				Global ir				
		Phase 2 - monitoring immediate trade in		monitoring in			VDA there are to also supported to a short-	
	Phase 3 - monitoring immediate trade impact						ps, positive commitment to communication activities, design trends and influence on	forest investment decisions.
Elements for inclusion in an IMM		Means of Verification					Risks and assumptions related to data collection	Comments
		Source of Information	Primary data collected by IMM	a IMM to collate from data collected by other agencies	purchased			
i. EU Timber Regulation	Application of EUTR compliant due diligence systems by operators in EU Member States	Publicly available reports from EUTR competent authorities (CAs) and Monitoring Organisations (MOS). EC with support of UNEP- WCMC are preparing a template for standard reports by CAs. Reports of ENGOs. Depending on scope of these reports, IMM may undertake structured interviews with CAs and MOs.	~	~		Annual	Reliable assessment of extent of application of EUTR conformant due diligence systems heavily dependent on availability of good quality information from the EC and relevant regulatory authorities in Member States.	EUTR is expected to be a significant driver of interes in FLEGT VPA Licensed timber in the EU. Under EUT FLEGT VPA Licenses and CITES certificates are the only forms of evidence formally recognised as providing an assurance of legality without the need for further due diligence. Acceptance of VPA License
	Sanctions imposed on non-compliant operators in EU Member States	As above	~	~		Annual		should be inherent to all due diligence systems implemented by the private sector to demonstrate
		As above	~	~		Annual	Information on prosecutions may not be readily available from regulatory authorities.	conformance to EUTR, whether by individual companies or through Monitoring Organisations. Ke
	Recognition that FLEGT VPA licensed timber meets EUTR and needs no further risk assessment or mitigation action, through reliable and consistent communication .	As above. As required IMM may undertake additional review of formal guidance issued by EUTR Competent Authorities and MOs.	*	*		Annual		issues are to assess effectiveness and consistency EUTR enforcement and reliable interpretation of EUTR across Member States.
	Volume and value of EU imports of wood products from non-VPA countries considered potentially high risk from perspective of illegal logging	Eurostat/GTF-STIX, ENGO/trade country risk assessments. IMM is developing an index to assess "level of exposure to forest governance risk" of individual EU import flows. IMM will not itself judge risk, but will monitor against a variety of measures of risk defined by other agencies (e.g. FSC National Controlled Wood Assessments, Chatham House Indicators).		×		Annual		Continuing high levels of EU import from non-VPA countries considered potentially high risk (e.g. exhibiting poor forest governance and with limited availability of certified products or other mitigation options) might suggest weak EUTR enforcement.
	Changes in import patterns by volume and value, by individual EU Member State, of wood products from non-VPA countries considered potentially high risk from perspective of illegal logging	Eurostat/GTF-STIX, ENGO/trade country risk assessments - see above.		~		Annual		Shifts in pattern of EU imports might indicate efforts to divert trade from "tough" Member States to those with weaker enforcement regimes or lower sanction
ii. Voluntary private sector timber procurement policies and codes exceeding regulatory requirements in the EU	Sustainable timber definitions used in private sector procurement policies include or exclude FLEGT VPA licensed timber.	Structured interviews with MO and Buying Group managers and other large timber buying companies, review of formal guidance issued by these organisations. Review of corporate websites. Retailers annual environmental reports. Identify and describe procurement policies of MO's, other buying groups outside the MO network, and large timber buying companies for "legal & sustainable" timber and timber products. For each, assess whether definitions of "legal & sustainable" timber: (a) are inclusive of FLEGT VPA licensed timber; or (b) will exclude FLEGT VPA licensed timber. As far as possible, quantify the volume and proportion of total trade in timber and timber products covered respectively by "inclusive" and "exclusive" policies.	×	×		Annual	Quantifying the volume and proportion of total trade in timber and timber products covered respectively by "inclusive" and exclusive" policies may be problematic, as the breakdown of information may not exist.	Many European buying companies have already chosen voluntarily to exceed EUTR requirements, for example by demanding specific forms of forest certification from all suppliers, including those in VP countries. A key factor is to assess the extent that this: (a) might limit role of VPA Licenses as a market assurance mechanism; or (b) encourage greater demand for FLEGT VPA Licensed timber if EU buyers can be convinced that it provides an assurance of "sustainability" or "progress to sustainability".
	Level of recognition of FLEGT VPA process as evidence of good forest governance in mainstream CSR guidance and the level of influence of CSR guidance.	Review of guidance issued e.g. Global Reporting Initiative (GRI), OECD Guidelines for Multinational Enterprises (MNEs), UN Global Compact, ISO 26000 Guidance Standard on Social Responsibility. KPMG Survey of Corporate Responsibility Reporting.		~		Annual	There may be a gap between corporate reporting and actual procurement actions. This is mainly relevant to large organisations whereas many timber buying organisations are SMEs.	

iii. Development and implementation of public procurement policies	Procurement Policies that: (a) accept FLEGT VPA licensed timber as a	Structured interviews with Government Departments (or their delegated experts e.g. CPET, TPAC), analysis of guidance documents issued by these organisations, Chatham House, NGOs, PROCURA+ initiative.	~	v	Annual	Very few government agencies monitor actual volumes and types of timber purchased. It is very difficult to provide accurate estimates of the actual proportion of timber imports that end up in government contracts.	Ideally government procurement policies should be assessed not only with respect to their impact on relative competitiveness between timber products, but also the overall impact on competitiveness of wood vis-a-vis non-wood materials. More complex requirements for legality of wood at source not matched by equivalent requirements on non-wood products may discourage use of all wood products. In practice, for FLEGT VPA licensed wood to be recognised in government procurement, it would require systems that enable it to be traced from port to customer. In the absence of such systems, a more important issue for FLEGT VPA licensing is likely to be the way that it is handled in chain of custody or timber sourcing standards for product labels like FSC, PEFC, and Ecolabels that are recognised in government procurement policies. The recognition and use of FLEGT licensed timber by key contractors supplying the Government offers a more accurate way to monitor the acceptability of FLEGT licensed timber as compliance with public procurement policies.
	Assess extent to which official European	Structured interviews with EC officials. Europa Green Procurement			Annual		
	Assess extent to which official European Commission guidance encourages recognition of FLEGT VPA Licensed Timber in Green Public Procurement.		~	~	Annual		
iv. Links between	Acceptance/non acceptance of FLEGT VPA	Structured interviews with FSC and PEFC officials. Analysis of PEFC			Annual		Many timber traders and consumers in the EU will
FLEGT VPA licensing and product labelling systems;	licensed timber as evidence that wood is: (a) Low risk with respect to all 5 risk categories identified in the FSC Controlled Wood standard (b) "low risk" with respect to illegal and other controversial sources in the PEFC Due Diligence System.	and FSC Chain of Custody standards.	¥	¥			view FLEGT through the prism of FSC and/or PEFC product labelling systems. A key marketing issue for FLEGT VPA Licensed timber is the extent to which it is accommodated within standards developed by these systems for percentage based or "mixed" labelling and project certification. In both cases, a proportion of wood used may be derived from uncertified sources as long as it is shown to be from a "low risk" source.
	Numbers of companies issued with FSC and PEFC chain of custody certificates, by EU country and, as far as possible, by sector	FSC and PEFC international on-line databases		~	Annual	Level of disaggregation of FSC and PEFC CoC data by company and product type is fairly limited.	Level of CoC uptake provides a crude measure of commitment to responsible wood sourcing, it is also useful to monitor CoC uptake to gain insights into which standards it is most important to achieve acceptance of FLEGT VPA licensing.
		FSC and PEFC international and national offices		~	Annual		Certification systems provide this information.
	imported into the EU, by EU country, supply country, and, as far as possible, by product group.	IMM is developing an index to assess level of "exposure" of individual EU import flows to different forms of legality or "sustainability" verification. IMM will not itself judge the reliability of individual verification systems, but will monitor against the variety of systems used by EUTR operators and traders, and recognised by EUTR MOs and EU Member State procurement policies.		¥	Annual	Neither FSC or PEFC provide data on levels (volumes or values) of wood production from certified forest, nor is certified wood treated separately in trade statistics. Numerous assumptions must therefore be made, for example by using forest area data as a surrogate for production volume. National log production data is also often unreliable at the best of times. So while it may be possible to come up with rough indicative estimates of certified wood supply, these will always have to be treated with caution.	Particularly important to assess trends in levels of PEFC and FSC certified supply to the EU from "high risk" non-VPA countries as an alternative risk mitigation option
	covered by private sector legality verification	Structured interviews with managers of legality verification systems, published reports by these systems. See also above note about IMM index of level of exposure to different forms of legality and sustainability verification.	~	4	Annual	Not all private sector legality verification systems make information publicly available on areas and volumes covered by their systems. Reliable assessment will depend on willingness of these organisations to cooperate with IMM.	Designed to measure extent to which private sector legality verification continues to be used as an alternative risk mitigation option to VPA Licensing
	wood origin in timber and timber based products.	Review of EU Ecolabelling standards for wood based products. http://ec.europa.eu/environment/ecolabel/		~	Annual		EU Eco-labelling criteria have been developed for a range of paper products, wood flooring, and wood furniture. The relevance of Ecolabelling to solid wood products to date has been fairly limited - even where
	Numbers of companies involved in marketing of EU Ecolabels for timber and timber based products, by EU country and product type.	Review of Ecolabelling database. http://www.eco- label.com/default.htm		4	Annual		criteria are available, the process is voluntary, and uptake limited. However, more public authorities are now giving preference to Eco-labelled products, which may help drive interest and demand in the

	Imposition/non imposition of equivalent requirements for legality of origin in Ecolabelling criteria for non-wood materials.	Review of EU Ecolabelling standards for competing non-wood products (e.g. hard flooring coverings). http://ec.europa.eu/environment/ecolabel/		✓		Annual		future. Eco-labels aim to be based on LCA criteria and those developed for wood-based products to date have included specific requirements for sustainable forest management at source.
	"FLEGT VPA labelling" system in the EU developed or in progress of being developed: monitor preparation of a feasibility study, presence/absence a body co-ordinating development of labelling system	Interviews with EC and VPA Partner officials, or private entities with an interest in developing a FLEGT VPA product label	~			Annual		Refers to a commitment in the Cameroon VPA. Development of FLEGT VPA Labelling system is likely to be a time consuming and complex process. This indicator will have to be amended in the light of progress made.
v. Links between FLEGT VPA licencing and Green Building Rating Systems	European Green Building Rating Systems include requirements for legal, sustainable or responsibly sourced timber products and that these requirements are inclusive of FLEGT VPA licensed timber.	Structured interviews with Rating System managers, review of formal guidance issued by these organisations. Identify and describe requirements for "legal", "sustainable" or "responsibly sourced" timber and timber products in European Green Building Rating Systems. For each system, assess whether requirements for timber and timber products: (a) are inclusive of FLEGT VPA licensed timber; or (b) will exclude FLEGT VPA licensed timber. Also determine whether equivalent requirements for legality at point of origin are applied to competing non-wood materials. As far as possible, quantify the wood market significance of different Green Building Rating systems.	~	~		Annual	Quantifying wood market significance is difficult. In practice, these systems are still heavily focused on structural elements (more important for softwoods) and less on finishing elements (more important for hardwoods).	Systems which rate the "sustainability" of whole buildings - like BREEAM in the UK, DGNB in Germany, and HQE in France - are becoming increasingly important in guiding material specification practices in some EU countries, particularly in construction funded by the public sector. Most are adopting a Life Cycle Analysis (LCA) approach to material specification. However, the existence of forest certification systems combined with widespread publicity surrounding illegal logging has meant that, to date, timber has tended to be singled out for specific measures to demonstrate sustainability at point of extraction. More recently, there have been some moves to extend requirements for responsible sourcing to non-wood products (e.g. in BREEAM).
vi. Policy initiatives in non-EU consuming countries		Analysis of laws and regulations (e.g. US Lacey Act Amendment, Australian Illegal Logging Prohibition Bill), Green Public Procurement (GPP) guidelines (e.g. Japan, China), Chatham House, WRI, Forest Trends.		~		Annual	Scope of research is very wide. However it is assumed that comprehensive secondary sources will exist as other organisations (Chatham House, Forest Trends, WRI etc) will be also gathering and reviewing data of this nature .	This requires both identification of regulations and policy initiatives in non-EU consuming countries with potential to generate demand for FLEGT VPA licensed timber and an assessment of the scope and relevance of these consuming countries & policies to FLEGT VPA countries.
vii. Perceptions of FLEGT VPA within the EU	Awareness of the FLEGT VPA process within the EU timber trading chain including: (a) importers; (b) manufacturers; (c) retailers;	Telephone surveys as far as possible with a statistically significant sample of interviewees	~			Annual	Choice of interviewees critical to accurate results. Must change yearly but be comparable over time.	
	NGO lobbying material and guidance with respect to the FLEGT VPA process is supportive, neutral, or negative.	Chatham House website. Interviews with representatives of key NGOs such as WWF, FERN, Transparency International, Global Witness, EIA and Greenpeace. Review of NGO publications. Media monitoring.	~	~		Annual	Assessing actual influence of different NGOs on perceptions and market attitudes is very challenging. Will involve qualitative reviews of the size of the NGOs, the geographic scope of output from their campaigns, and media output (see next indicator). Lessons can be taken from the Chatham House indicator and monitoring work where they have previously tried to do this kind of analysis.	
		Various options including free on-line services such as Google News or Europe Media Monitor, or more comprehensive bespoke services for a fee.EFI FLEGT Facility is already carrying out some monitoring of this nature and role of IMM will be partly dependent on the extent of their work.			~	Quarterly	Lessons can be taken from the Chatham House indicator and monitoring work where they have previously tried to do this kind of analysis.	
	Acceptance of FLEGT VPA licensing as a credible assurance of good material sourcing practice in architectural design	Design specifications for large scale projects. Environmental criteria for architectural awards and shows. In house environmental policies of large architectural practices. Environmental guidance issued by professional architects associations. Telephone interviews with influential architects	~	~		Annual	Architectural design is a hugely fluid and complex field and almost impossible to assess quantitatively. For practical purposes, monitoring of this indicator will likely be largely qualitative and focus on larger or particularly prestigious projects, firms and architects. While these may not be representative of the architectural profession as a whole, they do tend to be the most influential in driving design trends.	As part of the assessment of architectural and product design trends, consideration should be given not only to the potential value of FLEGT VPA licensing in improving the desirability of VPA licensed timber relative to other wood products, but also relative to non-wood materials.
	Acceptance of FLEGT VPA licensing as a credible assurance of good material sourcing practice in product design	Observation of trends and discussions with manufacturers and designers at key trade shows (e.g. Milan Furniture Fair, Cologne Interzum, UK SOLEX Garden Furniture Fair). Design specifications for products issued by large influential retailers in EU. Environmental criteria for furniture design competitions. Telephone interviews with influential product designers.	*	¥		Annual	As for architectural design, assessment is likely to be qualitative rather than quantitative. Focus should be on perceptions and practices of larger most influential designers and retailers. For example, the following retailers - all taken from Top 250 Global Powers of Retailing List - may be specifically targeted: Kingfisher, Carrefour, likea, El Corte Ingles, S.A., Marks & Spencers, Tengelmann Warehandelsgesellschaft KG, Groupe Adeo, Kesko Corp.	

licensed timber in EU Wood promotion campaigns	, , ,	Discussion with EC and other potential funding agencies for FLEGT VPA Marketing activities	✓		One-off	Raising awareness of FLEGT VPA Licensing will require financial support combined with close cooperation with suppliers in FLEGT VPA countries to ensure a direct link to product. There may be opportunities to work with some existing European wood marketing campaigns which, in exchange for financial and technical support, may be encouraged to expand activities to include promotion of FLEGT VPA licenses. Some VPA countries have included actions specific to promotion campaigns in their workplans for implementing the VPA, with support of the JIC.	
	Number of hours and/or financial resources dedicated to marketing FLEGT VPA Licencing to timber and timber product buyers and to potential forest sector investors in the EU	Structured interviews with EC officials, supportive wood marketing campaigns, Embassy staff of VPA countries, EU trade associations			Annual		
	EU countries containing positive, neutral or negative references to FLEGT VPA Licensing.	Structured interviews with managers of wood promotion campaigns. Documents issued by these campaigns. Include assessment of European 'generic'' wood promotion campaigns (e.g. Wood for Good in the UK) and campaigns promoting product from VPA countries (e.g. Ghana TIDD, Malaysia Timber Council, IFIA/ATIBT)			Annual		
ix. Impact on forest sector investment	operations and wood processing in VPA and non VPA countries	IMM is commissioning scoping study on impact of FLEGT licensing on forest sector investment flows in 2018 to help refine these indicators and identify data sources. In advance of that study, it is assumed main data sources will include government ministries in VPA countries, multilateral and bilateral donor agencies, The World Bank, Regional Development Banks, UNCTAD, and GEF. There may also be linkage to other ITTO projects.			Annual	Gathering accurate data of this nature is notoriously difficult. UNCTAD prepares an annual report of global Foreign Direct Investment, but data is only partially disaggregated by sector and not disaggregated by country. This indicator is included in the hope that data may improve in time and that some VPA governments may be gathering this data and willing to make it available to the IMM on a regular basis. Ideally data would be disaggregated by wood sector, and reported separately for Foreign Direct Investment and Domestic Direct Investment.	
		Structured interviews with representatives of large transnational companies, for example International Paper, Georgia-Pacific Group, Weyerhaeuser Company, Stora Enso Oyj, and UPM- Kymmene. Annual reports of these organisations.			Annual	Most transnational companies may be unwilling to provide detailed information on their investment decisions. This indicator is included in the expectation that they may be willing to comment in more general terms about the potential impact of FLEGT VPA processes on their investment decisions.	Most large transnational companies are more involved in the paper and pulp than solid wood sectors (which is much more fragmented and often reliant on domestic rather than foreign investment).
	relating to assessment of forest sector risk in the finance sector, as a credible risk mitigation	Interviews with managers of, and analysis of guidelines issued by relevant voluntary initiatives, including UNEP Finance Initiative, the Equator Principles, the London Accord, and the PwC Finance Sector Project. Review of guidelines for forestry investment issued by the world's leading banks (e.g. Citibank, HSBC, JP Morgan Chase, Bank of America).			Annual	These various initiatives have generally only been adopted by larger international financial institutions and apply to large investment decisions. However, much financing in the forest sector, particularly in developing countries, is by smaller domestic financial institutions and is in the form of short term loans and overdrafts not covered by these initiatives.	Methods to assess forest sector risks in the international finance sector have, to date, been fairly unsophisticated. However this is beginning to change with the emergence of various initiatives to improve guidance on assessment of risks when financing natural resource sectors, some including coverage of environmental and social factors alongside more traditional financial indices.
	Awareness and perceptions of the FLEGT VPA process amongst managers of private sector forestry investment funds.	Structured interviews with forestry fund managers. Analysis of websites focused on forestry investment (e.g. www.forestryinvestor.com, www.forestry-invest.com, www.invest- timber.com, www.alternativeoutlook.co.uk).			Annual	Most forest sector investment is currently directed towards plantations and temperate forests. This indicator aims to assess the extent to which the FLEGT VPA process might encourage greater investment in forests of all types in FLEGT VPA countries. Current availability of consistent information on forestry funds is limited.	Forestry funds are collective investment schemes designed to enable individual investors to cost- effectively participate in a wider range of forestry investment opportunities such as commercially managed forests. An expanding range of companies are encouraging investment in these funds, often highlighting carbon sequestration and broader environmental and social benefits, together with the "counter-cyclical" and diversification advantages of forestry investment.