



Forest Stewardship Council® UK

The Forest Stewardship Council® (FSC®) is an international, non-governmental organisation dedicated to promoting responsible management of the world's forests. FSC's pioneering certification system, which now covers more than 200 million hectares of forest, enables businesses and consumers to choose wood, paper and other forest products made with materials that support responsible forestry

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 non-profit making company limited by guarantee registered in England and Wales (No. 06792524).

The Environmental Audit Committee: Inquiry on sustainable timber and deforestation

Consultation Questions:

Growing the UK timber industry

Does the UK Government have an adequate understanding of the future demand for timber, including what tree species should be grown?

Wood can be more carbon and energy efficient in comparison to other building materials. However, wood can originate from unsustainable forest management practices which can undermine its benefits.

The Forest Stewardship Council scheme enables businesses and consumers to identify, purchase and use wood, and other forest products made with materials from well-managed forests and/or recycled sources. FSC has high standards for forest management and chain of custody.

The future timber demand for construction has not been evaluated for the UK. As demand for timber, and competition for land, increases, so does pressure on the world's forest. For the UK, our impact on forests is widespread as we rely so heavily on timber exports. The Government need to consider how they can ensure that demand for timber and other forest products is sustainable.

Are there sustainable sources of biomass for UK energy generation either from imported or domestically grown wood for pellet or woodchip? And how can future demand be met from sustainable sources?

Wood biomass should be derived from the waste material of trees that are being grown and processed for other purposes. This includes woody material from silvicultural thinnings, large branches and tops of harvested trees (fine material should be left on site) and sawmill and manufacturing waste.

We believe that re-using wood wastes can help in reducing the harvesting pressure on forests. Based on support for this principle, FSC supports the phasing out of subsidies for burning any primary woody biomass, i.e., materials taken straight from the forest and used for energy, rather than wastes and residues.

How well is the UK Government managing its plans for the domestic timber industry in tandem with meeting its woodland creation targets and related climate change, biodiversity and other environmental goals?

FSC UK fully supports the management of woodlands for timber as a sustainable resource, but management practices should not be focused on productive functions of woodland to the detriment of other valuable functions such as biodiversity conservation. Therefore, we ask the UK Government to consider how they can ensure that demand for timber and other forest products is sustainable.

The effectiveness of UK efforts to reduce global deforestation

How effective are the measures to improve due diligence and ban imported products of illegal deforestation in the Environment Act 2021? Do these measures target the right sectors? Given that they do not extend to all products of deforestation, are they adequate?

The measures in the Environment Act 2021 focus on the requirement to comply with laws relating the conversion of forests. They do not extend to sustainability or other legality issues, including biodiversity protection, human rights and social welfare and, as stated, do not extend to all products of deforestation.

To what extent have the Global Resource Initiative (GRI) Taskforce's recommendations on deforestation and land conversion been met by the Government?

The entire suite of measures recommended by the Global Reporting Initiative should be adopted, because a sole focus on 'importer country' regulations without a broader suite of policy measures, investments, inducements and disincentives is unlikely to achieve the stated policy goal of making forest risk commodities more sustainable and legal.

What role can sustainable certification and Government Buying Standards (GBS), have in tackling deforestation? How can the UK Government support the private sector to reduce its contribution to furthering deforestation?

The UK Government's Timber Procurement Policy <https://www.gov.uk/guidance/timber-procurement-policy-tpp-prove-legality-and-sustainability> sets out the documentary evidence required for government procurers and suppliers to show that timber is legal and sustainable. However, since the closure the Central Point of Expertise on Timber (CPET) in 2016, it is unclear how well this policy is understood or

implemented. By strengthening the policy and ensuring it is fully implemented, the UK Government could drive demand for legal and sustainable timber through the public sector.

The UK Timber Regulations (UKTR) aim to ensure that the UK imports timber harvested in compliance with the laws of the country of origin. The Regulations focus on legality rather than sustainability. By extending the scope to look at sustainability, the UK Government could drive demand for legal and sustainable timber more broadly.

Other commodities, beyond the timber and paper products covered by the Timber Procurement Policy and the UKTR, also contribute to global deforestation. Whilst these may be covered by the measures to ban imported products of illegal deforestation in the Environment Act 2021, this focuses on legality and not sustainability.

To be fully effective, certification schemes need to have robust deforestation criteria and indicators covering both environmental and social requirements. FSC UK thus encourages the UK government to set strict sustainability criteria as the basis to use schemes to help tackle deforestation.

Strong requirements for certification schemes can include:

- Environmental requirements
 - Explicit mention of high conservation values (HCVs)
 - Preservation of peatlands
 - Fight against conversion of natural ecosystems
 - Respect of the legal status of land
- Social requirements
 - Protection of Indigenous Peoples' rights
 - Complying with local labour laws and the regulations and standards of the International Labour Organization (ILO)
- Credibility requirements and assurances
 - Multi-stakeholder platform with representation of civil society
 - Third party auditing
 - Dispute resolution systems

Working with international partners to tackle deforestation

What impact will the UK's measures to tackle deforestation have on producer countries, indigenous peoples and local communities?

If measures to tackle deforestation are focussed on restoring forest value and forest rights to local stakeholders then FSC certification of forest management can play a large role in ensuring that the impact of these measures is positive for indigenous peoples and local communities. The Forest Stewardship Council (FSC) is a major international player in the fight against deforestation and forest degradation.