



Agriculture (Wales) White Paper Consultation March 2021

The Forest Stewardship Council® (FSC®) is a global, not-for-profit organisation dedicated to the promotion of responsible forest management worldwide. Our vision is that the world's forests meet the social, ecological, and economic rights and needs of the present generation without compromising those of future generations, and our mission is to promote environmentally appropriate, socially beneficial, and economically viable management of the world's forests.

FSC UK is the national office of the Forest Stewardship Council in the United Kingdom. FSC UK is independent of FSC international. It sets forest management standards for the UK by inputting into the UK Woodland Assurance Standard (UKWAS), promotes the FSC system, and provides an information service. FSC UK (Ephesea UK) is a charity registered in England and Wales (No. 1130203) and a nonprofit making company limited by guarantee registered in England and Wales (No. 06792524).

FSC UK welcomes the inclusion of provisions for forestry and woodlands in the Agriculture (Wales) Bill. We strongly support a drive towards woodland expansion within Wales and believe that this should be combined with efforts to ensure new and existing woodlands are being managed responsibly.

We ask the Welsh Government to recognise the important contribution the Forest Stewardship Council (FSC), through the UK Woodland Assurance Standard (UKWAS), has played in driving the implementation and recognition of the highest standards of forest management in Wales over the last two decades, and its potential role in the future to independently promote and assure such management. We welcome closer collaboration to maximise the synergies between regulation and certification to contribute to the aspirations of the Welsh Government in terms of sustainable farming and land management.

Consultation Questions

4. What are your views on the proposed purposes for funding in support of the delivery of Sustainable Land Management (SLM)? Are there other purposes which you feel should be considered? Please provide comments to support your view e.g. potential benefits and impacts.

We fully support the inclusion of woodland creation and management as a proposed purpose for funding to support the delivery of SLM, but we are wary of land management objectives being largely focused on carbon sequestration. We encourage the Welsh Government to ensure woodlands are designed and managed to the highest standards and for multiple purposes. These other purposes should include a range of environmental, biodiversity, economic, and social benefits.

11. What are your views on the proposed amendments to forestry legislation?

In broad terms, FSC UK supports the proposed amendments to forestry legislation. FSC UK agrees that there need to be improvements in the process for approving and funding woodland creation and management proposals. The FSC national forest stewardship standard is closely linked with the UK Forestry Standard, and also addresses other legal requirements, for example concerning environmental regulations, health and safety, equality and living wages. As such, FSC forest management certification could be a recognised means to demonstrate compliance with entry requirements and to verify the past performance of woodland planners by contributing to 'earned recognition' (paragraph 2.128). Explicit acknowledgment by the Welsh Government of the value of FSC's market led assurance mechanisms could greatly streamline the process of applying for grant schemes for FSC certificate holders.

FSC UK supports the encouragement of management towards timber as a sustainable resource (paragraph 2.213), although urges the Welsh Government to recognise FSC Forest Management certification (including, where appropriate, FSC verified ecosystem services claims) as the most credible independent guarantee of responsible woodland management.

We agree that there is a need for advisory support for woodland planning and management. We would be happy to work with the Welsh Government on joint provision of targeted advice where this supports compliance with FSC requirements. We would ask the Welsh Government to consider how holistic advice can be provided to farmers with woodlands, so that not only the individual requirements of agriculture and silviculture are better understood but also their positive and negative interactions.

12. What are your views on how the Welsh Government can support landowners in Wales to benefit from carbon markets for planting trees?

FSC UK supports the concept of rewarding farmers to deliver positive benefits from planting and managing woodland on their farms. We have concerns on woodlands designed primarily for carbon sequestration purposes; woodland management practices should not be overly focused on maximising carbon capture to the detriment of other ecosystem services and important habitats. Hence, we agree that payments should support woodlands with the purpose of 'improvement of habitat resilience and provision of amenity' as well as carbon sequestration (paragraph 2.135).

We also agree there should be support provided for landowners or managers implementing practices to provide carbon benefits and environmental outcomes in existing woodlands and woodlands not on farms. Existing woodlands and sustainable forest management should be explicitly recognised for their role in delivering nature-based solutions to mitigate the climate crisis, conserving biodiversity and for connecting people with nature.

The FSC Ecosystem Services Procedure provides a proven mechanism for measuring and verifying the positive impacts of forest management activities on the conservation or restoration of ecosystem services. Specific claims verified under the FSC Ecosystem Services Procedure, including carbon sequestration and storage, as well as co-benefits such biodiversity conservation, watershed services,



soil conservation and recreational services could form the basis for both public and private sector investment in these outcomes.

Creation of new woodland for carbon benefits should be matched with support for monitoring to ensure conformance to forest management standards. We firmly believe that there is a role for the independent third-party auditing required by FSC to supplement or substitute some of the self-assessment or Welsh Government monitoring requirements. FSC Forest Management certification and ecosystem services verification could offer support in assuring certain environmental and social standards are being maintained. Credible assurance of environmental benefits adds greater value to carbon units, allowing for woodland owners or managers to market their carbon units at a premium.

We also firmly believe any tree planting and woodland management schemes should commit to providing equal access to the range of benefits for landowners and community members, regardless of landholding size and income levels. There should also be pro-active efforts to support smallholders and target the provision of environmental and social benefits for disadvantaged communities. FSC, both in the UK and globally, continues to explore various approaches to engaging smallholders and community woodlands in responsible forest management, and we would be happy to share what we have learned.

For questions or more information please contact:

Amy Willox, Forestry Outreach Manager
amy@fsc-uk.org