

## **An Analysis of Corrective Action Requests (CARs) Emerging from Forest Management Certification Audits in the UK**

### **Background**

1. Forest management certification audits in the UK are conducted against the United Kingdom Woodland Assurance Standard (UKWAS). There are currently 3 accredited Certification Bodies carrying out FM certification audits in the UK which meet the requirements of the Forestry Stewardship Council (FSC). The main evaluations take place at 5 yearly intervals, with annual surveillance audits between the main evaluations. Certification Bodies are required to place a public summary of their audit reports on the FSC International website. As at 1 January 2014 there were 44 FSC Forest Management/Chain-of-Custody certificates, including group and resource manager certificates, listed on the FSC website, covering some 1.45 million hectares of forest in the UK.

2. When an auditor decides that some aspect of forest management does not meet the UKWAS requirements, a Corrective Action Request (CAR) is raised. CARs can either be major or minor. Certification cannot be finalised if there is an outstanding major CAR: with minor CARs the forest manager is given a specific deadline by which the issue must be resolved to the auditor's satisfaction. CARs are listed in the public summaries of the audit reports.

3. Conducting an analysis of CARs provides useful data on the areas in which forest managers are failing to meet UKWAS requirements. It also provide insights into forest practice in the UK more generally. This will help the forestry sector to prioritise actions to improve standards of forest management, and should inform the next revision of the UKWAS standard.

### **Report and Contents**

4. This report was commissioned by Richard Howe of the Forestry Commission GB. The report analyses all the CARs listed in the most recent main evaluations for each of the 44 current FSC FM/COC certificates in the UK. The report provides:

- A summary of the area (hectares) covered by individual, group and resource manager certification, and the area currently certified by the different CBs.
- An analysis of major and minor CARs by UKWAS section.
- A breakdown of the nature of the CARs between those relating to inadequate documentation and those observed on site visits.
- An assessment of the CARs relating to Group certification.
- An assessment of whether there are significant differences between the CARs raised for individual, multi-site and group certification.
- A commentary on whether there appear to be significant differences between CARs raised by the different Certification Bodies (CBs).
- A comparison between the findings of this study and a similar one carried out by Simon Jeffreys of Tilhill in 2002.
- An assessment of the implications of the findings in relation to UK forestry practice.

## Methods

5. The analysis was based on the public summary reports relating to the most recent Main Evaluation audits for all the UK FM/CoC Certificates listed on the FSC UK website as at January 2014. As main evaluations take place every 5 years, the dates when the certificates were issued ranges from 2009 through 2013. The great majority of the audits were against UKWAS Version 2, with those from 2013 being against Version 3.0 or 3.1. As the structure of UKWAS did not change between versions 2 and 3, the revision did not create a problem in terms of this analysis. There was very little evidence that the changes to requirements and means of verification between Version 2 and Version 3 resulted in an increase in the number of CARs.

6. An Excel spreadsheet was constructed, containing the following information for each of the 44 certificates:

- Certificate code
- Certificate issue year
- Certification Body
- Property name
- Woodland area (hectares) covered by certificate
- Type of certificate (Single, Multi-site, Group)
- Duration of audit (days)
- Major CARs (listed by type and UKWAS Section)
- Minor CARs (listed by type and UKWAS Section)

## Analysis by Certification Type and Certification Body

7. **Table 1** below shows the breakdown of type of certificate by Certification Body

Type of Certificate	Number of Certificates	Area (hectares)	Certification Body			
			SGS Qualifor	Soil Association	Commercial Union	Rainforest Alliance
Single	13	9,438	1	6	6	-
Multi-site	12	1,057,410	2	9	1	-
Group	19	388,286	5	7	6	1
	44	1,455,134	8	22	13	1

**Table 2** below shows the area certified by each of the Certification Bodies

	Certification Body				Totals
	SGS Qualifor	Soil Association	Commercial Union	Rainforest Alliance	
Area (hectares)	1,225,742	165,754	56,951	6,687	1,455,134
% of total area	84%	11.5%	4%	0.5%	100%
Mean area per cert	153,217	7,534	4,381	6,687	33,071

8. The total area of woodland currently certified in the UK is shown as 1,455,134 hectares. This compares with the figure given in the Forestry Commission statistics, as at 31 March 2013, of 1,362,000 hectares of certified woodland which is stated to be 44% of the woodland area in the UK.

9. Tables 1 and 2 above show that while single owner certificates represent almost 30% by number, they represent less than 1% by area. Multi-site certificates represent 73% by area, due mainly to the certificate covering the whole of the Forestry Commission land holding in England, Scotland and Wales, an area of 924,000 hectares. (Note that this certificate pre-dates the separation of the FC in Wales). The figures for the four Certification Bodies are markedly distinct, SGS Qualifor certificates currently represent 18% by number but 84% by area. Rainforest Alliance no longer offer forest management certification in the UK.

### **Analysis of Major and Minor CARs by UKWAS Section**

10. Table 3 below shows the number of major CARs by UKWAS section divided between CARs based on inadequate documentation, resulting from office based checks, and CARs resulting from site visits. Where a CAR related to documentation was picked up during the site visit, for instance the lack of a plan for dealing with accidental spillages, this was allocated to “site”. The UKWAS sections are described as follows:

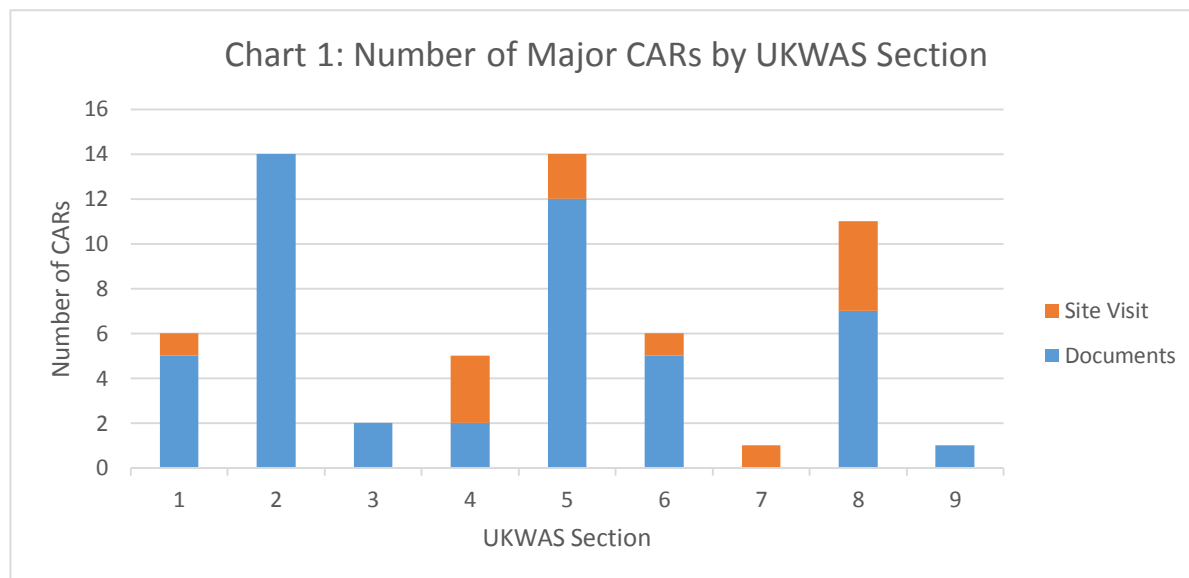
- Section 1. Compliance with the law and conformance with the requirements of the certification standard.**
- Section 2. Management planning**
- Section 3. Woodland design: creation, felling and replanting**
- Section 4. Operations**
- Section 5. Protection and maintenance**
- Section 6. Conservation and enhancement of biodiversity**
- Section 7. The community**
- Section 8. Forestry workforce**

In addition certain CARs were described in the audit reports as overall, or were not allocated a specific section: these have been listed in the tables below as “Other”.

**Table 3: Major CARs shown by UKWAS Section**

<b>UKWAS Section</b>	<b>Documents</b>	<b>Site</b>	<b>Total</b>	<b>Examples (abbreviated)</b>
<b>Section 1. Compliance</b>	<b>5</b>	<b>1</b>	<b>6</b>	<b>Doc: No signed commitment to UKWAS Site: Unauthorised quad biking</b>
<b>Section 2. Man. planning</b>	<b>14</b>	<b>nil</b>	<b>14</b>	<b>Doc: No monitoring plan</b>
<b>Section 3. Design</b>	<b>2</b>	<b>nil</b>	<b>2</b>	<b>Doc: No EPS checklist</b>
<b>Section 4. Operations</b>	<b>2</b>	<b>3</b>	<b>5</b>	<b>Doc: No track planning consent Site: Lack of warning signs</b>
<b>Section 5. Prot/maint</b>	<b>12</b>	<b>2</b>	<b>14</b>	<b>Doc: No chemical reduction policy Site: No emergency plan (spillage)</b>

<b>Section 6. Biodiversity</b>	<b>5</b>	<b>1</b>	<b>6</b>	<b>Doc: No PAWS policy Site: Insufficient deadwood left</b>
<b>Section 7. Community</b>	<b>nil</b>	<b>1</b>	<b>1</b>	<b>Site: No warning notices</b>
<b>Section 8. Workforce</b>	<b>7</b>	<b>4</b>	<b>11</b>	<b>Doc: No operator certificates Site: Unsafe high seats</b>
<b>Other</b>	<b>1</b>	<b>nil</b>	<b>1</b>	<b>Doc: Poor overall compliance</b>
<b>Totals</b>	<b>48</b>	<b>12</b>	<b>60</b>	



The major CARs are shown in **Chart 1** below:

11. Overall there were 60 UKWAS related major CARs, 80% of which arose from non-existent or inadequate documentation. The main sources of these CARs were under Sections 2, 5 and 8 with 23%, 23% and 18% of the total respectively. These are analysed by UKWAS sub-section in Tables 4, 5 and 6 below:

**Table 4: Major CARs under UKWAS Section 2 - Management Planning**

<b>UKWAS Sub-section</b>	<b>Number of CARs</b>	<b>Description in UKWAS (abbreviated)</b>
<b>2.1.1</b>	<b>4</b>	<b>Management planning documents</b>
<b>2.2.4</b>	<b>3</b>	<b>Harvesting and timber sales documents</b>
<b>2.3.2</b>	<b>2</b>	<b>Monitoring Plan</b>
<b>2.3.5</b>	<b>2</b>	<b>Annual monitoring of features of significance</b>
<b>2.3.6</b>	<b>3</b>	<b>Summary of monitoring results</b>
<b>Total</b>	<b>14</b>	

**Table 5: Major CARs under UKWAS Section 5 – Protection and Maintenance**

UKWAS Sub-section	Number of CARs	Description in UKWAS (abbreviated)
5.1.2	2	Tree health monitoring
5.1.4	3	Deer management strategy
5.2.1	3	Strategy for minimising the use of chemicals
5.2.2	1	Use of pesticides justified and recorded
5.2.3	1	Best practice in the use of pesticides
5.2.4	3	Use of highly hazardous chemicals
5.5.3	1	Emergency plan for accidental spillages (site)
<b>Total</b>	<b>14</b>	

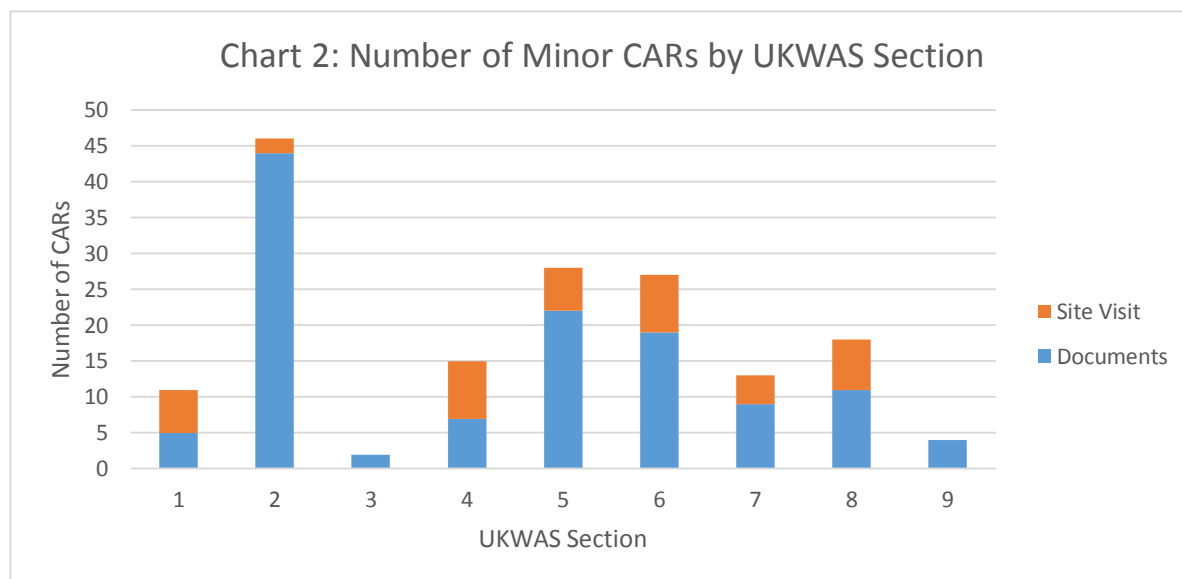
**Table 6: Major CARs under UKWAS Section 8 – Forestry Workforce**

UKWAS Sub-section	Number of CARs	Description in UKWAS (abbreviated)
8.1.1	6	Compliance with H&S legislation and Codes
8.1.2	3	Instruction in safe working practices
8.2.1	2	Qualifications and training (competence)
<b>Total</b>	<b>11</b>	

12. Table 7 and Chart 2 below shows the number of minor CARs by UKWAS section, analysed in the same way as the major CARs:

**Table 7: Minor CARs shown by UKWAS Section**

UKWAS Section	Documents	Site	Total	Examples (abbreviated)
<b>Section 1. Compliance</b>	5	6	11	Doc: No ownership documents Site: Fly tipping
<b>Section 2. Man. planning</b>	44	2	46	Doc: Inadequate monitoring plans Site: Planned work not completed
<b>Section 3. Design</b>	2	nil	2	Doc: No assessment of impacts
<b>Section 4. Operations</b>	7	8	15	Doc: Inadequate operations planning Site: Burning lop and top
<b>Section 5. Prot/maint</b>	22	6	28	Doc: Inadequate pesticide records Site: No chemical spillage kits
<b>Section 6. Biodiversity</b>	19	8	27	Doc: Inadequate sporting leases Site: Inadequate deadwood left
<b>Section 7. Community</b>	9	4	13	Doc: Lack of tree safety surveys Site: Inadequate warning signs
<b>Section 8. Workforce</b>	11	7	18	Doc: No checks on operator certs. Site: Compliance with H&S codes
<b>Other</b>	4	nil	4	Doc: Chain of custody certificates
<b>Totals</b>	<b>123</b>	<b>41</b>	<b>164</b>	



13. Overall there were 167 minor CARs, 74% of which arose from non-existent or inadequate documentation. The main sources of these CARs were under Sections 2, 5 and 6 with 28%, 17% and 16% of the total respectively. These are analysed by UKWAS sub-section in Tables 8, 9 and 10 below:

**Table 8: Minor CARs under UKWAS Section 2 – Management Planning**

UKWAS Sub-section	Number of CARs	Description in UKWAS (abbreviated)
2.1.1	11	Management planning documentation
2.1.3	4	Review of management planning documents
2.2.1	1	Planning and budget forecasting
2.2.2	2	Maintaining productive potential
2.2.3	2	Harvesting of non-timber wood products
2.2.4	5	Harvesting and timber sales documentation
2.3.1	1	Implementation of the management plan
2.3.2	9	Monitoring plan
2.3.3	5	Maintaining monitoring records
2.3.4	2	Analysing and using monitoring data
2.3.5	2	Annual monitoring of special features
2.3.6	2	Summary of monitoring results
<b>Total</b>	<b>46</b>	

**Table 9: Minor CARs under UKWAS Section 5 – Protection and Maintenance**

UKWAS Sub-section	Number of CARs	Description in UKWAS (abbreviated)
5.1.2	1	Tree health monitoring
5.1.4	2	Deer management strategy
5.1.6	1	Awareness of safety plans and procedures

5.2.1	1	Strategy for minimising the use of chemicals
5.2.2	5	Use of pesticides justified and recorded
5.2.3	3	Best practice in the use of pesticides
5.2.4	2	Use of highly hazardous chemicals
5.4.2	1	Alignment of fencing
5.5.1	2	Disposal of waste
5.5.2	6	Use of biodegradable lubricants
5.5.3	4	Emergency plan for accidental spillages
<b>Total</b>	<b>28</b>	

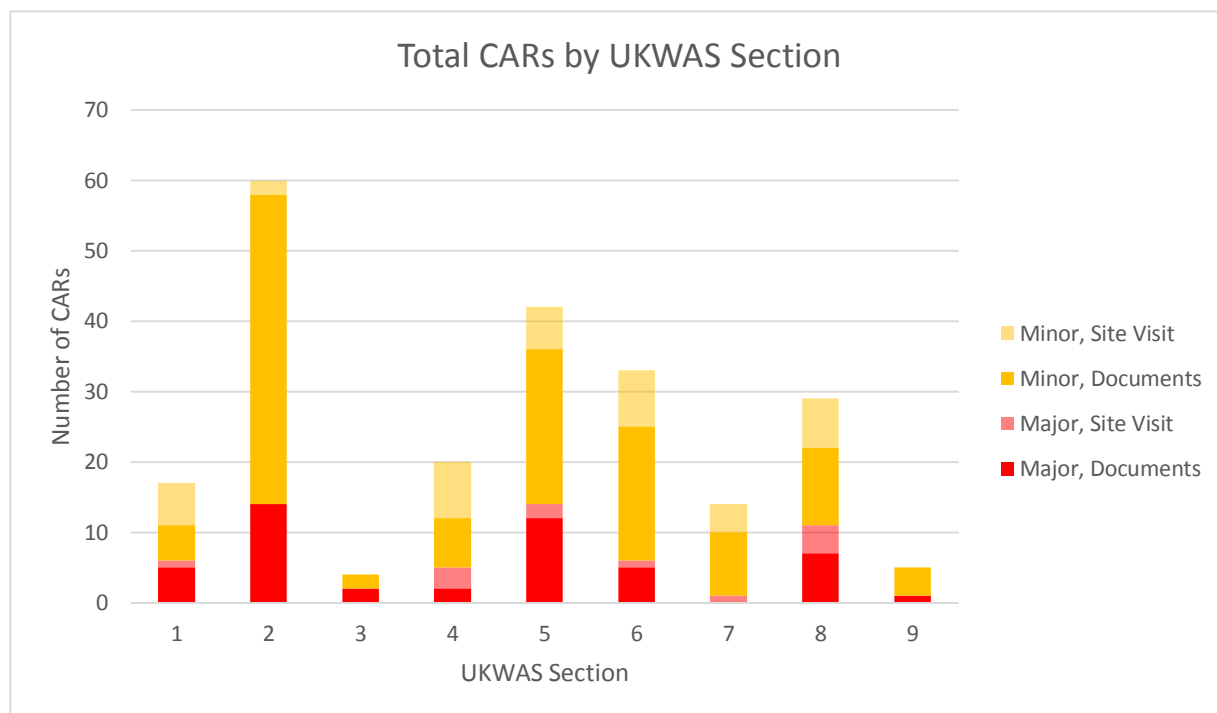
**Table 10: Minor CARs under UKWAS Section 6 – Biodiversity**

UKWAS Sub-section	Number of CARs	Description in UKWAS (abbreviated)
6.1.1	4	Identifying/mapping special features
6.1.2	1	Managing designated sites
6.1.3	1	Identifying small scale habitats in woodlands
6.2.1	5	Maintenance of biodiversity – 15% of woodland
6.2.2	2	Provision of deadwood habitats
6.3.2	5	PAWS policy and practice
6.4.1	6	Hunting, game rearing and shooting licences
6.4.2	2	Shooting of native game
6.4.3	1	Impacts of game management
<b>Total</b>	<b>27</b>	

14. The major and minor CARs are shown together in Table 11 and Chart 3 below:

**Table 11: Major and Minor CARs shown by UKWAS Section and type**

UKWAS Section	Major CARs		Minor CARs		Total CARs			
	Doc	Site	Doc	Site	Doc	Site	Total	
					No	No	No	%
Section 1	5	1	5	6	10	7	17	7
Section 2	14	nil	44	2	58	2	60	27
Section 3	2	nil	2	nil	4	nil	4	2
Section 4	2	3	7	8	9	11	20	9
Section 5	12	2	22	6	34	8	42	19
Section 6	5	1	19	8	24	9	33	15
Section 7	nil	1	9	4	9	5	14	6
Section 8	7	4	11	7	18	11	29	13
Other	1	nil	4	nil	5	nil	5	2
<b>Totals</b>	<b>48</b>	<b>12</b>	<b>123</b>	<b>41</b>	<b>171</b>	<b>53</b>	<b>224</b>	<b>100</b>



15. The main points emerging from the figures in Table 11 are as follows:

- The total number of CARs issued was 224, averaging 5.1 CARs per certificate.
- Of the total number of CARs, 27% were major and 73% were minor.
- Of the total number of CARs, 76% were related to inadequate or non-existent documentation and 24% emerged during site visits.
- The most common source of CARs came under Section 2 – Management Planning (27%) followed by Section 5 – Protection and Maintenance (19%), Section 6 - Biodiversity (15%) and Section 8 – Workforce (13%). Together the CARs from these 4 Sections comprised 74% of the total number of CARs.
- The most common source of CARs related to documentation was under Management Planning, with 26% of the total number of CARs.
- The most common sources of CARs emerging from site visits were under Operations and Workforce, with 5% of the total number of CARs each.

### Assessment of CARs relating to Group Certification

16. When auditing group schemes, auditors check whether group scheme management and documentation meet the requirements set out in the relevant standards of the certification scheme. With FSC this is FSC-STD-30-005 (V1-0). Groups can either consist of individual members who manage their own woodland or can be the “resource manager” type where the group manager manages the woodland on behalf of the owner. The group certificates do



not normally distinguish between these two types, and indeed some groups are a mix of both types.

The total number of group related major CARs issued for the 19 Group schemes was 27. A breakdown of the type of CARs issued is as follows:

- Inadequate group management and internal auditing – 9
- Inadequate group rules - 5
- Poor timber sales protocols – 3
- Inappropriate use of FSC logo – 3
- Miscellaneous (1 CAR each) – 7

17. The total number of group related minor CARs issued for the 19 Group schemes was 34. A breakdown of the type of CARs issued is as follows:

- Inadequate documentation on group structure – 15
- Inadequate internal audit – 6
- Inappropriate use of labels and trademarks -3
- Poor invoicing procedures – 2
- Miscellaneous (1 CAR each) – 8

### Comparison between UKWAS CARs raised for Single, Multi-site and Group Certification

18. **Table 12** below shows the number of UKWAS CARs by the different types of certificate:

Certificate Type	No. of Certs.	Area in hectares	UKWAS CARs			Number of UKWAS CARs	
			Major	Minor	Total	Per cert.	Per 10k ha.
Single	13	9,438	14	24	38	2.9	40.3
Multi-site	12	1,057,410	16	49	65	5.4	0.6
Group	19	388,286	30	91	121	6.4	3.1
<b>Totals</b>	<b>44</b>	<b>1,455,134</b>	<b>60</b>	<b>164</b>	<b>224</b>	<b>5.1</b>	<b>1.5</b>

Table 12 indicates that the number of UKWAS related CARs per certificate is roughly the same for multi-site and group certification, and around twice that for single certification. However based on the number of CARs per 10,000 hectares of woodland there is a huge difference between the 3 types of certification. It would be a mistake to read too much into these figures as the area of single certification is very low compared to the others, and because almost 1 million hectares is covered by one multi-site certificate.

### Comparison between CARs raised by different Certification Bodies

19. **Table 13** below shows the number of UKWAS CARs raised by the different Certification Bodies:

Item	Certification Body				Total
	SGS	SA	CU	RA	
<b>Number of certificates</b>	<b>8</b>	<b>22</b>	<b>13</b>	<b>1</b>	<b>44</b>
<b>Area (hectares) certified</b>	<b>1,225,742</b>	<b>165,754</b>	<b>56,951</b>	<b>6,687</b>	<b>1,455,134</b>
<b>Number of Major CARs</b>	<b>5</b>	<b>12</b>	<b>37</b>	<b>6</b>	<b>60</b>
<b>Number of Minor CARs</b>	<b>51</b>	<b>72</b>	<b>40</b>	<b>1</b>	<b>164</b>
<b>Total number of CARs</b>	<b>56</b>	<b>84</b>	<b>77</b>	<b>7</b>	<b>224</b>
<b>No. of CARs per certificate</b>	<b>7.0</b>	<b>3.8</b>	<b>5.9</b>	<b>7.0</b>	<b>5.1</b>
<b>No. of CARs per 10k ha.</b>	<b>0.5</b>	<b>5.1</b>	<b>13.5</b>	<b>10.5</b>	<b>1.5</b>

Table 13 indicates that there some difference between the number of CARs per certificate but a far greater difference between the number of CARs per 10,000 hectares. Again it is probably a mistake to read too much into these figures for the same reasons given in paragraph 18. It is perhaps significant that Commercial Union have a far higher proportion of major to minor CARs than SGS Qualifor or the Soil Association.

### Comparison with the 2002 CAR Analysis by Simon Jeffreys

20. In January 2002 Simon Jeffreys produced a report for the UKWAS Support Unit “An analysis of all Forest Management Certification Corrective Action Reports in the United Kingdom”. It is instructive to compare the CARs issued over the last 5 years with those issued before 2002. Note that the 2002 report identified 44 CARs (described as “other”) relating to Group certification: these have not been included in the analysis below. It should also be noted that pre-2002 certification would have been against UKWAS Version 1: fortunately the section structure of UKWAS has not changed with successive versions.

21. **Table 14** below shows an overall comparison between the 2002 and this (2014) report:

Item	2002 Report	2014 Report
<b>Number of certificates</b>	<b>29</b>	<b>44</b>
<b>Area (hectares) certified</b>	<b>1,083,906</b>	<b>1,455,134</b>
<b>Number of Major CARs</b>	<b>42</b>	<b>60</b>
<b>Number of Minor CARs</b>	<b>268</b>	<b>164</b>
<b>Total number of CARs</b>	<b>310</b>	<b>224</b>
<b>No. of CARs per certificate</b>	<b>10.7</b>	<b>5.1</b>
<b>No. of CARs per 10k ha.</b>	<b>2.9</b>	<b>1.5</b>

Table 14 shows that the number of certificates and the certified area increased significantly since 2002, hardly surprising as forest management certification only started in the UK in 1999. The average area covered by a certificate is now 33,070 hectares compared with 37,376 in 2002. The number of CARs per certificate and the number of CARs per 10,000 hectares have both roughly halved between 2002 and 2014. It is noticeable that the proportion of major CARs has increased from around 13% of total CARs in 2002 to 27% of total CARs in 2014. However it is not possible to explore this issue further as the commentary in the 2002 report does not distinguish between major and minor CARs.

22. **Table 15** below compares the number of CARs issued by UKWAS Section

UKWAS Section	2002 Report				2014 Report			
	Major	Minor	Total	%	Major	Minor	Total	%
Section 1. Compliance	4	14	18	6	6	11	17	8
Section 2. Man. plan.	15	48	63	20	14	46	60	27
Section 3. Design	5	27	32	10	2	2	4	2
Section 4. Operations	2	24	26	8	5	15	29	9
Section 5. Prot/maint	7	55	62	20	14	28	42	19
Section 6. Biodiversity	9	59	68	22	6	27	33	15
Section 7. Community	nil	25	25	8	1	13	14	6
Section 8. Workforce	nil	16	16	5	11	18	29	13
Other	nil	nil	nil	nil	1	4	5	2
<b>Totals</b>	<b>42</b>	<b>268</b>	<b>310</b>	<b>100</b>	<b>60</b>	<b>164</b>	<b>224</b>	<b>100</b>

Table 15 shows that the 3 UKWAS Sections with the highest % of CARs has not changed between 2002 and 2014 - Sections 2, 5 and 6. The biggest increases in % between 2002 and 2014 are in Sections 2 and 8, while the biggest decreases have been in Sections 3 and 6.

23. The conclusion section of the 2002 report commented on the “most common failings” These are set out by UKWAS Section below, with thoughts on whether progress has or has not been made:

UKWAS Section	2002 Most Common Failings	2014
Section 2	Management Planning, records and monitoring	Still a source of a high number of CARs
Section 3	Consultation before restructuring. Meeting species % requirements	These issues appear to have been largely resolved

Section 4	Harvesting management	Not a significant source of CARs
Section 5	Deer management, chemical use and reduction strategy, biofuels	All continue to be issues
Section 6	Conservation areas, long term retentions, deadwood, PAWS	All except LTRs are still issues but overall fewer biodiversity CARs
Section 7	Local consultation, public health and safety	Public H&S remains an issue but fewer consultation related CARs
Section 8	Records of competence and insurance	Considerable increase in the number of CARs, esp. major

### Conclusions: Implications of the 2014 findings for UK Forest Practice

24. A number of conclusions, which have implications for UK forest managers, industry leaders, regulators and policy makers, can be reached from the foregoing analysis. It should be noted that these are to a degree subjective and there would be merit in instigating an industry wide discussion on the findings. The following points emerge:

**A. Size Matters.** There is evidence that the number of CARs issued is far higher, on a per hectare basis, with certificates covering smaller areas: see Table 16.

**Table 16: Number of CARs by size of certified area**

Item	Area Covered by Certificate (hectares)				Totals
	<1,000	1,000 – 10K	10K – 100K	>100K	
<b>No. of certificates</b>	<b>16</b>	<b>18</b>	<b>8</b>	<b>2</b>	<b>44</b>
<b>No. of CARs</b>	<b>61</b>	<b>73</b>	<b>73</b>	<b>17</b>	<b>224</b>
<b>Total area (ha)</b>	<b>5,724</b>	<b>78,560</b>	<b>257,937</b>	<b>1,112,913</b>	<b>1,455,134</b>
<b>CARs per cert.</b>	<b>3.8</b>	<b>4.1</b>	<b>9.1</b>	<b>8.5</b>	<b>5.1</b>
<b>CARs per 10K ha</b>	<b>107</b>	<b>9.3</b>	<b>2.8</b>	<b>0.15</b>	<b>1.5</b>
<b>% of certified area</b>	<b>0.5%</b>	<b>5%</b>	<b>18%</b>	<b>76.5%</b>	<b>100%</b>
<b>% of CARs</b>	<b>27%</b>	<b>33%</b>	<b>33%</b>	<b>7%</b>	<b>100%</b>

Overall 27% of the CARs came from 0.5% of the certified area and only 7% of the CARs came from 76.5% of the certified area. This would suggest that the managers of the largest properties and groups have got to grips with the requirements of certification, while the smaller owners/managers have not. Another possibility is that the Certifying Bodies scrutinise the smaller properties more intensely, at least proportionately to their size, and if they look closely enough some non-compliance is likely to turn up. It will be interesting to see whether the less onerous means of verification for SLIM woodlands, the size threshold for which was

raised from 100 hectares to 500 hectares for UKWAS Version 3, will result in less CARs for smaller properties.

**B. Get the Documentation in order.** Some 73% of the CARs were due to a lack of or inadequate documentation revealed during the office based part of the audits. A further 6% of the CARs were due to inadequate documentation revealed during the site visits, for instance a lack of operational checklists. So almost 80% of the total number of CARs issued were document related. It is not known what percentage of audit time was spent on the site visits, and there is an argument that inadequacies in documentation may be easier to pick up than problems on site. In addition it can be argued that some of the requirements relating to documentation are excessive, and the extension to the SLIM threshold should make a difference for smaller properties. Nevertheless there is a clear message for forest owners and managers to improve documentation.

**C. Sort out Management Planning.** Some 27% of the CARs were due to inadequate planning, monitoring and record keeping: monitoring on its own made up almost half of this total. This suggests that more should be done to clarify and communicate the requirements and guidance in this area. There is a clear link here with the work of the regulatory and grant giving authorities as under the new Rural Development Regulation (RDR) a woodland management plan will be required to access RDR grant support. Forestry Commission England have recently revised their management planning template, so that it is UK Forestry Standard compliant. It is a short step for this to be UKWAS compliant. If the other UK forest regulatory authorities were to follow down this line it should help to reduce the number of management planning CARs.

**D. Safety First.** All the CARs relating to Section 8 of UKWAS, and half of the CARs relating to Section 7 of UKWAS are related to the safety of the workforce or the public. Together they constitute 16% of the total number of CARs. The majority of these were due to inadequate documentation. The Forest Industry Safety Accord (FISA), launched in 2012, represents a recognition by the industry of the need to improve its safety performance. It is reasonable to hope that this initiative will result in a reduction in safety related CARs.

**E. Requirements relating to Pesticides.** Some 8% of the total number of CARs issued related to Section 5.2 of UKWAS – Pesticides, biological control agents and fertilizers. It seems likely that some of these are due to the amount of uncertainty that surrounds this area, and the fact that it has seen considerable revision in each successive version of UKWAS. The deficiencies do not seem to be related to any particular size of woodland or type of certificate. There is a case for initiating an advice and information campaign within the industry to improve performance in this area.

**F. Differences between Auditors and Certifying Bodies?** It is not possible to demonstrate conclusively that there are differences between the approach of and interpretation by different auditors, but there is a sense that this is the case. In particular there appear to be inconsistencies between whether to issue a major or minor CAR for what seems to be the same issue. There would be merit in exploring the findings of this report with the currently active Certifying Bodies, and feeding the results into the next revision of UKWAS.

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