

Purchase of Transparently and Sustainably Sourced Timber

Central Procurement

26 September 2011

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Central Procurement

Document Control

Version 1.0	Status DRAFT <i>04.2011 TSST</i>	Author <i>Ben Brown, Sustainable Business Manager, Central Procurement, Corporate Resources</i>
Document Objectives: To ensure the purchase of transparently and sustainably sourced timber in all Haringey Council contracts, practically restricted to construction, civil engineering and furniture.		
Intended Recipients: Council employees responsible for the purchase of relevant contracts, ALMO contract officers responsible for the purchase of relevant contracts (i.e. HfH) and Suppliers of relevant contracts.		
Monitoring Arrangements: <ul style="list-style-type: none"> 10% audit regime of contracts to include scrutiny of specifications, contract conditions, evidence of supplier compliance – CoC certification and delivery notes. 		
Training/Resource Implications: <ul style="list-style-type: none"> An intensive training programme for all identified relevant staff (likely to be held over three one-day events). A yearly refresher programme for key staff and ad-hoc training events for new starters once a minimum attendance threshold. A member of the Energy and Sustainable Team in Central Procurement to undertake the 10% audit. Sustainable Business Manager to deliver training (4 days max inaugural year, 2 days max p.a. thereafter). 		
Approving Body and Date Approved		<i>Centre of Procurement Expertise for Timber (CPET). June 2009</i>
Date of Issue		<i>Month 20XX</i>
Scheduled Review Date		<i>Month 20XX</i>
Lead Officer (<i>a contact person who can assist with inquiries about the policy and any other tools or supporting materials that will help the policy to be understood and successfully implemented</i>)		Ben Brown Sustainable Business Manager ben.brown@haringey.gov.uk 020 8489 2132
Path and file name		

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1. Introduction

In 2007, the UK Government timber procurement policy was announced as part of the UK Government Sustainable Procurement National Action Plan. It requires central government departments in England to buy wood and wood-based products from legal and sustainable sources or FLEGT (Forest Law Enforcement, Governance and Trade) licensed suppliers - an EU initiative to support countries to address illegal logging.

Whilst the policy is mandatory for all central Government departments, local authorities are only encouraged to comply. However, as a Council committed to the improvement of our natural environment, we believe it is essential that we maintain the standards set by central government.

Whilst FLEGT licensing is due for launch by the end of 2011, as of the 1st August 2011, Haringey Council will only accept transparently and sustainably sourced timber (softwoods, temperate hardwoods and wood derived products) in all contracts relating to the provision of construction, civil engineering and furniture, ensuring both legality and sustainability in all affected purchases. This policy will affect all procurement officers and suppliers of relevant market segments.

2. Scope and Definition

Haringey Council is committed to encouraging a diverse supplier base as it enables us to contribute to increased social inclusion. This is especially important when dealing with business within the borough as we seek to promote economic growth and hence improved living conditions for our residents.

We recognise that small to medium sized enterprises (SMEs) may believe the requirement to prove the transparency of source and sustainability of all timber provided to the Council as an undue financial and/or resource encumbrance.

Haringey Council also recognises there is a widespread belief that achieving and maintaining chain of custody (CoC) certification can be an expensive and resource intensive process, which is not financially justifiable for organisations with small turnovers. We are mindful that mandating CoC certification would therefore pose a serious barrier to relevant SME suppliers.

Haringey Council is also keen to ensure that non-CoC certified SMEs are not disadvantaged in preparing evidence for tender documents, as this can be a lengthy and difficult process. (For more information on CoC certification, please read the Government Timber Procurement Advice Note available from <http://www.cpet.org.uk>)

In resolution of these issues, **Haringey Council has decided that all contractors must either:**

- 1. Have CoC certification and be able to present the paperwork on request or;**

2. **Ensure that they have sourced any timber and wood derived products from a CoC certified supplier (1st tier only).** The Contractor shall provide Haringey Council with a copy of the supplier's chain of custody certificate and records of measures taken to avoid contamination with non-sustainable timber such as records of storage and transportation from the contractor's supplier to Haringey Council.

Should the latter situation exist, the format by which this evidence shall be conveyed is as follows:

Contractor's Name	Contractor's Supplier	Supplier's CoC code	Copy of Supplier's Certificate and Delivery Note	Measures taken to avoid contamination
Build Haringey Inc.	Haringey Timber Merchants	TT-COC-1234	Supplied	Separate Storage Area on Site (Photo Evidence Supplied). Delivered directly to customer site etc.

Haringey Council will only accept CoC certification if it is from a Government approved programme. These are from the Forest Stewardship Council and Programme for the Endorsement of Forest Certification¹. Currently as shown below:



Exemptions

Recycled Wood and Wood Products:

Wherever possible, Haringey Council is committed to employing a cradle to cradle approach to procurement. This means that we will contribute to avoiding the generating of waste wherever we can. In respect of timber, we will do this by accepting waste wood and wood products as constituent materials in our purchases without the need to identify the original source of the timber, assuming there are no health and safety implications resultant of recycling process.

Coppiced Material:

Haringey Council understands that coppicing plays an important role in improving the quality of woodland and perpetuating the biodiversity of habitats. It also sustains rural traditions and links with historic land management practices. As coppicing is inherently carbon neutral (lost CO₂ from coppiced wood is recapture by new growth encouraged by increased availability of space) and does not alter woodland sufficiently as to disrupt forest dwelling communities, **coppiced material will not require chain of custody certification for its use in Haringey Council projects. However, evidence of compliance with the UK Forestry Standard (including associated guidelines) for coppicing, legal rights to, and the source of the coppiced wood must be provided.**

Tropical Hardwoods:

¹ PEFC is an "umbrella scheme" which endorses national schemes. The Canadian scheme, CSA, and the North American, SFI, were initially assessed by CPET but they have now been endorsed by PEFC and therefore a separate assessment is no longer required. A CPET report in 2010 confirms both FSC and PEFC continue to provide excellent coverage of legality and sustainability requirements.

Occasionally the projects that Haringey Council undertakes require any timber products used to be able to withstand adverse weather conditions or marine environments. In the event that softwoods or temperate hardwoods are deemed to be unsuitable for the projects, we will use tropical hardwoods. However, the length of time it takes for tropical hardwoods to reach maturity, and the levels of corruption in the regions they grow means sustainability certification is difficult to achieve. ***Haringey Council will therefore not require a CoC certificate for tropical hardwoods. However, evidence of legality and forest source will still be required. Moreover, a business case must be submitted, justifying the need to use tropical hardwood.***

3. Aim

The aim of this policy is ***to ensure that we buy 100% sustainably and transparently sourced timber*** without impeding opportunities for SMEs to bid for Council contracts. It will also ensure we are improving the global environmental – specifically with regards to biodiversity and climate change – by shaping the market from which we purchase. Forest owners will be incentivised to maintain and perpetuate forests that act as a carbon sink and a home for thousands of species worldwide.

4. Roles and responsibilities

Haringey Council's Sustainable Business Manager is responsible for this policy. To ensure its implementation (s)he will:

- Deliver training to all project officers and procurement staff involved in construction, civil engineering and furniture contracts;
- Run monthly reports to track the type, value and number of contracts let which include the provision for transparently and sustainably sourced timber, underpinning this with a 10% audit regime to ensure staff are correctly following procedure;
- Ensure our timber policy and conditions of contract are formally communicated in the tenders we send out;
- Run free workshops for suppliers to help them understand our requirements, where to source certified timber and what evidence is required to verify transparency and sustainability.

All contract officers requiring the use of timber are responsible for ensuring the adherence to this policy through the contracts they agree.

5. Principles

Haringey Council is committed to:

- Ensuring we improve the environmental credentials of our estate and deliver benefits to businesses and residents within our borders through careful selection and improved usage of the timber we buy;
- Raising the supply market's awareness of our sustainable timber requirements in order to stimulate demand and increase the availability and variety of products available to us;
- Providing all interested stakeholders – buyers, suppliers and other public bodies – with tools and guidance on obtaining transparently and sustainably sourced timber products and verifying authenticity so that the risks of long lead-in times and perceived price premiums are removed;
- Encourage our suppliers to adopt practices that minimise their environmental impact and deliver community benefits in relation to their own operations and throughout the supply chains in which they operate;
- Working in partnership with suppliers and communicate good news stories to enhance the reputations of both Haringey Council and those suppliers who provide a positive contribution to the environment.
- Deliver against the London Borough of Haringey's Greenest Borough Strategy – *“to tackle climate change and secure a clean, safe and environmentally sustainable future for everyone living, working, visiting or studying in Haringey.”*

6. Equalities and diversity

Please see Equality Impact Assessment (Annex C)

7. Audit

The policy will be audited through Sustainable Procurement Reports – a monthly document sent to the Sustainable Business Manager containing a list of all new contracts let that have required sustainability considerations to be applied in delivery by the contractor.

To ensure contract officers include this policy in new contracts, the Sustainable Business Manager will map Sustainable Procurement Reports to a quarterly Contract Managers' Report that lists all contracts in place for Haringey.

To ensure contracts correctly evaluate evidence, the Sustainable Business Manager will undertake a 10% audit of all contracts containing the policy as outlined in the Sustainable Procurement Reports.

8. Training

In order to ensure this policy is implemented effectively, contract officers and suppliers will require training concerning specification and evaluation requirements.

The Sustainable Business Manager will identify, in collaboration with Category Managers, the contract officers that require training in line with the contracts they let. Training will be mandatory for all contract officers in the first instance. Training will then be offered annually as a refresher course/training for new starters.

Suppliers will be offered training on their request, to ensure they understand how to provide us with the materials and evidence we require.

9. Review

The policy is expected to lever significant environmental benefits whilst minimising administrative and cost burdens on suppliers in providing against this policy. Audits will yield a sample that can be factored up to provide indicative quantifiable results in amounts of sustainable timber purchased.

Supplier feedback will also be sought and an impacts assessment produced after one year of implementation to understand and alleviate supplier issues with the policy.

The policy will be reviewed one year into implementation.

10. Appendices

Annex A – Contract Conditions.

USE OF TRANSPARENTLY AND SUSTAINABLY SOURCED TIMBER

The UK Government timber procurement advice note requires “Central government departments, their executive agencies and non-departmental public bodies are now required to procure timber and wood-derived products originating from either legal and sustainable or FLEGT licensed or equivalent sources.” The Council is encouraged by DEFRA to implement this policy throughout its procurement. The Council has interpreted this to mean transparently and sustainably sourced timber.

(1) Definition of Timber

For the purposes of the Contract Specification ‘timber’ and ‘wood derived products’ are deemed to include any product that contains wood or wood fibre. Such products range from solid wood to those where the manufacturing processes obscure the wood element (e.g. paper). Timber and wood derived products supplied or used in performance of the contract that have been reclaimed or re-used are referred to as ‘recycled’ timber, which is further defined below. Timber and wood derived products supplied or used in performance of the contract that are not recycled are referred to as ‘virgin’ timber when the distinction needs to be made for clarity.

(2) Transparently and Sustainably Sourced Timber

All timber purchased by, or on behalf of The Employer, must be verifiable as from a legal and sustainable source. The term ‘Transparently and Sustainably Sourced Timber’ in the context of this Contract Condition refers to the timber from a forest that meets the requirements set out in the document titled “UK Government Timber Procurement Advice Note” (available from the Employer on request and visible on the UK Government authorised Central Point of Expertise on Timber web site www.proforest.net/cpet). The edition current on the day the Contract is awarded shall apply. In summary, the organisation or body that felled the trees and provided the timber from which the wood supplied under the Contract derived shall have had legal use rights to the forest, complied with all relevant local and national laws and codes of practice including environmental, labour and health and safety laws and paid all relevant royalties and taxes. Trees will be felled on rotation and replanted to ensure continuous growth and constant density of forest or plantation that guarantees a continuous level of carbon sequestration and habitat for forest dwelling flora, fauna and communities. Management of the forest or plantation shall be audited at intervals confirming ongoing good forest management. Audits will be undertaken by organisations with appropriate forest management experience that are independent of the organisation that holds timber harvest and/or management rights for that forest. Plantation owners should be able to demonstrate continual replacement of felled trees and due regard for environmental and socio-economic impacts of felling and transportation.

(3) Evidencing Transparently and Sustainably Sourced Timber

(a) Category A evidence: The Contractor holds a valid Chain of Custody certificate under a scheme recognised by the UK Government as meeting the criteria set out in the document titled “UK Government Timber Procurement Policy: Criteria for Evaluating Category A Evidence” (available from The Employer on request and visible on the UK Government authorised Central Point of Expertise on Timber web site www.proforest.net/cpet). The edition current on the day the Contract is awarded shall apply. A list of assessed certification schemes that currently meet the government’s requirements can be found below.

	Scheme	Legal	Sustainable
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	Forest Stewardship Council (FSC)	Yes	Only products and lines containing >70% certified or recycled raw material
	Programme for the Endorsement of Forest Certification (PEFC)	Yes	Only products and lines containing >70% certified or recycled raw material

(b) The Contractor's attention is drawn to point 6 – Independent Verification, which requires him or her to provide credible evidence on the source of products supplied that has been or can be independently verified as such by an individual or body whose organisation, systems and procedures conform to ISO Guide 65:1996 (EN 45011:1998) General Requirements for Bodies Operating Product Certification Systems or equivalent: and who is accredited to audit against timber production standards by a national or international body whose organisation, systems and procedures conform to ISO 17011: 2004 General Requirements for Providing Assessment and Accreditation of Conformity, Assessment Bodies or equivalent. This condition is met automatically where Category A evidence is supplied.

(c) Category B evidence: In the instance that the Contractor does not hold a Chain of Custody Certificate (Category A evidence) the Contractor shall, before delivering any timber or wood product under this contract, obtain documentary evidence that any timber and wood derived products have been sourced from a Chain of Custody certified supplier. The Contractor shall provide the Council with a copy of the supplier's chain of custody certificate and records of any storage and transportation from the Contractor's supplier to the Council. The format by which this evidence shall be conveyed is as follows:

	Contractor's Name	Contractor's Supplier	Supplier's CoC code	Copy of Supplier's Certificate and Delivery Note	Measures taken to avoid contamination
Example	The Picket Fencing Corporation	Prefab Pickets	TT-COC-1234	Supplied	Separate Storage Area on Site (Photo Evidence Supplied). Delivered directly to customer site etc.

(4) Definition of Recycled Wood

For the purposes of the Contract Specification 'recycled wood' and 'timber or wood-derived products derived from recycling' are deemed to include any product that contains wood or wood fibre which are obtained through reuse of existing wood or wood-derived products, or reprocessing of waste wood and wood-derived products for inclusion in a new product. Products range from solid wood to those where the manufacturing processes obscure the wood element (e.g. paper).

(5) Use of Recycled Wood

The Council understands that recycling plays an important role in reducing the quantity of waste arising directly attributable to the disposal of wood or wood-derived products. Due to the inherent sustainability of recycled wood, the Council will not require chain of custody certification for its use in Council projects. However, the Contractor shall, before delivering any recycled timber or wood product under this contract, obtain documentary evidence of legal rights to, and the source of, the recycled wood.

(6) Definition of Coppiced Wood

(a) For the purposes of the Contract Specification 'coppiced wood' and 'timber or wood products derived from coppicing' are deemed to include any product that contains wood or wood fibre which

are obtained using a traditional method of woodland management in which young tree stems are cut down to a low level to encourage re-growth. Such products range from solid wood to those where the manufacturing processes obscure the wood element (e.g. paper).

(b) Coppicing must be carried out in accordance with requirements under the UK Forestry Standard and its associated guidelines. Particular attention should also be paid to avoiding or minimising disturbance to the immediate ecosystem and ensuring the stools are adequately protected against deer (and other herbivores) to ensure good re-growth (at least 1m growth on >75% of stools at the end of the first growing season), or that there is otherwise effective deer management in place to allow such re-growth to take place.

(7) Use of Coppiced Material

The Council understands that coppicing plays an important role in improving the quality of woodland and perpetuating the biodiversity of habitats. It also sustains rural communities as an historic staple in the economy. Due to the inherent sustainability of coppiced wood, the Council will not require chain of custody certification for its use in Council projects. However, the Contractor shall, before delivering any timber or wood product derived from coppicing under this contract, obtain documentary evidence of compliance with the UK Forestry Standard (including associated guidelines) for coppicing, legal rights to, and the source of, the coppiced wood.

(8) Independent Verification

(a) The Council reserves the right to decide whether the evidence submitted to demonstrate legality and sustainability is adequate to satisfy the criteria that the timber or wood product is transparently and sustainably sourced timber. In the event that the Council is not so satisfied, the Contractor shall, on written request by the Council, commission and meet the costs of an 'independent verification' and report that will (a) verify the forest source of the timber or wood and (b) assess whether the source meets the criteria for legality as defined on the CPET website www.proforest.net/cpet.

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

(9) The Council's Right to Reject Timber

The Council reserves the right to reject any timber or wood derived products that do not comply with the provisions of these Conditions or the Contract Specification. Where the Council exercises its right to reject any timber, the Contractor shall supply alternative timber, which does so comply, at no additional cost to The Council and without causing delay to the contract completion period.

(10) Contact Information

For further information on the use of transparently and sustainably sourced timber contact:

Ben Brown
Sustainable Business Manager
Central Procurement
Haringey Council
ben.brown@haringey.gov.uk
020 8489 2132



HARINGEY COUNCIL

EVALUATION GUIDANCE

TRASPARENTLY SOURCED AND SUSTAINABLE TIMBER

CENTRAL PROCUREMENT UNIT

Contact:

Ben Brown

Sustainable Business Manager

Central Procurement Unit

ben.brown@haringey.gov.uk

020 8489 2132

Registration Certificate



Certificate Number: TT-COC-1234

05/10/2005

05/10/2005

05/10/2008

Date of Initial Registration

Date of Issue

Date of Expiry

This is to certify that
ZZZ Merchants

BM TRADA
*meets the requirements for FSC Chain of Custody Standard
FSC-STD-40-004 (2004) within the
BM TRADA Certification Limited Scheme for
TRADA-Trak chain of custody certification.*

*The scope of the approval in respect of processes and products which
are eligible to carry the FSC logo are as shown in the Schedule*

This certificate cannot be presented as evidence that certified wood products have been supplied.

In all cases, such evidence must be conveyed on the corresponding sales invoice.

SPECIMEN



A. Gaver

Signed on behalf of BM TRADA Certification Ltd

BM TRADA Certification Ltd, Stocking Lane, Hughenden Valley, High Wycombe, Buckinghamshire, HP14 4NR, England UK. FSC
Trademark © 1996 Forest Stewardship Council A.C. FSC-SECR-0021

For verification of this certificate please visit www.bmtrada.com

Registration Schedule



Certificate Number TT-COC-1234

<u>Establishment</u>	<u>Address</u>	<u>Number</u>
ZZZ Merchants	Anony House, Some Place, Nowhere	123/321

Scope

This is where the scope normally appears and it includes information such as:
"The purchasing, processing, sales and distribution of FSC certified timber and timber products."

Product Groups / Categories Covered by this Certification

<u>Product Group</u>	<u>Product Category</u>
Round softwood fencing posts, peeled Softwood rails, peeled	

05/10/2005

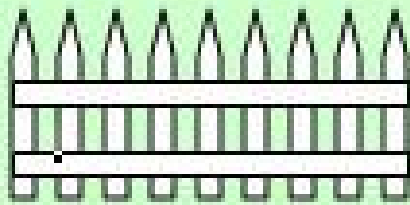
Date of Initial Registration

05/10/2005

Date of Last Issue

05/10/2008

Date of Expiry



ZZZ Merchants

INVOICE

Invoice No. 123-123-000
 Invoice Date 20.08.2007
 Customer ID NE-123-123

Billing Address:
 Procurement Officer
 Timber Lodge
 Wood Street
 Copse Row

ZZZ Merchants
 Anywhere House
 Some Place
 Nowhere

Delivery Address:
 Forest Hill NNR
 Sapling Avenue
 Treetown

Tel: (01234) 567890
 Fax: (01234) 098765
 Info: zzz@merchants.org

Item No.	Quantity	m ³	Description	Amount %	VAT	Unit Price	Total
112/08	130	390	Round softwood fencing posts, peeled	7	100%	100%	100%
084/00	12	60	Softwood rails, peeled		100%	100%	100%
						Subtotal	100%
						Tax 17.5%	100%
						Misc.	100%
						P&P	100%
						Balance Due	100%








ZZZ Merchants verify that item numbers 112/08 and 084/00 are certified under the FSC sustainable timber scheme, and are covered under the registration schedule of ZZZ Merchant's Chain of Custody certificate. Code: TT-COC-1234.

Remittance

Customer ID: NE-123-123
 Date: 20.08.2007
 Amount Due: Exxx
 Amount Enclosed: Exxx



A Quick Checklist to Help You Evaluate Legal and Sustainable Timber

Number	What to look out for												
(1)	<p>Make sure the provided certificate displays a government endorsed certification logo. These are as follows:</p> <table border="1" data-bbox="400 371 1351 680"> <thead> <tr> <th></th> <th>Scheme</th> <th>Legal</th> <th>Sustainable</th> </tr> </thead> <tbody> <tr> <td data-bbox="400 405 544 533">  </td> <td data-bbox="544 405 879 533">Forest Stewardship Council (FSC)</td> <td data-bbox="879 405 979 533">Yes</td> <td data-bbox="979 405 1351 533">Only products and lines containing >70% certified or recycled raw material</td> </tr> <tr> <td data-bbox="400 533 544 680">  </td> <td data-bbox="544 533 879 680">Programme for the Endorsement of Forest Certification (PEFC)</td> <td data-bbox="879 533 979 680">Yes</td> <td data-bbox="979 533 1351 680">Only products and lines containing >70% certified or recycled raw material</td> </tr> </tbody> </table> <p>NB: With the exception of the mixed sources logo for each scheme unless the logo EXPLICITLY states the material has >70% certified or recycled material. To the right is an example of one such logo. <i>(By Jan 2010 all FSC mixed source products will be a minimum of 70%)</i></p> 		Scheme	Legal	Sustainable		Forest Stewardship Council (FSC)	Yes	Only products and lines containing >70% certified or recycled raw material		Programme for the Endorsement of Forest Certification (PEFC)	Yes	Only products and lines containing >70% certified or recycled raw material
	Scheme	Legal	Sustainable										
	Forest Stewardship Council (FSC)	Yes	Only products and lines containing >70% certified or recycled raw material										
	Programme for the Endorsement of Forest Certification (PEFC)	Yes	Only products and lines containing >70% certified or recycled raw material										
(2)	<p>Every certificate must have a VALID Certificate Number. If you are unsure of the authenticity of the certificate, this number can be typed into the product search of the corresponding website.</p> <p>An FSC certificate number can be tracked at: http://www.fsc-uk.org/product-search http://www.fsc-info.org</p> <p>A PEFC certificate number can be tracked at: http://register.pefc.cz/search1.asp</p>												
(3)	<p>Every certificate should be in date. Therefore, it should not be postdated on the 'date of registration' or the 'date of issue'. Neither should the 'date of expiry' have passed.</p>												
(4)	<p>The certificate comes in two parts – the registration certificate and the registration schedule. It is important to ensure that the certificate numbers match on both parts to the certificate. The two parts may be on a single page or split over two pages.</p>												
(5)	<p>The registration schedule lists the products covered by the certification. You should ensure that the products covered by the registration are fit for purpose. For example, it's no use having a certificate which only covers mdf sheets if the project requires peeled and round softwood posts.</p>												
(6)	<p>It is important to ensure that the registration, issue and expiry dates match on both parts to the certificate.</p>												
(7)	<p>When timber is received for the project, one of two things must happen.</p>												

	<p>1) If the timber is delivered directly to site, or to a Haringey Council depot, you will need to receipt an invoice or delivery note. This should detail the type of timber received which should match with the product scope on the certificate registration schedule.</p> <p>2) If the timber is delivered to the contractor's site, you will need to receipt a copy of the delivery note/invoice ensuring the delivered materials and the certificate registration schedule are a match. You should ALSO receive evidence (photo, site visit, signed declaration etc.) proving that the certified timber has not been contaminated by other sources. I.e. It is stored and transported separately to non-certified timber.</p>
(8)	The invoice/delivery note should explicitly state that the timber delivered for use on the project is registered under a certificate number. This number should match the number on the certificate.
Finally...	It is important to remember that you will not necessarily receive a certificate at the framework tender stage. Contractors may not wish to commit to a preferred supplier of certified timber for the duration of the framework as that supplier may not have capacity to provide the required material for each job. Rather, contractors may provide the certificate with each quote, and it may be from a different supplier every time. Either way, if the delivery note/invoice does not match the certificate, or you do not receive the information before the project commences, you will have to reject the timber.

HARINGEY COUNCIL

EQUALITY IMPACT ASSESSMENT FORM

Service: Central Procurement Unit

Directorate: Corporate Resources

Title of Proposal: Transparently and Sustainably Sourced Timber Policy

Lead Officer (author of the proposal): Ben Brown

Names of other Officers involved: David Mulford

Step 1 - Identify the aims of the policy, service or function

1.1 Introducing a sustainable timber policy will ensure the following:

- Alignment with Central Government Policy.
- Safeguarding of communities reliant of sales of timber for income. WWF estimates illegal timber felling reduces forest capital (that is, the amount of money generated through sales) by up to \$22.5bn per year).
- A contribution to the campaign against climate change. Illegal logging practice does not replace felled trees, thus reducing the potential for carbon emissions to be recaptured in the 'carbon sink'.
- Safeguarding of biodiversity. Illegal logging practice is indiscriminate regarding species but often may target protected species (e.g. mahogany) for its value on the black market.

1.2 It will benefit:

- Legally compliant operatives that adhere to legislation and environmental standards. It will help to reduce competition with black market timber that is substantially cheaper, owing to non-payment of taxes and import/export charges.
- Peoples who are reliant on forests for their livelihoods. It will help reduce the felling of trees that are subsequently not replanted and hence deforestation.
- UK timber merchants. 66.7% of all UK timber products, and 81% of softwood roundwood are Chain of Custody certified, which is substantially higher than UK imports from abroad. Implementing this policy will inherently increase the amount of UK timber used in contracts and thus reinvest money in the local economy.

Step 2 - Consideration of available data, research and information

2.1 Haringey is one of London's 32 boroughs. It is located in the north of the capital and more than 11 square miles in area. Nearly half of its 224,700 people come from ethnic minority backgrounds. According to the 2001 Census the largest groups are:

- Caribbean - 11%
- African - 10%
- Asian (Indian, Pakistani and Bangladeshi) - 8%
- Eastern European, Turkish and Kurdish - 5%
- Irish - 4%

2.2 This diversity is reflected in the fact that almost half of all pupils in Haringey schools speak English as an additional language, and in 2008, between them reported the use of over 160 languages at home.

2.3 It's often said that Haringey is an outer London borough with inner London challenges. It ranks as one of the most deprived boroughs in the country with 6.6 per cent of the economically active (i.e. those working or actively seeking work) population unemployed in December 2008. This is more than the Great Britain average of 4.1 per cent.

2.4 However, none of the populations resident in Haringey are over or under represented in our current purchasing arrangements. This is because the purchase of timber is not a frontline action and does not interact with residents.

2.5 Haringey's business arena reflects the diversity of the Borough, with around 95% of the 8,000 businesses classified as Small-to-Medium Sized Enterprise.

2.6 Without a defined Council Policy for Sustainable Timber, several issues restrict access to Council contracts for SMEs and BAMEs.

2.7 The barriers accountable for restricting opportunities for SMEs and BAMEs to bid for Council contracts are as follows:

- Where there is no set policy, organisations that have become accredited in a bid to increase their chances for winning Council contracts are disadvantaged when supplying evidence. This is because there is no criteria for evidencing the legality and sustainability of timber. Therefore, contractors with Chain of Custody (CoC) certification and who have made significant investment in auditing their supply chain are not considered for contracts any more than suppliers with a verbal or written declaration.
- When requiring legal and sustainable timber, the most common public sector line is to evidence that the timber is FSC or PEFC accredited.² However, where accreditation is not forthcoming, suppliers are required to evidence the legality and sustainability of the timber they are providing. Increased administration and data gathering. A sustainable timber policy requires suppliers to evidence the legitimacy of claims that they are supplying legal and sustainable timber. SMEs and BAMEs may not have the resource to undertake this process.
- Accreditation leads to increased costs. In order to guarantee the legality and sustainability of timber, organisations can become CoC certified. This means an independent auditor has traced the supply chain from supplier to forest source and is satisfied that all supply tiers conform with pre-agreed legal and sustainable criteria. Whilst this removes any resource issues for SMEs and BAMEs, it does increase costs. A typical CoC certificate costs around £1300 for an initial assessment and between £775 and £3530 per year to maintain (depending on sales of forest products).³

² UK Timber Policy Report Dec 2008 - CPET

³ Conversation with BM Trada 17.03.2009 – Karen Prendergast 01494 569700

Step 3 - Assessment of Impact

3.1 This proposal is expected to reduce barriers to SMEs in providing the Council with Sustainable Timber and increase tendering opportunities.

3.2 All suppliers will be required either:

- To have CoC certification; or
- To source their timber from a CoC certified supplier and evidence the steps from supplier to site as free from contamination.

3.3 This will ensure:

- All contractors are required to submit the same type and quality of evidence, mitigating the disadvantages of CoC certification when competing with non-certified bidders.
- All contractors must only provide evidence of legality and sustainability to the depth of one supply chain tier, thus reducing the resource required to collate and present information.
- All contractors are able to demonstrate CoC certification in the supply chain and are not required to maintain it themselves. This alleviates cost implications of maintaining CoC certification for contractors, and sends the risk down the supply chain to large scale distributors/merchants with the financial stability and wide customer-base for CoC to be commercially beneficial (24 suppliers in London alone of FSC accredited soft and hardwood products).⁴

3.4 Whilst a policy formalises Council requirements, there is still a risk that SMEs will not be aware of the Government drive for legal and sustainable timber. Whilst this is not a risk that can be mitigated through a policy, Haringey will develop a Supplier Engagement Presentation which will outline the Council requirements and the steps that contractors must undertake to ensure these are met.

Step 4 - Consult on the proposal

Stakeholder	Internal/External	Key Issues	Mitigation Actions
BSF Design Team	Internal	None	N/A
Construction Procurement Manager	Internal	None	N/A
CPET	External	None	N/A
Corporate Landlord Manager	Internal	None	N/A
Head of Facilities Management	Internal	None	N/A
Legal Services	Internal	None	N/A
Sustainable Haringey	External	None	N/A

Step 5 - Addressing Training

⁴ [FSC Product Search - London Trade 17.03.09](#)

5.1 In order to ensure compliance with the policy, two levels of training have been identified and developed for Council Officers and Suppliers respectively.

- Council Contract Officers will be required to attend a mandatory training event that explores the background to the policy (including Government requirements and sustainability benefits), an explanation of Chain of Custody and the policy in practice (including evaluating bid submissions).
- Suppliers will receive an abridged version of the same presentation should they request it.

5.2 Contract Officers will be identified by the Sustainable Business Manager in conjunction with Category Managers. Invitations to training events will be sent via Category Managers (whom the Sustainable Business Manager will liaise with to identify a suitable training venue). The event will also be communicated via Harinet.

5.3 The training will provide information concerning the effects of the policy on equality and diversity and the actions being taken to ensure no group is disadvantaged through compliance. Feedback will be requested concerning the risks to suppliers in the delivery of this policy.

Step 6 - Monitoring Arrangements

6.1 The policy will be audited through Sustainable Procurement Reports – a monthly document sent to the Sustainable Business Manager containing a list of all new contracts let that have required sustainability considerations to be applied in delivery by the contractor.

6.2 To ensure contract officers include this policy in new contracts, the Sustainable Business Manager will map Sustainable Procurement Reports to a quarterly Contract Managers' Report that lists all contracts in place for Haringey.

6.3 To ensure contracts correctly evaluate evidence, the Sustainable Business Manager will undertake a 10% audit of all contracts containing the policy as outlined in the Sustainable Procurement Reports. Suppliers will be asked to feedback following completion of contracts on their experience with policy compliance. A pro-forma will be developed to this effect, combining supplier equalities information (as laid out in the Council's pre-qualification questionnaire) and questions on the policy itself.

6.4 Equalities monitoring data will be gathered, analysed and report quarterly, in the first instance to the Corporate Resources DMT and to the Equalities Team thereafter, by the Sustainable Business Manager.

Step 7 - Summarise impacts identified

In the table below, see summary for each diversity strand the impacts identified in the assessment.

Age	Disability	Ethnicity	Gender	Religion or Belief	Sexual Orientation
		Black and Minority Ethnic Enterprise – concern that price premiums/ increased administration may prohibit them from bidding for contracts. No current mechanisms for feedback concerning this issue.	Women-Owned Business - concern that price premiums/ increased administration may prohibit them from bidding for contracts. No current mechanisms for feedback concerning this issue.		

Step 8 - Summarise the actions to be implemented

In the list below are recommendations for action that will be taken as a result of this impact assessment.

Issue	Action required	Lead person	Timescale	Resource implications
No current supplier feedback form available	Develop feedback pro-forma	Sustainable Business Manager	End of quarter 2, 11/12	0.5 days FTE p.a.
Report and react to supplier/client feedback	Quarterly collation and presentation of monitoring information	Sustainable Business Manager	Ongoing	2.0 days FTE p.a.

Step 9 - Publication and sign off

9.1 This impact assessment will be published alongside the Sustainable Timber Policy on the Haringey Sustainable Procurement Webpage. A Powerpoint presentation will follow one year later summarising Contract Officer and Supplier feedback and any changes to the policy required as a result of this exercise.

Assessed by (Author of the proposal):

Name: Ben Brown

Designation: Sustainable Business Manager, Central Procurement

Signature:

Date: 19.04.11

Quality checked by (Equality Team):

Name: Inno Amadi

Designation: Senior Policy Officer, Equality and Diversity Team

Signature:

Date:

Sign off by Directorate Management Team:

Name:

Designation:

Signature:

Date: