

Tree.Strategy.Consultation@defra.gov.uk

26 August 2020

Dear Sir / Madam

England Tree Strategy – consultation response supplementary input

I write as chair of the UK Woodland Assurance Standard (UKWAS) partnership.

Background

The partnership is governed by a multi-stakeholder steering group which sets the UK's national certification standard; it also provides a useful forum for debate on forestry standard-setting issues across the UK. The Forestry Commission (FC) is a member of the steering group.

The UKWAS certification standard is an independent certification standard for verifying sustainable woodland management in the UK. The standard is based on the requirements set out in the UK Forestry Standard (UKFS) and those of the two international certification schemes – the Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC).

Uniquely, the UKWAS provides a route to certification through both these global schemes.

Timber market assurance

Independent certification of its raw material to FSC / PEFC standards is widely demanded by UK timber processors.

Certification is also important for exporters of UK timber and timber products to international markets; in EU countries, if required post-Brexit, it will provide evidence to help importers meet their legal obligations under the EU Timber Regulation (EUTR).

The government's Forestry Statistics 2019 publication shows that uptake of certification to UKWAS through the FSC and PEFC schemes in 2018 was substantial:

- 1.40 million hectares (44%) of the UK's woodland area was independently certified as sustainably managed in conformance with UKWAS by FSC and PEFC
- 71% of private sector softwood removals were from certified sources and once production from state forest services¹ is included, this equates to around 82% of all softwood removals being from certified sources
- 64% of sawmills' softwood and hardwood roundwood consumption was certified
- 54% of round-fencing manufacturers' softwood consumption was certified.
- All the national forest estate in the UK is certified to the UKWAS standard.

This demonstrates clearly that certification to UKWAS through FSC and PEFC provides a powerful tool to demonstrate delivery of UKFS in a robust and comprehensive way. Importantly, FSC and PEFC-certified timber is recognised and understood in the international marketplace and these schemes are widely recognised as meeting best certification practice and are industry 'gold standard'.

FSC and PEFC-certified timber can therefore readily access both UK and export markets; it ensures timber meets both the UK timber procurement policy and EUTR requirements. FSC and PEFC also provide for on-product labelling of timber products for which there is a high level of consumer brand recognition.

¹ Forestry England, Forestry and Land Scotland, Natural Resources Wales and NI Forest Service.

Underpinning delivery of UKFS

I welcome full reference to the UKFS in the ETS consultation paper which rightly recognises the delivery of UKFS requirements and good practice guidance as 'essential'. However, there are too few regulatory tools and too little manpower to fully underpin their delivery in practice. The paper suggests that 'implementation of UKFS is largely self-regulating' which is a tacit admission that forest management is largely unregulated except at the points of establishment and harvesting.

Given this, I am surprised to see no reference to UKWAS and only a passing reference to the independent international certification schemes. It is bewildering that the consultation paper fails to recognise the major role that UKWAS and the FSC / PEFC schemes already play in underpinning UKFS delivery.

This is a grave omission since the Forestry Commission was instrumental in setting up UKWAS to facilitate independent certification in the UK. Indeed, in 2001, WWF presented its prestigious "Gift to the Earth" award to the UK in recognition of FSC- certification of the entire UK state forest and the FC's role in achieving multi-stakeholder acceptance of the UK Woodland Assurance Standard as the national certification standard.

Since then, independent certification has continued to be central to forestry policy throughout the UK, with UKWAS supported by the FC and its devolved successor bodies and reflected in successive country strategies. Moreover, all the state forests in the UK continue to be independently certified so providing a vital source of assurance to both the timber industry and wider stakeholder groups.

The references in the consultation paper to the 'Grown in Britain' (GiB) scheme are misleading as this essentially provides a label of provenance but only a very limited level of additional assurance. It is certainly not an equivalent to certification to UKWAS using the FSC and PEFC schemes and, in contrast to FSC / PEFC, GiB has a very low uptake and little market recognition.

Recommendations

To conclude, I would urge you to focus on continuing to support the successful and rigorous UK Woodland Assurance Standard which, used in combination with the FSC and PEFC schemes, has proven itself over two decades to be a highly effective tool for underpinning UKFS delivery, providing stakeholder and customer assurance, and market access.

The England Tree Strategy must explicitly recognise and welcome the contribution of the UKWAS standard and FSC and PEFC schemes:

- to underpinning delivery of the UKFS
- to providing stakeholder and consumer assurance
- to promoting timber market access for growers
- to providing wood processors with the certified raw material they need
- to meeting the UK timber procurement policy
- to meeting the requirements of the EUTR for exporters if required post-Brexit.

The ETS must commit:

- to promoting uptake of certification to UKWAS through the FSC and PEFC schemes
- to maintaining the FSC / PEFC certification of the national forest estate in England.

Yours faithfully

R Howe
Chair