

Alan Yates
Technical Director, Sustainability
BRE Global Limited
E: YatesA@bre.co.uk

4th April 2014

Dear Mr Yates,

BWF response to the consultation on the assessment of responsible sourcing schemes in BREEAM

The British Woodworking Federation (BWF) is the active voice on behalf of the Woodworking Sector in the UK, a fundamental part of the UK manufacturing sector representing an estimated £3.8 billion spread across 5,070 firms and employing an estimated 50,000. BWF members have supplied and in many cases installed their products in almost every type of major construction project, and our members' products and processes are constantly innovating to meet the latest sustainability requirements.

We welcome the latest attempt to draft more transparent evaluation criteria and process for the assessment of responsible sourcing schemes within BREEAM. Although an overall positive step in the development of BREEAM, we believe there are a number of issues with the criteria and the evaluation methodology that fail to address some of the more crucial elements of responsible sourcing.

Much improvement has been made in the criteria since the first round of consultation in Summer/Autumn 2013, and we are pleased to see that many of the points that we initially put forward have been addressed, at least to some extent.

In this response we first provide some general comments as well as some more specific ones on key issues we have concerns about.

General Comments

More often than not the largest environmental damage in a supply chain is caused right at the start, where extraction of raw materials occurs. Therefore responsible sourcing schemes that identify and manage sustainability issues at this point in the supply chain should be considered superior to those that can only consider sustainability issues at various processing points in the supply chain.

Without having traceability back to source of raw materials it is impossible to know whether the actual raw/ input materials used have come from a responsibly managed source, whether this is a forest, mine, quarry etc. Therefore schemes that are based on providing traceability back to such a source should, first and foremost receive extra recognition.

Draft v2.2 of the criteria notes that 'Establishing and maintaining Chain of Custody for a complex supply chain is an expensive exercise and so may not be feasible within all sectors'. We feel that schemes that operate in a high risk supply chain which cannot demonstrate that the raw materials are traceable or responsibly sourced simply cannot claim to be sourcing responsibly.

The broader Timber Industry of which we are part has already invested heavily in developing an infrastructure that allows traceability back to a responsibly managed forest/ plantation. It is a best practice model that other sectors such as the Aluminium Industry are also adopting and allowing other material sectors to stop short of this level of traceability is unjustly discriminatory and does not create a level playing field.

Given that different building products have different environmental, social and economic impacts, allowing sectors to focus on issues of most relevance, through the use of the BS8902 sustainability list, is also welcomed. The danger of such an approach however is that procurers of building products will use such a list in isolation and without any knowledge of the context of whether such issues are critical or not within different material sectors.

It is important, however that responsible sourcing schemes remain accessible to SMEs, given that the majority of construction product manufacturers and distributors are small or micro-businesses, and thus schemes that oblige SMEs to put in place accredited management systems (such as BRE's BES6001) are simply not accessible for them and therefore unlikely to be scalable. They will only really work for industries that are dominated by large and, more often than not, global corporations.

In order to meet BREEAM's stated aim to 'Encourage the specification and procurement of responsibly sourced materials', the criteria must be achievable for all sizes of business and reward genuine responsible sourcing where the high and medium risk areas applicable to the different material sectors have been satisfactorily addressed.

Specific Comments

Comments on General Assessment Document

- The provision of 2 different routes of achieving credits is a concern to us, based on our understanding that one of the routes to achieving BREEAM credits is based on the proportion of the supply chain that is "*certified*" as responsible sourced. This is a backward step for BREEAM as it takes the focus away from actual products and places the emphasis on how an organization sources responsibly and not sourcing responsible products. The two are two very different things, as a company that is sourcing responsibly could be buying products that have not originated from a responsible source. BREEAM should not reward contractors and supply chains that do not embrace the full meaning of responsible sourcing-credits should only be allocated for the amount of responsibly sourced materials procured for the build.
- Following up on the first point, Route 1 states "*....intended for use in the majority of situations where detailed information on quantities of materials is not readily available*". We do not see in which situation this would apply-why would a contractor not know the quantity of materials that they have bought? This should clearly be marked on delivery notes and invoices - it is not only vital to the resource efficiency of project management but is also vital for suppliers when invoicing their customers.
- We welcome the addition of an additional credit for those contractors that put a sustainable procurement plan into place. The inclusion of this means that contractors cannot just push this issue up their supply chain and that they must share some of the responsibility in procuring sustainable products.
- Although the examples are useful in the document, it is still not very clear how points are then converted into Mat3 credits.

Comments on Evaluation Criteria Document

- Throughout this document the phrase "assessment schedule" is used. What exactly is meant by this?
- Section 5 of this document is not very clear and it is difficult to clearly understand how the various eligibility criteria will be applied to different RS schemes.
- Furthermore, it is also unclear how the points that schemes score in the evaluation criteria (Sections A to D) feed into table 5.4 which determines where schemes will fit within the overall tier levels for BREEAM.

- For section A2 of the evaluation criteria it would be helpful to have examples of the types of targets that BREEAM is proposing that schemes use. Is this criteria supposed to promote target setting for individual certificate holders within schemes or the overall scheme itself?
- Criterion A5 proposes that certification audit results should be freely available. Does this apply to the whole supply chain (in timbers case from forest to end timber merchant or joiner) or is this solely for the last organization in the supply chain? We also believe this to be perhaps an over ambitious criterion as we do not believe that other standards, in particular ISO make publication of an audit report mandatory. This criterion is too broad and open to interpretation of what is meant by a "public summary" and therefore further details here would again be useful.
- In Section B, It may be helpful to break the paragraph that describes the aims into bullet points.
- For the timber industry, traceability is vitally important. We are slightly unclear how this criterion will be applied to schemes that allow mixing of "controlled or uncontroversial sources" with sources that are from fully certified forests. We are assuming that, because the "controlled or uncontroversial sources" are traceable back to source, timber schemes will achieve the full 2 points. Confirmation or further clarification of this would be helpful, prior to evaluation of the schemes.
- In criterion C1, it is mentioned that sustainability issues can be excluded in schemes if there is appropriate justification. Guidance needs to be provided on what BRE consider to be appropriate justification.
- In section D, further clarity is required on what is deemed as *"the scheme shall encourage continual improvement"*
- For D3, verification of reported KPI's, it is unclear whether the scheme's KPIs need verification of the certificate holders using the scheme. More details would again be useful on what BRE is looking for here.

Comments on Evaluation and Appeals Document

- We noticed that the BES 6001 Scheme is available as a product certification and as a standard certification. Can BRE explain the difference?
- We do not see why schemes should pay a fee to be evaluated to be included in the BREEAM scheme. We believe such costs should be part of BREEAMs operational costs, especially if BREEAM is being promoted by public sector agencies in planning guidance. If a fee is to be charged- transparency of this fee needs to be provided to demonstrate cost neutrality at the very least.

- For 2.1.7 at which level does BREEAM look at changes within the scheme? For timber schemes, standards at forest level can be changed every few years - will this effectively mean that both PEFC and FSC have to be re-evaluated every year because an FM standard in a particular country has changed?
- The conflicts of interest of BRE owning, developing and managing both BES6001 and BREEAM need to be much more transparent and detailed rather than generic.
- We suggest that in 5.2.2 the applicant should have 2 weeks upon acknowledgment rather than from the date of correspondence issued. This takes away the risk that feedback is missed if the applicant is on a 2 week holiday!
- We propose that for 5.4.1 feedback is reviewed by an approved independent reviewer rather than someone from BRE Global to avoid any possible conflicts of interest.
- For the appeals process, there generally needs to be more independent people on the suggested panels, especially at the first stage. At this stage we are assuming that there are independent people on the BRE Impartiality Committee.

On behalf of the UK woodworking industry, I thank you for taking the time to consider our recommendations and remain at the disposal of your team to discuss or provide additional data on any of the points raised.

Yours Sincerely,



Matt Mahony
Policy Executive
British Woodworking Federation
E: matthew.mahony@bwf.org.uk