate, Community & Biodiversity (CCB) Standards - v3.1 ¹⁸	2017	The Climate, Community & Biodiversity (CCB) Standards were created to foster the development and marketing of projects that deliver credible and significant climate, community and biodiversity benefits in an integrated, sustainable manner. Projects that meet the Standards adopt best practices to deliver net positive benefits for climate change mitigation, for local communities and for biodiversity.	No reference	Positive
Forest Stewardship Council (FSC) Controlled-Wood Standard 3.1 - Requirements for Sourcing FSC Controlled Wood ¹⁹	2018	This standard outlines the requirements for a due diligence system for FSC Chain of Custody certified organizations to avoid material from unacceptable sources.	Positive	Positive

14. <https://www.astm.org/Standards/D7612.htm>

15. <https://shop.bsigroup.com/SearchResults/?q=pas%202021>

16. <https://www.bureauveritas.fr/documents-olb>

17. <https://www.certisource.org/standard/>

18. <https://www.climate-standards.org/>

19. <https://fsc.org/en/document-centre/documents/resource/373>

Table 4 (part 2): Summary of certification and verification standards

Initiatives	Publication / edition date	Summary	Refers to FLEGT Licencing	Attitude to Certification
Global Timber Tracking Network: GTTN Standards and Guidelines Version 1.0 - Identification of timber species and geographic origin ²⁰	2014	Global Timber Tracking Network, GTTN, is an open alliance that cooperates along a joint vision of all stakeholders involved in combating illegal logging and associated timber trade. GTTN is led by Bioversity International and is working with scientists and other stakeholders to elaborate a reference database of DNA and stable isotope fingerprints for priority timber species that will be used to identify species and track the origin of wood and wood products along the supply chain.	No reference	
NEPCon LegalSource Programme - Standard v2.1 / Certification System Evaluation LS-18 v.1 ²¹	2019	The LegalSource Standard sets out the LegalSource requirements for producing and sourcing legally harvested timber. The standard is aligned with key regulations applicable in the EU, the US and Australia. The Standard forms the backbone of the “LegalSource” Programme and Due Diligence System.	No direct reference	Positive
Programme for the Endorsement of Forest Certification (PEFC) Standard - 1003 - Requirements for certification schemes ²²	2010	The requirements laid out in this document must be reflected in the forest management standards submitted for PEFC endorsement.	Positive	Positive
Rainforest Alliance Verified Legal Compliance (VLC) Standard 2013 (Generic / global)		Standard superseded by NEPCon LegalSource.		
SCS “LegalHarvest” V1.1 2014 ²³		Standard appears to have been withdrawn.		

Comparison with 2018

Since 2020 it has been identified that two of the standards previously assessed have ceased to operate, having been enveloped within the NEPCon LegalSource Programme.

For the remaining nine standards analysed, the average date of most recent revision is 2015.

With the reduction in number of standards considered, the overall total of standards referencing FLEGT Licencing has reduced from 4 to 3. The two main certification standards that reference FLEGT Licencing are:

- FSC – where FLEGT Licencing is used as an example of a Control Measure: “*FLEGT Licences shall be used for legality verification.*”
- PEFC – “*5.7.1 Forest management shall comply with legislation applicable to forest management issues including forest management practices; nature and environmental protection; protected and endangered species; property, tenure and land-use rights for indigenous people; health, labour and safety issues; and the payment of royalties and taxes. Note: For a country which has signed a FLEGT Voluntary Partnership Agreement (VPA) between the European Union and the producing country, the “legislation applicable to forest management” is defined by the VPA agreement.*”

The most recent standard assessed (NEPCon – 2019) does not appear to make any direct reference to FLEGT Licencing.

Trade association initiatives

Synopsis of the 2018 results

Previously reviewed in 2018, four trade association initiatives are included. All four initiatives were favourable towards certification and three initiatives made positive reference to FLEGT Licencing in their guidance.

The average date of most recent revision is 2016.

Comparison with 2018

Since 2018 there have been no observed changes to the documentation reviewed.

20. <https://globaltimbertrackingnetwork.org/portfolios/gttn-standards-and-guidelines-version-1-0/>

21. <https://www.nepcon.org/certification/legalsource/legalsource-standard>

22. <https://www.pefc.org/resources/technical-documentation/pefc-international-standards-2010/676-sustainable-forest-management-pefc-st-10032010>

23. Formerly available at: [cs_lhv_std_coc_v1-1_020614.pdf](https://www.scsglobal.com/cs_lhv_std_coc_v1-1_020614.pdf) (scsglobalservices.com)

Table 5: Summary of trade association initiatives

Initiatives	Publication / edition date	Summary	Refers to FLEGT Licencing	Attitude to Certification
Confederation of European Paper Industries' (CEPI) Legal Logging Code of Conduct ²⁴	2012	Code of Conduct comprising 6 principles.	Refers to FLEGT Action Plan of 2003.	Positive
UK Timber Trade Federation Responsible Purchasing Policy & Due Diligence Guide (RPP) ²⁵	2017	The TTF RPP is a risk management framework for the continuous improvement of TTF Members' awareness of what their obligations are under the EU Timber Regulation (EUTR), the Construction Products Regulation (CPR) and TTF Code of Conducts, and how they can meet these requirements.	Positive	Positive
European Timber Trade Federation (ETTF): The "Gateway to International Timber Trade" provides information on both the timber industry and legislation of producer countries (ETTF 2017) ²⁶	2018	European Timber Trade Federation (ETTF) responses to the numerous questions timber traders have when it comes to legal timber trade, due diligence, country requirements and export. It serves as a central information point, with country profiles on both timber industry and legislation of producer countries, mainly located in tropical Africa, Asia and Latin America. All published profiles have undergone expert review.	Positive	Positive
France - Le Commerce du Bois - Environmental Charter (<i>Charte environnementale de l'achat et de la vente de bois</i>) ²⁷	undated	Le Commerce du Bois (LCB) has been recognized as a Control (Monitoring) Organization by the European Commission under the EU Timber Regulation (EUTR). Their Due Diligence (DD) procedure has been validated and is integrated into the LCB environmental charter audit scope, for companies that want to join a collective DD system.	Positive	Positive

CSO led Rating systems

Synopsis of the 2018 results

Seven initiatives were assessed in 2018. Of these four were identified as positive towards certification. At that time only one made reference to FLEGT Licencing – ZSL

Spott. The reference was: "Award points based on % of land bank verified as being in mandatory (e.g. SVLK) or voluntary (e.g. Rainforest Alliance Timber Legality Verification, NEPCON LegalSource) legal compliance (VLC) by a third party – including percentage certified under FSC or PEFC (or other SFM standard that provides legality verification)".

Table 6 (part 1): Summary of Civil society organisation led rating systems Policies developed post 2018

Initiatives	Publication / edition date	Summary	Refers to FLEGT Licencing	Attitude to Certification
Global Canopy Programme - Forest500.org ²⁸	2020	The Forest 500 is the world's first rainforest rating agency. It identifies and ranks the most influential companies, financial institutions and governments in the race towards a deforestation-free global economy. It primarily assesses commitments to deforestation-free supply chains.	No reference	
Green Blue - Environmental Paper Assessment Tool (EPAT) ²⁹	2021	The Environmental Paper Assessment Tool (EPAT) is an assessment tool that allows buyers and sellers of paper products to evaluate environmental performance data along the paper supply chain. EPAT was developed by the sustainability non-profit GreenBlue in collaboration with leading paper buyers and suppliers.	not accessed	-
WWF Paper Scorecard	(2007)	Not available	-	Positive

24. Formerly available at: <http://www.cepi.org/system/files/public/documents/publications/forest/2005/illegallogging152955A-2006-00032-01-E.pdf>

25. <https://ttf.co.uk/download/code-conduct-2017/> & <https://ttf.co.uk/rpp-hub/>

26. <http://www.timbertradeportal.com/>

27. <http://www.lecommercedubois.org/medias/File/Charte-LCB-2012-11-Web-3F-rwpo?PHPSESSID=pf6fgefe7s44rspf80n4k6jot7>

28. https://forest500.org/sites/default/files/2020_forest_500_company_assessment_methodology_0.pdf

29. <https://www.epat.org/>

Table 6 (part 2): Summary of Civil society organisation led rating systems

Initiatives	Publication / edition date	Summary	Refers to FLEGT Licencing	Attitude to Certification
WWF Tissue Scoring	(2006)	Not available	-	Positive
WWF Check Your Paper - Environmental Paper Awards	(2016)	“Check Your Paper” was an on-line paper rating scheme where pulp and paper producers, merchants and other. The database was initially launched 2007.	No reference	Positive
ZSL - SPOTT – Ratings ³⁰	2018	SPOTT – Sustainability Policy Transparency Toolkit – is a free, online platform supporting sustainable commodity production and trade. SPOTT scores tropical forestry and palm oil companies annually against over 100 sector-specific indicators to benchmark their progress over time.	Refers to mandatory systems	Positive

The average date of review for the three currently maintained or functioning initiatives is 2020.

Comparison with 2018

Since 2018 the number of operational initiatives has shrunk to three. None of the remaining initiatives makes reference to FLEGT Licencing within its criteria with the exception of ZSL SPOTT (see above).

CSO led initiatives & Others

Synopsis of the 2018 results

Previously reviewed in 2018, eighteen initiatives were

reviewed. Of these eighteen were favourable towards certification whilst four indicated a positive view towards FLEGT Licencing.

The average date of review of the initiatives that are still believed to be active or offering guidance that is still valid is 2016.

Comparison with 2018

Since 2018 there has been little change with respect to reference of certification and FLEGT Licencing. Six initiatives specifically reference FLEGT Licencing and fourteen (up from 13) reference certification.

Table 7 (part 1): Summary of Civil society initiatives Policies developed post 2018 highlighted

Initiatives	Publication / edition date	Summary	Refers to FLEGT Licencing	Attitude to Certification
Carbon Disclosure Project - CDP 2021 Forests Scoring Methodology ³¹	2021	The Carbon Disclosure Project is designed to create transparency and improve companies’ understanding of the “forest footprint” of their direct operations and the operations they finance. The «forest footprint» focuses on production, use, and trade of key commodities linked to global deforestation: timber, soy, beef and leather, palm oil and biofuels. Every year, a number of companies are invited to disclose information about policies related to the sustainable supply chains for these commodities, and the actions they are taking to manage risks. CDP works with companies and investors to manage this risk and continue the transition to a low-carbon economy.	No reference	Positive
Environmental Paper Network: Paper Calculator ³²	2018	The Paper Calculator, originally launched in 2005 by the Environmental Defense Fund (EDF), is an innovative web-based tool that is publicly available and allows users to compare the environmental impacts of different paper choices using a methodology based in life cycle assessment (LCA). LCA is a tool that can be used to assess the environmental impacts associated with the life cycle of paper, from raw material extraction and processing to end-of-life phase. LCA provides a unique, quantified approach for comparing the environmental performance of different sources of fiber.	No reference	–
Forest Legality Alliance ³³	2018	The Forest Legality Initiative is a multi-stakeholder project led by the World Resources Institute. The Forest Legality Initiative is a multi-stakeholder project led by the World Resources Institute with the goal to reduce illegal logging through supporting the supply of legal forest products.	Positive	Positive

30. <https://www.spott.org/timber-pulp/>

31. <https://www.cdp.net/en>

32. <https://c.environmentalpaper.org/pdf/SCS-EPN-PC-Methods.pdf>

33. <https://forestlegality.org/>

Table 7 (part 2): Summary of Civil society initiatives *Policies developed post 2018 highlighted*

Initiatives	Publication / edition date	Summary	Refers to FLEGT Licencing	Attitude to Certification
Global Canopy Programme - Supply Chain Transparency Network ³⁴	2019	Global Canopy works with companies, investors and governments to increase transparency and understand the opportunities to shift to a more sustainable global economy. The Supply Chain Transparency Network is a community of practice convened by Global Canopy and the Stockholm Environment Institute (SEI) that aims to bring together initiatives working on supply chain transparency as a key solution to addressing commodity-driven deforestation and other environmental and social impacts.	not assessed	–
Greenpeace's Responsible Procurement Guide	(2008)	not available	–	–
INTERPOL Forestry Enforcement - Project LEAF ³⁵	2019	The INTERPOL Forestry Enforcement team supports law enforcement working across the entire timber supply chain to disrupt international criminal networks.	–	–
National Council for Air and Stream Improvement - Environmental Footprint Comparison Tool ³⁶	2013	Provides general overview information about greenhouse gas (GHG) emissions from the paper-making process, and the role of forests, wood and paper-based products in storing carbon. It also covers the links between GHG emissions and energy usage.	–	Positive
Proforest - Responsible sourcing and production briefings ³⁷	2021		not assessed	not assessed
Smartwood - Supplychain Services ³⁸	Unknown	A supply chain management resource that supports forest products purchasing programs by tracing the origin of products throughout the supply chain; evaluating various risks associated with the supply chains; and developing and implementing policies and actions to address the risk.	not assessed	Positive
Sustainable Timber Action (STA) – Guid ³⁹	(2013)	The project ended in November 2013. Its efforts to increase the share of sustainable timber on the European market are continued in the European Sustainable Tropical Timber Coalition.	Positive with caveats regarding sustainability.	Positive
The Forest Trust (TFT): Membershi ⁴⁰	-	Defunct, see: https://www.earthworm.org/our-work/areas-of-work/healthy-forests	No reference	Positive
The Forest Trust - Good Wood, Good Business guide	(2003)	No longer accessible	No reference	Positive
Tropenbos International - Enhancing the Trade of Legally Produced Timber, a Guide to Initiatives ⁴¹	2011	A guide to 127 major initiatives that promote the legal production and trade of timber. The guide provides an overview of the array of initiatives, highlighting trends, gaps, and major opportunities.	Positive	Positive

34. <https://www.supplychaintransparency.network/publications/>

35. <https://www.interpol.int/Crime-areas/Environmental-crime/Projects/Project-Leaf>

36. www.paperenvironment.org

37. <https://www.proforest.net/en/publications/responsible-sourcing-and-production>

38. <http://www.rainforest-alliance.org/forestry/sourcing> & <https://www.rainforest-alliance.org/business/tailored-services/corporate-advisory-and-supply-chain-services/>

39. <http://www.sustainable-timber-action.org/home/>

40. Defunct, see: <https://www.earthworm.org/our-work/areas-of-work/healthy-forests>

41. <http://www.tropenbos.org/file.php/154/enhancing-trade-legallytimber-web.pdf>

Table 7 (part 3): Summary of Civil society initiatives *Policies developed post 2018 highlighted*

Initiatives	Publication / edition date	Summary	Refers to FLEGT Licencing	Attitude to Certification
We Mean Business ⁴²	2021	We Mean Business is a global non-profit coalition to take action on climate change. The coalition brings together seven international nonprofit organizations: BSR, CDP, Ceres, The B Team, The Climate Group, The Prince of Wales Climate Leaders and WBCSD.	not assessed	not assessed
WRI & WBCSD: Sourcing Legally Produced Wood: A Guide for Businesses ⁴³	2018	This publication updates the 2014 version of Sourcing Legally Produced Wood, which provides information on illegal logging and associated trade, public and private procurement policies, export country logging and log export bans, and introductory guidance to the wood products legality legislation in the United States, the EU, and Australia.	Positive	Positive
WRI & WBCSD: Sustainable procurement of forest products ⁴⁴	Unknown	The purpose of the Guide is to assist sustainability officers and business procurement managers to develop and implement their wood and paper-based procurement policies. The Guide identifies and reviews issues central to procurement of wood and paper-based products, and highlights resources that can be of help.	No reference	Positive
WWF's Guide to Buying Paper (companion to WWF's Paper Scorecard) ⁴⁵	2010	A guide for corporate purchasers of paper products.	No reference	Positive
WWF's Global Forest & Trade Network (GFTN) - company participation ⁴⁶	2014	GFTN provides an approach for companies to follow when developing forest management plans. The approach outlines the various steps needed to achieve credible certification within an agreed time frame. GFTN also helps companies phase out products from illegal or unsustainable timber sources and increase those from certified sources.	Positive	Positive
WWF's Global Forest & Trade Network (GFTN) - Guide to responsible purchasing of forest products ⁴⁷	2014	A guide to responsible purchasing of forest products.	Positive	Positive
ZSL - SPOTT - Guide to Responsible Sourcing and Financing ⁴⁸	2021	An introduction to the environmental, social and governance issues associated with tropical timber for financial institutions and buyers of timber products.	Positive	Positive

Selected private sector company policies

Examining individual company forest product purchasing policies at any representative scale is an enormous undertaking. For the purposes of this study a small sample has been selected to provide some insight to the contents of a purchasing policy and also to identify the levels of recognition of FLEGT Licencing.

In total 20 companies were selected for analysis. The rationale for the selection can be found in

- 42. <https://www.wemeanbusinesscoalition.org/companies/#checkedOptions=Remove%20deforestation>
- 43. <https://forestlegality.org/document/sourcing-legally-produced-wood-guide-businesses-%E2%80%94-2018-edition>
- 44. <https://sustainableforestproducts.org/>
- 45. assets.panda.org/downloads/wwf_paper_guide.pdf
- 46. http://d2ouvy59p0dg6k.cloudfront.net/downloads/gftn_participant_list_september_web_2018_2.pdf
- 47. <https://forestsforward.panda.org/?193889/interactiveguide>
- 48. <https://www.spott.org/news/tropical-timber-a-guide-to-responsible-sourcing-and-financing/>

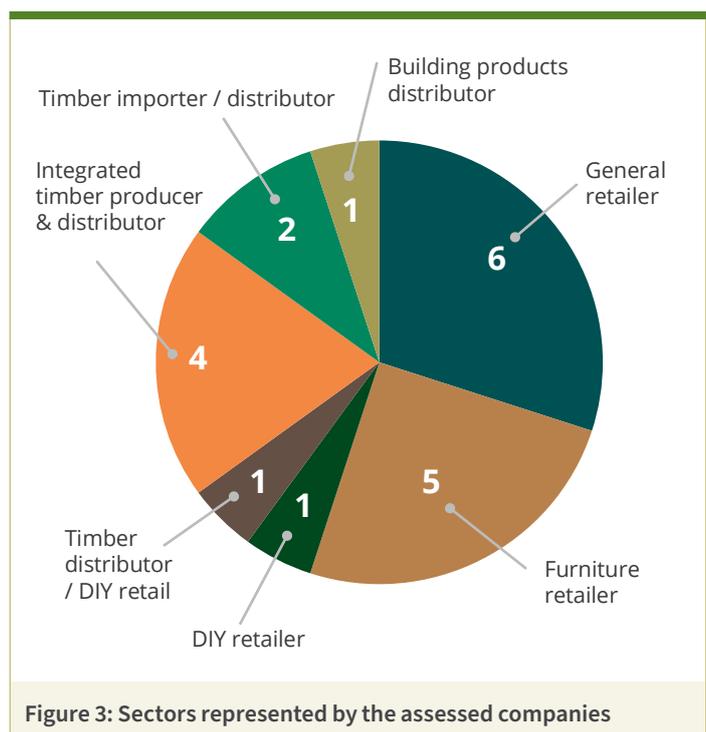


Figure 3: Sectors represented by the assessed companies

the 2018 report.⁴⁹ At the time of writing all twenty companies continue to trade and the companies assessed are the same legal entities as those assessed previously. The companies selected have combined annual sales of in excess of Euro €518 billion. For the larger retailers within the list only a very small percentage of this total will include wood based products for resale or used within their infrastructure.

Synopsis of the 2018 results

The 2018 study identified that nineteen of the twenty companies had an environmental policy and seventeen of these were accessible at that time. Sixteen of the accessed policies referred positively to certification and thirteen made reference to legal compliance for forest products. Of the twenty companies assessed in 2018 only two made positive and supportive policy references to FLEGT Licencing.

Name	Sector	Base country	Turnover (Euro-€ billion)
ALDI Group	Retailer	Germany	77.5
Carrefour SA	Retailer	France	80.7
Casino Guichard Perrachon SA (Casino)	Retailer	France	37.8
Danzer / Interholco (Danzer Foundation)	Integrated timber producer & distributor	Switzerland	0.2 est.
Höffner (Möbelhaus) GmbH & Co. KG	Furniture Retail	Germany	2.0
IKEA (Inter IKEA Systems B.V.)	Furniture Retail	Sweden	41.3
James Latham plc	Timber importer	UK	0.3
JYSK A/S	Furniture Retail	Denmark	2.4
Kingfisher plc	DIY Retailer	UK	12.3
Marks & Spencer Group plc	Retailer	UK	10.2
Otto Group GmbH & Co KG	Furniture Retail	Germany	14.3
Precious Woods	Integrated timber producer & distributor	Switzerland	0.05
Rougier SA	Integrated timber producer & distributor	France	0.05
Compagnie de Saint-Gobain S.A. St Gobain UK	Building products distributor	France / UK	41.8
Steinhoff International (Conforama)	Furniture Retail	Germany / Netherlands / South Africa	12.9
Schwarz Gruppe GmbH (Lidl)	Retailer	Germany	113.3
Tesco plc	Retailer	UK	64.9
Vandecasteele Houtimport	Timber importer	Belgium	private
Travis Perkins plc	Timber distributor / DIY Retail	UK	6.2
Wijma Kampen B.V.	Integrated timber producer & distributor	Netherlands	private

49. White, G. (2018) *Op. Cit.*

Table 9 (part 1): Purchasing policies of the 20 European Union & UK operating companies
Policies developed post 2018 **highlighted**

Name	Document name	Date	Policy specifically promotes certification	Policy specifically refers to legality / legal compliance	Policy specifically refers to FLEGT Licencing
ALDI Group	International Timber Purchasing Policy ⁵⁰	2020	Yes	No	No reference
Carrefour SA	Supplier assessment criteria - The Wood Charter ⁵¹	2020	Yes	No	No reference
Casino Guichard Perrachon (Casino) ⁵²	2019 Environment Policies document	2019	No	No	No reference
Danzer / Interholco ⁵³	Responsible Procurement Rules – Suppliers information (IHC-Proc_46_08, V.6, 2017)	2017	Yes	Yes	Referenced
Höffner (Möbelhaus)	Not seen		Not seen	Unknown	Not seen
IKEA	IWAY Standard General Section - IWAY Standard 6 - Forestry Section - Edition 5.4 ⁵⁴	2020	Yes	Yes	No reference
James Latham plc	Environmental certification schemes and timber purchasing information guide ⁵⁵	2018	Yes	Yes	Referenced
JYSK	JYSK Forestry ⁵⁶	2021	Yes	No	No reference
Kingfisher plc	Kingfisher Wood and Paper Policy Guidelines ⁵⁷	2019	Yes	Yes	Referenced
Marks & Spencer Group PLC	M&S Wood sourcing policy ⁵⁸	2016	Yes	Yes	Referenced
Otto Group	Furniture Strategy ⁵⁹	2021	Yes	No	No reference
Precious Woods	Various ⁶⁰	2020	Yes	Yes	Referenced
Rougier	Various ⁶¹	various	Yes	Yes	No reference
St Gobain (UK)	⁶²	2015	Yes	Yes	No reference
Steinhoff International	Steinhoff Group Environmental Policy ⁶³		Not seen	Unknown	Not seen
Schwarz Gruppe GmbH (Lidl)	Lidl GB - Policy on Sustainable Timber and Wood-Based Products ⁶⁴	2019	Yes	Yes	Referenced

50. <https://www.aldi-nord.de/unternehmen/pressemitteilungen/aldi-veroeffentlicht-holz-inkaufspolitik.html>

51. <http://www.carrefour.com/protecting-biodiversity/wood-and-paper-a-certified-offering-that-does-not-harm-the-planets-forests>

52. https://www.groupe-casino.fr/wp-content/uploads/2019/06/Politique_Environnement.pdf

53. https://www.danzer.com/images/company/ProcurementPolicy_EN.pdf

54. <https://about.ikea.com/en/work-with-us/for-suppliers/iway-our-supplier-code--of-conduct#IWAYdocs>
[https://gbl-sc9u2-prd-cdn.azureedge.net/-/media/aboutikea/pdfs/iway/iway-standard-forestry-section-edition-54.pdf?rev=7781e0a-dfee9448592faa4581c4846c3&hash=91E36C6ADAB20CDBDFB1030A525036DB#:~:text=IWAY%20Must%20Forestry%20Minimum%20Requirements%3A&text=FSC%20claim%20\(FSC%20100%25%3B,Tracing%20System%20\(WTS\)%20homepage.](https://gbl-sc9u2-prd-cdn.azureedge.net/-/media/aboutikea/pdfs/iway/iway-standard-forestry-section-edition-54.pdf?rev=7781e0a-dfee9448592faa4581c4846c3&hash=91E36C6ADAB20CDBDFB1030A525036DB#:~:text=IWAY%20Must%20Forestry%20Minimum%20Requirements%3A&text=FSC%20claim%20(FSC%20100%25%3B,Tracing%20System%20(WTS)%20homepage.)

55. www.lathamtimber.co.uk

56. <https://www.jysk.com/forestry>

57. www.kingfisher.com/content/dam/kingfisher/Corporate/Documents/Sustainability/Supplier_resources/Guidelines/Wood%20and%20Paper%20Policy%20Vendor%20Guidelines%20April%202019_v3.pdf

58. <https://corporate.marksandspencer.com/documents/plan-a-our-approach/mns-wood-policy.pdf>

59. <https://www.ottogroup.com/en/verantwortung/Nachhaltige-Unternehmensfuehrung/CR-Strategie.php>

60. <http://www.preciouswoods.com/en/sustainability/documentations>

61. <http://www.rougier.fr/en/rougier-afrique-international/487-commitments.html>

62. <http://www.saint-gobain.co.uk/media/17796/sgbd-responsible-purchasing-timber-policy-2015.pdf>

63. <http://www.steinhoffinternational.com/corporate-responsibility/>

64. <https://www.lidl.co.uk/en/Responsible-sourcing-11119.htm>

Table 9 (part 2): Purchasing policies of the 20 European Union & UK operating companies
Policies developed post 2018 highlighted

Name	Document name	Date	Policy specifically promotes certification	Policy specifically refers to legality / legal compliance	Policy specifically refers to FLEGT Licencing
Tesco plc	UK Wood and Paper Policy ⁶⁵	2020	Yes	No	No reference
Vandecasteele Houtimport	Vandecasteele Houtimport Responsible Sourcing Policy ⁶⁶	2021	Yes	Yes	No reference
Travis Perkins plc	Supplier commitments: Timber ⁶⁷	2021	Yes	Yes	Obscure reference
Wijma	Wijma Environmental Policy ⁶⁸	2019	Yes	Yes	No reference

The average review date of the environmental policies assessed is 2019. Thirteen of the twenty companies have revised their environmental policies as they relate to timber and timber products since 2018. Of those that have revised their policies, nine have reviewed or revised their policies in the past year (between 2020 and 2021).

Comparison with 2018

Since 2018 there are three notable changes in the content of the policies under consideration. The number of policies that were accessible decreased from nineteen to eighteen. The number that explicitly supports forest certification has grown from sixteen to seventeen. Of most relevance to this study though – the number that specifically and positively refers to FLEGT

Licencing has grown from a meagre two to seven. These results correlate to the results of the IMM annual survey conducted in 2018 and 2019⁶⁹ which assessed a much broader range of over 100 companies across EU markets. FLEGT Licencing is becoming more widely adopted as an element of timber and timber product purchasing policies.

EU27+UK Public procurement policies

The table below provides an overview of the 27 EU Member States and the United Kingdom and their procurement policies that relate to wood and to other wood based forest products. The table is based upon a wide variety of sources.

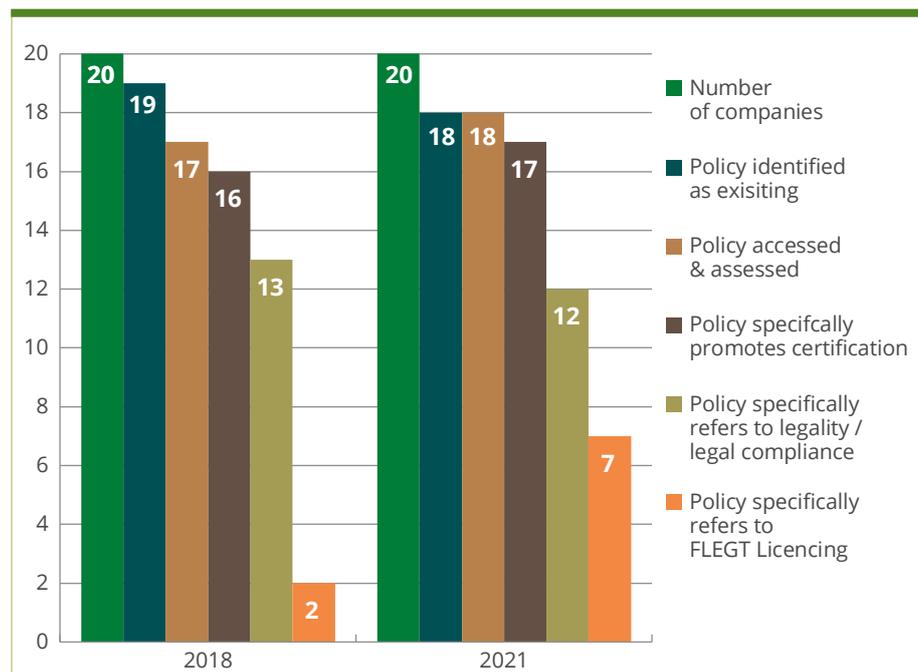


Figure 4: Purchasing policies of the 20 European Union & UK operating companies – changes 2018 to 2021

The “Criteria” column is a brief summary of the minimum criteria that are used for the included product type (or end-use) category covered by the policy or policies.

The “Level of definition” column briefly gives some information regarding the amount of detail published to support definitions. In some cases there appears to be no definition available and in others there is a huge amount of detailed analysis available.

The “Forms of proof acceptable” column briefly outlines what paperwork is acceptable, often ranging from third party certification, to FLEGT Licences through to export documentation.

65. <https://www.tescopl.com/sustainability/publications/policies/downloads/wood-and-paper-policy>

66. <http://www.vandecasteele.be/en/corporate-sustainability>

67. <https://www.travisperkinsplc.co.uk/sites/travis-perkins/files/2021-03/2532086%20-%20Timber%20Document%20V01%20HR.pdf>

68. <https://www.wijma.com/download/millieubeleid/1/en/Environmental%20Policy%20Wijma%20Kampen%20B.V.%20%20%202019.pdf>

69. Storck, S., Oliver, R. (2021) FLEGT VPA Partners in EU Timber Trade 2019: Main Report – November 2020. Op. Cit

The “Range of products covered” column briefly describes what products or end uses are included within the scope of the policies. The degree of specificity varies widely from product specific (e.g. copy paper) through to far more generic descriptions based on end-uses (e.g. timber used in construction).

The “2021 updates” column highlights any changes to the policies. Typical changes include a broader scope or, in two cases, an entirely new policy which has been added to the analysis.

Please note that for a number of cases a broader scope of policy application has been identified but this may not necessarily mean that the scope has been revised since the previous analysis. This may be due to an error to note the full breadth of the scope in the previous analysis or due to genuine changes in the scope.

Synopsis of the 2019 study

The previous study indicated twenty-two member states had some form of policy. Six member states had at that

time no public procurement policy – Estonia, Greece, Hungary, Poland, Portugal and Romania. Poland had developed a National Action Plan but no specific criteria had been identified for wood-based products. Portugal at that time had indicated that it will potentially include all EC GPP product / use categories in future policy. Estonia, Greece, Hungary and Romania in 2019 remained the only EC member states without a policy or any identified plans to develop such policies.

Table 10 (part 1): Overview of EU27 Member State & UK public timber and timber product procurement policies <i>Policies developed post 2019 highlighted</i>							
Country and name of policy	Criteria	Level of Definition	Forms of proof acceptable	Introduction or revision dates	Range of products covered	2021 updates	Note on this analysis
Austria ⁷⁰	Legal - all products except furniture Sustainable - furniture Paper - preference for recycled FLEGT	Defined Federal Procurement Agency	FSC & PEFC or equivalents. FLEGT Licences Voluntary legality verification	Introduced: 2010 Revised: ?	All wood based products including paper	Unchanged	New references added
Belgium Public procurement policy aimed at promoting the use of timber and wood from sustainably managed forests ⁷¹	Sustainable	Detailed Belgian Government Procurement Policy	FSC & PEFC or equivalents.	Introduced: 2006 Reviewed: 2009 & 2015	Wood based products including paper	Paper added	New references added
Bulgaria ⁷²	Legal Sustainable (encouraged) Recycled	Based upon EU GPP criteria	Legal: FSC & PEFC, FLEGT Licences, third party legal verification. Sustainable: Verified as sustainably managed (with no scheme specified).	Introduced: 2012	Paper	Unchanged	New references added
Croatia ⁷³	Legal Sustainable (encouraged) Recycled	Based upon EU GPP criteria	Legal: FSC & PEFC, FLEGT Licences, third party legal verification. Sustainable: Verified as sustainably managed (with no scheme specified).	Introduced: 2015	Paper	Unchanged	New references added

70. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

71. [vlaanderen.be/sites/default/files/documenten/overheidsopdrachten/duurzame overheidsopdrachten/20150216_productfiche%20hout.pdf](https://vlaanderen.be/sites/default/files/documenten/overheidsopdrachten/duurzame%20overheidsopdrachten/20150216_productfiche%20hout.pdf)

72. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

73. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

Table 10 (part 2): Overview of EU27 Member State & UK public timber and timber product procurement policies *Policies developed post 2019 highlighted*

Country and name of policy	Criteria	Level of Definition	Forms of proof acceptable	Introduction or revision dates	Range of products covered	2021 updates	Note on this analysis
Cyprus ⁷⁴	Legal Sustainable (encouraged) Recycled	Based upon EU GPP criteria	Legal: FSC & PEFC, FLEGT Licences, third party legal verification. Sustainable: Verified as sustainably managed (with no scheme specified).	Introduced: 2007 Revised: 2012	Paper Furniture	Furniture added	New references added
Czech Republic ⁷⁵	Legal Sustainable (encouraged) Recycled	Based upon EU GPP criteria	Legal: FSC & PEFC, FLEGT Licences, third party legal verification. Sustainable: Verified as sustainably managed (with no scheme specified).	Introduced: 2010	Furniture	Furniture added	New references added
Denmark ⁷⁶ 1) Danish guidelines on public procurement of legal and sustainable timber. 2)Denmark, 2014 Criteria for assessment of certification schemes in the context of the Danish Government's policy and guidelines on public procurement of sustainable timber, and assessment results of FSC and PEFC	Sustainable	Detailed Danish Government Procurement Policy for Tropical Forests	FSC & PEFC acceptable. Nature Agency assesses schemes against criteria.	Introduced: 2001 (tropical timber) General: 2003 Revised: 2013 & 2014	All wood based products including paper	Unchanged	New references added
Estonia ⁷⁷	Legality (considered to encompass sustainability)	Based upon EU GPP criteria	FLEGT Licences, FSC & PEFC and "equivalent evidence" acceptable as proof of "attesting history of timber" Documentation of timber legality for unlicensed and uncertified timber.	Planned: 2021	Furniture, copying and graphic paper. Possibly other products as definition of categories not yet finalised	New policy added to analysis	New references added
Finland ⁷⁸ Strategic Programme for the Forest Sector - Finnish National Public Procurement Policy for Wood-Based Products	Legal Sustainable FLEGT	Legality based upon FLEGT, CITES. Sustainability based upon "Forest Europe process".	FSC & PEFC. FLEGT Licences Ecolabels "Other reliable indicators"	Introduced: 2009 Revised: 2010	All wood based products including paper	Unchanged	

74. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

75. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

76. <http://www.naturstyrelsen.dk/Naturbeskyttelse/Skov/Miljoet/vejledning/> <http://eng.mst.dk/trade/forestry/>

77. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

78. http://www.tem.fi/files/28240/Finnish_National_Public_Procurement_Policy_for_Wood-Based_Products_web.pdf

Table 10 (part 3): Overview of EU27 Member State & UK public timber and timber product procurement policies *Policies developed post 2019 highlighted*

Country and name of policy	Criteria	Level of Definition	Forms of proof acceptable	Introduction or revision dates	Range of products covered	2021 updates	Note on this analysis
France Policy on Public Procurement of Timber and Wood Products	Legal Sustainable Recycled papers	Detailed. Policy on Public Procurement of Timber and Wood Products	Any product or chain of custody certificate. FLEGT Licences. Evidence of management plan. Ecolabels. Industry code of conduct - self declaration of compliance. Customs documents to qualify legal/sustainable products when entering the EU market.	Introduced: 2004 Reviewed: 2011	All wood based products including paper	Unchanged	
France-2 ⁷⁹ National Strategy to Combat Imported Deforestation (SNDI)	Guide to good practices for public procurement actors	Detailed. Guidance on Public Procurement of Timber and Wood Products	Any product or chain of custody certificate. FLEGT Licences. Evidence of management plan. Industry code of conduct - self declaration of compliance. Customs documents to qualify legal/sustainable products when entering the EU market.	Introduced 2020		New policy added to analysis	Excludes ecolabels
Germany ⁸⁰ <i>Begleitende Erklärung zur Beschaffung von Holzprodukten</i> German Government Procurement Policy	Legal Sustainable	Detailed	FSC & PEFC or equivalents.	Introduced: 2007 Revised: 2017	All wood based products made mainly from virgin material		New references added
Greece ⁸¹	No criteria seen					Unchanged	New references added
Hungary ⁸²	No criteria seen	Public Procurement Act has no reference to timber and timber products				Updated	New references added

79. https://www.atibt.org/files/upload/news/Guide_politique_achat_public_zero_deforestation_18nov2020.pdf

80. <http://www.bmelv.de/SharedDocs/Standardartikel/Landwirtschaft/Wald-Jagd/Waldpolitik/HolzbeschaffungErlassAnhang.html?sessionid=6DA33376E3501B75948E21C90DEE0981>

81. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

82. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

Table 10 (part 4): Overview of EU27 Member State & UK public timber and timber product procurement policies *Policies developed post 2019 highlighted*

Country and name of policy	Criteria	Level of Definition	Forms of proof acceptable	Introduction or revision dates	Range of products covered	2021 updates	Note on this analysis
Ireland ⁸³ Green Tenders - An Action Plan on Green Public Procurement	Legal Sustainable Recycled papers	Detailed	FSC & PEFC FLEGT Licences	Introduced: 2012	Paper Timber in construction	Unchanged	
Italy ⁸⁴	Legal Sustainable Recycled papers	Detailed	FSC & PEFC Ecolabels FLEGT Licences Verifiable self-declarations Third party legal verification State approved export permits	Introduced: 2009 Revised: 2013	Copy & graphic paper. Windows & doors. Office furniture. Construction.	Construction added	New references added
Latvia ⁸⁵	Legal	Not defined	Certification FLEGT Licences	Introduced: 2008	All wood based products including paper	Unchanged	New references added
Lithuania ⁸⁶	Legal Sustainable	Not defined	FSC & PEFC FLEGT Licences Third party legal verification	Introduced: 2007 Revised: 2013	All wood based products including paper	Unchanged	New references added
Luxembourg ⁸⁷	Legal Sustainable FLEGT	Detailed	FSC & PEFC acceptable. FLEGT Licences	Introduced: 2014	All products listed in EUTR		
Malta ⁸⁸	Legal Sustainable (encouraged) Recycled	Based upon EU GPP criteria	Legal: FSC & PEFC, FLEGT Licences, third party legal verification. Sustainable: Verified as sustainably managed (with no scheme specified).	Introduced: 2011	Furniture	Unchanged	New references added

83. <https://ogp.gov.ie/>

84. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

85. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

86. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

87. Efeca (2018) *Draft proposal: GPP/Ecolabel criteria for timber and timber products* -Final Report. Efeca / European Commission. Ares(2018)4343248

88. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

Table 10 (part 5): Overview of EU27 Member State & UK public timber and timber product procurement policies *Policies developed post 2019 highlighted*

Country and name of policy	Criteria	Level of Definition	Forms of proof acceptable	Introduction or revision dates	Range of products covered	2021 updates	Note on this analysis
Netherlands Dutch Timber Procurement Policy Framework for Evaluating Evidence of Compliance with Timber Procurement Requirements ⁸⁹	Legal Sustainable (encouraged) Recycled	Detailed. Dutch Timber Procurement Policy Framework for Evaluating Evidence of Compliance with Timber Procurement Requirements	FSC & PEFC acceptable. FLEGT-Licensed. Timber Procurement Assessment Committee assesses schemes against criteria on a case by case basis.	Introduced: 2004 & 2021 Revised: 2014	All wood based products including paper	Unchanged	New references added
Poland ⁹⁰	No criteria seen			4th national action plan for GPP was introduced in 2017	No specific criteria identified for wood based products	Unchanged	New references added
Portugal ⁹¹	No criteria seen			Criteria are under development.	Potentially will include all EC GPP product / use categories	Paper & Construction products to be added	New references added
Romania ⁹²	Minimum requirements regarding environmental protection			Introduced: 2018		Updated	New references added
Slovakia ⁹³	Legal Sustainable (encouraged) Recycled	Based upon EU GPP criteria	Legal: FSC & PEFC, FLEGT Licences, third party legal verification. Sustainable: Verified as sustainably managed (with no scheme specified).	Introduced: 2016	Paper Furniture Office building design	Unchanged	New references added
Slovenia ⁹⁴	Legal Sustainable (encouraged) Recycled	Based upon EU GPP criteria	Legal: FSC & PEFC, FLEGT Licences, third party legal verification. Sustainable: Verified as sustainably managed (with no scheme specified).	Introduced: 2011	Paper Furniture	Unchanged	New references added

89. <http://www.inkoopduurzaamhout.nl/pdf/Dutch%20Framework%20For%20Evaluating%20Evidence%20of%20Compliance.pdf> - <https://www.tpac.smk.nl/32/home.html> - <http://www.tpac.smk.nl/Public/TPACdocuments/DutchProcurementCriteriaMAR2014.pdf>

90. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

91. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

92. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

93. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

94. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

Table 10 (part 6): Overview of EU27 Member State & UK public timber and timber product procurement policies *Policies developed post 2019 highlighted*

Country and name of policy	Criteria	Level of Definition	Forms of proof acceptable	Introduction or revision dates	Range of products covered	2021 updates	Note on this analysis
Spain ⁹⁵	Sustainable Recycled	Not defined	FSC & PEFC Ecolabels	Introduced: 2008 Revised: ?	Paper Furniture Construction	Construction added	New references added
Sweden ⁹⁶	Legal Acceptable	Legal: detailed definition. Acceptable: No violations of human rights, traditional rights; no loss of high conservation values, no conversion of natural ecosystems.	Legal: FSC & PEFC, FLEGT Licences, third party legal verification. Acceptable: FSC & PEFC, FSC Controlled Wood or equivalent	Introduced: 2011	All wood based products including paper	Unchanged	New references added
United Kingdom UK Public Procurement Policy on Timber ⁹⁷	Legal Sustainable FLEGT	Detailed definitions. UK Government Timber Procurement Policy	FSC & PEFC acceptable. FLEGT-Licensed. Until 2014 assessments made by Central Point of Expertise (now defunct)	Introduced: 1997 Revised: 2013	All wood based products including paper	Unchanged	New references added
UK - 2 UK Timber Standard for Heat & Electricity ⁹⁸	Legal Sustainable	Detailed definitions within the standard.	FSC & PEFC acceptable. FLEGT Licences acceptable ONLY as Legal.	Introduced 2014	Virgin wood for woodfuel generation of electricity	New policy added to analysis	
EC - GPP - Guides Policy to promote public green procurement and to increase similarities among procurement criteria of EU member states, and provide guidance and advice. ⁹⁹	Recycled Legal FLEGT CITES		Recognizes chain-of-custody certificates from FSC or PEFC. It also recognizes EU Forest Law Enforcement, Governance and Trade (FLEGT) Licences from countries that have signed voluntary partnership agreements. For non-certified products, require ability to trace through the supply chain to the origin.	Revised: 2018	Paper Furniture Timber in Office Building Design, Construction and Management	Unchanged	

95. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

96. https://ec.europa.eu/environment/gpp/pdf/GPP_NAPs_June_2018.pdf

97. <http://www.cpet.org.uk/uk-government-timber-procurement-policy>

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/320982/2013_05_08_-_CPET_Defn_Legal___Sustainable_5th_ed_-_Final.pdf

98. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/278372/Timber_Standard_for_Heat_and_Electricity_under_RO_and_RHL_-_10-Feb-2014_for_pdf_-_FINAL_in_new_format.pdf

99. https://ec.europa.eu/environment/gpp/eu_gpp_criteria_en.htm

Comparison with the 2019 study

The latest analysis indicates that the coverage of green public procurement policies that reference timber and timber products has increased across paper, furniture and timber used in construction. Policies for paper have become most widely adopted (22 policies) closely followed by furniture (21 policies). Timber used in construction has grown from fifteen to eighteen policies. Seventeen of the EU27 & UK states now have comprehensive policies that include all three end uses or material types.

The nature of this study ensures a focus on the relevance of FLEGT Licencing within public procurement policies, though it is important to consider this within the wider context of policy content, such as acceptance of third party forest certification or other means of verification.

The policies of the member states contain a variety of means of verification of compliance. The most common, in fact universal, acceptable means of proof of legality and sustainability is through certification, usually FSC or PEFC. The second most common acceptable form of verification is that of FLEGT Licences, specified or mentioned by name within the policies of twenty countries.

Fourteen countries also allow for other forms of verification, ranging from third party verification of legal compliance through to forms of self-declaration. Ecolabels, in particular the EU ecolabel and the Nordic Swan ecolabel, also feature in the policies of eleven countries.

Several reports¹⁰⁰ have been produced in recent years which discuss the detail of policy content at great length and it is not the purpose here to review all of the environmental and social elements of the EU member states' procurement policies. Needless to say there has been great effort amongst many EU member states to justify the acceptability of the various means of verification to ensure compliance with EU Directives 17 & 18 and to meet the expectations of a wide range of stakeholder groups.

The 'legal and sustainable' hierarchy

In terms of their definitions of 'legal' and 'sustainable',

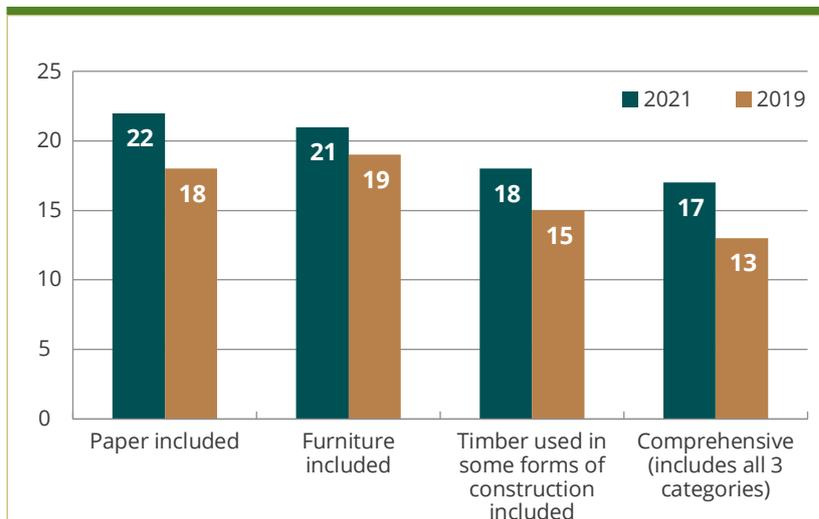


Figure 5: Public procurement policy coverage across the EU 27&UK - 2019 and 2021. N = number of states which include / exclude specified end use within their policies.

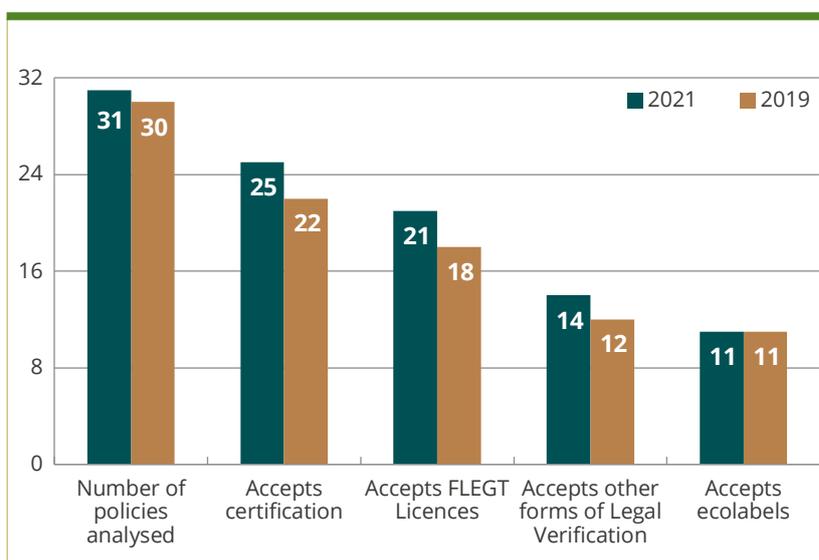


Figure 6: Variations in policy verification acceptance content across the 27 EU Member States & UK (2019 & 2021)

the procurement policies can be divided into **four** broad groups¹⁰¹.

- 1) Those that take their **definitions from the EU's common GPP criteria** where compliance with the EUTR is a basic condition¹⁰².
- 2) Those that use the terms **'legal' and 'sustainable' without setting out detailed definitions** of exactly what these terms mean.
- 3) Those that have developed **detailed sets of criteria for 'legal' and 'sustainable'**. The criteria derive from a variety of sources and inputs, including, generally, a multi-stakeholder consultation process, and they can

100. The most recent comprehensive reviews include: Efeca (2018) *Draft proposal: GPP / Ecolabel criteria for timber and timber products -Final Report*. Efeca / European Commission. ISBN 978-92-79-92899-4, Van Bueren, E.L. (2016) *Comparison of selected TPP's*. I S A F O R, Netherlands Ministry of Infrastructure & Environment

101. Brack, D. (2014) *Promoting Legal and Sustainable Timber: Using Public Procurement Policy*. Chatham House

102. Van Bueren, E.L. (2016) *Comparison of selected TPP's*. I S A F O R, Netherlands Ministry of Infrastructure & Environment

be subject to revision in the light of developments. As reported by the Standing Forestry Committee¹⁰³, in almost all cases certain social criteria are included and there is a focus on origin and production of wood and timber products, as opposed to life-cycle performance overall. All these countries have learned from one another's experiences, and, sometimes, adapted their definitions accordingly¹⁰⁴.

- 4) The fourth group is just one country: Germany. It **accepts only products certified** by the two main global forest certification schemes, FSC and PEFC, or equivalent.

Status of FLEGT-Licensed timber in the hierarchy

It should be noted that member states differ in their approach to including timber accompanied by FLEGT Licences in their procurement policy. FLEGT-Licensed timber is verified as legally produced in and exported from countries with which the EU has agreed a FLEGT VPA. To date only Indonesia has started to issue FLEGT Licences, but several other countries are in the process of putting in place the necessary timber legality assurance schemes under the terms of their VPAs.

Part of the VPA's is a commitment of the EU to provide a "green lane" for FLEGT-Licensed timber as being recognized legal timber. This green lane has the form of preferential treatment in the EUTR. In addition, such preferential treatment could be established by giving FLEGT-Licensed timber a status in the national procurement policy.

There are three different scenarios evident across the member states when it comes to acceptance of FLEGT Licenced timber:

1. accepting FLEGT-Licensed timber on equal footing with sustainably produced timber, or,
2. accepting FLEGT-Licensed timber second to sustainably produced timber (for example: "if sustainably is not available") or,
3. accepting FLEGT-Licensed timber as legal timber

Acceptance of FLEGT Licencing on equal footing to "sustainable" is the "most generous" option¹⁰⁵ and may be considered fair to the VPA countries, which after all made great efforts to implement a Legality Assurance System (LAS).

However, policy makers in a number of EU member states have flagged up difficulties with this approach, partly as VPA-related legislation varies from country to country and the absolute levels of silvicultural

performance almost certainly will not stand comparison from VPA partner country to country (i.e. forest practices that are legally allowed in one country are not always what can be considered as being sustainable in another country or even generally considered so). Another practical difficulty raised was the lack of a FLEGT chain-of-custody system.

Accepting FLEGT timber as being second to sustainably produced / certified timber, or even less, merely as legal timber is almost certain to cause additional hurdles in the market. In practice, it means that FLEGT-Licensed timber is unlikely to ever be specified in public projects. It also means that FLEGT-Licensed timber is unlikely to benefit from leadership or supplier consolidation effects.

For the purpose of their timber procurement policies, the UK regards a FLEGT Licence as evidence of 'sustainability'¹⁰⁶, on equal footing with FSC and PEFC certification, and Luxembourg treats a FLEGT Licence as equivalent to 'legal and sustainable'. A number of other member states with policies aiming at sustainability but without detailed definitions, including Austria, Finland and Lithuania, also list FLEGT Licences as acceptable means of verification of sustainability. Belgium, Denmark, Italy, the Netherlands and Sweden, however, treat FLEGT licences as adequate proof of legality but not of sustainability (or, in Sweden's case, of general 'acceptability')¹⁰⁷.

The UK does not provide an explanation of why it treats FLEGT Licences as evidence of sustainability¹⁰⁸, but the report¹⁰⁹ that formed the basis for Luxembourg's policy included the following argument: 'It is generally believed that FLEGT licences are stand-alone tools and thus have to be differentiated from those means directly addressing sustainability at a forest management unit level, e.g. certification. It is important that the Member States provide incentives for joining the FLEGT process and this can be done through public procurement policies. It is therefore suggested that the Luxembourg Government also explicitly accept FLEGT-Licensed timber as meeting the government requirements.'

Accepting on equal footing means that both sustainably produced timber and FLEGT-Licensed timber are accepted. It does not mean though that FLEGT-Licensed timber is considered to be the same as sustainably produced timber. Though this point is somewhat lost in the semantics – it is accepted as an equivalent whilst not meaning the same thing – a confusing state of affairs.

Most countries have not yet formally stated what status they will grant FLEGT-Licensed timber in their procurement policy hierarchy.

103. https://ec.europa.eu/agriculture/sites/agriculture/files/forest/publications/pdf/sfcci-report_en.pdf

104. For a detailed analysis see: Van Bueren, E.L. (2016) *Comparison of selected TPP's*. I S A F O R, Netherlands Ministry of Infrastructure & Environment

105. Van Bueren, E.L. (2016) *Comparison of selected TPP's*. I S A F O R, Netherlands Ministry of Infrastructure & Environment

106. *Personal communication*. David Hopkins, Managing Director UK Timber Trade Federation. April 2019

107. Brack, D. (2014) *Promoting Legal and Sustainable Timber: Using Public Procurement Policy*. Chatham House

108. The UK government's commitment in 2009 was to consider FLEGT-Licensed products as meeting the criteria for 'legal and sustainable' until April 2015. In July 2014 the deadline was extended indefinitely. It is understood that a review is planned to be undertaken in mid-2019 onwards.

109. ProForest (2012). Support for the Development of Luxembourg's Public Procurement Policy for Timber, pp. 22–23.

UK Timber Standard for Heat & Electricity

The current analysis has been broadened to allow inclusion of an additional government procurement standard not previously considered in 2019. The UK Department of Energy and Climate Change developed in 2014 a Timber Standard for Heat & Electricity intended for wood fuel used under the Renewable Heat Incentive and Renewables Obligation¹¹⁰.

The standard explicitly states it was developed in recognition that wood used for fuel is typically low value that is not yet certified. The principles used for the sustainable forest management criteria applied under the RO and RHI are based on the same set of principles as the UK Timber Procurement Policy, covering the same social, environmental and economic issues, the process of bespoke evidence assessment will not be the same. The standard states “wood purchased for construction or solid furniture is high value, and can be readily sourced in sufficient volume and at an acceptable cost from certified forests. In contrast the wood used for fuel is typically low value, and a significant proportion is expected to be sourced from forests in North America that are not yet certified. Therefore the option of providing suitable bespoke evidence, in the case of wood fuel sourcing, is likely to be a widely-used means of demonstrating sustainability, at least in the short-term while markets develop.”

Regarding “bespoke evidence” the Timber Standard states that “evidence that the wood fuel originates from a legal and sustainable source can also be provided in the form of alternative / bespoke documentary evidence that provides sufficient assurance that the source of the wood is legal and sustainable. This is known as ‘Category B’ evidence under the UK TPP”. It goes on to state that “the Timber Standard allows the use of the mass balance approach (MBA) to the chain of custody for wood that uses ‘Category B’ evidence, as well as allowing its use for wood that is certified by one of the approved schemes”.

Regarding the justification for being less certification-focused than the Responsible Purchasing Policy it goes on – “High quality timber suitable for construction and solid furniture making commands a significant premium which can cover the cost of certification. However, the low quality wood residues suitable for electricity generation are typically procured in high volumes and at a low cost per tonne. Similarly, much of the wood-fuel used by UK domestic and community heat customers is likely to be sourced from local forests, including small woodlands that would find FSC or PEFC standard certification costly and complex.”

One former member state therefore applies a different standard for the same material, from the same jurisdictions, that is dependent upon the end use.

110. Published by: UK Office for Renewable Energy Deployment, Department of Energy and Climate Change. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/278372/Timber_Standard_for_Heat_and_Electricity_under_RO_and_RHI_-_10-Feb-2014_for_pdf_-_FINAL_in_new_format.pdf

Non-EU Public sector instruments & guidance

Synopsis of the 2019 study

The previous study identified three non-EU based public sector instruments and guidance. None of the initiatives

identified made reference to certification of FLEGT Licencing. The average date of revision was 2012.

Comparison with the 2019 study

The latest assessment has not identified any changes to the initiatives post 2019.

Country and name of policy	Criteria	Level of Definition	Introduction or revision dates	Range of products covered	2021 updates
Switzerland Ordinance on Declaring Wood and Wood Products (<i>Ordonnance sur la Declaration Concernant le Bois et les Produits en Bois</i>) ¹¹¹	Requires any party selling timber or timber products to consumers to disclose information about the species used in the product, including whether or not the species is listed in CITES, and the place of harvest.	Defined	Introduced: 2010	All wood-based products including paper	Unchanged
- UNEP Sustainable Public Procurement programme ¹¹²	UNEP supports capacity building and provide technical assistance to countries on policies and initiatives. The UN Environment Programme (UNEP) has been active in the promotion of Sustainable Public Procurement at national, regional		2018	All wood-based products including paper	Unchanged
- UN FAO - Public procurement policies for forest products and their impacts ¹¹³			2007	All wood-based products including paper	Unchanged

111. http://app.tisi.go.th/warning/fulltext/fulltext_CHE120.pdf

112. <https://www.unep.org/explore-topics/resource-efficiency/what-we-do/sustainable-public-procurement>

113. www.fao.org/forestry/media

Conclusions

Companies have begun to embrace FLEGT Licencing as evidenced by the numbers that have revised their purchasing policies to now explicitly include a positive reference to FLEGT Licencing. Whilst the tiny sample of twenty companies is not statistically representative of the EU27&UK market, it does indicate the fact that some of the significant players have valued the availability of licensed material. Given the relative size and purchasing power of some of these companies, plus the relative sectoral influence, a trickle-down effect could be anticipated within their supply chains.

Overall the growth in acceptance of FLEGT Licencing across the wide range of initiatives is visible but remains modest. While the private sector and those seeking to influence their purchasing behaviour have begun to recognise it, many other areas have yet to revise their policies or to recognise FLEGT Licencing's value. The modest wider recognition matches a similar level of growth in recognition of certification.

The most fertile area with respect to renewal and re-evaluation of policy lies within the private sector. The selected companies have an average revision date of 2019 and CSO rating systems (targeting the private sector) have an average renewal date of 2020. Other private sector initiatives are also fairly up to date with an average renewal date of 2017 (i.e. post the introduction of FLEGT-Licensed material to the market). The assessed green building rating systems are also targeting the private sector and average a renewal date of 2018. Trade associations appear to lag the other private sector initiatives, though in reality those assessed were fast to embrace FLEGT and adapted their policies well in advance. Overall the private sector initiatives as a whole have proven most willing to keep their policies current.

The public sector policy initiatives are more slowly evolving. With an average revision date of 2013 most EU member states green procurement policies are still in the process of broadening their scope with respect to timber and timber products. Whilst around two thirds accept FLEGT Licences they continue to vary in their product or usage scope and often are not the powerful market driving tool that they might be.

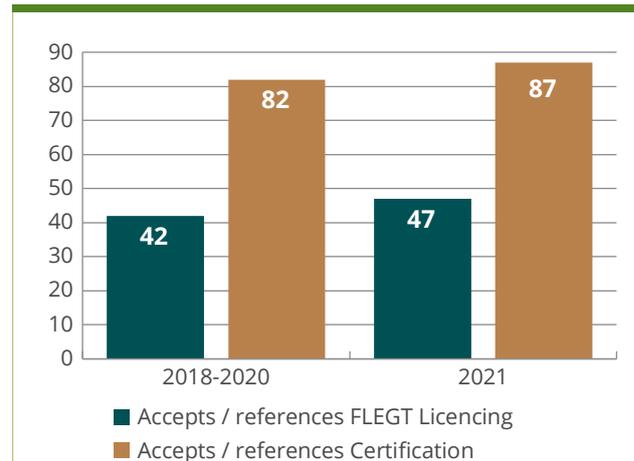


Figure 7: Comparison of initiative attitudes towards FLEGT Licencing and Certification across the four studies 2018 to 2021

Table 11: Average revision dates for policy or guidance by type of initiative

**Based on an average of those initiatives that have an identifiable publication date and which are believed to be operational*

Initiatives	Average year of most recent update*
Trade association initiatives	2016
Non-EU Public sector instruments & guidance	2012
'Green Building' Rating systems	2018
Certification & Verification systems	2015
Private sector initiatives	2017
CSO led Rating systems	2020
CSO led initiatives & Others	2016
Selected private sector companies	2019
EU27+UK Public procurement policies	2013



IMM

Independent Market Monitoring of FLEGT-Licensed Timber

International Tropical Timber Organization (ITTO)

International Organizations Center
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FLEGT Independent Market Monitor

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