

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 forests¹.

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

¹ 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".

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.

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)