

# **United Kingdom Woodland Assurance Standard**

**UKWAS Revision 2009-2011: Issues Paper**

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## Summary

The UKWAS revision process is set out in the *UKWAS Revision 2009-2011: Process and Timetable* document approved by the UKWAS Steering Group on March 24<sup>th</sup> 2009; this process conforms to the *UKWAS Standard Setting Process (Version 1.1)* document which is aligned with the FSC and PEFC requirements.

FSC UK and PEFC UK were invited to participate in the review process and been provided with a process document with a projected time line; both confirmed their participation in accordance with the process and timetable.

The revision and consultation processes are being taken forward in three main phases:

- **Phase 1(2009):** an **evidence gathering** phase including initial stakeholder consultation (60 days) to take place May-June 2009
- **Phase 2 (2010):** a **main revision drafting** phase leading to a revision draft consultation (60 days) to take place Dec 2010 – Jan 2011
- **Phase 3 (2011):** a **conclusion phase** including a further revision and pre-approval draft consultation (30 days) to take place by end April 2011 prior to any further amendment and final submission to FSC UK and PEFC UK by the end of July 2011.

In Phase 1 the Steering Group identified the key issues to be considered during the main revision drafting phase and involved the following elements:

- Certification Schemes' Requirements Review
- International Benchmarking Review
- Interpretation Review
- Small and Low Intensity Managed Woodlands Review
- Technical Review
- Standard Users' Feedback Review
- Review of the Initial Stakeholders' Consultation.

**This Issues Paper is a working document setting out the results of Phase 1 identifying the information to be taken into consideration during the Phase 2 main revision drafting phase.**

**UKWAS Steering Group**

**February 2010**

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## Section 1:

### Certification Schemes' Requirements Review

#### ***Purpose***

*A consideration of advice (to be provided by the certification schemes) on any new or revised policies, procedures or guidance that is relevant to the revision. National certification schemes should seek advice and guidance from their international body when compiling their advice.*

#### **PEFC UK Requirements Review**

PEFC UK has confirmed that no changes to PEFC's requirements are anticipated.

#### **FSC UK Requirements Review**

##### Principles & Criteria for Forest Stewardship

FSC UK has advised that there is an ongoing revision of the FSC's Principles and Criteria for Forest Stewardship.

Version 5-0 Draft 2-0 of the FSC Principles and Criteria for Forest Stewardship was published for consultation from July to September 2009. A final draft was scheduled to be submitted to the FSC membership for approval in 'early 2010' but in late February 2010 was said to be 'due for completion at the end of 2010'.

FSC has informally advised FSC UK that it is content for the revision of the UKWAS to proceed using the current Principles and Criteria (FSC-STD-01-001 April 2004). FSC has proposed a number of options for when existing national standards might be required to conform to the revised P&C but no decision has been made. The UKWAS Steering Group and FSC UK have proposed that the current revision of the UKWAS standard be based on the existing P&C and the standard be brought into conformance during the next revision and the Steering Group is proceeding on this basis.

##### Other FSC Policies, Procedures and Guidance

FSC UK advises that there are a number of new policies, procedures and guidance that have been issued by FSC since the publication of the UKWAS second edition which should be taken into account in the third. FSC UK's recommendations in outline are as follows:

- **Compliance and Conformance.** Most comments on compliance and conformance relate to amplifying existing wording to ensure that FSC's increased requirements in respect of legal compliance are addressed;
- **Disputes and Grievances.** We have suggested some additional wording to clauses in both the community and forestry workforce sections covering FSC's latest views on complaints and compensation. We also believe that more wording is required to cover complaints procedures and to introduce bodies such as working groups and the interpretation panel;
- **Consultation.** FSC is increasing its requirements for greater consultation. I am keen to avoid the concept of a social management system which would not work in the UK, but I feel that some parts of the consultation section should be strengthened;
- **Endangered Species.** A small point to ensure no endangered species are overlooked;
- **Restoration.** Some suggested extra sentences on exotic species, special landscapes and natural woodland;
- **Assessment, Monitoring and Records.** We feel that the requirements dealing with the collection and monitoring of records need to be made more specific in one or two cases;
- **GMOs.** We merely note a point to be borne in mind should the UK lose its GMO-free status.
- **Harvesting.** We have included a couple of points on waste and whole-tree harvesting;
- **Access to Information.** We are keen that reference documents to identify HCvFs etc are up-to-date.

FSC UK presented suggested textual amendments ('Annex A') which are shown in full in Appendix 1 of this paper.

### ***Consideration***

*FSC UK's 'Annex A' proposals need to be considered on a case-by-case basis.*

## Section 2:

### International Benchmarking Review

#### ***Purpose***

*A comparison with any equivalent accredited standards of a similar geographical or ecological scope of application, and an evaluation of whether there are any substantial differences in the overall cost/benefit balance of compliance for similar types of enterprise with similar forest conditions.*

*(To be provided by the certification schemes.)*

### FSC UK International Benchmarking Review

#### ***Submission from FSC UK:***

We have compared the UKWAS with the FSC national forest management standards for Germany, Holland, Denmark and Sweden (in the latter case, this standard is more than ten years old). The most obvious point to make is that the UKWAS format is different to the other four standards, the latter being structured on the lines of FSC's Principles and Criteria, whilst the UKWAS follows the layout judged most appropriate to the UK forest management sector.

It is also true to say that the four neighbouring standards are more prescriptive than the UKWAS in certain respects. For example, all of them address forest workers' rights in considerable detail, whereas the UKWAS refers to the requirements of UK employment and associated legislation. This differing pattern of handling detail is widespread, with the UKWAS referring to guidance documents produced by other UK agencies whilst neighbouring standards tend to import this information into annexes. It is arguable which is the more user-friendly. The British approach of an independent standard-setting body mitigates strongly in favour of broad direction and reliance on well-understood guidance provided by other authorities, whereas the purely FSC-set standards have the luxury of including many more indicators. We are also wary of importing information from other documents into the UKWAS; there is the inevitable danger of the UKWAS becoming out of date as the reference documents themselves are amended.

Our chief conclusion from the comparative review is that the main difference between the UKWAS and neighbouring standards is that those which have been more recently written are more in line with evolving FSC indicators. The inclusion of our amendments covered in the requirements review below will more than bridge this gap.

Although we do not want to labour the point, it is noticeable how many gaps have appeared in the Swedish standard as a result of its non-revision for so many years. Indeed, we

understand this is having serious repercussions on the ground. (N.B. A revised FSC Swedish standard was approved in March 2010.)

### **Consideration**

*UKWAS makes an interesting contrast to these examples. Particularly interesting to note that:*

- *UKWAS is the only standard approved by FSC with a bespoke format adopted to suit local conditions rather than following that of the P&C*
- *UKWAS is generally less prescriptive*
- *UKWAS relies to a greater extent on well-understood guidance provided by other authorities*
- *Consequently UKWAS is less prone to being out of date.*

*These points should be seen as positive for UK owners although the bespoke UKWAS format is a complicating factor for the UKWAS Steering Group when undertaking revision of the standard and for Certification Bodies. No action required.*

### **PEFC UK International Benchmarking Review**

As part of its 2008 Small Woods Review (see Section 4) the UKWAS Steering Group commissioned ProForest to prepare a report entitled *Maintaining and extending market access for UK timber from small and/or low intensity managed (SLIM) woods*. The ProForest Report recommended that further consideration should be given to:

- simplifying certification processes
- regional certification
- FC acting as a Group Manager.

A PEFC UK team undertook international benchmarking in 2009 as follow-on to the ProForest Report. The objective was to examine approaches to sustainable forest management certification under PEFC requirements in various European countries with a view to identifying ways of increasing the uptake of certification in the UK with a particular focus on medium sized woodlands of 100 to 500 hectares.

Findings from visits to Geneva, Belgium, Slovakia and Norway were presented to the UKWAS Steering Group in November 2009 (see Appendix 6 for PowerPoint presentation).

### **Summary of findings:**

- Certification is tailored to circumstances in each country – history, forest types, ownership patterns



- A high level of co-operation was found between state/private owners (Belgium and Slovakia) or between private owners (Norway)
- Certification is based on large “groups” with internal audit processes embracing both large and small properties providing some cross subsidy for smaller owners
- Certification is more accommodating to small owners than in the UK
- The costs to private owners are much lower than in UK (in part due to state subsidy in Belgium).

***Implications for the UK:***

- Regional certification – there is scope to explore enthusiasm for regional certification with FC/FE/NIFS
- Audit intensity – there is scope to review opportunities for reducing audit intensity and costs in the UK under both FSC and PEFC, including an assessment of implications for UKWAS
- FC as Group Manager – there is scope to explore with FC/FE/NIFS their willingness to consider acting as Group Manager.

***Next steps:***

Evidence from the European countries visited indicates costs (to the owner) can be much lower than in the UK. Part of the reason for this appears to be that the intensity of both internal audit (group schemes) and external audit (Certification Bodies) is lower than in the UK.

The UKWAS Steering has therefore commissioned Sandwood Enterprise to undertake a further study on simplifying certification procedures

The follow-up work includes:

- An analysis of the requirements, under both FSC and PEFC, relating to audits and audit intensity under both group and individual certification
- An assessment of opportunities (if any) to reduce the costs of auditing in the UK within the current FSC and PEFC requirements
- An assessment of opportunities (if any) to reduce costs of auditing in the UK, which would involve adjustments to the current FSC and PEFC requirements
- A report to the sponsors of this work.

The work should be concluded in spring/ summer 2010.

***Consideration***

*No conclusions can be drawn at this stage.*

## Section 3:

### Interpretation Review

#### ***Purpose***

*A consideration of any advice developed by the Interpretation Panel.*

An Interpretation Panel is appointed by the Steering Group to provide advice on interpretation of the standard for standard users.

Two Interpretation Notes have been issued for the second edition:

- Interpretation Note 6 - Use of bio-solids – November 2006 (see Appendix 2)
- Interpretation Note 7 - Wind farm development on certified forest land – October 2008 (see Appendix 3).

#### ***Use of bio-solids***

Relevant requirement references: Section 5.2.5c on fertilizers

The Interpretation Panel concluded that the use of bio-solids as a fertilizer is permitted and agreed that:

- the Standard only permitted the use of bio-solids as a fertilizer within the limits stated in requirements 5.2.5a and 5.2.5b; and
- when bio-solids were used as a fertilizer an assessment of the environmental impacts of their application was necessary under the relevant parts of Requirements 3.1.1, 3.1.2 and 3.1.3.

#### ***Consideration***

*Whilst the IP did not recommend a change to the text of Section 5.2.5c it might aid clarity to make a minor amendment to the wording to include explicit reference to the theme of Section 3.1 which covers 'assessment of environmental impacts'.*

*Existing wording:*

*c) When using bio-solids section 3.1 shall also apply.*

*Suggested revised wording:*

*c) In addition, bio-solids shall only be used following an assessment of environmental impacts in accordance with section 3.1.*

### ***Wind farm development on certified forest land***

Relevant requirement references:

- Section 3.5.1 on conversion to non-forested land
- Section 6.1.3 on conservation and enhancement of biodiversity
- Section 1.1.5 on commitment by owner, tenant, manager to conformance with the standard in the long term.

The Interpretation Panel concluded that:

- Timber felled from areas where wind turbines and their associated infrastructure will be located may not be sold as UKWAS certified timber.
- Timber harvested from areas which are felled as part of e.g. wind farm development but which will subsequently be restocked or will otherwise meet the provisions of Requirement 3.5.1 (enhanced ecological value; improved landscape; cultural /archaeological restoration) may be sold as certified timber.
- Areas of woodland cleared for occupation by wind turbines and their associated infrastructure may not retain certified status.
- Areas of forest cleared during e.g. wind farm development but which will be restocked or will otherwise meet the provisions of Requirement 3.5.1 (enhanced ecological value; improved landscape; cultural /archaeological restoration) may retain certified status
- The continued certification of all areas of the FMU affected by e.g. wind farm development will be determined by the certifying body taking full account of Requirements 3.5.1; 6.1.3 and 1.1.5.
- Planning consent and a favourable EIA for e.g. wind farm development would normally be considered sufficient evidence of lack of substantial dispute about the development.
- Specific reference should be made to wind farm development on forest land in the next UKWAS revision.

#### ***Latest from Interpretation Panel***

*The Interpretation Panel chair has indicated support for the submissions made calling for the situation about wind farms be clarified:*

*“As I mentioned when this was being discussed in the IP I am sure there will be increasing pressure on forest land for wind farm development. I also think small-scale hydro electricity development may have an increasing impact and in some areas also other developments e.g. social housing. I would therefore argue that the review should explicitly consider these "development" options for forest land and the implications for certification both of the timber and more importantly the forest area.”*

*A related request for interpretation was considered by the Panel and a report submitted to the Steering Group in February 2010:*

*The proposal was that in interpreting Requirement 3.5.1 bullet 1 the comparison should be made between the ecological value (in UKBAP terms) of **potential** woodland on the site and open-ground habitat; not simply a comparison of the ecological value of the **existing** woodland and open-ground. For example in the case of proposed deforestation of a SS plantation the ecological value of potential alternative forms of woodland on the site should be compared with the ecological value of conversion to open moorland. The implication of the proposal is that if deforestation to open ground occurred on a site judged to have higher ecological value as a different type of woodland, the harvested timber could not be certified and the FMU would lose its certified status unless the affected area was excised from the FMU.*

*The Chair reported to the Steering Group:*

- *The IP has not been able to reach a consensus by e mail correspondence on the issue referred to us. We regret we are therefore unable to submit an Interpretation Note to the SG meeting.*
- *Members' comments show that the proposal raises a range of complex issues affecting different parts of the Standard and that consequently the matter really needs to be resolved by the UKWAS Steering Group through a revision of the Standard.*
- *However as a contribution to the revision process Panel members would be willing to compile a report which sought to identify relevant issues concerning deforestation and revision of the Standard. Members have already made extensive comments in their replies and have valuable practical experience and clear opinions on the subject. Drafting such a report would fall within the IP's terms of reference (ToR 4): "proposing revisions to the UKWAS Standard (improvements and updating)"*

*The Steering Group noted that given the range of views expressed it seems the IP's existing interpretation will need to stand until the next edition of UKWAS is produced and that the focus will need to be on whether there should be changes in the next edition. The Drafting Group was asked to consider what would be the most helpful way forward to help come up with clear drafted proposals, or options, for any text revisions which can then go before the Steering Group. This might require a Deforestation Group of interested parties to be established to work specifically on this issue or for the Interpretation Panel to reconvene.*

**Consideration**

*The IP recommended that specific reference be made in the standard to wind farm development and this is supported by the initial stakeholder consultation. It is clearly a source of confusion and it is the issue most commonly raised with the UKWAS chair and Support Unit. To avoid similar problems arising, the revised text should also seek to embrace other development options.*

## Section 4:

### Small and Low Intensity Managed (SLIM) Woodlands Review

#### **Purpose**

*A consideration of the impact and applicability of the standard for small and low intensity managed (SLIM) operations.*

During 2007 the Steering Group established a Small Woods Task Group which considered how to make the standard more accessible to managers of SLIM woodlands, identified ways to increase uptake of certification by SLIM woodland managers and actions that other stakeholders might take forward.

A summary of the task group's recommendations, the Steering Group's responses and the outcomes is provided in Appendix 4.

One recommendation relates specifically to the next full revision:

*When revising the UKWAS text, opportunities should be taken to better cater for small woods, especially for 'very small' woods (<10 ha).*

#### **Consideration**

*An extensive review was carried out in 2007-2008 and changes incorporated into an amended UKWAS second edition launched in November 2008. As noted in Section 2 follow-up work is still ongoing.*

*As already agreed, during this revision the Steering Group should wherever possible seek to identify opportunities to improve the standard for:*

- *SLIM woodlands*
- *Very small woods (<10ha).*

*The Steering Group agreed that each section of the standard should be 'SLIM proofed' to determine whether there was scope for reducing the burden for SLIM woodlands.*

*The Steering Group also noted that the need for SLIM woods to submit to certification will be much reduced if FSC UK's application for the UK to be classified by FSC as 'low risk' is successful; this will allow a proportion of non-certified wood to enter a certified supply chain as Controlled Wood so potentially removing the necessity for all woodlands to be certified. The PEFC scheme includes a similar mechanism.*

*At the September 2009 Steering Group it was reported that some members were working together on a short questionnaire for small woodland owners and, although it was not certification-specific, it might yield helpful feedback.*

## Section 5:

### Technical Review

#### ***Purpose***

*A consideration of any new scientific or technical knowledge.*

### Forestry Commission

#### ***UK Forestry Standard and Guidelines***

The revisions aim to clarify and strengthen the relationship between the Guidelines series and The UK Forestry Standard and to improve the consistency of approach. The new UK Forestry Standard will continue to define governments' requirements for sustainable forest management and will link directly to the Guidelines for greater detail on the key areas below:

- Forests and Landscape
- Forests and Historic Environment
- Forests and Biodiversity (to include deadwood)
- Forests and Soil
- Forests and Climate Change
- Forests and People
- Forests and Water.

#### ***Latest news***

Consultation on the revised UKFS and six Guidelines has been completed and the Water Guidelines are currently out for consultation.

It is understood that the UKFS & GL text is likely to be confirmed by end April 2010 and that will provide us with working documents for the main revision drafting exercise. A checklist will then be prepared against each UKFS/ GL requirement to identify the relevant UKWAS sections.



## Forest Stewardship Council

### *Principles & Criteria for Forest Stewardship*

#### ***Latest news***

The UKWAS revision will work with the existing FSC Principles & Criteria for Forest Stewardship (Version 4).

FSC is frequently reviewing and updating its policies and guidance and this will need to be closely monitored during 2010. Issues to keep under review include plantations review outcomes, forest nurseries, chemicals and forest carbon.

#### ***Consideration***

*The UKWAS standard will need to be checked carefully to ensure conformance to FC and FSC requirements.*

## Section 6

### Standard Users' Feedback Review

#### **Purpose**

*A consideration of feedback from certificate holders and accredited certification authorities.*

*(To be provided by the certification schemes.)*

Since all current certificates have been issued by FSC the review does not apply to PEFC UK.

### FSC UK Standard Users' Feedback Review

#### **Submission from Charles Thwaites:**

**General Comment.** FSC UK has received no complaints about the workings of the second edition of the UKWAS over the past three years. This is hardly surprising as we are not the Standard Development Group. The Standard Development Group (the UKWAS Steering Group) is currently conducting its own round of consultation on the workability of the second edition.

**Certification Bodies.** These will not be fully collated until September 2009 at the earliest. For the purposes of this review we have contacted the four certification bodies providing certification services to forest managers in the United Kingdom, and a synopsis of their comments is as follows:

- **Control Union UK.** Initial views are that sometimes the Guidance could be more complete (some elements of monitoring were mentioned), but in other areas it was felt the Guidance was over-fussy (in this regard, deadwood policy was also mentioned). Paul Sandys also mentioned the fact that writing certification reports is made more difficult because the UKWAS and FSC's Principles and Criteria have different headings and order.

N.B. Additional input from Control Union UK direct to UKWAS relates to better referencing chain of custody and trademark issues in the text.

- **Woodmark/Soil Association.** Woodmark are currently conducting a consultation exercise with their clients and will compile their own synopsis of these views. This exercise has not been completed. When it is, the synopsis will be forwarded along with Woodmark's own impressions of the workability of the Second Edition.
- **Rainforest Alliance/SmartWood UK.** SmartWood do not intend to comment in the first round of consultation because they have 'no burning desire to see changes to the second

edition'. They do however wish to comment on changes recommended by other stakeholders.

- **SGS Qualifor UK.** [Comments submitted directly to UKWAS Initial Stakeholder Consultation.]

**Forest Managers.** As a separate exercise, FSC UK telephoned a cross-section of UKWAS certificate-holders to poll the views of forest managers who may not be inclined to comment in the first round of consultation. In the event Miranda Hales managed to have conversations with 23 forest managers, having emailed over 100. As you will see, respondees ranged across the spectrum in terms of size and commercial perspective.

Her report (*below*) makes rather sobering reading. I think we need to compare her conclusions with those submitted formally to you in writing. Respondents are largely self-selecting and the more vocal tended to ring her back whereas the 'content' didn't bother.

Nevertheless, there is clearly a measure of frustration abroad about the level of bureaucracy, either because of the UKWAS itself, or because of the 'extended requirements' placed on the UKWAS by the certification bodies.

### ***Report by Miranda Hales:***

#### **FSC UK Standard Users' Feedback Review**

#### **Consultation Exercise: Opinions of Forest Managers on the UKWAS**

##### **Introduction**

FSC UK recently carried out a consultation exercise to gauge woodland managers' opinions on the current UKWAS prior to its revision. A cross-section of certificate holders has been contacted and forest managers were then invited to give their opinions on the UKWAS as a standard and its workability in practice. We have compiled the results into the following report, subdivided into categories according to the type of woodland organization. Names of organizations or individual forest managers have been supplied where consent has been obtained.

##### **Executive Summary**

The comment which has recurred most frequently across the range of consultees is that the process of UKWAS compliance is both bureaucratic and time-consuming. To many, the UKWAS seems to generate a heavy administrative burden which is quite negatively received by many forest managers. High costs were also mentioned with some forest managers stating that the cost of obtaining and maintaining certification was disproportionate to the benefit received.

##### **Large Estates and Commercial Organizations**

Overall it is the larger commercial organizations which have been most critical of the UKWAS. Some organizations were very negative in their responses and expressed the

opinion that the entire UKWAS system was a waste of time. Whilst this attitude does not represent the view of the entire sample consulted, it did surface sufficiently frequently to be worth a mention at the outset. The principal issue raised was definitely the amount of administrative work required to comply with the UKWAS. One commentator labelled it ‘the most monumental and unnecessary form of bureaucracy that the industry has ever been subjected to’. Other organizations were less derogatory, but the overall feeling of negativity towards these bureaucratic aspects of UKWAS was notable. The monitoring and planning sections of the UKWAS were particularly referred to in this respect. Geraint Richards at the Duchy of Cornwall labelled the UKWAS ‘increasingly complex and costly’ and suggests that efforts should be made to make the process of certification simpler and easier for all woodlands, rather than merely for SLIMs. Tinsey and MacMullen felt that the record-keeping required was disproportionate and far too time-consuming, whilst Russell Porter at Land Factor stated that the standard was reasonably fair, but again, generated too much paperwork and was only complied with in order to sell timber.

Forest managers also frequently mentioned that they felt the labour involved in certification is not proportional to the benefit, since certified timber does not sell for a higher premium than ordinary timber, although certification is sometimes required even to make a sale. Among the larger organizations overall, there has been little experience of market demand for timber certified to UKWAS. Several organizations stated that they only remained in the UKWAS system in order to qualify for Forestry Commission grants. The cost of audit by certification bodies has been cited as an excessive expense, again one which is not offset by any appreciable market benefit.

More specifically, some forest managers have observed that the UKWAS document is hard to navigate, suggesting that an improved indexing system be introduced to enable specific sections or requirements to be found more easily. One commentator felt that UKWAS requirements were too vague in places which gave excessive power to Certification Bodies for individual interpretation.

Forest managers would generally prefer a simple and comprehensive report with clear on-line links to relevant legislation and guidance documents. Deadwood policy was felt to be over-fussy by one or two commentators (specifically the requirement specifying the number of trees per hectare), and the situation regarding pesticides both in terms of the derogations which some have been refused and the administrative burden created by derogations themselves was criticized by some.

### **Small and Low Intensity Managed Woodlands (Including Group Schemes)**

Despite the introduction of the SLIM category to the revised edition of the UKWAS, some small forest managers still struggle to meet the costs of forest certification. Most of the organizations interviewed were happy with the UKWAS in most other respects, citing the process as relatively simple and painless or only slightly more effort than was anticipated. One organization also mentioned that their FSC timber sold for a higher premium. However one small landowner did comment that the UKWAS represented a ‘huge raft of bureaucracy’ which achieved very little, and suggested that the UKWAS should be combined with the Forestry Commission to prevent forest managers from being ‘policed’ by two organizations.

Charlton Abbots Forestry, a collection of predominantly-SLIM woodlands managed under a group scheme, have commented that the certification process itself was a straightforward and positive experience, and that they were quite happy with the UKWAS as it stands. Their main concern is that the forestry commission's new threshold for certain grants, which has risen from 30 to 100 hectares, now means that most of the SLIMs are no longer eligible for financial assistance from the Forestry Commission. This concern was echoed across the board of SLIM woodland managers interviewed. As many small woods joined the scheme primarily in order to be eligible for grants, the manager fears that they may pull out of the scheme in the future. Since a large chunk of a small organization's management budget currently goes towards obtaining UKWAS certification, he feels that the cost of certification should be lowered to reflect these new circumstances. The forest manager also commented that machine operator certificate (FMOC) is too expensive for small operators. The owners of one small wood felt that group schemes should be far simpler to implement than is currently the case in order to bring more small wood owners into the scheme. Another organization, citing cost as a major threat to their ability to remain certified, suggested that after the principal five-yearly audit small wood owners should be allowed to practice self-audit with some form of low-level external monitoring.

### **Conservation and Community Orientated Woodlands**

Overall managers of woodlands primarily for conservation or community recreation purposes (i.e. local wildlife trusts and Council community woods) have been positive about UKWAS certification. Generally wildlife trusts etc have found the process of certification to be helpful to their conservation aims and the organization of their management practices. They have also discovered opportunities to pursue commercial aims which had not previously been considered and to apply for woodland grants. One or two forest managers pointed out that there were too many requirements to satisfy in relation to commercial timber production which were irrelevant to them as a largely non-commercial woodland. However they do wish to continue receiving forestry commission grants for which UKWAS certification and some evidence of commercial of timber production are required. North Somerset Council noted that they would prefer that the sections on operations and requirements dealing with harvesting and timber management be loosely interpreted in the case of conservation woodlands. Canterbury city council also made a similar point, stating that the most recent version of UKWAS is an improvement in this respect. Two trusts also mentioned that much of their wood lost its FSC status once it left the forest because the woodworkers who bought the timber to make forest products such as hurdles or greenwood chairs were unable to afford separate FSC certification.

### **FSC UK Conclusions**

The UKWAS does seem to have a reputation as an expensive and time-consuming system which creates a hefty burden of administrative work for foresters and brings little actual benefit to the forest organization. Whilst this opinion was strongest amongst managers of large organizations some SLIM woodland managers expressed the same opinion. Some organizations even went so far as to question whether the UKWAS system actually benefited the forest itself, arguing that government legislation on environmental regulation and the current UK Forestry Standard are sufficient to ensure that most forests are being well

managed. Certainly there are feelings of bitterness towards the process in some areas and it is clear that these should be addressed if this can be done without compromising the high environmental and social standards which the UKWAS represents. This desire for the process to be simplified or streamlined appears to be universal and should be taken into account if possible.

Equally the fact that SLIM woodland owners may now be excluded from major grant schemes will surely affect future take-up and does throw the issue of certification costs for SLIM-woodland owners into a different light. The revision of the UKWAS should look for any opportunities to make the certification process simpler and still less costly for small woodland owners in light of these changes. Whilst certification costs are not set by UKWAS, some form of monitoring of the charges made by certification bodies may be advisable. The UKWAS is felt to be an extra burden by those whose woodlands fall within areas subjected to special environmental control (such as areas of outstanding natural beauty) so perhaps closer alignment with such bodies would be useful.

On a more positive note many of the conservation based organizations and some of the smaller woodland managers seemed quite happy with the system and several organizations noted that the process of certification has been relatively straightforward. Some have also requested that there be no major changes to the document as most operators are now used to the current format. Nevertheless clarity on specifics and improved indexing and linking system may be advisable to avoid confusion.

***Consideration***

*For consideration by the Drafting Group.*

## Section 7

### Initial Stakeholders' Consultation

***Purpose***

*A consideration of consultees' comments and responses.*

A consultation paper was issued on 1<sup>st</sup> May 2009 and comments were requested by 30<sup>th</sup> June 2009. Seventeen individuals and organisations submitted comments and these are provided in full in Appendix 5.

***Consideration***

*For consideration by the Drafting Group.*

## **Appendices**

- 1. FSC Requirements Review: Annex A to UKWAS Revision 2009-11 Evidence Gathering (FSC UK)**
- 2. UKWAS Interpretation Note 6 - Use of bio-solids (November 2006)**
- 3. UKWAS Interpretation Note 7 - Wind farm development on certified forest land (October 2008)**
- 4. UKWAS Small Woods Review – Outcomes and Lessons Learned**
- 5. UKWAS Initial Stakeholder Consultation (1<sup>st</sup> May – 30<sup>th</sup> June 2009) – Responses**
- 6. PEFC UK International Benchmarking Exercise – Presentation to UKWAS Steering Group by Sandwood Enterprise**



## FSC Requirements Review: Annex A to UKWAS Revision 2009-11 Evidence Gathering (submitted by FSC UK)

UKWAS Serial No	FSC UK's Suggested Revision to Text of UKWAS Edn 2 (Amended Text in <i>Italics</i> )	Justification
<b>Compliance and Conformance</b>		
1.1.1	Insert into first sentence of Requirement: There shall be compliance with the law, <i>including relevant international agreements.</i>	FSC requires countries to respect all binding international agreements. We are not sure if this is fully implied by the existing text
1.1.1	New insertion into non-SLIM Woodlands bullet: A system to be aware of and implement requirements of new <i>and existing</i> legislation.	Surely forest managers should be aware of existing legislation as well?
1.1.1	Add extra bullet to Guidance: <i>That any identified legal non-compliance has been documented and promptly corrected</i>	To acknowledge that sometimes legal non-compliances occur. When they do they should be documented and corrected.
1.1.2	Insert into first sentence of Requirement: ...or agreements, <i>which include payment of fees, royalties, taxes and other charges</i>	FSC amplifies agreements to include the payments mentioned.
1.1.2	New insertion into non-SLIM Woodlands bullet: ...a system to be aware of and implement new <i>and existing</i> legislation, <i>codes of practice, guidelines and agreements.</i>	For reasons why we have inserted 'and existing', see above. Without the inclusion of codes of practice etc, we do not believe this bullet is consistent with the Requirement.
1.2.1	Add extra bullet to non-SLIM woodlands: <i>maintain records of illegal and unauthorised activities and follow-up action.</i>	FSC's actual requirements for non-SLIM woodlands are for: documented policies and procedures and records of any illegal activities within the FMU and of relevant consultations with local communities. We feel that the wording we have provided covers this.
4.2.1	Harvesting operations shall conform to all relevant <i>legal requirements, codes of practice, guidelines and other agreements.</i>	To align requirement with 1.1.1 and 1.1.2 in that 1.1.2 not only refers to 'guidelines' but also to the three other requirements.
4.2.1	Discussions with the owner/manager, employees <i>and contractors, where relevant.</i>	We feel that contractors should be included in this Means of Verification.
8.2.2	Add an introductory sentence in Guidance: <i>The owner/manager or tenant shall make the forestry workforce aware of the implications of the signed declaration of commitment (see 1.1.5)</i>	FSC guidance requires that staff are informed of the content of FSC's P&Cs. We realise that this wording is not acceptable in a forest management standard set by an independent body. However we feel it is not unreasonable to relate 8.2.2 to 1.1.5.
<b>Disputes and Grievances</b>		
7.4.2	Insert second bullet for non-SLIM woodlands: <i>Evidence that compensation has been paid, where awarded.</i>	To cover FSC's requirement that in the case of loss or damage caused by the forest enterprise affecting the rights, property, livelihood or resources of local people, fair compensation should be offered.
7.4.3	Insert as first bullet in Means of Verification' new heading for non-SLIMF woodlands: <i>A documented complaints procedure, records of complaints received and follow-up action.</i>	For large woodlands the UKWAS should contain reference to a documented complaints procedure.

7.4.3	We suggest a Guidance note recommending that: <i>An employee should be appointed to manage the complaints procedure.</i>	This guidance covers FSC's requirement that an employee should be appointed to review and resolve any grievances raised in relation to the forest enterprise.
8.1.1	Insert under Means of Verification at the end of the first bullet: for All woodlands...being implemented, <i>and that the health of workers is being monitored.</i>	There is nowhere in the UKWAS that requires forest managers to monitor the health of their workforce. FSC is quite concerned about the cumulative effect of chemicals, but surely workers made unfit for any reason should be identified.
8.1.2	A second sentence should be added to the Requirement: <i>Workers should be made aware of the means of claiming compensation, should their health be placed in jeopardy.</i>	We would like to see this wording included as a Requirement in order to address FSC's extensive policy guidance on the ability to seek compensation if chemicals in particular are misused and thus affect health.
In the Introduction	We believe that somewhere in the Introduction there should be formal reference to the Interpretation Panel and other working groups (possibly in Section 4). The precise wording of this entry should be the subject of discussion.	FSC wishes standards to address the need to resolve conflict between laws/regulations and FSC's P&Cs. Such conflict mainly arises in UK where FSC's P&Cs exceed re-requirements of the law and an interpretation panel or working group is required to resolve the issue, as in the case of pesticides and the status of wind farms. Naturally such an entry in the main UKWAS document should be brief and could refer to subsidiary information held on the website etc.

#### Consultation

6.1.1	Amend wording to c) of Requirement: delete 'Communication' and replace with: There shall be evidence of <i>fully resolved</i> consultation with statutory bodies etc	FSC is tightening its rules about forest management proceeding before the consultation process is complete, even suggesting an exchange of paperwork. Whilst the UKWAS need not go this far we do not believe that mere 'communication' is adequate (hence removal of the term) and have inserted the concept that consultation needs to have been resolved.
7.1.1	We believe a new sub-clause a) should be inserted before the two existing sub-clauses (which themselves should be 're-numbered' in the Requirement. The new sub-clause should read: <i>a) Owners shall take a systematic approach to identifying consultees.</i>	FSC is beginning to embrace the idea of a social management system, but this is not really appropriate to the UK setting. We believe that if the forest owner can demonstrate a systematic approach to identifying consultees, and then meet the remainder of the requirement, much of FSC's social management system will be in place.
7.1.1	Insert new second paragraph into Guidance: <i>Consultation should be continuous where the circumstances demand.</i>	FSC are keen to have no ambiguity over when consultation takes place. They do not regard it as a once-only activity and we believe this sentence ensures that sentiment is reflected in the UKWAS.
7.3.1	Add wording to first bullet of Guidance: Making reasonable provision for local employment for contractors and suppliers to provide services and supplies <i>and advertising the fact.</i>	FSC prefers forest managers to contact contractors to inform them of opportunities. We acknowledge that this is going too far in the UK context but feel that 'making reasonable provision' is not enough on its own.

7.3.1	Insert paragraph in Guidance below last bullet: <i>The woodland's potential products include non-timber forest products and recreational activities</i>	The insertion of this Guidance alerts wood-land owners' attention to the fact that poten-tial products are not just confined to timber (indeed carbon has also been mentioned!).
7.3.1	Remove wording in Guidance bullet now to read as follows: <i>Promoting and encouraging enterprises which will strengthen the local economy.</i>	We do not feel this bullet as it stands reflects the need for certified woodland to streng-then the local economy wherever possible. Worldwide, FSC is seeking commitments to put local people before those coming from further afield and to use them to meet the forest manager's long term staffing requirements. There is also an emphasis on supporting the local infra-structure. Hence we do not feel that there should be any ambiguity about this guidance-bullet.
<b>Endangered Species</b>		
2.1.1		We have no specific wording to suggest by way of amendment in the Guidance section, but we need to ensure that the documents referred to cover the protection of all rare, threatened and endangered species in order for requirements j) and k) to be met in specific FMUs. FSC are keen to ensure that these species are identified in each case.
<b>Restoration</b>		
3.3.4	Add an extra sub-clause c) to read: <i>Accidentally introduced exotic invasive species shall be eradicated.</i>	FSC has produced some guidance on the need to act when exotic species become invasive. We feel that the addition of this extra sub-clause covers most eventualities.
4.2.2	A bullet needs to be inserted at the beginning of 'means of verification' requiring: <i>Written guidelines prepared and implemented to control erosion and protect water resources.</i>	Field observation alone may not be sufficient to guarantee that timber is harvested with minimum loss or damage. We feel that, particularly in large wood-lands, guide-lines are necessary.
6.2.1	Insert a new paragraph in the Requirement below d) saying: <i>A minimum of 10% of the woodland should be retained in the condition of natural woodland appropriate to the locale. This area can be included within the area identified above.</i>	FSC wish to see at least 10% of forest area (especially plantations) retained or restored in as natural condition as possible.
<b>Assessment, Monitoring and Records</b>		
2.1.1	Final paragraph under Guidance: <i>Maps should identify extraction routes and storage sites.</i>	It may be helpful to provide a little more guidance on maps.
2.1.3	Second bullet of Guidance. We suggest this now reads: <i>Advances in scientific and technical research.</i>	We suggest this very small inclusion for accuracy's sake.
2.2.1	It may be worth including some Guidance wording to the effect that: <i>Proposed operations include both on-site activities and those that occur beyond the woodland boundary such as waste disposal, highway traffic etc.</i>	It is natural that a forest manager will tend to concentrate on what goes on within the woodland area. We propose this Guidance wording just to ensure that downstream impacts are taken into consideration.
2.2.4	Two sentences (not bullets) should be included at	We feel this Means of Verification may be helpful

	the end of 'means of verification': <i>Production records and sales invoices to be kept for a minimum of five years.</i> <i>Where appropriate notes and invoices shall identify the name and address of the next consignee/purchaser, date of consignment/ sale, type of product and volume sold.</i>	because FSC believes it is one way to allow physical products to be linked to paper records.
5.2.1	Insert in the first sentence of sub-clause a) of the Requirement: ... an effective <i>Integrated Pest Management</i> strategy for minimising....	A suggestion to reflect the growing relevance of Integrated Pest Management strategies.
<b>GMOs</b>		
5.3.1		We do not feel that the Requirement and Means of Verification in connection with GMOs need to be hardened whilst UK is a GMO-free area in relation to open forestry. Should this change, FSC would require forest owners/managers to sign a declaration that their holdings are GMO-free.
<b>Harvesting</b>		
4.2.2	Guidance: new sentence below bullets: <i>targets should be set for the level of waste to be left on-site.</i>	FSC is keen for forest managers to take more responsibility for waste produced in the FMU.
4.2.2	Means of Verification, second bullet should now read: <i>Field observation and documented evidence for reporting on targets for waste.</i>	To give a means of verification for waste targets.
4.2.4		FSC's most recent suggested guidelines require that whole-tree harvesting is not practiced. FSC UK lacks sufficient forestry experience to know whether this restriction is acceptable in the UK context or not. We merely query whether the wording of the Requirement of 4.2.4 should be hardened up in light of evolving deadwood policies etc.
<b>Access to Information</b>		
2.1.1		We offer no text to revise this Clause, but seek reassurance that sub-clause c) of the Requirement (need to identify special characteristics and sensitivities of the woodland) can be achieved in practice. Documents referred to in the Guidance must allow for the identification, where they exist, of woodland with significant concentrations of valuable biodiversity, and those that contain rare, threatened or endangered ecosystems, and where such landscape features as watersheds need particular protection

**UKWAS Interpretation Note 6 - Use of bio-solids (November 2006)**

**Key Words:** Fertilisers, bio-solids, waste disposal.

**Relevant requirement references:** 5.2.5c, UKWAS 2nd edition

**Date:** Discussed at Interpretation Panel meeting 1 November 2006 and agreed via email communication.

**Question:**

Tilhill auditors are unsure on the ability to use bio-solids under wording of requirement 5.2.5c. Does the standard mean that bio-solids cannot now be used, and, if so is that what the standard should mean?

**Discussion:**

Bio-solids are used at rates of 2-400t/ha, and their use is a highly regulated activity needing an EIA. While bio-solids are used for fertilisation, they also provide some weevil control, as well as a social service in waste disposal. Concern was raised that the quantities used are not simply to aid establishment. Concern was also raised that bio-solid use as a social service is not an acceptable use in a certified woodland. The rates of bio-solids applied are required in order to achieve the corresponding N P K outputs of inorganic fertilisers.

Interpretation Panel meeting of 1st November 2006 agreed that:

1. the Standard only permitted the use of bio-solids as a fertiliser within the limits stated in requirements 5.2.5a and 5.2.5b; and
2. when bio-solids were used as a fertiliser an assessment of the environmental impacts of their application was necessary under the relevant parts of Requirements 3.1.1, 3.1.2 and 3.1.3.

**Conclusions:**

The use of bio-solids as a fertiliser is permitted.

**References:**

FC Information Note 079 "Use of Sewage Sludges and Composts in Forestry", January 2006, Andy Moffat.

(Replaces and updates FC Bulletin 107, "A Manual of Good Practice for the use of sewage sludge in forestry", 1992.)

## UKWAS Interpretation Note 7 - Wind farm development on certified forest land (October 2008)

### Key words.

Wind farms, development, conversion to non-forest land.

### Relevant requirement references.

3.5.1 Conversion to non-forest land.

6.1.3 Conservation and enhancement of biodiversity.

1.1.5 Commitment by owner, tenant, manager to conformance with the Standard.

### Date.

The issues were discussed by the Panel via e mail between March and August 2008. Guidance was also provided by the UKWAS Steering Group and Forestry Commission GB.

### Questions.

The following questions were posed by a certifying body.

1. If a wind farm is developed within a certified FMU, what are the criteria that would allow:
  - a. the timber to be felled for the wind farm to be classed as UKWAS certified timber?
  - b. the residual part of the FMU to remain certified?
2. In this context is there any % limit on how much of the FMU can be felled and converted to a wind farm and the felled timber to be certified/the residual part of the FMU still to be certified? Is it possible for an FMU to be 100% felled for a wind farm and all the timber to be sold as certified?

### Discussion.

#### 1. Certification of timber felled from sites for wind turbines and associated infrastructure.

Requirement 3.5.1 Guidance Note states: *timber felled from areas cleared for construction which is not related to the management of woodlands may not be sold as sourced from certified woodland.*

In the context of wind farm development this requirement applies to timber felled on land which will be occupied by wind turbines and associated infrastructure. The restriction does not apply to timber felled in the course of wind farm development where the harvested areas will be restocked or will meet the criteria for conversion to non-forest land specified in this Requirement (enhanced ecological value, improved landscape, cultural /archaeological restoration)

Requirement 6.1.3 Guidance Note refers to *small scale restoration within a woodland habitat to (inter alia) heathland, bog and other open habitats.* Such restoration might be accompanied by the erection of wind turbine(s). Timber from sites occupied by wind turbines and associated infrastructure may not be sold as UKWAS certified material.

## **2. Certification of the residual part of the FMU**

Requirement 3.5.1 stipulates that conversion to non-forest land shall only be carried out where there is no evidence of substantial dispute. Planning consent and a favourable EIA report would normally be considered as evidence of lack of substantial dispute.

Additionally Requirement 3.5.1 stipulates that conversion to non-forest land is only permitted if the new land use:

1. will be ecologically more valuable in terms of the UK Biodiversity Action Plan, or
2. will contribute to an improvement in the landscape, or
3. is required for cultural or archaeological maintenance or restoration.

It follows that forest areas which will be occupied by wind turbines and their associated infrastructure may not retain certified status. FMU boundaries may need to be redefined to excise the affected areas in order for the residual part of the FMU to retain certified status. The Standard places no limit on the percentage of FMU area that can be excised.

Forest management plans may need to be revised following excision.

Requirement 1.1.5 commits the woodland owner, tenant or manager to conform to the Standard and to declare an intention to protect and maintain the ecological integrity of the woodland in the long term. The certifying body must be satisfied that a wind farm development on forest land does not infringe these requirements.

Details of wind farm developments will vary from case to case and it is the duty of the certifying body in each case to take full account of the terms of Requirements 3.5.1; 6.1.3 and 1.1.5.

### **Conclusions.**

1. Timber felled from areas where wind turbines and their associated infrastructure will be located may not be sold as UKWAS certified timber.
2. Timber harvested from areas which are felled as part of eg. wind farm development but which will subsequently be restocked or will otherwise meet the provisions of Requirement 3.5.1 (enhanced ecological value; improved landscape; cultural /archaeological restoration) may be sold as certified timber.
3. Areas of woodland cleared for occupation by wind turbines and their associated infrastructure may not retain certified status.
4. Areas of forest cleared during eg. wind farm development but which will be restocked or will otherwise meet the provisions of Requirement 3.5.1 (enhanced ecological value; improved landscape; cultural /archaeological restoration) may retain certified status
5. The continued certification of all areas of the FMU affected by eg. wind farm development will be determined by the certifying body taking full account of Requirements 3.5.1; 6.1.3 and 1.1.5.
6. Planning consent and a favourable EIA for eg. wind farm development would normally be considered sufficient evidence of lack of substantial dispute about the development.

7. Specific reference should be made to wind farm development on forest land in the next UKWAS revision.



## UKWAS Small Woods Review – Outcomes and Lessons Learned

### 1. Background

Throughout the development and revision of the UK Woodland Assurance Standard all the stakeholders have sought to minimise the burden of certification for owners and managers of smaller woodlands.

It was recognised that the level and complexity of management needed to meet the requirements of the standard depended on the size and type of the woodland being audited. In particular, small woodlands were not expected to need the same level of documentation or management systems and procedures as are normally used for larger or more intensively managed woodland areas or by management companies.

Within the standard, the means of verification included specific and more appropriate types of evidence for 'small' woodlands. In undertaking their audits, certification bodies also took account of the size of the woodland and the scale and intensity of its management and operations.

However, the unit cost for smaller owners is inevitably higher than for larger owners and despite the availability of mechanisms such as group certification there remained a widespread perception amongst owners and managers that the standard was itself a barrier to certification.

The FSC approval of the Second Edition of UKWAS was subject to a number of Conditions including a requirement to develop alternative indicators which require special provision when applied to small and/or low intensity managed forests<sup>1</sup>.

The UKWAS Steering Group made this work a key priority for 2007 and a Small Woods Task Group (SWTG) was established and asked to report to the Steering Group.

### 2. Small Woods Task Group's recommendations and outcomes

The Small Woods Task Group included Steering Group members and experts in the field of small woodlands and certification.

At its initial meeting in March 2007, the SWTG noted that the Steering Group's remit was limited to setting a certification standard. The SWTG recognised that the UKWAS Steering Group could play an important role by simplifying the standard for smaller woodland managers wherever possible but that it had to act within any constraints set by the FSC and PEFC certification schemes.

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<sup>1</sup> The FSC approval of the second edition of UKWAS was effective from 1st November 2006 and subject to a number of Conditions including: "Within 24 months following the accreditation of this standard, FSC UK shall develop alternative indicators which require special provision when applied to small and/or low intensity managed forests to establish full compliance with Clause 4.3 of FSC-STD-20-002".

In light of this limited scope for action, the SWTG considered it essential also to identify what actions might be taken by other parties such as the certification schemes, the certification bodies and government bodies.

The following terms of reference were drafted and subsequently approved by the Steering Group:

- to make the standard more accessible to managers of small and / or low intensity managed (SLIM) woodlands
- to identify ways to increase uptake of certification by SLIM woodland managers by identifying actions that other stakeholders might take forward
- to fulfil the requirement of FSC Condition 2.

The SWTG submitted an initial report to the Steering Group for their feedback prior to preparing a final report, [UKWAS for Smaller Woods](#), which was submitted to the Steering Group in November 2007. A summary of the report's recommendations, the Steering Group's responses and the outcomes is given below.

## 2.1 SWTG Recommendations: UKWAS standard

### Recommendations

#### *Scale and intensity:*

- The current UKWAS 'small woodland' category should be expanded to 'small and / or low intensity managed woodland' ('SLIM woodland')
- The current size definition of a 'small woodland' as an individual wood of 100ha or under should be retained
- A 'low intensity managed woodland' should be defined by adopting the FSC criteria for defining low intensity
- When revising the UKWAS text, opportunities should be taken to better cater for small woods, especially for 'very small' woods (<10 ha).

#### *Text reduction and adaptation:*

- The UKWAS text should be adapted by making only those alterations necessary to fulfil the FSC's requirements for the minimum set of FSC Criteria
- A separate SLIM woodland version of the UKWAS standard should be prepared and released in pdf format on the UKWAS website.

## Steering Group response

The Steering Group accepted the SWTG's recommendations.

A drafting group was established to make the necessary amendments to the UKWAS standard and a draft revision and a [Consultation Paper](#) on these proposals were issued in May 2008. The responses received were broadly supportive but respondents were doubtful that the proposed measures would result in any significantly greater uptake of certification by SLIM owners.

## Outcomes

### *Scale and intensity:*

- A new 'small and / or low intensity managed woodland' ('SLIM woodland') category has been adopted by extending the 100ha or under 'small woodland' category to include 'low intensity managed woodland' as defined by the FSC criteria
- The UKWAS text has been reviewed and revised to better cater for SLIM woods and in future revisions there will be a continued emphasis on adapting the text to cater best for SLIM woods and for 'very small' woods (<10 ha).

### *Text reduction and adaptation:*

- The Amended Version of the UKWAS standard has been approved by FSC and is available in pdf and html format on the UKWAS website.

## 2.2 SWTG Recommendations: Additional advice & guidance

### Recommendations

#### *Advice and guidance:*

A "SLIM Woodland Toolkit" should be established on the UKWAS website to include:

- A reduced SLIM woodland version of the UKWAS standard in pdf format
- A *Users' Guide* for SLIM woodland managers to sit at a level between the UKWAS leaflet and the standard: acting as an introduction it should aim to demystify certification but remain at a general rather than detailed level
- Advice on interpretation of the standard for different situations through provision of case studies, examples of management plans for different sizes and levels of intensity, example clauses, the role of the Interpretation Panel, etc.

## Steering Group response

The Steering Group accepted the SWTG's recommendation to provide additional advice and guidance.

It was decided that having two versions of the standard would cause confusion and that an Amended Version of the full UKWAS standard should be prepared.

The *Users' Guide* concept was considered in detail but it was concluded that at this stage a leaflet targeted at woodland owners and managers to explain and illustrate the SLIM criteria would provide the most useful advice.

Careful consideration was given to what other advice might most usefully be provided. It was decided that, in addition to the SLIM leaflet, a list of additional examples of the SLIM criteria would be prepared and posted on the website. Further examples can then be added as necessary.

## Outcomes

### *Additional advice and guidance*

- The Amended Version of the UKWAS standard is available in pdf and html format on the UKWAS website
- A downloadable leaflet, *Are you SLIM?*, has been prepared and placed on the website
- Illustrative examples of SLIM woodlands have been prepared and placed on the website.

## 2.3 SWTG Recommendation: Other parties

### Recommendations

#### *Other parties*

- A consultancy should be commissioned so as to identify actions which other parties might take in support of SLIM woodland owners and managers
- Meanwhile the following actions should be taken:
  - FSC UK and PEFC UK should be asked to consider having the UK designated as of low risk status so as to allow non-certified timber better market access
  - All CBs operating in the UK should be invited to join UKWAS as Associate Members and to nominate a joint representative to attend UKWAS Steering Group meetings (in a non-voting capacity) to improve linkages and liaison.

### Steering Group response

The Steering Group accepted the SWTG's recommendations.

ProForest Ltd was commissioned to prepare a report identifying actions which other parties might take in support of SLIM woodland owners and managers.

FSC UK and PEFC UK have been asked to consider having the UK designated as of low risk status so as to meet the provisions for the FSC 'Controlled Wood' and PEFC 'Non-controversial Sources' processes in the UK. If successful the benefit would be that uncertified material from low risk sources could enter a certified supply chain so reducing costs for smaller owners.

An Associate Membership category has been introduced and invitations extended to the four Certification Bodies operating in the UK so as to improve linkages and liaison.

## Outcomes

### *Identifying priority actions for other parties*

The ProForest report, [Maintaining and extending Market Access for UK Timber from Small and/or Low Intensity Managed \(SLIM\) Woodlands](#), was presented to the Steering Group in April 2008. The Forestry Commission and the Confederation of Forest Industries (ConFor) took the lead in considering which recommendations might most usefully be taken forward. Following discussion, the Steering Group identified two priority actions:

- Better alignment of Forestry Commission (FC) / NI Forest Service (NIFS) and UKWAS management planning and certification process requirements
- Meeting the provisions for the FSC 'Controlled Wood' and PEFC 'Non-controversial Sources' processes in the UK.

### *Certification Bodies*

Three of the four eligible CBs have taken up or indicated that they will take up the invitation to become UKWAS Associate Members and one has declined. A CB representative attends Steering Group meetings (in a non-voting capacity) to improve linkages and liaison.

### *FSC UK and PEFC UK*

FSC UK and PEFC UK have been asked to consider having the UK designated as of low risk status so as to meet the provisions for the FSC 'Controlled Wood' and PEFC 'Non-controversial Sources' processes in the UK. If successful the benefit would be that a certified supply chain could contain a proportion of uncertified material from low risk sources so reducing costs for smaller owners.

- FSC UK has confirmed that it is seeking to obtain a Low Risk status designation for the UK from FSC International and has begun the risk assessment and application process
- PEFC UK has confirmed that its existing procedures allow for individual companies to include a proportion of uncertified timber from Non-controversial Sources in a certified supply chain

### *Forestry Commission & NI Forest Service*

FC and NIFS have been asked to consider better alignment of Forestry Commission / NI Forest Service and UKWAS management planning and certification process requirements.

- FC has confirmed that it wishes to scope what opportunities might exist for appropriate, improved alignment between UKFS implementation and certification; it has suggested this is best taken forward by means of a small working group once the new UKFS is agreed but before the FC's approval processes are finalised.
- NIFS has confirmed via the FC that they are also content to proceed in this manner.

### **3. Benefits for SLIM owners and lessons learned**

What was immediately clear was that smaller owners need a low cost and easily accessible route into certified markets.

Secondly, it was equally clear that the UKWAS Steering Group has very limited scope to take actions that would make a substantial difference to smaller woodland owners. This was because the Steering Group's remit is restricted to setting a certification standard whereas many of the factors influencing the accessibility of certification by woodland owners are influenced by the FSC and PEFC certification scheme rules, the certification bodies' products and the degree of alignment between government requirements and certification process requirements.

It is clear that there is only a very limited understanding in the sector that the Steering Group's scope is restricted or why. This has led to expectations amongst some stakeholders which cannot be met. The Steering Group considers that expectations management should be an important part of future reviews.

#### **Changes to the UKWAS standard**

The changes made to the UKWAS standard were constrained by the FSC's requirements. They are essentially limited to an expansion of the previous Small Wood category to embrace woodlands managed at a low intensity to create a new Small and / or Low Intensity Managed (SLIM) woodland category based on FSC criteria.

The Steering Group believes that by far the majority of the UK's woodland ownerships will qualify as SLIM. This extends the benefits that previously applied only to small ownerships to larger but low intensity managed woodland ownerships.

The main benefit of this is that those means of verification specifically adapted to small owners will now also apply to those managing larger woodlands provided they are managed at a low intensity. In addition the certification bodies can be expected to reduce the intensity of their auditing leading to them undertaking fewer audit visits and thus a reduced audit cost. However, it would be wrong to portray this as a major advance that will significantly increase uptake of certification.

The opening of the UKWAS process to the certification bodies through their Associate Membership and representation on the UKWAS Steering Group will assist in maintaining the quality of the standard.

#### **Actions for other parties**

Given the restricted scope of its own activities it was important that the Steering Group went to considerable lengths to identify what actions could be taken by other parties involved in the certification process.

The ProForest report identified a range of possible actions and the Steering Group identified two of these as priority actions to be pursued.

#### *Low risk status*

If FSC UK and PEFC UK can achieve a low risk status for the UK through their Controlled Wood and Non-controversial Sources processes this would potentially allow a large number of smaller owners

to access certified timber markets without having to undertake full certification. This would save them much cost and management time. It is likely to be the most significant way so far identified of helping smaller owners maintain low cost market access and could therefore deliver a substantial benefit for smaller owners without significant risk to sustainable woodland management.

*Better alignment of FC / NIFS and certification process requirements*

The importance of achieving the best possible alignment between government requirements and the requirements of the UKWAS standard and the certification process is clear. This will reduce costs and management time making the certification process more straightforward.

Work to produce management templates, for example, has taken place over the years but is made more complex by frequent changes in government requirements, greater divergence amongst the four UK nations and revisions to the UKWAS and certification process requirements.

This is a matter that can only be taken forward by the Forestry Commission and NI Forest Service working with the certification schemes and certification bodies. It will require commitment from all parties to develop enduring benefits for smaller owners.

**UKWAS Steering Group**

**March 2009**

UKWAS Initial Stakeholder Consultation (1<sup>st</sup> May – 30<sup>th</sup> June 2009)

<b>Responses received by 30<sup>th</sup> June 2009</b>
<b>Respondents' Comments</b>
<p><b>Herriard Estates</b></p> <p>Many people, including myself, consider this UKWAS scheme fundamentally misguided and a waste of effort as it is applied in the UK, although we are currently being ignored.</p> <p>I manage an estate in the south of the UK with over 1000 acres of mixed woods in over 130 compartments. We breakeven in cash terms on our woods, ignoring both my time and that of my office staff. However to generate no real economic value from 1000 acres of land is not sensible personally or for the country as a whole. The increased burden of managing contractors, employees, and health and safety all contributes to this, as clearly does the effect of imported timber and timber products on UK prices.</p> <p>The UK through the Forestry Commission has always operated a well controlled forestry sector. UKWAS has added cost to wood management and the only benefit is for the marketing of retailers. The false certification from some corrupt overseas countries is well known in the industry I have been told by a number of people. Until that is sorted out, which is clearly unlikely, then you are simply adding cost on the UK and exporting jobs overseas.</p> <p>The problems UKWAS has caused in the UK are:</p> <ul style="list-style-type: none"> <li>• Increased administration, which on an estate with this many compartments would be significant, particularly when the administration and record keeping does not of itself create any benefit to the environment.</li> <li>• We cannot now claim most grants without being UKWAS approved – which we will not – so woods management will suffer</li> <li>• By accepting that increased regulation was relevant, you have encouraged the position that means we are now required to also register with the RPA and to comply with farm compliance issues. These are wide ranging and inflexible.</li> </ul> <p>We sadly expect to reduce our woodland management going forward to a most basic care and maintenance basis.</p> <p>Whatever the brief of this consultation, and I clearly understand that is how politicians limit comment, by limiting the brief and scope you have, you can still comment outside it. To really support the industry you need to stand back and consider what benefit this actually tangibly produces, and say whether it is a good direction or not.</p>
<p><b>Confederation of Forest Industries (ConFor)</b></p> <p>Many of our members consider that the Standard is too strongly focussed on controlling economic activity rather than promoting sustainable forest management. True SFM requires that management decisions are taken with due regard for the ongoing financial viability of the activity and the long term economic sustainability of the woodland or forest. The current structure and content of the Standard means that the viability of, for example, the conversion of productive woodland or alternatives to chemical control of pests and diseases, is not assessed. Equally, no consideration is given to whether an activity would still be viable if a subsidy that, for example enabled an activity such as conversion of productive woodland, were to be removed or reduced.</p>
<p><b>Pryor &amp; Rickett</b></p> <p>I would like to discuss this. I was not (and remain!) unhappy about the way PAWS are treated in the UKWAS standard. It has the Woodland trust written all over it. They assume expert status and yet to be frank we have equal knowledge and different views of the PAWS debate. I wrote vigorously (with Geraint) to the consultation last time and yet it remained largely unchanged. Fundamentally the PAWS debate affects the SW majorly and the SS merchants less, yet it is all about</p>



economics and whether unmanaged scrub oak YC 4 is more sustainable than YC 20 DF on a PAWS site. Not dissimilarly to the Heathland restoration there is a large & popular NGO weighing in here but the whole UKWAS structure should be about discussion and compromise. Last time we were not heard, or someone at the table gave way. The PAWS debate needs to allow for differing owners objectives, and be practical & not purist in its approach. If the NGO in question isn't happy to agree to differ, it, like the grower, does not have to be at the table. UKWAS supposedly is a two way street or a three legged stool. In relation to PAWS there is still an underlying theme that restoration is an absolute. In my view (and a lot of CONFOR members in SW England) it is definitely not absolute but discretionary, according to management objectives.

In reality we fudge this by highlighting PAWS areas on maps, restoring some and keep thinning the conifer, but when you come to replant some / all with DF, issues do arise at UKWAS assessment time.

#### **Scottish Woodlands Ltd**

First Aid at Work regulations to change in October 2009.

#### **SGS Forestry**

I wish to commend the UKWAS and would contrast the oft expressed negativity with feedback from SGS Forestry's clients in the UK. I could refer you to some hard headed commercial managers who say, 'It makes us do what we know we're supposed to do'. I know of other commercial organisations who like it as their forest management standard, almost regardless of certification. In terms of the auditing experience, so much depends on the CB attitude and approach. Similarly, I could refer you to people who say it 'Is challenging and, on the day, fairly exhausting, but, equally, stimulating, healthy and, overall, a positive experience.' Others, 'It keeps us on our toes and makes us think about what we do.', and, 'It reassures us that our managers are following a consistent approach to forest management.'

I'd like to suggest that the following be reviewed under UKWAS 3rd edtn.

2.1.2 Management Plan summaries

2.3.6 Monitoring summaries

3.5.1 Conversion re. windfarms, public infrastructure roads & social housing, forestry crofting

5.1.5 Fire planning

5.2.2 Pesticides - guidance

5.2.4 Pesticides - guidance

5.2.5 Bio-solids

5.5.2 Biodegradable lubricants

6.3.2 PAWS

8.1.2 First Aid training

#### **Tweed Forum**

Could you tell me about any work you are doing to incorporate Natural Flood Management features into UKWAS (if any). This is of great interest to people in Border towns such as Hawick and Selkirk, and I have recently been asked to comment on a scoping study of felling in the upper Teviot. The kind of thing I am interested in is the effect on water run-off of new riparian woodland becoming established on first-crop conifer sites (a very good thing). The UKWAS section on ecological functions does not seem to discuss the issue.

#### **Country Land & Business Association (CLA)**

The CLA has 36,000 members who between them own or manage over half of the rural land in England and Wales. For most CLA members woodland forms an integral part of their rural landholding. Some members are already managing their woodlands to a very high standard whilst others especially those with only small woodland holdings are not managing their woodlands at all. This revision of the UKWAS needs to address all their concerns.

The CLA supports UKWAS and values its seat on the Steering Group. The CLA understands the current role of the UKWAS partnership and the political complexities within which it operates. The CLA recognises the excellent work done by the UKWAS Steering Group sometimes in very difficult circumstances to drive UKWAS forward whilst keeping everyone on board.

The CLA recognises the value of an independent internationally recognised certification standard and that that standard should be a guarantee of high quality sustainable forest management. It must sit in the context that currently the biggest threat to our woodlands is lack of management. However the CLA is adamant that it must be appropriate, accessible and affordable for all UK woods and forests.

In its current format and with the current delivery system it clearly is not. Not only have the majority of smaller woodland owners not signed up but an increasing number of larger owners are becoming very disenchanted with the whole thing. This is a real shame.

If this review is to make a difference in the way that certification is viewed by the forestry sector then it is important that the steering group is bold enough to tackle all the issues that will make that difference even if this means straying into new areas.

The CLA is keen that we use the review to see if we can come up with something that will get a much broader uptake and that the CLA can be more comfortable promoting to its members.

The original premise of a certification scheme was that it would be a market driven scheme that would reward the adoption of certification and best practice through a premium being paid by the consumer that would filter down through the supply chain to the primary producer. What is increasingly happening is that certification of the lack of it is being used as a mechanism to deny access to the market place. In this circumstance it is not appropriate that certification should reflect best practice, instead it should reflect good practice.

At a time when there is a resurgence in the use of timber and wood for renewable energy, when there is a real opportunity to get more of our woodland resource in to productive management it is important to have standards that ensure that resource is not abused but it is equally important that those standards are not a disincentive to management. In its current form any requirement for certification is barrier in engaging those owners not managing their woods.

“Controlled wood” is being touted as a way for owners who do not want to meet the costs and bureaucracy of certification to get their timber into the market place but this is just a short term fudge. It is dependent upon the majority supply being certified to allow the minority to remain uncertified. Unless there is a significant price differential then it is likely to have the effect of owners coming out of certification and opting for the controlled wood avenue with the real danger that the percentage of certified wood available drops below the set level.

The CLA believes we should take a more robust attitude towards FSC and PEFC. The UKWAS principle now has broad support from all parts of the forestry sector and this puts it in a strong position. The experience of living with certification has brought some of the more diverse parts of the sector closer together and climate change is going to focus a lot of minds, FSC is having to become more realistic hence controlled wood etc. We should be bringing maximum pressure for the UK to be declared a low risk area which would allow the standard to be significantly simplified.

The CLA believes we should be using the revision of the UKFS and the UKWAS to effectively bring the two standards together and for certification for SLIM woodlands to be delivered by the Forestry Commission.

So hopefully the revision will be sufficiently wide ranging and bold enough to result in a standard that guarantees high quality sustainable woodland management, is appropriate to the UK, and does not in any way act as a deterrent to productive woodland management.

### **Smallwoods Association**

We, through Judy Walker, were involved in the SLIM woodlands review. The resulting document represents an advance towards meeting the needs of small woodland managers the limit of 100ha does not make sense in the UK context, and we would welcome rapid progress towards developing a framework that would enable small (2-25ha) woodlands to become certified economically. Many farm woodlands are in this size range and as marketing timber locally is likely to become more difficult in the absence of certification we would welcome measures which would encourage such woodlands to enter the schemes.

If I could mention a personal example my firewood supplier has recently entered the business and invested in kit including a firewood processor. He is supplying domestic users locally from a number of small farm woodlands in accordance with FC approved management plans. He recently had to turn down the opportunity to expand his business by supplying a national company because they were insisting on FSC chain of custody and he knew that the woodland owners would not consider the expense and administration of becoming certified. The woodlands are being managed legally and responsibly,

but because the owners find the certification procedure too onerous the supplier has missed out on an excellent business opportunity.

I know that FSC and PEFC are looking at allowing a proportion of uncertified material from low risk areas to enter the certified supply chain but we would be keen to see the details of how this might work before commenting.

## **RSPB**

### **Introduction**

The RSPB welcomes the chance to comment at this early stage of the development of the 3rd Edition of the UK Woodland Assurance Standard (UKWAS). We will comment in further detail through our work on the UKWAS Steering Group and subsequent consultations.

We are supportive of voluntary certification of sustainable forest management in the UK, such as UKWAS, as long as it meets all of the following criteria:

- meets priority species, habitats and designated sites needs under country biodiversity strategies, UK Biodiversity Action Plan, EU Birds & Habitats Directives & the Ramsar Convention;
- includes environmental, economic and social stakeholders and issues in all processes;
- is independently third party audited; &
- has transparent governance, standard setting, audit and appeal processes and procedures.

We do recognise the need for stability and continuity in the content of the standard to allow woodland owners and managers to effectively formulate and run their management plans. This revision should aim to be more of a refinement. We hope that this review process will be supported by FSC and PEFC through timely and accurate advice, both from the UK and HQs.

The RSPB has the following issues that we would like this revision of UKWAS to address.

### **Small and/or Low Intensity Managed Woodland certification**

The RSPB would welcome further development of the UK Woodland Assurance Standard, and associated certification audit procedures to assist the uptake of UKWAS by owners of small and/or low intensity managed woodlands (SLIMW).

We recognise that some of the measures required to facilitate this, for example the setting up of SLIMW group schemes, may be beyond the scope of this revision of the standard and lie mostly with the FSC, PEFC and their certification bodies.

### **Restocking on priority open ground habitats**

The RSPB would like to see UKWAS make a clearer commitment to not permitting the restocking on important open ground habitats, such as lowland heathland, blanket and raised bogs and coastal dune systems. The existing requirements on woodland design, management planning and removal of woodland for habitat creation are helpful, but could be improved.

This highlights an anomaly with the UK Forestry Standard (which underpins UKWAS), that allows the restocking on priority open ground habitats which are restorable, but quite rightly does not permit the initial afforestation of such habitats.

### **Other concerns**

The RSPB has concerns, outside the standard review process, that impact on the environmental credibility of UKWAS. We consider that the full and widespread compliance with UKWAS may *(be)* restricted by the effectiveness of audit protocols and their implementation.

We also have concerns about the certification of controlled wood and how this relates to actual woodland management that protects and enhances biodiversity.

## **SelectFor**

I have the following comment re UKWAS 7.3.1 which requires:

“Owners/managers shall promote the integration of woodlands into the local economy.”

However, FSC P&C 4.1 requires that “**The communities within, or adjacent to, the forest management area should be given opportunities for employment, training and local services.**”

I can't see this reflected clearly anywhere in UKWAS.

UKWAS 7.3.1 is adequate to conform to the requirements of FSC P&C 5.4 but is not a correct interpretation of the requirements of FSC P&C 4.1 in relation to **providing opportunities for communities within or adjacent to forests**.

The problem lies with the fact that in Britain, the local economy can cover a much wider geographical area than those "**communities within, or adjacent to the forest management area**". This can mean that villages situated in or near large forests are often not provided with employment opportunities, because 'local economy' can have a wider geographical definition and could be interpreted as including the nearest large town or even a whole region.

I accept that the rural economy has changed over time, however, the UKWAS requirement should be re-written to accurately reflect what is meant by the FSC requirement 4.1, in particular the inclusion of the phrases '**communities within, or adjacent to**' rather than with an emphasis of the word local which can have a wider definition.

#### **PEFC UK**

On behalf of PEFC UK, I should like to confirm that PEFC will fully participate in the review process of UKWAS which has now commenced.

At this stage there are no substantial matters which I need to raise apart from one significant element of UKWAS which is that it must be entirely neutral and be the UK Standard for Forest Certification adopted by all stakeholders through consensus.

Accordingly it must not reference within the text or associated documentation, either directly or indirectly, the requirements of one or more of the Forest Certification Schemes which may adopt the use of UKWAS for verification of specific items to detailed or of other requirements. It will be up to the Schemes to enhance requirements, should they so wish, and set additional requirements over and above those adopted within UKWAS.

It will be impossible for one Scheme to accept specific conditions required by another Scheme if the reference points in the documentation give acceptance to matters outwith the control of UKWAS and of course of the Scheme itself.

I am sure that you appreciate that this is a matter which needs to be addressed, perhaps even in the immediate future, as for example the wording relating to the derogation of hazardous chemicals requires the input of one Scheme which the other cannot have any control of and is not within the remit of the Standard setting process of UKWAS.

#### **UPM Kymmene**

Our main concern is the current UKWAS position regarding chemicals - and particular the approach to the FSC highly hazardous grouping. This has been highlighted with the recent position on Propylamide - a chemical which is widely used in the UK, has not received derogation and has been "banned" on what is questionable unscientific evidence.

The FSC position on chemicals should be considered much more at a national level rather than globally - with UKWAS for example being able to apply exemptions where the loss of a particular chemical would have a significant impact at a National level.

We look forward to taking part in rest of the consultation process.

#### **Forestry Commission England**

- **Climate change**

Need to make clear the role of sustainably managed woodlands in mitigation of climate change. Also need to consider what climate change adaptations should be expected in certified woodlands. Guidance needed on how best to sustainably manage the carbon stocks held within woodlands.

- **Windfarms**

Need to address inconsistency arising from UKWAS Interpretation Panel Note 7 (October 2008). For example, if clearing forest for windfarms, the timber can be sold as certified if the cleared area meets the criteria for conversion to non-forest land specified in Requirement 3.5.1. However, if the clearance meets the Requirement in 6.1.3 (small scale restoration of

open habitat), then that timber specifically cannot be sold as certified.

- **Definition of forest management unit**

This is not covered in UKWAS but is in IP note 7. The concept of FMU will need much better definition. For example, FE have telephone masts in clearings in the forest, but have never excluded these areas from the FMU, why then should we exclude forest clearings with wind turbines in them. Nor have we excluded road accesses passing through the forest which are to do with accessing land beyond the forest, and not there for the purpose of managing the forest. There is a risk that we will end up with very moth-eaten forest management units.

- **Integrated pest management**

Need to respond to the recommendations (yet to be published) contained in the IPM workstream from FSC. For example, this is likely to include pesticide recording and evidence of adoption of an IPM approach (as evidenced by following FC Practice Guide 14).

- **FSC 'highly hazardous list'**

Given that UKWAS is also a standard for PEFC, we should re-consider having a specific reference to FSC 'highly hazardous list' of pesticides (section 5.2.4).

- **Research plots**

Important to allow research plots within a certified forest to work with pesticides, and other management techniques, that may not be permitted on the wider certified estate.

- **Plant procurement**

Need to carefully consider how to interpret the recent FSC advice note regarding sourcing of nursery stock for certified forests.

- **Brash and stump harvesting**

These topics need to be covered and updated in the light of recent FR work

- **Deadwood**

Need to fully review section 6.2.2 referring to Deadwood requirements in line with the soon to be published FC Practice Guide. Figures in the guidance such as the 20m<sup>3</sup>/ha or 5-10% stand volume should be looked at again, noting that it is very hard to quantify deadwood in practice.

As a general point, we consider UKWAS to be a sufficiently rigorous standard as it is. Need to be careful not to revise it in a way that makes it more restrictive, but to strive to keep it well balanced and hence attractive for woodland managers to continue to sign up to.

## Responses received after 30<sup>th</sup> June 2009

### Soil Association

#### Wind farm development

There is an increase demand for wind farm development on forestry land in UK and little provision within the UKWAS standard to deal with such development in relation to certification.

UKWAS has issued an interpretation note (Note 7 – October 2008) that gives some guidance in relation to wind farm development and certification.

The interpretation note states that the UKWAS requirements applying in the case of wind farm development are 1.1.5, 3.5.1 and 6.1.3. However under requirement 3.5.1 the guidance section states *"The requirement does not relate to clearance for development such as road and houses"*. The term development is ambiguous here and it is not clear if "road" and house" are only given as example or if those are the only two cases when this guidance applies? It might be useful to include wind farms as an example of development as this is most likely type of development to happen on forestry land.

Also requirement 3.5.1 is directly related to requirement 6.1.1. This requirement includes designated areas, important areas for nature conservation, etc. What happens if wind farm developments occur on planting sites (which is commonly the case) or other sites that don't fall under requirement 6.1.1?

Also stakeholder consultation is only partly (vaguely) covered by those requirement: 6.1.1 states that *"Felling of part of the woodland or restoration of that part to non-forested land shall be carried out only where there is no evidence of substantial dispute..."*. The requirement does not place enough emphasis for a proper and thorough stakeholder consultation process in case of conversion to non-forest land.

### FSC Principle 9

No definition is given in the UKWAS standard in relation to the 4 HCVF categories as defined by FSC. There is a need to define and clearly explicit what are the existing HCVF categories in the UK context. Clarification from the UKWAS working group will avoid ambiguity, especially for High Conservation Values that don't have a legal designation but might still be of a value high enough to be considered under FSC Principle 9.

The UKWAS standard under Section 6 mainly deals with protected areas however the four categories under FSC Principle 9 also include: endemic, rare and endangered species (under FSC category a), forest areas that provide basic services (under category c) and forest that are fundamental to meeting basic needs of local communities (category d). Those categories are not clearly reflected within the UKWAS standard.

It is generally assumed that UKWAS section 6 on "*Conservation and Enhancement of Biodiversity*" is covering those aspects. However UKWAS requirements under Section 6 are mainly covering FSC Principle 6 that deals with environmental impacts and conservation of biodiversity areas. Areas covered under FSC Principle 9 have a higher conservation value than those dealt with under FSC

Principle 6 (in particular a precautionary approach should be adopted when developing conservation measures).

### UKWAS 7.3.1

The UKWAS requirement 7.3.1 intention is to cover FSC criterion 4.1 that relates to opportunities for employment, training and local services for communities within, or adjacent to the forest management area. However the UKWAS requirement only asks for "an integration of the woodland in the local economy". The term "within or adjacent to" has been translated in the UKWAS standard by "local economy". In the UK context the local economy is generally considered at a wider scale than what was intended in the FSC P&C, i.e in UK the local economy might encompass a whole county or region and, while the opportunity provided by the forest management might be real little of that might really benefit "communities within or adjacent to the forest".

An option might be to incorporate the term "communities within or adjacent to" in the UKWAS standard in order to avoid any ambiguity and to be in line with the spirit of the FSC norm. Another might be to define what is meant by the term "local economy" within the section guidance.

### **Rural Services**

Thank you for the opportunity to contribute the UKWAS revision process.

I would like to comment on Section 5.2.4 which I believe has a serious flaw, specifically:

#### *5.2.4 Requirement*

*a) World Health Organisation Type 1A and 1B pesticides, any pesticides banned by international agreement and those referred to as 'highly hazardous' in the guidance column, shall not be used, unless derogated\* in the UK.*

*\*The Forest Stewardship Council produces a definitive list of 'highly hazardous' pesticides. These pesticides cannot be used unless a specific UK derogation has been granted.*

In the introduction to the standard, it is stated that UKWAS provides INDEPENDENT verification against the standard.

#### **1. Background and purpose**

*The international timber products market is increasingly demanding assurance about the quality and environmental impacts of woodland management. One way to provide this assurance is through independent verification against a published standard which defines appropriate and effective management. In forestry, this process is widely known as forest or woodland certification.*

This independence is, however, undermined by the reference to just one of the certification providers.

By incorporating an FSC requirement on pesticide use, foresters who have otherwise conformed to all other UKWAS requirements but wish to use UK approved pesticides of their choice are effectively denied access not only to the FSC logo, but to that of PEFC or any other provider.

I would suggest therefore that the references to FSC & the highly hazardous list is removed.

May I also comment that in the early stages of UKWAS development the Chemicals Working Group was seriously concerned about the implications of developing such a list of pesticides, and it is of concern that such a list, produced without any international scientific peer review should be imposed on those desiring certification.

EC and UK pesticide registration is extremely rigorous, and is based on independent scientific study, and therefore it this, and the corresponding Code of Conduct that UKWAS should specify as the requirement for compliance.

### **Duchy of Cornwall**

The Duchy's woodlands were almost the first to be certified in the UK (and certainly the Duchy's were the first commercial woodlands of any significant size) and so in that sense we have been in it from the beginning. Last year we had our major 5-yearly audit and a new FSC certificate was issued (with annual inspections to follow, as is always the case).

I guess we all realise by now that having FSC certified status doesn't really bring additional income to the woodland owner; all it does is allowed us to continue to supply the markets and claim the FC grants that we always supplied/claimed! My concern, however, is not so much about the lack of additional income but the actual cost AND complexity of the whole FSC process. There has, over recent years, been a lot of attention given to making FSC certification more simple and affordable for the small woodland owner (hence the new SLIM standards) but I think this has been a distraction. What FSC/UKWAS should be concerned about is making the process more simple and affordable for ALL owners. What FSC/UKWAS need to understand is that most woodland owners are managing their woodlands with skeleton staff and a shoestring budget (that's what the economics of woodland management in this country dictates!) Yes, there are Gov.t organisations (obviously the FC) and large NGO's (like the Woodland Trust) who may be in the luxurious position of having numerous field staff and office staff but that is simply not the case for most of us. I am the only Forester employed by the Duchy of Cornwall with over 4,000 acres of woodland stretching from the Isles of Scilly to Herefordshire to oversee. I believe that, if I am to try and follow in the footsteps of the great British foresters of past generations (and the foresters of the present day on the continent), then my time should chiefly be spent in the forest but the whole FSC process drives me indoors, trying to create and maintain paperwork that for the most part will do nothing for the actual long-term prosperity of the woodland.

We now hear that the UK might become a Controlled Wood zone; that surely suggests that our existing forestry regulatory framework is very sufficient and so to rise to FSC status should be a lot simpler than it presently is.

Time doesn't allow me to comment further now but I trust that I've made myself clear enough!

### **British Association for Shooting and Conservation (BASC)**

I have only just discovered that this process is starting, so I hope you can accept this late submission.

About BASC

BASC was founded in 1908 as the Wildfowlers' Association of Great Britain and Ireland (WAGBI) and is the UK's largest shooting association. BASC is constituted as an Industrial and Provident Society with approximately 130,000 members. BASC is the largest representative body for sporting shooting in the UK. It aims to promote and protect sporting shooting and the well being of the countryside throughout the UK and overseas. It actively promotes good firearms licensing practice, training, education, scientific research and practical habitat conservation. BASC believes that all who shoot should conduct themselves according to the highest standards of safety, sportsmanship and courtesy, with full respect for their quarry and a practical interest in wildlife conservation.

BASC's expertise in shooting matters is widely recognised and it is routinely consulted by a variety of government departments and agencies and other statutory and non-statutory bodies.

Many of BASC's members shoot under lease agreements on Forestry Commission land. Recently we have been told that shooting leases have been drawn up to exclude certain legitimate quarry species including woodcock, grey partridge and some waterfowl species. There seems little reason for this other than to allow certain woodlands to be given UKWAS certification.

It seems rather odd that FC/UKWAS are acting in this way, as a government agency I would have thought it reasonable to expect them to be guided by JNCC, the government agency responsible for the quarry list. If JNCC have an issue with the conservation status of quarry species then they carry out a review and if necessary, remove the species from the quarry list.

It seems to me that by acting in this way, rather than engaging with those that have a vested interest in conserving quarry species, so that a sustainable harvest can be taken, the UKWAS certification is alienating a valuable force for conservation gain.

The findings of the independent economic and environmental survey by PACEC, in 2006, showed that in the UK shooting is involved in the management of two-thirds of the rural land area and that two million hectares are actively managed for conservation. Shoot providers spend £250 million a year on conservation and in total, shooting is worth £1.6 billion to the UK economy. The PACEC study also found that whilst the Wildlife Trusts, collectively the UK's largest charity dedicated to conservation, manages 80,000 hectares nationally, shooters manage more than three times this area in the south east. The importance of working with BASC and the shooting community should therefore not be overlooked. For more information on the PACEC report please visit <http://www.shootingfacts.co.uk/>

I hope that these points can be taken forward in this review and please keep me informed as the project moves forward.



## PEFC UK International Benchmarking Exercise – Presentation to UKWAS Steering Group by Sandwood Enterprise

### Slides 1-2



24 November 2009

## Presentation to the UKWAS Steering Group

### Outline of the Presentation

- The task
- ProForest Report – “Maintaining and extending market access for UK timber from small and/or low intensity managed (SLIM) woods”
- Findings from visits to Geneva, Belgium, Slovakia and Norway
- Summary of findings
- What can the UK learn?
- What next?

### Slides 3-4

#### The Task

- To examine approaches to FM certification under PEFC requirements in various European countries with a view to identifying ways of increasing the uptake of certification in the UK
- Medium sized – 100 to 500 hectares
- Not looking at certification standards
- Timing – to fit in with UKWAS revision

#### ProForest Report 2008

- Dealt with extending market access from SLIM woods in the UK
- Recommendations that further consideration should be given to:
  - simplifying certification processes
  - regional certification
  - FC as Group Manager

### Slides 5-6

#### Geneva

- Met Ben Gunneberg and Yaroslav Tymrak: their views:
  - for small woodland owners to effectively access FM certification they need to join with larger enterprises
  - sceptical about viability of small owners getting together for purposes of certification only
  - In UK the scale and role of the FC provides a unique opportunity for state/private partnership

#### Belgium (Walloon Region)

- 521,000 ha of forest in Walloon Region
- 55% privately owned, average 2.7 ha
- 45% managed by forest department (state)
- 85% of private woods actively managed
- Royal Society of Belgian Foresters
  - members have 50% of private forests
  - main driving force behind certification
- Forest Code (revised 2008) underpins certification

### Slides 7-8

#### Belgium (cont)

- Have gone for regional certification
- 95% of “public” forests certified, but only 10% of private forests
- Private owners must apply through the Society – operates a group scheme with internal audit
- Significant subsidy by Government
- Cost to private owner:
  - 10 ha – 33p per ha per annum
  - 50 ha – 20p per ha per annum
  - 100 ha – 18p per ha per annum
 (external and internal audit costs only)

#### Slovakia

- c. 2 million ha of forest (41% of land)
- 55% owned by non-state organisations
- 45% managed by state forestry organisation (Lesy)
- All forests must have a forest plan approved by the state
- Planning guided by Forest Law

## Slides 9-10

### Slovakia (cont)

- Regional certification, 4 regions
- Lesy does organisation and management of certification including internal audit
- Any non-state owner can apply to join
- All state forests certified
- 19% of non-state certified
- Cost to non-state owners:
  - less than 10p per hectare per annum (external and internal audit costs only)

### Norway

- c. 12 million ha of forest (37% of land)
- 80% privately owned, handed down within families, long tradition of management
- Average private property 60 ha
- 80% of forests covered by FM plans, state pays 50% of costs of producing these
- Forest Act (revised 2006) underpins the certification standard

## Slides 11-12

### Norway (cont)

- Long history of cooperative management
- Strong Owners Federation, organised into 8 regional co-operatives
- Co-ops handle 80% of sales from private forests
- Certification organised through co-ops, nearly all productive forests certified (group certification)
- No fee for certification but costs recovered
- Costs estimated at 20p per ha per annum (includes internal and external audit)

### Summary of Findings

- Certification tailored to circumstances – history, types of forest, ownership patterns
- High level of cooperation between state/private (Belgium and Slovakia) or private (Norway)
- Certification based on large “groups” with internal audit processes. Large and small properties included, effectively some cross subsidy
- Certification accommodating to small owners
- Costs to private owners much lower than in UK (in part due to state subsidy in Belgium)

## Slides 13-14

### What can the UK learn?

- Regional certification
- Audit intensity
- FC as Group Manager

### What Next?

- Explore enthusiasm for regional certification with FC/FE/NIFS (but note also implications for UKWAS)
- Explore with FC/FE/NIFS their willingness to consider acting as Group Manager
- Review opportunities for reducing audit intensity and costs in the UK under both FSC and PEFC, including an assessment of implications for UKWAS

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