

FSC UK Risk Review

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1. Executive summary

Based on a review of changes to the FSC normative framework, the current situation in the UK, and lessons from National Forest Stewardship Standards with a similar scope, FSC UK recommends that, in considering whether UKWAS 4 adequately addresses scale, intensity and risk (SIR) and High Conservation Values (HCVs), the UKWAS Working Group should:

- be aware that, while standard requirements are by no means the only factor, uptake of certification among smaller woods remains low in the UK;
- be aware that the concept of scale, intensity and risk is one of the key tools for tailoring certification requirements to different types of forest ownership and management;
- take into account the clarification of the concept of scale, intensity and risk and the examples of its application in FSC-GUI-60-002 V1-0 EN *Guideline for Standard Developers for addressing risk of unacceptable activities in regard to scale and intensity*;
- take into account the potential application of FSC-PRO-60-010 V1-0 EN *Incorporating a risk-based approach in National Forest Stewardship Standards*, and FSC-GUI-60-010 V1-0 EN *Guideline for Standard Developers on incorporating a risk-based approach in NFSS*;
- consider the draft FSC UK Low Intensity Management Standard (Annex 1 to this review) as a starting point for an SIR-adjusted version of UKWAS;
- consider the UK country profile produced during the FSC UK Small Woods project as a basis for discussion of SIR issues;
- be aware of the current and potential status of and risks to High Conservation Values in the UK;
- consider whether current UK HCV definitions are adequate, taking into account the full range of guidance provided by FSC and the definitions used in other national contexts;
- consider the implications for HCV requirements, particularly in terms of engagement with affected rights holders, of the review of the applicability of Criterion 4.2 recommended in the separate *FSC Requirements Review*;
- consider whether the existing National High Conservation Value Framework (Annex 2 to this review) is fit for purpose, taking into account the latest FSC guidance;
- consider whether the current voluntary use of the National HCV Framework is appropriate, or whether mandatory use might result in better protection of HCVs in the UK; and,
- at the very least, consider updating references, links etc. in the National HCV Framework.

2. Brief and approach

The UKWAS *Standard-setting Process* version 3.0 calls for 'A Risk Review

- a consideration of the impact and applicability of the standard for different scales and intensities of operation
- a consideration of potential impacts on areas and features of high conservation value.'

This document represents FSC UK's input to the UKWAS Risk Review. To address the issue of different scales and intensities of operation (section 3), it is based on a review of the most recent procedures and guidance from FSC on taking account of scale, intensity and risk in National Forest Stewardship Standards, as well as experience gained through FSC UK's Small Woods project. To address the issue of High Conservation Values (section 4), it is based on a review of the most recent requirements and guidance from FSC on developing a National High Conservation Value Framework, as well as the experience gained through developing a framework alongside UKWAS 4. Both elements of this risk review also refer to lessons learned from National Forest Stewardship Standards with a similar scope to UKWAS as part of the separate *FSC Requirements Review*. Recommendations to the UKWAS Working Group from FSC UK are made at the ends of the separate considerations of scale, intensity and risk (section 3.5) and High Conservation Values (section 4.5).

Most of the documents mentioned in this review are available from the [FSC Document Centre](#). Direct links to individual documents are provided at their first occurrence in the text.

Two annexes to this review are provided separately:

- Annex 1 – Low Intensity Management Standard D1-4 August 2020
- Annex 2 – UK National HCV Framework V1-1 February 2019

3. Scale, intensity and risk

3.1 Background

While the scale and intensity of forest management were considered in previous iterations of the FSC Principles and Criteria, the concept of scale, intensity and risk (SIR) was formalised in the most recent version, FSC-STD-01-001 V5-2 EN [FSC Principles and Criteria for Forest Stewardship](#), the preamble to which states:

The FSC Principles and Criteria are generally independent of spatial scale and intensity of management activities. All certified Management Units must comply with all Principles and Criteria and this Preamble. Also, the FSC Principles and Criteria recognize that ways of achieving compliance with the Principles and Criteria may differ depending on the scale and intensity of management activities, and on the risk of negative impacts related to The Organization, the Management Unit or management activities.

Depending on scale, intensity and risk, the actions required to comply with the Principles and Criteria may vary from one organization to another. The concept of scale, intensity and risk applies to almost all Criteria. Explicit reference is included in specific Criteria where it is known from experience that a level of flexibility arising from scale, intensity and risk is required to achieve compliance across the range of potentially certifiable vegetation types, land uses and related management systems. However, there are also requirements, for example, those requiring compliance with laws that are not liable to adjustments to scale, intensity and risk. Further details concerning the interpretation of scale, intensity and risk, including the types and limits of flexibility, are provided in indicators in FSC Forest Stewardship Standards.

The concept of scale, intensity and risk is one of the key tools for tailoring certification requirements to different types of forest ownership and management. There are explicit references to SIR in two Principles and 21 Criteria.

The FSC normative document governing the contents of National Forest Stewardship Standards, FSC-STD-60-002 V1-0 EN [Structure and Content of National Forest Stewardship Standards](#), predates the current version of the Principles and Criteria. It states that standards must 'be cost effective and practical for use in small-scale and low intensity forest management units' (FSC-STD-60-002 V1-0 EN, clause 6.1), and includes the options that 'Small and/or low intensity managed forests may be made exempt from some indicators which are applicable to other forests, and/or alternative indicators may be developed for application to small and/or low intensity managed forests' (clause 6.2).

The implementation of SIR in National Forest Stewardship Standards is addressed in FSC-PRO-60-006 V2-0 EN [Development and Transfer of National Forest Stewardship Standards to the FSC Principles and Criteria Version 5-1](#), which effectively supersedes the provisions regarding scale and intensity in FSC-STD-60-002 V1-0 EN. This procedure states that ‘Where a Principle or Criterion in the P&C V5-1 requires the consideration of Scale, Intensity and Risk (also referred to as “SIR indicators”), [standard development groups] may decide to develop additional variations of indicators and verifiers for low, medium and high impact organisations’ (FSC-PRO-60-006 V2-0 EN, clause 5.1). It also refers to FSC guidance on SIR (see below).

In any review of a National Forest Stewardship Standard, it is important to consider whether the standard is adequately applicable to and achievable in the range of scales and intensities of forest management operations in the country, and whether it adequately manages the risks associated with those operations.

3.2 Changes to the FSC normative framework

Although it was published before UKWAS 4 was finalised, FSC-GUI-60-002 V1-0 EN [Guideline for Standard Developers for addressing risk of unacceptable activities in regard to scale and intensity](#) came too late in the standard development process to have a significant influence; see the separate *FSC Requirements Review*. This guidance document is important in clarifying the concept of scale, intensity and risk and how it should be applied in practice. The key message (FSC-GUI-60-002 V1-0 EN, section 2) is that:

Standards Developers are recommended to have three variances of indicators for each SIR Criterion:

- Low potential impact indicators, for management activities with low potential unacceptable negative impacts; and
- Standard potential impact indicators for management activities with standard (“non-low”) potential unacceptable negative impacts.
- High potential impact indicators, for management activities with high potential unacceptable negative impacts. [...]

Even if theoretically possible, Standard Developers are not recommended to develop more than three SIR variances for indicators, as this could become difficult to manage.

The guideline sets out the main impact factor (scale, intensity and/or risk) and examples of SIR indicators for all of the Criteria which explicitly mention SIR (section 8). It also includes guidance on identifying and developing indicators for large-scale forest operations (Annex 1).

Since UKWAS 4 was produced, FSC has also published FSC-PRO-60-010 V1-0 EN [Incorporating a risk-based approach in National Forest Stewardship Standards](#), and FSC-GUI-60-010 V1-0 EN [Guideline for Standard Developers on incorporating a risk-based approach in NFSS](#). The preamble to the procedure sets these documents in the context of incorporating risk-based and outcome-oriented approaches in National Forest Stewardship Standards as part of the process to streamline the FSC normative framework. It also contextualises them in terms of the ADAM model (FSC-PRO-60-010 V1-0 EN, Preamble and Annex 1), within the framework of which they address the first two of the following four steps:

- Assessment of risk
- Designation of risk for indicators
- Adapted risk response
- Monitoring and evaluation

Use of the procedure and guidance document is entirely voluntarily, although if a standard development group chooses to apply the procedure it must notify the FSC Performance and Standards Unit and agree the scope of the work (FSC-PRO-60-010 V1-0 EN, clause 1.1). The procedure basically covers the assignment of risk levels ('very low risk', 'low risk', 'moderate risk' and 'high risk') to some or all of the indicators in a National Forest Stewardship Standard (clauses 2.1 and 2.2). The guidance document expands significantly on the very short procedure to explain what a risk-based approach is, how to decide whether it would be beneficial, how to carry out a risk assessment (considering how to profile the national context, and sources of information such as an analysis of corrective action requests or a legislation gap analysis), and how the outcomes of a risk assessment might ultimately be used.

The publication of FSC-PRO-60-010 V1-0 EN and FSC-GUI-60-010 V1-0 EN was the first step in an ongoing process of developing and implementing the concept of risk-based approaches in the FSC system. The next step is to consider [how risk categorisations might affect auditing](#), the 'Adapted risk response' element of the ADAM model. Even in the current absence of a risk-adjusted verification system, standard developers may find the approach set out in FSC-PRO-60-010 V1-0 EN and FSC-GUI-60-010 V1-0 EN useful in guiding their thinking on SIR.

3.3 The current situation in the UK

While current FSC Forest Management certificates in the UK encompass many areas managed at a low intensity, and many woodlands which fall under the 500 ha threshold to be considered 'small' for streamlined auditing purposes, the huge numbers of UK woodlands under 10 ha in size are barely represented. There are also very few certified community owned or managed woods.

Following much discussion during the UKWAS 4 standard development process, a decision was taken not to include indicators adapted to smaller woods, but rather to make the standard size neutral. This decision is explained in the standard introduction, including the observation that 'scale has not been found to be closely correlated with intensity or risk of woodland management' in the UK.

Despite this, there is continuing interest in some quarters in developing a standard tailored specifically for small and low risk woods. One proposal from a UK stakeholder was picked up by FSC International, and FSC UK was invited to explore it. This resulted in the launch of the [FSC UK Small Woods project](#). The project web pages set out the aspirations and approach, but in short the aim was to produce a standard which set aside much of the FSC structure of Criteria and International Generic Indicators and instead used the Principles as a framework for a small number of requirements focussing on risks and opportunities specific to small woods in the UK.

An excellent group of economic, environmental and social stakeholders came together to work on the project. Differences in attitudes to risk and conceptions of which woods should be in scope led to some [interesting developments in the project](#), and ultimately resulted in two draft standards. One, which has been named the Small Woods Standard, is close to the original vision for the project. The other, which has been named the Low Intensity Management Standard, is essentially an SIR-adjusted version of UKWAS 4. It is aimed at woods up to 25 ha in size, or with a low timber harvesting level (less than 5,000 m³ per five year certificate period). It was developed by considering UKWAS 4 requirements in turn in the context of the woods in scope, and adopting, adapting or dropping them, before attempting to simplify the language for a non-specialist readership. The resulting draft Low Intensity Management Standard is included as Annex 1 to this review for consideration by the UKWAS Working Group.

As part of the evidence gathering for the project, a [country profile](#) was produced along the lines suggested in FSC-GUI-60-010 V1-0 EN *Guideline for Standard Developers on incorporating a risk-based approach in NFSS*. Although now a little dated (it was produced in March 2019), it may still provide a useful basis for discussion of SIR issues by the UKWAS Working Group.

It should be noted that standard requirements are not the only factor in making certification more attractive and accessible to owners and managers of smaller woodlands. FSC UK is also exploring how the benefits of certification can be made more relevant to small woods (including through certification of non-timber forest products, verification and ecosystem services claims, and emphasising the potential role of certification in securing a legacy of good management) and how we can foster low cost group schemes tailored to support small and community woodlands.

3.4 Lessons from National Forest Stewardship Standards with a similar scope

The separate *FSC Requirements Review* includes a review of the National Forest Stewardship Standards for Denmark and the Netherlands.

The approach to scale, intensity and risk in FSC-STD-NLD-02-2018 EN [The FSC National Forest Stewardship Standard of The Kingdom of The Netherlands](#) is very similar to that in UKWAS 4. There are no separate sets of low or high potential impact indicators as per FSC-GUI-60-002 V1-0 EN, and adjustments for scale are made only for a few specific indicators; requirements for accommodating community requests for recreational and educational activities (FSC-STD-NLD-02-2018 EN, indicators 4.4.1 and 4.4.2) are only applicable to certificate holders managing more than 1,000 ha, and different requirements for determining increment and mortality apply to various size categories (< 20 ha, 20-100 ha, > 100 ha) and groups (indicator 5.2.3).

The approach in FSC-STD-DNK-02-2018 EN [The FSC National Forest Stewardship Standard of Denmark](#) is very different, and closer to FSC-STD-60-002 V1-0 EN than FSC-GUI-60-002 V1-0 EN. The standard identifies a number of indicators for which there is considered to be a very small risk of non-conformance, and these indicators are marked as being applicable only to large forests (> 250 ha). In this way, smaller forests are effectively exempted from a number of indicators, although the standard states that 'small forests are also expected to meet the indicators [for large forests], but they do not have to be audited for compliance, as the risk of non-compliance is considered minimal'. Large forest indicators are found under some, though not all, of the Criteria which explicitly mention SIR, but also under other Criteria; for a partial list, see the *FSC Requirements Review*.

These are clearly very different approaches. The Dutch standard shows that others have found the model currently in use in the UK to be valid. The Danish standard, in contrast, gives an indication of the range of issues for which an SIR-adjusted approach can be adopted.

3.5 Recommendations

In considering whether UKWAS 4 adequately addresses scale, intensity and risk, the UKWAS Working Group should:

- be aware that, while standard requirements are by no means the only factor, uptake of certification among smaller woods remains low in the UK;
- be aware that the concept of scale, intensity and risk is one of the key tools for tailoring certification requirements to different types of forest ownership and management;



- take into account the clarification of the concept of scale, intensity and risk and the examples of its application in FSC-GUI-60-002 V1-0 EN *Guideline for Standard Developers for addressing risk of unacceptable activities in regard to scale and intensity*;
- take into account the potential application of FSC-PRO-60-010 V1-0 EN *Incorporating a risk-based approach in National Forest Stewardship Standards*, and FSC-GUI-60-010 V1-0 EN *Guideline for Standard Developers on incorporating a risk-based approach in NFSS*;
- consider the draft FSC UK Low Intensity Management Standard (Annex 1 to this review) as a starting point for an SIR-adjusted version of UKWAS; and,
- consider the UK country profile produced during the FSC UK Small Woods project as a basis for discussion of SIR issues.

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4. High Conservation Values

4.1 Background

The maintenance and/or enhancement of High Conservation Values (HCVs) is a key feature of the FSC system, enshrined in Principle 9 of the *FSC Principles and Criteria for Forest Stewardship* (FSC-STD-01-001 V5-2 EN). Full definitions of the six HCVs recognised by FSC are given in the Principles and Criteria, but in brief they are:

- HCV 1 Species diversity
- HCV 2 Landscape-level ecosystems and mosaics
- HCV 3 Ecosystems and habitats
- HCV 4 Critical ecosystem services
- HCV 5 Community needs
- HCV 6 Cultural values

The Principles and Criteria require certificate holders to assess and record the presence and status of HCVs (Criterion 9.1), develop effective strategies that maintain and/or enhance the identified HCVs (Criterion 9.2), implement those strategies taking a precautionary approach (Criterion 9.3), and carry out monitoring to assess changes in the status of HCVs, adapting management strategies if necessary to ensure their effective protection (Criterion 9.4).

These basic requirements have not changed since UKWAS 4 was produced. However, there have been changes to the associated International Generic Indicators (IGIs) and FSC has issued guidance on HCVs for both forest managers and standard developers. These developments should be taken into account by the UKWAS Working Group when reviewing whether the standard provides adequate protection to High Conservation Values.

4.2 Changes to the FSC normative framework

The revised [International Generic Indicators](#), which came into effect in July 2018, include a number of new indicators dealing specifically with Intact Forest Landscapes (IFLs) as part of HCV 2 (FSC-STD-60-004 V2-0 EN, indicators 9.1.2, 9.2.4, 9.2.5, 9.2.7, 9.3.3 and 9.3.4). Changes have also been made to the instructions for standard developers for Principle 9, and instructions have been added to Criteria 9.1 and 9.2, with specific requirements for IFLs. An annex has been added (Annex H) which sets out instructions to develop indicators for Intact Forest Landscape core areas.

References to 'affected rights holders' have been added to several indicators (FSC-STD-60-004 V2-0 EN, indicators 9.1.3, 9.2.3 and 9.4.2). Affected rights holders are defined as 'Persons and groups, including Indigenous Peoples, traditional peoples and local communities with legal

or customary rights whose free, prior and informed consent is required to determine management decisions', and are identified under Criteria 3.2 (for Indigenous Peoples) and 4.2 (for local communities). Affected rights holders are also included in instructions for standard developers for Principle 9 and Criterion 9.1.

The main focus of the instruction for standard developers for Principle 9 is unchanged; it deals with the development of a National HCV Framework as 'a tool for the identification, management and monitoring of High Conservation Values in the country'. However, the list of source information to consider has been expanded to include, among other sources:

- Intact Forest Landscapes maps;
- Culturally appropriate engagement with affected rights holders, affected and interested stakeholders, and relevant local and regional experts;
- FSC guidance on Free, Prior and Informed Consent (FPIC);
- Guideline for standard developers for addressing risk of unacceptable activities in regard to scale and intensity; and,
- FSC guidance on HCV management for forest managers.

Instructions on the best available information to be used in identifying HCVs has been moved to Criterion 9.1, and the list of source information to consider has also been expanded to include, among other sources, IFL maps, culturally appropriate engagement, and guidance on FPIC and scale, intensity and risk.

In addition to the [High Conservation Value Guidance for Forest Managers](#) (FSC-GUI-30-009 V1-0 EN) included in the instruction for standard developers for Principle 9, FSC has also issued FSC-GUI-60-009 V1-0 EN [Guidance for Standard Development Groups: Developing National High Conservation Value Frameworks](#) and FSC-GUI-60-009a V1-0 EN [Template for National High Conservation Value Frameworks](#). All of these guidance documents were published and came into effect in January 2020.

Finally, an explicit reference to HCVs has also been added to an IGI under Criterion 10.11 (FSC-STD-60-004 V2-0 EN, indicator 10.11.1):

Harvesting and extraction practices for timber and non-timber forest products are implemented in a manner that conserves environmental values as identified in Criterion 6.1 and High Conservation Values identified in Criteria 9.1 and 9.2.

4.3 The current situation in the UK

It is not particularly easy to assess the status of High Conservation Values in the UK on the basis of publicly available information, and it is not currently feasible to assess differences in status in certified and uncertified forests. FSC-NRA-GB V1-0 EN [FSC National Risk Assessment for the United Kingdom of Great Britain and Northern Ireland](#), approved December 2018, includes relevant sources of information in relation to controlled wood category 3, wood from forests in which High Conservation Values are threatened by management activities. The assessment concludes that there is a low risk of forest management activities causing loss or degradation of HCVs in the UK context. Note, however, that there is a significant difference between a general conclusion of low risk (but not no risk) to HCVs in UK forestry and the specific positive requirement to maintain and/or enhance HCVs in the FSC Principles and Criteria.

There are no Intact Forest Landscapes, as defined by FSC and mapped by Global Forest Watch, in the UK, and so the changes to the International Generic Indicators relating to IFLs are not relevant. Recent guidance on IFLs is also not relevant; see the separate *FSC Requirements Review*.

There are no recognised Indigenous Peoples in the UK, so FSC Principle 3 is not applicable, and FSC-STD-GBR-03-2017 V1-0 EN [The FSC National Forest Stewardship Standard of the United Kingdom](#) states that Criterion 4.2 is not applicable. As such, the changes to the International Generic Indicators relating to affected rights holders are also not relevant. Again, see the separate *FSC Requirements Review*, which recommends that the need to evaluate the applicability of various FSC requirements, including Criterion 4.2, be considered by the UKWAS Working Group.

A National High Conservation Value Framework for the United Kingdom was produced in parallel with UKWAS 4 and FSC-NRA-GB V1-0 EN *FSC National Risk Assessment for the United Kingdom of Great Britain and Northern Ireland*, and was subject to public consultation at the same time as the National Risk Assessment. V1-0 was published on the FSC UK website in June 2018, and V1-1, with updated links to sources of information, was published in February 2019; V1-1 is provided as Annex 2 to this review for consideration by the UKWAS Working Group. This Framework merits review if only to ensure that it remains up to date, given ongoing changes to statutory authorities and sources of information. It also merits review in light of recently published FSC guidance and changes to instructions for standard developers in the IGLs. In particular, there may be value in reviewing the approach to one (unchanged) instruction, which states (FSC-STD-60-004 V2-0 EN, Principle 9 instruction for standard developers):

Standard Developers shall clarify in the National Standard and Interim National Standard how the National HCV Framework shall be used by The Organization, when identifying

the High Conservation Values in the Management Unit and when developing management strategies to protect these High Conservation Values.

The current version of the Framework states that 'Use of the Framework is not compulsory but is strongly recommended to help owners/managers meet the requirements of Principle 9'. Similarly, *The FSC National Forest Stewardship Standard of the United Kingdom* states (FSC-STD-GBR-03-2017 V1-0 EN, Annex I):

Use of the HCV Framework is not compulsory. However, it is intended to help users conform to the requirements of Principle 9 and contains useful guidance on sources of information and relevant stakeholders. As such, it is strongly recommended that Standard users make use of the Framework.

The UKWAS Working Group should consider whether mandatory use of an updated National High Conservation Value Framework for the United Kingdom would result in better protection for High Conservation Values.

4.4 Lessons from National Forest Stewardship Standards with a similar scope

The separate *FSC Requirements Review* includes a review of the National Forest Stewardship Standards for Denmark and the Netherlands.

As in the UK, Intact Forest Landscapes (HCV 2) are not present in Denmark or the Netherlands. However, whereas UKWAS recognises areas and features of critical importance for either watershed management or erosion control as HCV 4, the Danish and Dutch standards consider only water catchments to be HCV 4. This is presumably because they do not have the same mountainous landscapes as the UK, as they place great emphasis on soil protection in other contexts; see the *FSC Requirements Review*. While UKWAS recognises that some local communities may be dependent on water supplies from forests as resources fundamental for satisfying their basic necessities under HCV 5, this High Conservation Value is not considered to be applicable in Denmark or the Netherlands.

FSC UK believes that the definitions of the different categories of High Conservation Value currently used in the UK, as set out in various parts of UKWAS and more explicitly in the National HCV Framework, are robust. However, the different approaches in Denmark and the Netherlands, particularly with regard to HCV 5 (community needs), should be taken into account when considering whether current protections for High Conservation Values in the UK are appropriate and adequate.

4.5 Recommendations

In considering whether UKWAS 4 adequately addresses High Conservation Values, the UKWAS Working Group should:

- be aware of the current and potential status of and risks to High Conservation Values in the UK;
- consider whether current UK HCV definitions are adequate, taking into account the full range of guidance provided by FSC and the definitions used in other national contexts;
- consider the implications for HCV requirements, particularly in terms of engagement with affected rights holders, of the review of the applicability of Criterion 4.2 recommended in the separate *FSC Requirements Review*;
- consider whether the existing National High Conservation Value Framework (Annex 2 to this review) is fit for purpose, taking into account the latest FSC guidance;
- consider whether the current voluntary use of the National HCV Framework is appropriate, or whether mandatory use might result in better protection of HCVs in the UK; and,
- at the very least, consider updating references, links etc. in the National HCV Framework.