

UKWAS Revision (2009-11) – Lessons Learnt

1. Background

A full report on the outcomes of the UKWAS revision *UKWAS Revision 2009-2011: Summary Revision Report (December 2011)* is available on the UKWAS website:

<http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Revision-2009-11-Summary-Revision-Report-December-2011.pdf>

This Summary Report sets out:

- How the revision process was undertaken
- A summary of changes made in the UKWAS Third Edition.

Appendix 1 is a separate document providing a Final Draft of the revised certification standard showing all the deletions and insertions made to the Second Edition:

<http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Revision-2009-11-Summary-Report-Appendix-1-Third-Edition-showing-changes-from-UKWAS-2nd-Edition.pdf>

Appendix 2 lists the dates of relevant meetings.

Appendix 3 lists the key documents produced during the revision process with links to the documents which may be downloaded from www.ukwas.org.uk.

2. The revision and consultation process

A detailed document setting out the arrangements for the 2009-11 revision was agreed in March 2009: *UKWAS Revision 2009-2011: Process and Timetable*: <http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Revision-Process-2009-2011-Standard-Setting-Process-March-2009.pdf>

The work was undertaken by the UKWAS Steering Group supported by a Drafting Group which took forward issues between meetings. In addition, the Board reviewed progress and ensured Steering Group decisions were implemented correctly.

The revision and consultation processes were taken forward in three main phases which incorporated 150 days of stakeholder consultation:

- **Phase 1 (2009):** this was the **evidence gathering** phase including a 60-day initial stakeholder consultation in May-June 2009. There were seven elements in this phase:
 - 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 phase identified the key issues that would need to be considered during the main revision drafting phase and these were published in an Issues Paper in February 2010: *UKWAS Revision 2009-2011: Issues Paper*: <http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Revision-2009-11-Issues-Paper-February-2010.pdf>

- **Phase 2 (2010):** this was the **main revision drafting** phase when all the issues identified in the Issues Paper were considered by the Steering Group with the support of a drafting sub-group which met seven times. This phase was concluded with the publication of a Consultation Draft for 60 days' consultation during December 2010 and January 2011: *UKWAS Revision 2009-2011: Consultation Draft*: <http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Revision-2009-11-Consultation-Paper-December-2010.pdf> and <http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Third-Edition-Consultation-Draft-December-2010.pdf>
- **Phase 3 (2011):** this was the **conclusion phase** and included analysis by the Steering Group of the consultees' comments and suggestions and further revision of the draft certification standard. The Steering Group was assisted by a drafting sub-group which met once. <http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Consultation-Report-on-Consultation-Draft-Steering-Group-responses-April-2011.pdf>

A Pre-approval Draft was issued for a further 30 days' consultation at the end of April 2011: <http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Revision-2009-11-Consultation-Paper-on-Pre-approval-Draft-April-2011.pdf> and <http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Third-Edition-Pre-approval-Draft-April-2011.pdf>

The Steering Group met and agreed further amendments on 21st June 2011: <http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Consultation-Report-on-Pre-approval-Draft-Steering-Group-Responses-June-2011.pdf>

A Final Draft of the certification standard was prepared and made available to FSC UK and PEFC UK at the end of July 2011 so that they could submit it for approval through their international scheme processes. A small number of text clarifications to avoid ambiguity or deliver greater clarity was subsequently incorporated in August at the request of the FSC UK Trustees and some minor text corrections were incorporated to produce the final text in November 2011: <http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Revision-2009-11-Summary-Report-Appendix-1-Third-Edition-showing-changes-from-UKWAS-2nd-Edition.pdf>

- **Certification Schemes' approval:** FSC UK and PEFC UK prepared the necessary documentation and submitted the Final Draft of the certification standard to their international parent bodies – the Forest Stewardship Council (FSC) and the PEFC Council - to check conformance with their scheme's requirements.

PEFC Council endorsement was confirmed to PEFC UK on 14th November 2011 with an 'effective date' of 1st January 2012.

FSC International Centre provided notice of conditional approval to FSC UK in March 2012 and an approval date of 1st April 2012 was later confirmed subject to a List of Conditions, Recommendations & Clarifications being met within three months. Subject to this, the 'effective date' will be 1st July 2012.

[Those changes made to meet FSC's conditions will be incorporated into the PEFC UK national standard at the earliest opportunity.]

3. Lessons learnt

A full discussion on the lessons learnt was held during the UKWAS Steering Group on 26th March 2012.

Four main issues were highlighted:

- **A thorough and open process**

The three-year process and timetable were agreed to have been appropriate and to have resulted in a very thorough process.

It was noted that the Steering Group had kept to its timetable almost exactly throughout the three-year process and that the final action of providing a Final Draft of the revised standard to FSC UK and PEFC UK had been completed on time.

It was agreed that the various consultation papers, drafts and reports of outcomes provided for a very open and transparent process aided by use of the website.

The appointment of a Drafting Group to undertake detailed work in between Steering Group meetings was agreed to have provided an effective mechanism. It meant that the Steering Group was able to focus on the issues of particular concern and consider possible solutions already developed by the Drafting Group so making the most effective use of their time.

It was noted that the process had benefited from being facilitated 'in-house' by contracting the necessary extra facilitation resources (57 days) from the Executive Chair and additional administrative support (15 days) from the Company Secretary. Previous revisions had been facilitated using Forestry Commission or FSC UK resources and this had led to a degree of ambiguity in the ownership of the process.

Conclusion:

The process proved to be satisfactory.

Note the comments on the revision schedule below in relation to providing additional time for certification schemes to undertake their approval/endorsement processes.

- **Revision fatigue**

It was noted that the three-year process, particularly the phase 2 and 3 drafting phases, had required an intense input of resources particularly from the Drafting Group members and facilitator over a prolonged period. The Steering Group also met more frequently than is the norm during this period. This resulted in a degree of revision fatigue.

It was noted that the stakeholders were provided with three opportunities to make their input and again a degree of revision fatigue was evident.

Conclusion:

A degree of revision fatigue is regrettable but inevitable especially in the preparation of the Consultation Draft.

In order to avoid repeatedly re-opening issues it is important that Steering Group members attend all meetings (or otherwise feed in their views) so that all views are presented when decisions are made.

Once made decisions should not be revisited unless there is new information; this is especially important when preparing the pre-approval draft and the final draft.

- **Certification schemes' internal consultation**

An issue arose when the FSC UK Trustees requested changes to be made to the Final Draft text which had been approved by the Steering Group (with FSC UK support) for submission to the international arms of the certification schemes for their approval.

It was noted that this resulted in additional editing of the UKWAS text to satisfy FSC UK after PEFC UK had already submitted the agreed UKWAS for international PEFC endorsement.

This was agreed to be unsatisfactory since the pre-approval draft consultation stage was the stage for final input and because it meant that there was a divergence from the text that PEFC UK had already submitted to PEFC Council for international endorsement and that subsequently submitted by FSC UK for international approval.

It was noted that it also required additional work by the UKWAS facilitator and the Steering Group and incurred additional cost.

Conclusion:

Certification schemes should undertake any internal consultation at national level throughout the process and complete it prior the pre-approval draft being issued.

It would be helpful if certification schemes could seek guidance from their international organisations on the acceptability of proposed revisions throughout the preparation of the Consultation Draft and obtain a full 'pre-MOT' assessment of the Pre-approval Draft.

- **Time for certification scheme approval or endorsement processes**

It was agreed that the time allocated for each phase of the revision was, in the main, adequate but challenging.

It was noted that the only exception was that the period set aside for the certification schemes to approve the revised standard was perhaps too short. The revised standard was provided on time to FSC UK and PEFC UK at the end of July 2011 and they were asked to ensure that the approval/endorsement process was completed for the Steering Group meeting of 15th November 2011. The purpose of the Steering Group meeting was to ensure that any issues raised by the certification schemes could be addressed.

It was noted that PEFC UK met the deadline with an approval date of 14th November but notice of impending FSC conditional approval was not received until March 2012 which was more than seven months after FSC UK received the Final Draft of the revised standard.

It was noted that this led to PEFC UK and FSC UK using different versions of the UKWAS for several months and PEFC UK having to introduce further amendments due to changes to the UKWAS standard required by FSC. This is an unsatisfactory situation that leads to uncertainty and additional work for UKWAS users (CBs and owners/managers), FSC UK and PEFC UK, the UKWAS facilitator and Steering Group.

It was agreed that allowing a longer period for schemes to approve the revised standard might be helpful but it was noted that it was behoven on the international schemes to provide an efficient and timely approval service.

Conclusion:

Additional time should be permitted following completion of the Final Draft to allow the certification schemes six months to obtain approval.

In setting the revision timetable, account should be taken of certification schemes' relevant meeting dates (Boards, General Assemblies, Trustee meetings, etc.) where possible.

UKWAS Steering Group
March 2012