

FSC Requirements Review

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August 2020

1. Executive summary

A review was carried out of changes to the FSC normative framework since UKWAS 4 was produced, along with advice from FSC International and lessons from National Forest Stewardship Standards with a similar scope. There have been a number of developments in the FSC normative framework, some of them quite significant. FSC UK has made recommendations to the UKWAS Working Group based on the various elements of the review, the most significant of which are that the Working Group should:

- consider the need to bring Integrated Pest Management and pesticide requirements in line with the environmental and social risk assessment (ESRA) framework requirements for certificate holders in the *FSC Pesticides Policy*;
- consider whether the standard gives sufficient emphasis to maintaining basic ecosystem services (carbon sequestration and storage, biodiversity conservation, watershed services, soil conservation, and recreational services) as a minimum requirement of responsible forest management;
- consider whether the standard adequately addresses workers' rights;
- consider whether the standard adequately addresses gender equality;
- consider whether the standard adequately addresses soil protection;
- consider whether the standard provides an adequate steer on sustainable harvesting levels;
- consider the need to evaluate the applicability of various FSC requirements, particularly under Principle 4 (community relations);
- consider the need to clarify the scope of the standard, in terms of both vegetation types and non-timber forest products, and to develop specific requirements as appropriate; and,
- consider the need to change the form of standard requirements from 'shall' to statements in the present indicative.

As a general principle, FSC UK believes that the UKWAS Working Group should aspire to challenge foresters and explore new elements of responsible forest management.

2. Brief and approach

The UKWAS *Standard-setting Process* version 3.0 calls for 'A Certification Schemes' Requirements Review – a consideration of advice (to be provided by the certification schemes based on a gap analysis) on any new or revised policies, procedures or guidance that is relevant to the revision and any learnings from equivalent accredited standards of a similar geographical or ecological scope of application and similar forest conditions. National certification schemes should seek advice and guidance from their international body when compiling their advice.' This document represents FSC UK's input to the UKWAS Requirements Review.

A check was carried out of FSC's document catalogue to identify relevant policies, procedures, standards and guidance documents issued from February 2017, the date that a revised draft of UKWAS 4 was submitted to FSC for approval. Some guidance from 2016 was also identified which came too late in the standard development process to have a significant influence on UKWAS 4. A check was also carried out of published forest management interpretations from February 2017 onwards. All of these sources were reviewed to determine whether they had any substantive bearing on the contents of UKWAS. In addition, the potential for alignment with the latest version of the controlled wood National Risk Assessment for the UK was considered. The document catalogue and all of the relevant normative documents are available from the [FSC Document Centre](#). The results of this review are set out in section 3.

Advice received from FSC International, separate from documented changes to the FSC normative framework, is set out in section 4.

The National Forest Stewardship Standards for Denmark and the Netherlands were reviewed on the basis of their geographical proximity to the UK and their superficially similar forest history (extensive historical deforestation, followed by extensive reforestation in the nineteenth and twentieth centuries). Despite the similarities between the UK and Ireland, the Irish National Forest Stewardship Standard was discounted as it has not yet been transferred to V5-2 of the FSC Principles and Criteria. The results of this review are set out in section 5.

Recommendations to the UKWAS Working Group from FSC UK are highlighted throughout this document in bold, and are summarised in the final section.

Some ongoing developments in the FSC normative framework are noted in section 3.3.1 on pesticides. Other ongoing processes are likely to be delayed by the effects of the COVID-19 pandemic, including the postponement of the FSC General Assembly. Processes which may affect UKWAS in due course include the development of the [FSC Policy on Conversion](#) and associated [implementation mechanisms](#), and discussions around [sustainable intensification](#) and landscape approaches.

3. Review of changes to the FSC normative framework

This review is separated into a consideration of mandatory requirements (section 3.1) and guidance (section 3.2), which are then summarised by topic (section 3.3). The emphasis throughout is on changes to the normative framework with implications for standard contents; other issues, such as the approval process and implementation of standards, are largely omitted, although brief reference is made to new or revised documents.

3.1 Policies, procedures, standards and interpretations

The following FSC policies, procedures and standards relevant to the development or contents of National Forest Stewardship Standards have been produced or revised since February 2017:

Document code	Title	New or revised	Effective date
FSC-POL-30-001 V3-0 EN	FSC Pesticides Policy	Revised	1 August 2019
FSC-POL-30-001a	FSC Lists of highly hazardous pesticides	New	1 August 2019
FSC-PRO-30-006 V1-0 EN	Ecosystem Services Procedure: Impact Demonstration and Market Tools	New	21 August 2018
FSC-PRO-60-007 V1-2 EN	Structure, Content and Development of Interim National Standards	Revised	V1-2 undated, but updated following FSC International Board of Directors meeting in November 2019
FSC-PRO-60-010 V1-0 EN	Incorporating a risk-based approach in National Forest Stewardship Standards	New	8 November 2018
FSC-STD-01-002	FSC Glossary of Terms	Revised	19 October 2017
FSC-STD-60-004 V2-0 EN	International Generic Indicators	Revised	1 July 2018

Although it is applicable to the development of Interim National Standards, rather than National Forest Stewardship Standards, FSC-PRO-60-007 V1-2 EN has been included because it contains the most up to date requirements for the inclusion of non-timber forest products in the scope of standards.

The revised *International Generic Indicators* (FSC-STD-60-004 V2-0 EN) include a raft of changes in relation to Intact Forest Landscapes (IFLs) and Indigenous cultural landscapes which are not relevant to the UK, changes in relation to free, prior and informed consent which may be relevant depending on the decisions of the UKWAS Working Group, and also changes in relation to workers' rights, transaction verification/fibre testing, and High Conservation Values which are relevant to our context.

Also relevant is FSC-NRA-GB V1-0 EN *FSC National Risk Assessment for the United Kingdom of Great Britain and Northern Ireland*, approved December 2018.

FSC-PRO-10-606 V2-1 EN *Approval of Forest Stewardship Standards*, revised version effective from October 2017, has not been included in this review on the basis that it has no bearing on the contents of National Forest Stewardship Standards. FSC-STD-30-005 V1-1 EN *FSC standard for group entities in forest management groups*, revised version effective April 2017, has been excluded on the same basis. Note, however, that interpretation INT-STD-20-007_44/INT-STD-30-005_08, below, affects the application of some standard requirements in the context of group schemes, which may influence how those requirements are viewed by stakeholders. FSC-DIR-20-007 *FSC Directive on FSC Forest Management Evaluations* has been excluded on the basis that the only recent update relates to auditing time.

The following interpretations relevant to the development or contents of National Forest Stewardship Standards, taken from the version of [Forest Management Interpretations](#) published 23 July 2020, have been issued or updated since February 2017:

Relevant normative document	Interpretation code	Publication date	Topic
FSC-POL-20-003 (2004) EN FSC Policy on the Excision of Areas from the Scope of Certification	INT-POL-20-003_01	10 April 2012, updated 20 May 2020	Excision of areas where there is a conflict
	INT-POL-20-003_09	7 November 2018, updated 3 December 2018	Situations where FSC requirements are not met for reasons beyond the control of the

Relevant normative document	Interpretation code	Publication date	Topic
			forest manager in more than 5% of the area of the management unit
	INT-POL-20-003_11	10 July 2019	Excision of areas where the owner/manager has voluntarily relinquished management control to a third party
FSC-POL-30-001 V3-0 EN FSC Pesticides Policy	INT-POL-30-001_07	22 May 2019, updated 19 June 2019, 3 April 2020, 20 May 2020 and 25 June 2020	Transition to the revised <i>FSC Pesticides Policy</i>
FSC-STD-01-001 V5-2 EN FSC Principles and Criteria for Forest Stewardship	INT-STD-01-001_09	3 June 2015, updated 14 March 2016, 14 July 2017, 24 January 2018 and 23 July 2020	Meeting requirements for representative sample areas (Criterion 6.5) outside SLIMF management units
	INT-STD-01-001_14	24 January 2018	Definition of the management unit, specifically in relation to the degree of management control
	INT-STD-01-001_16	17 December 2019	Certification of 'other vegetation types'
FSC-STD-01-003 V1-0 EN SLIMF Eligibility Criteria	INT-STD-01-003_05	24 September 2019	Definition of the management unit/SLIMF

Relevant normative document	Interpretation code	Publication date	Topic
FSC-STD-20-007 V3-0 EN Forest management evaluations	INT-STD-20-007_44 (also published with code INT-STD-30-005_08)	24 January 2018, updated 20 March 2018	Sharing requirements for representative sample areas (Criterion 6.5) among group scheme members
	INT-STD-20-007_45	24 January 2018, updated 20 March 2018	Sharing requirements for a conservation area network (Criterion 6.5) among group scheme members
FSC-STD-20-007a V1-0 EN Forest management evaluations addendum – Forest certification reports	INT-STD-20-007a_03	3 April 2020	Recording of pesticide usage on rights of way or other easements
FSC-STD-60-004 V2-0 EN International Generic Indicators	INT-STD-60-004_02	23 July 2020	Providing information to interested stakeholders from management plan (Criterion 7.5) and monitoring (Criterion 8.4) summaries
FSC-DIR-20-007 EN FSC Directive on FSC Forest Management Evaluations	INT-DIR-20-007_11	15 June 2018	Including specific non-timber forest products in the scope of a standard
	INT-DIR-20-007_14	13 November 2014, updated 10 July 2019	Application of existing advice on wind turbines to other renewable energy developments

Also relevant, of course, is INT-FSC-STD-GBR-03-2017_01 on the definition of ‘priority species’ in FSC-STD-GBR-03-2017 V1-0 EN *The FSC National Forest Stewardship Standard of the United Kingdom*.

A number of recent interpretations have been excluded on the basis that they are not immediately relevant.

3.2 Guidance documents

The following FSC guidance documents relevant to the development or contents of National Forest Stewardship Standards have been produced or revised since January 2016:

Document code	Title	New or revised	Effective date
FSC-GUI-30-006 V1-0 EN	Guidance for Demonstrating Ecosystem Services Impacts	New	9 October 2018
FSC-GUI-30-009 V1-0 EN	High Conservation Value Guidance for Forest Managers	New	10 January 2020
FSC-GUI-60-002 V1-0 EN	Guideline for Standard Developers for addressing risk of unacceptable activities in regard to scale and intensity	New	1 April 2016
FSC-GUI-60-005 V1-0 EN	Promoting Gender Equality in National Forest Stewardship Standards	New	1 October 2016
FSC-GUI-60-008 V1-0 EN	Guideline for Standard Developers on the generic criteria and indicators based on ILO Core Conventions principles	New	18 September 2017

Document code	Title	New or revised	Effective date
FSC-GUI-60-009 V1-0 EN	Guidance for Standard Development Groups: Developing National High Conservation Value Frameworks	New	10 January 2020
FSC-GUI-60-009a V1-0 EN	Template for National High Conservation Value Frameworks	New	10 January 2020
FSC-GUI-60-010 V1-0 EN	Guideline for Standard Developers on incorporating a risk-based approach in NFSS	New	8 November 2018

Although it is applicable to certificate holders rather than standard developers, FSC-GUI-30-009 V1-0 EN has been included in case it helps to clarify the application of the National High Conservation Value Framework by forest owners/managers. FSC-GUI-60-008 V1-0 EN has been included on the basis that it may clarify the intent and application of new workers' rights indicators under Criterion 2.1 in FSC-STD-60-004 V2-0 EN *International Generic Indicators*.

FSC-GUI-30-010 V1-0 EN *Intact Forest Landscapes Guidance for Forest Managers*, effective January 2020, and FSC-GUI-60-004 V1-0 EN *Guidance for Standard Developers to Develop a National Threshold for the Core Area of Intact Forest Landscapes (IFL) within the Management Unit*, effective June 2020, have not been included in this review as they apply only to countries with Intact Forest Landscapes; the lists of countries with IFLs in FSC-GUI-30-010 V1-0 EN does not include the UK. FSC-GUI-30-007 V1-0 EN *Living Wage Auditor Guidance*, effective May 2016, has also not been included on the basis that it has no bearing on the contents of National Forest Stewardship Standards.

3.3 Summary of changes to the FSC normative framework by topic

3.3.1 Pesticides

The revised *FSC Pesticides Policy* has introduced the concept of environmental and social risk assessment (ESRA). As part of the ESRA framework, the Policy requires standard developers to incorporate International Generic Indicators (IGIs) for the use and risk management of Highly Hazardous Pesticides (HHPs) into their standards and to 'develop locally relevant thresholds or conditions for the use of the relevant FSC Highly Restricted HHPs and FSC Restricted HHPs' (FSC-POL-30-001 V3-0 EN, clause 4.10), following normal standard development procedures (clause 4.11). The development of these HHP IGIs has been delayed by the effects of the COVID-19 pandemic. At the time of writing, they seem likely to be approved at the end of 2021; it is not clear at this stage what timeline will be set for their incorporation into national standards. In due course, however, standard developers will be required to identify Highly Restricted HHPs and Restricted HHPs used or likely to be used in their country; conduct an overall risk assessment; based on the risk assessment, determine whether or not a Highly Restricted HHP or Restricted HHP may be used in their country; and, develop national indicators for the use and risk management of allowed Highly Restricted HHPs and Restricted HHPs using the IGIs as a starting point (FSC-POL-30-001 V3-0 EN, p. 24).

In the interim, **the UKWAS Working Group should consider the need to bring Integrated Pest Management and pesticide requirements in line with the environmental and social risk assessment (ESRA) framework requirements for certificate holders in the FSC Pesticides Policy** (FSC-POL-30-001 V3-0 EN, clauses 4.12 and 4.13):

4.12 The Organization shall:

1. Give preference, as a matter of principle, to:
 1. non-chemical methods over chemical pesticides,
 2. chemical pesticides not listed in the FSC lists of HHPs over those listed in the FSC lists of HHPs, and
 3. FSC restricted HHPs over FSC highly restricted HHPs.
2. Undertake a comparative ESRA according to scale, intensity and risk (SIR) as part of its integrated pest management to identify the lowest risk option to control a pest, weed or disease, the conditions for its use and the generic mitigation and monitoring measures to minimize the risks.
3. Consider in their ESRA the minimum list of types of hazards, exposure elements and exposure variables described in Annex 2.
4. Select the option that demonstrates least social and environmental damages, more effectiveness and equal or greater social and environmental benefits.

5. Conform with the applicable international and national indicators and thresholds for the use of HHPs.
6. Before applying any chemical pesticide, incorporate the results of their ESRA to site operational plans, to identify site-specific risks and adapt the generic mitigation and monitoring measures previously identified in the IPM ESRA (Clause 4.12.2).
7. Make the ESRAs and incorporation to the operational plans available to affected stakeholders upon request.
8. Consult the online FSC database for information exchange on alternatives and monitoring procedures.
9. Have programmes in place, according to SIR, to research, identify and test alternatives to replace FSC highly restricted HHPs and restricted HHPs with less hazardous alternatives. Programmes shall have clear actions, timelines, targets and resources allocated.
10. Engage with stakeholders in conformance with the requirements in the applicable National Forest Stewardship Standard or Interim National Standard when conducting ESRA.
11. Not use any FSC Prohibited HHPs except in the case of an emergency situation or by governmental order. (See Annex 3. Procedure for use of FSC prohibited HHPs in case of emergency situations or governmental orders).
12. Inform third-party processing plants located in the spatial area of the MU and third-party nursery suppliers of the list of FSC prohibited chemical pesticides, encouraging them to avoid these pesticides in their processes and in the production of seedlings and other materials entering the management unit.
13. Request the list of FSC prohibited chemical pesticides used by processing plants and nurseries suppliers described in clause 4.12.12.

4.13 The Organization may:

1. Collaborate with other Organizations with similar pest problems and forest conditions to conduct ESRA.
2. Collaborate with research institutions and other Organizations on research programs for the identification of less hazardous alternatives.

Note that, until such time as HHP IGIs have been finalised and incorporated into national standards, certificate holders are required to consider the latest draft IGIs when developing their ESRAs (FSC-POL-30-001 V3-0 EN, clause 4.12.5; INT-POL-30-001_07).

Although most standard users are likely to assume that the relevant requirements apply without limitation, **the UKWAS Working Group should consider whether existing requirements (UKWAS 3.4.2(d) and 3.4.3) adequately address recording/reporting of pesticide usage on areas subject to easements**, in line with INT-STD-20-007a_03.

3.3.2 Ecosystem services

During the last UKWAS revision, a decision was made not to include requirements relevant to FSC promotional claims regarding the maintenance and/or enhancement of ecosystem services (FSC-STD-60-004 V1-0 EN, Annex C). The publication of the *Ecosystem Services Procedure* (FSC-PRO-30-006 V1-0 EN) and its associated guidance document (FSC-GUI-30-006 V1-0 EN), along with changes to the *International Generic Indicators* (FSC-STD-60-004 V2-0 EN), now means that it is not necessary to include such requirements in National Forest Stewardship Standards in order for certificate holders to make ecosystem services claims. However, in the context of the *Ecosystem Services Procedure* and the *Guidance for Demonstrating Ecosystem Services Impacts*, and more generally FSC Principle 6, **the UKWAS Working Group should consider whether the standard gives sufficient emphasis to maintaining basic ecosystem services (carbon sequestration and storage, biodiversity conservation, watershed services, soil conservation, and recreational services) as a minimum requirement of responsible forest management.**

3.3.3 Scale, intensity and risk/risk-based approaches

The implications of FSC-GUI-60-002 V1-0 EN *Guideline for Standard Developers for addressing risk of unacceptable activities in regard to scale and intensity*, 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* are considered in the separate *FSC UK Risk Review*.

Also relevant, however, are various interpretations on the application of some conservation requirements in small or low intensity management forests (SLIMF); see section 3.3.8.

3.3.4 High Conservation Values

The implications of FSC-GUI-30-009 V1-0 EN *High Conservation Value Guidance for Forest Managers*, FSC-GUI-60-009 V1-0 EN *Guidance for Standard Development Groups: Developing National High Conservation Value Frameworks*, FSC-GUI-60-009a V1-0 EN *Template for National High Conservation Value Frameworks*, and revised indicators and instructions for standard developers in FSC-STD-60-004 V2-0 EN *International Generic Indicators* are considered in the separate *FSC UK Risk Review*.

3.3.5 Workers' rights

The revised *International Generic Indicators* replace the original three indicators under Criterion 2.1 with a far more comprehensive set of indicators and sub-indicators addressing the principles of the ILO Core Labour Conventions (FSC-STD-60-004 V2-0 EN, indicators 2.1.1-2.1.4):

2.1.1 The Organization shall not use child labour.

2.1.1.1 The Organization shall not employ workers below the age of 15, or below the minimum age as stated under national, or local laws or regulations, whichever age is higher, except as specified in 2.1.1.2.

2.1.1.2 In countries where the national law or regulations permit the employment of persons between the ages of 13 to 15 years in light work such employment should not interfere with schooling nor, be harmful to their health or development. Notably, where children are subject to compulsory education laws, they shall work only outside of school hours during normal day-time working hours.

2.1.1.3 No person under the age of 18 is employed in hazardous or heavy work except for the purpose of training within approved national laws and regulation.

2.1.1.4 The Organization shall prohibit worst forms of child labour.

2.1.2 The Organization shall eliminate all forms of forced and compulsory labour.

2.1.2.1 Employment relationships are voluntary and based on mutual consent, without threat of a penalty.

2.1.2.2 There is no evidence of any practices indicative of forced or compulsory labour, including, but not limited to, the following:

- Physical and sexual violence
- Bonded labour
- Withholding of wages/including payment of employment fees and or payment of deposit to commence employment
- Restriction of mobility/movement
- Retention of passport and identity documents
- Threats of denunciation to the authorities.

2.1.3 The Organization shall ensure that there is no discrimination in employment and occupation.

2.1.3.1 Employment and occupation practices are non-discriminatory.

2.1.4 The Organization shall respect freedom of association and the right to collective bargaining.

2.1.4.1 Workers are able to establish or join worker organizations of their own choosing.

2.1.4.2 The Organization respects the rights of workers to engage in lawful activities related to forming, joining or assisting a workers' organization, or to refrain from doing the same; and will not discriminate or punish workers for exercising these rights.

2.1.4.3 The Organization negotiates with lawfully established workers' organizations and/or duly selected representatives in good faith and with the best efforts to reach a collective bargaining agreement.

2.1.4.4 Collective bargaining agreements are implemented where they exist.

The associated instructions for standard developers state that 'Standard Developers shall give due consideration to the rights and obligations established by national law, while at the same time fulfilling the objectives of the indicators and sub-indicators in this criterion'.

FSC-GUI-60-008 V1-0 EN *Guideline for Standard Developers on the generic criteria and indicators based on ILO Core Conventions principles* provides brief additional context and guidance.

Taking into account the far more comprehensive coverage of the ILO Core Conventions in the revised IGIs, **the UKWAS Working Group should consider whether the standard adequately addresses workers' rights.**

3.3.6 Gender equality

FSC's requirements in relation to gender equality, as set out in Criterion 2.2 and the *International Generic Indicators* (FSC-STD-60-004 V2-0 EN), have not changed since UKWAS 4 was published. However, FSC-GUI-60-005 V1-0 EN *Promoting Gender Equality in National Forest Stewardship Standards* provides useful context and explanation of the intent of the relevant IGIs (FSC-STD-60-004 V2-0 EN, indicators 2.2.1-2.2.9), and **the UKWAS Working Group should consider whether the standard adequately addresses gender equality.**

3.3.7 Standard scope

A number of developments in the FSC normative framework have clarified requirements for specifying the scope of National Forest Stewardship Standards, in particular in relation to non-timber forest products. Interpretation INT-DIR-20-007_1 states that 'A FSC-approved National Forest Stewardship Standard (NFSS) is qualified for Non-Timber Forest Products (NTFP) evaluations when its scope explicitly mentions the possibility to apply the standard for certification of a particular NTFP and includes specific indicators for those NTFPs'. A more

detailed steer is provided by *Structure, Content and Development of Interim National Standards*, which sets out the Criteria under which NTFP-specific requirements should be considered (FSC-PRO-60-007 V1-2 EN, clause 2.4). The scope of FSC-STD-GBR-03-2017 V1-0 EN *The FSC National Forest Stewardship Standard of the United Kingdom* currently refers in general terms to 'non-timber forest products', but this would clearly not be considered adequate in any revised version; it would be necessary to determine exactly what NTFPs were in scope and to develop appropriate requirements.

The scope of FSC-STD-GBR-03-2017 V1-0 EN also refers to 'all forest types', encompassing both plantations and (semi-)natural forest, but interpretation INT-STD-01-001_16 states that case by case decisions must be made on the certification of any 'other vegetation types', including 'silvo-pastoral production systems, agroforestry, [and] medium to long rotation coppice systems'; it is not clear whether decisions should be made at the level of the National Forest Stewardship Standard or for individual management units, but some clarification of the scope of the standard and consideration of the need for system-specific requirements might be worthwhile.

For some observations on the potential need to clarify the scope of the standard, see the separate *FSC UK Standard Users' Feedback Review*; FSC UK suggests that **the UKWAS Working Group should consider the need to clarify the scope of the standard, in terms of both vegetation types and non-timber forest products, and to develop specific requirements as appropriate.**

3.3.8 Other changes

Of obvious relevance is the only formal interpretation of UKWAS 4 to date, INT-FSC-STD-GBR-03-2017_01, and **the UKWAS Working Group should consider the need to update the definition of 'priority species'.**

The FSC National Forest Stewardship Standard of the United Kingdom, the standard formally approved by FSC and therefore, in FSC's eyes, the basis for UKWAS 4, includes an extensive list of applicable legislation (FSC-STD-GBR-03-2017 V1-0 EN, Annex A). Work on the controlled wood National Risk Assessment for the UK (FSC-NRA-GB V1-0 EN) involved revising this list of applicable legislation, including clarifying the scope of some of the categories, and other changes to legislation will have occurred since. Although the list in FSC-STD-GBR-03-2017 V1-0 EN is more extensive than that in the UKWAS Appendix it is still relevant to the implementation of the standard, and **the UKWAS Working Group should consider the need to update the list of applicable legislation.**

Interpretations INT-STD-01-001_14 and INT-STD-01-003_05 are both relevant to the understanding of the 'management unit' as described in the introduction to UKWAS. INT-STD-

01-001_14 clarifies that, in the case of multiple management unit certification, the certificate holder must have full management control of the management units in order to guarantee that decisions are taken which lead to compliance with FSC requirements. INT-STD-01-003_05 deals with situations in which group scheme members own multiple properties and want to enter them separately in the group; in the example in the interpretation, this is so that each individual property falls below the SLIMF size threshold, whereas if considered together they would exceed the threshold. The interpretation confirms that this is possible provided each individual property fulfils the definition of a management unit. While these might be considered scheme-specific rules, **the UKWAS Working Group should consider whether the standard introduction adequately addresses different types of management units, especially multiple small woods treated as individual management units in a single ownership.**

Interpretations of FSC-POL-20-003 (2004) EN *FSC Policy on the Excision of Areas from the Scope of Certification* (INT-POL-20-003_01, 09 and 11) address situations where the management control of the owner/manager is limited, as described in the section on third party rights in the introduction to UKWAS. INT-POL-20-003_11 clarifies that if the owner/manager voluntarily relinquishes management control through a lease arrangement, the management activities implemented by the lessee cannot be considered beyond the control of the owner/manager, and the requirements of the Policy, as briefly summarised in the UKWAS introduction, would apply. INT-POL-20-003_09 emphasises the Policy requirement that areas affected by factors beyond the control of the owner/manager may not exceed 5 % of the management unit (FSC-POL-20-003 (2004) EN, clause 3.1(d)), and that failure to meet this threshold constitutes a major non-conformity. INT-POL-20-003_01 clarifies that areas of a management unit may not be excised from the scope of certification where there is an unresolved conflict; in the example in the interpretation, this is a dispute over traditional use rights. As with the detail of the definition of the management unit, while these might be considered scheme-specific rules, **the UKWAS Working Group should consider whether the standard introduction adequately addresses situations in which the owner/manager does not have full management control of a management unit.**

A number of interpretations relate to the implementation of conservation requirements under Criterion 6.5 in SLIMF and groups. INT-STD-01-001_09 allows requirements for representative sample areas of native ecosystems (roughly equivalent to UKWAS 4.4.1, 4.4.2 and 4.4.3) to be met outside the management unit for individual and group certificates where the management unit is smaller than 50 hectares. INT-STD-20-007_44 allows these requirements to be met at the group scheme level for SLIMF groups, while INT-STD-20-007_45 allows conservation area network requirements (equivalent to UKWAS 2.11.1) to be met at the group scheme level for SLIMF groups. Note that FSC-STD-30-005 V1-1 EN *FSC standard for group entities in forest management groups* is currently under revision, and V2-0 is likely to formalise provisions for meeting area thresholds across management units for group schemes containing SLIMF management units. While none of these developments directly affects standard contents, **the**

UKWAS Working Group should be aware of how UKWAS 2.11.1, 4.4.1, 4.4.2 and 4.4.3 might be applied in practice, and consider whether there is a need to reframe these requirements accordingly.

Interpretation INT-STD-60-004_02 clarifies requirements for making management planning documentation (Criterion 7.5, UKWAS 2.2.2) and monitoring results (Criterion 8.4, UKWAS 2.15.3) publicly available, confirming that this includes making information available to 'interested stakeholders', as defined by FSC, and should include information on all management units within the scope of the certificate. The UKWAS definition of 'publicly available' includes 'local people or other interested parties', while the definition of 'interested parties' encompasses the FSC terms 'affected stakeholder' and 'interested stakeholder'; as such, UKWAS requirements already cater for 'interested stakeholders'. Although most standard users are likely to assume that the relevant requirements apply without limitation, and in many cases stakeholders will be interested in specific management units, **the UKWAS Working Group should be aware that requirements to make information publicly available extend to all management units within the scope of a certificate.**

Interpretation INT-DIR-20-007_14 states that advice note ADVICE-20-007-016, which applies to wind turbine establishment within FSC certified areas, is not applicable to other renewable energy infrastructure development. This is unlikely to affect the conversion requirements in the standard (UKWAS 2.13.1 and 2.13.2), guidance for which refers to infrastructure and built development in general terms.

The revised *International Generic Indicators* include a number of changes relating to free, prior and informed consent (FPIC). Some of these changes relate to Indigenous Peoples (under Principle 3) and are therefore not applicable in the UK. Other apply to local communities who have legal and customary rights to maintain control over management activities within or related to the management unit to the extent necessary to protect their rights, resources, lands and territories (Criterion 4.2). 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, on the basis that there are no communities with such rights in the UK; if the position on Criterion 4.2 changes, a number of revised FPIC requirements in the IGIs will become applicable (FSC-STD-60-004 V2-0 EN, indicators and instructions for standard developers under Criterion 4.2, and indicators 7.6.3, 9.1.3, 9.2.3 and 9.4.2 referring to 'affected rights holders'). **The UKWAS Working Group should be aware of the current position regarding Criterion 4.2, and consider whether there is a need to reconsider this position taking into account the related requirements, including those relating to free, prior and informed consent.**

Finally, the revised *International Generic Indicators* also introduce requirements to facilitate transaction verification and fibre testing (FSC-STD-60-004 V2-0 EN, indicator 8.5.1). As a scheme-specific requirement this is unlikely to result in a change to UKWAS, but **the UKWAS**

Working Group should be aware that any revised version of FSC-STD-GBR-03-2017 V1-0 EN *The FSC National Forest Stewardship Standard of the United Kingdom* will include requirements to facilitate transaction verification and fibre testing.

4. Advice received from FSC International

While *Structure and Content of National Forest Stewardship Standards* (FSC-STD-60-002 V1-0 EN) remains unchanged since its approval 2009 and presents example indicators using the form 'shall', the *International Generic Indicators* (FSC-STD-60-004 V2-0 EN) are (with the exception of some of the new indicators under Criterion 2.1) written in the present indicative. This form was justified during the original development of IGIs (2012-2015) in the following terms:

- Each indicator applies to The Organization, as stated in the Principle and Criteria. As a result, the indicator will not state, 'The Organization shall...'.
- Each indicator is stated in the present tense, meaning that it expresses what is meant to be in place at the time of audit and not at some future date.
- As the Principles and Criteria are written as 'shall' statements, this is not repeated in the indicators.
- Each indicator applies throughout the Management Unit. As a result, the indicator will not state '...within the Management Unit...'.
- The only exception for this is when a Criterion also includes activities outside, adjacent to/surrounding the Management Unit. In these cases the geographic scope of the requirement will be clarified by including '...within the Management Unit...'.

We have been advised by FSC International's Performance and Standards Unit that the form used in the IGLs is the preference of the FSC Policy and Standards Committee for future National Forest Stewardship Standards. We are given to understand that, once all national standards have transferred to version 5 of the *FSC Principles and Criteria for Forest Stewardship* (FSC-STD-01-001 V5-2 EN), FSC-STD-60-002 V1-0 EN will be revised and combined with FSC-STD-60-006 V1-2 EN *Process requirements for the development and maintenance of National Forest Stewardship Standards* and FSC-PRO-60-006 V2-0 EN *Development and Transfer of National Forest Stewardship Standards to the FSC Principles and Criteria Version 5-1*; at this point, presumably, this preference will be stated formally in the FSC normative framework. In the interim, **the UKWAS Working Group should consider the need to change the form of standard requirements from 'shall' to statements in the present indicative.**

5. Review of National Forest Stewardship Standards with a similar scope

The standards FSC-STD-DNK-02-2018 EN [The FSC National Forest Stewardship Standard of Denmark](#) and FSC-STD-NLD-02-2018 EN [The FSC National Forest Stewardship Standard of The Kingdom of The Netherlands](#) both have the same scope, applying to all forest types and sizes, but not covering non-timber forest products.

Indigenous Peoples are not present in either country, and so, as in the UK, Principle 3 is not applicable.

The standards have a similar approach to the definition of High Conservation Values (HCVs, Principle 9) at the national level. As in the UK, Intact Forest Landscapes (HCV 2) are not present in Denmark or the Netherlands. Whereas UKWAS recognises areas and features of critical importance for either watershed management or erosion control (UKWAS 4.5.1) as HCV 4, the Danish and Dutch standards consider only water catchments, no doubt because their topography is very different to that of the UK. While UKWAS recognises that some local communities may be dependent on water supplies from forests (UKWAS 5.1.1(b)) 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.

Both standards were submitted for approval before the revised *International Generic Indicators* (FSC-STD-60-004 V2-0 EN) were published, and were therefore unaffected by changes such as those to indicators under Criterion 2.1 (workers' rights). As in the IGIs, however, both use the present indicative rather than 'shall' in indicators.

5.1 The Danish standard

5.1.1 Scale, intensity and risk

To address scale, intensity and risk, the Danish 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. Large forests are defined as being larger than 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'.

Just over sixty indicators applicable to large forests are identified, in areas including:

- Documented legal ownership (indicator 1.1.1) and management rights (1.2.1)
- Gender equality (2.2.1-2.2.9)

- Health and safety (2.3.1-2.3.8)
- Wages (2.4.1)
- Mitigation of impacts on local communities (4.5.2 and 4.5.3)
- Identification and use of resources and ecosystem services (5.1.1 and 5.1.2)
- Establishment of local services (5.4.2)
- Long-term economic viability (5.5.1 and 5.5.2)
- Identifying rare and threatened species and their habitats (6.4.1)
- Detailed contents of the management plan (7.2.1-7.2.3)
- Verifiable targets (7.3.1 and 7.3.2)
- Making the management plan publicly available (7.5.1 and 7.5.2)
- Monitoring management plan implementation (8.1.1 and 8.1.2)
- Monitoring social and environmental impacts (8.2.1)
- Setting strategies to maintain and/or enhance HCVs (9.2.1-9.2.3)
- HCV monitoring (9.4.1-9.4.4)
- Use of non-native species (10.3.1 and 10.3.2)
- Ecologically appropriate silvicultural practices (10.5.1)
- Fertiliser records and damage mitigation (10.6.3 and 10.6.5)
- Assessment of natural hazards (10.9.1)
- Infrastructure development (10.10.1 and 10.10.2)
- Protection of environmental values during harvesting (10.11.1 and 10.11.2)

5.1.2 FSC requirements considered not applicable

In addition to Principle 3 not being applicable in Denmark, the Danish standard considers a number of Criteria to be 'non-contributing' (a term used 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*) in the context of other standard requirements:

- Providing reasonable opportunities for employment, training and other services to local communities, contractors and suppliers (Criterion 4.3)
- Mechanisms for resolving grievances and providing fair compensation to local communities and individuals with regard to the impacts of management activities (Criterion 4.6)
- Identifying, recognising and managing and/or protecting sites which are of special cultural, ecological, economic, religious or spiritual significance, and for which local communities hold legal or customary rights (Criterion 4.7)
- Upholding the right of local communities to protect and utilise their traditional knowledge (Criterion 4.8)
- Assessing environmental values in the management unit and those values outside the management unit potentially affected by management activities (Criterion 6.1)

For comparison, FSC-STD-GBR-03-2017 V1-0 EN *The FSC National Forest Stewardship Standard of the United Kingdom* considers Criterion 4.8 (and Criterion 4.2) not to be applicable.

5.1.3 Treatment of specific issues

The standard includes indicators on specific health and safety issues – including workplace assessment (indicator 2.3.1), personal protective equipment (2.3.3), training (2.3.4), records (2.3.5), and review after incidents or accidents (2.3.7) – rather than general references to guidance or legislation; this may have the benefit of focussing the attention of certificate holders and auditors on key issues rather than the full gamut of health and safety requirements. As noted above, these health and safety requirements are only audited for large forests.

There are straightforward and logically ordered requirements for setting sustainable harvesting levels, defining the evidence base (indicator 5.2.1), adjusting for natural hazards and maintenance of ecosystem functions (5.2.2), ensuring that the level set does not exceed a sustainable level (5.2.3), documenting actual annual harvesting levels (5.2.4), and ensuring that, over a 10-year period, the actual harvesting level does not exceed the planned timber harvesting level (5.2.5). Such an approach, which is largely in line with the IGIs, might be more useful to some standard users, especially those without formal forestry training, than the simple statement that ‘Timber shall normally be harvested from the WMU at or below a level which can be permanently sustained’ in UKWAS 2.4.2(a).

There is a specific requirement for machine operators, contractors and forest workers to have access to maps of the relevant area when carrying out forest operations, or to ensure that they are made aware in some other way of the identified environmental values in the area (indicator 6.2.3). An explicit requirement along these lines could be considered as a supplement to the existing requirement to communicate operational plans to workers in UKWAS 3.1.3.

In comparison with the UKWAS requirement for a minimum of 15 % of the management unit to be managed with conservation and enhancement of biodiversity as the primary objective (UKWAS 2.11.1(a)), the Danish standard requires a minimum of 10 % of the certified area to be designated for the purpose of maintaining and/or enhancing biodiversity (indicator 6.5.1). However, a minimum of 5 % of the forest covered area must be managed as ‘untouched forest’ (6.5.6):

Forests areas, where the biodiversity – understood as good habitats for threatened species – are maintained and enhanced. Untouched forest can be grazed by domesticated or wild animals. A preliminary restoration of hydrological conditions and vegetation structure will often benefit the biodiversity. Optimally the forest should be self-sustained in the long term. Nature conservation activities should, however, be undertaken where it is necessary to ensure the conditions for threatened species or to control invasive

species. No harvest of wood products for the purposes of sale takes place. This definition does not consider access.

The standard notes that, when converting areas to untouched forest, it may be beneficial to create more light and variation in the vegetation of the area by some preparatory harvesting, provided that the harvest does not pose a significant risk to the long-term survival of known rare and endangered species in the area (6.5.6). Such an approach might be an interesting supplement or alternative to requirements for natural reserves and long-term retentions in UKWAS 4.6.1 and 4.6.2.

The standard allows regeneration with non-native species only where management units have more than 65 % native species (or more than 25 % on nutrient-poor soils), with further caveats including that the use of non-native species must be in 'scattered stands' of no more than one hectare (indicator 10.2.1). Norway Spruce (*Picea abies*) and European Silver-fir (*Abies alba*) are accepted in mixture with native species, on the basis that they are 'regarded as potentially native' (10.2.1); otherwise Denmark's native conifers are the same as the UK's, Scots Pine (*Pinus sylvestris*), Yew (*Taxus baccata*) and Juniper (*Juniperus communis*) (Annex D). This would be a radical departure for the UK, of course, but might suggest some new approaches to an appropriate balance between native and non-native tree species.

Regarding silviculture, the standard requires that 'A permanent forest cover is maintained, or established when regenerating stands, using selective logging, natural regeneration, or planting/sowing under shelter trees' (indicator 10.5.2). Clearfelling is to be avoided (10.5.3), but may be used:

- In even-aged coniferous stands, where other regeneration forms are not possible,
- When unstable plantations are discontinued, or
- Where necessary to ensure a useful rejuvenation with native tree species requiring light, such as birch, Scots pine and oak.

The size of clearfells must avoid threats to biodiversity, forest climate, and water and soil resources (10.5.4), and is linked to the overarching requirement for regeneration to return a stand to pre-harvest conditions or to provide a better starting point for the development of natural values and stability than the old stand, thus moving towards a more natural forest (10.1.1). While there are undoubtedly differences between the UK and Denmark, our broadly similar trajectories of re-forestation may allow us to draw inspiration from this approach to gradually fostering more natural forest conditions.

There are explicit restrictions on ground preparation (indicators 10.10.3 and 10.10.4), and a ban on stump removal and deep ploughing (10.10.5). There are also requirements applicable to large forests to avoid damage to environmental values, particularly soil, from heavy machinery

(10.11.1 and 10.11.2). Given the increasing recognition of the fundamental importance of protecting soils, this might prompt a re-evaluation of the protections currently included in UKWAS (e.g. UKWAS 2.4.1, 3.1.2, 3.2.1(b), 3.2.3 and 4.5.1).

5.2 The Dutch standard

The preamble to the Dutch standard includes the following interesting description of the work of the Standard Development Group (SDG):

The approach of the SDG can be characterised as 'pragmatic', focusing on the practise 'in the field' and the craftsmanship of the forest manager. The SDG in addition has made an effort to develop a standard that challenges the forest manager and a standard that aims to introduce new ideas and elements in forest management in the Netherlands e.g. with regard to prevention of soil compaction and procurement of plant material.

The aspiration to challenge foresters and promote new elements in forest management should be an inspiration to us all.

5.2.1 Scale, intensity and risk

In general, there are no specific indicators for different levels of scale, intensity and risk. However, requirements for accommodating community requests for recreational and educational activities (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 (5.2.3).

5.2.2 FSC requirements considered not applicable

In addition to Principle 3, the following Criteria are considered not to be applicable:

- Upholding the right of local communities to protect and utilise their traditional knowledge (Criterion 4.8)
- Plantations established on areas converted from natural forest after November 1994 (Criterion 6.10)

Criterion 6.10 is considered not applicable on the basis that there is no natural forest in the Netherlands (and that there was no natural forest in 1994).

5.2.3 Treatment of specific issues

The Dutch standard includes quoted text from various legislation referred to in indicators, for example under Criteria 1.7 (corruption), 2.2 (gender equality), 2.3 (health and safety) and 6.4 (rare and threatened species and their habitats). This may have been requested by FSC International, to demonstrate exactly what legal provisions address the relevant elements of the Criteria. There are obvious disadvantages, however, if legislation is likely to be subject to change or if, as in the UK, there are variations in legislation in different parts of a country. The UKWAS approach of referring to relevant legislation and associated guidance in an appendix seems like a more pragmatic solution.

There is an interesting approach to verifiers. They are not provided for all indicators, but in some cases they suggest who should be interviewed and what should be asked, what administrative checks should be made, or how auditors should approach stakeholder consultation (e.g. indicators 1.6.4, 2.1.1, 2.5.5). This could be considered if auditing of particular requirements is contentious or inconsistent.

The specific requirements for determining increment and mortality in different size categories and groups noted previously (indicator 5.2.3) are interesting, especially in the context of a logical progression of indicators (5.2.1-5.2.4) similar to the IGIs and those in the Danish standard for establishing and demonstrating sustainable harvesting rates under Criterion 5.2. Again, a more concrete steer here might be more useful for some standard users than the requirement and guidance in UKWAS (UKWAS 2.4.2(a)).

Similarly to the Danish standard, the Dutch standard includes requirements to prevent soil compaction (indicator 10.5.2) and to use machinery and practices that minimise damage to environmental values (10.5.3). There are also restrictions on the disposal of brash (10.11.4 and 10.11.5) and on the removal of underground biomass (10.11.6). Again, these might prompt a re-evaluation of the current protections in UKWAS.

5.3 Lessons from these standards

As a general principle, FSC UK believes that **the UKWAS Working Group should aspire to challenge foresters and explore new elements of responsible forest management.**

While FSC UK believes that the definition of the various categories of High Conservation Value currently used in the UK is robust, the different approaches in Denmark and the Netherlands, particularly with regard to HCV 5 (community needs), should be considered when the National High Conservation Value Framework is reviewed; see the separate *FSC UK Risk Review*.

In terms of scale, intensity and risk, the Dutch approach is arguably closer to the current UK model (i.e. the standard is expected to be applicable to all scales and intensities of operation, with a few specific exceptions), whereas the Danish standard gives an indication of what might be possible with an SIR-adjusted approach; again, see the separate *FSC UK Risk Review*.

There is clearly some variation, even in broadly similar countries, in which FSC Criteria are considered applicable. In this context, **the UKWAS Working Group should consider the need to evaluate the applicability of various FSC requirements, particularly under Principle 4 (community relations).**

In terms of specific issues in standard contents, the main area where lessons might be learned from these standards seems to be soil protection, particularly in relation to the use of heavy machinery, and **the UKWAS Working Group should consider whether the standard adequately addresses soil protection.**

Another area of similarity between the Danish and Dutch standards and difference from the UK is the level of detail specified in determining sustainable harvesting levels, and **the UKWAS Working Group should consider whether the standard provides an adequate steer on sustainable harvesting levels.**

We further suggest that **the UKWAS Working Group should consider the potential for refining standard requirements in the following areas:**

- **Addressing specific health and safety issues, rather than referring in general terms to legislation, codes of practice and guidance**
- **Communicating protections for environmental values to workers**
- **Adopting something akin to the Danish concept of ‘untouched forest’**
- **Addressing the balance between native and non-native species**
- **Promoting more natural forest conditions**

If there is a demand from certificate holders, certification bodies or stakeholders, there may be advantages in adopting the style of verifiers used in the Dutch standard. However, on the basis of the example of the Dutch standard, FSC UK strongly recommends that **the UKWAS Working Group should resist any pressure to quote legislation directly in the standard, and should continue to refer to published guidance.**

6. Conclusions and summary of recommendations

The various elements of this review show that there have been a number of developments in the FSC normative framework since UKWAS 4 was produced, some of them quite significant, and also that there are some interesting lessons to be learned from standards in neighbouring countries which might influence our thinking in the UK. In the following summary of the various recommendations made throughout this review, an attempt has been made to indicate just how significant FSC UK considers some of the issues to be.

For issues relating to scale, intensity and risk and High Conservation Values, see the separate *FSC UK Risk Review* for recommendations.

6.1 Recommendations based on changes to the FSC normative framework

FSC UK considers the following issues to be very significant, and strongly recommends that the UKWAS Working Group should:

- consider the need to bring Integrated Pest Management and pesticide requirements in line with the environmental and social risk assessment (ESRA) framework requirements for certificate holders in the *FSC Pesticides Policy*;
- consider whether the standard gives sufficient emphasis to maintaining basic ecosystem services (carbon sequestration and storage, biodiversity conservation, watershed services, soil conservation, and recreational services) as a minimum requirement of responsible forest management;
- consider whether the standard adequately addresses workers' rights;
- consider whether the standard adequately addresses gender equality; and,
- consider the need to clarify the scope of the standard, in terms of both vegetation types and non-timber forest products, and to develop specific requirements as appropriate.

FSC UK considers the following issues to be less significant, but still recommends that the UKWAS Working Group should:

- consider whether existing requirements (UKWAS 3.4.2(d) and 3.4.3) adequately address recording/reporting of pesticide usage on areas subject to easements;
- consider the need to update the definition of 'priority species';
- consider the need to update the list of applicable legislation;
- consider whether the standard introduction adequately addresses different types of management units, especially multiple small woods treated as individual management units in a single ownership;
- consider whether the standard introduction adequately addresses situations in which the owner/manager does not have full management control of a management unit;

- be aware of how UKWAS 2.11.1, 4.4.1, 4.4.2 and 4.4.3 might be applied in practice, and consider whether there is a need to reframe these requirements accordingly;
- be aware that requirements to make information publicly available extend to all management units within the scope of a certificate; and,
- be aware that any revised version of FSC-STD-GBR-03-2017 V1-0 EN *The FSC National Forest Stewardship Standard of the United Kingdom* will include requirements to facilitate transaction verification and fibre testing.

FSC UK also recommends that the UKWAS Working Group should be aware of the current position regarding Criterion 4.2, and consider whether there is a need to reconsider this position taking into account the related requirements, including those relating to free, prior and informed consent; this should be seen in the context of the more general recommendation in section 6.3 to consider evaluating the applicability of various FSC requirements, particularly under Principle 4.

6.2 Recommendation based on advice received from FSC International

FSC UK strongly recommends that the UKWAS Working Group should consider the need to change the form of standard requirements from 'shall' to statements in the present indicative.

6.3 Recommendations based on National Forest Stewardship Standards with a similar scope

As a general principle, FSC UK believes that the UKWAS Working Group should aspire to challenge foresters and explore new elements of responsible forest management.

FSC UK considers the following issues to be very significant, and strongly recommends that the UKWAS Working Group should:

- consider the need to evaluate the applicability of various FSC requirements, particularly under Principle 4 (community relations);
- consider whether the standard adequately addresses soil protection; and,
- consider whether the standard provides an adequate steer on sustainable harvesting levels.

As noted previously, the recommendation to consider evaluating the applicability of various FSC requirements should be taken to include the more specific recommendation in section 6.1 regarding Criterion 4.2.

FSC UK considers the following issues to be less significant, but still recommends that the UKWAS Working Group should consider the potential for refining standard requirements in the following areas:



- Addressing specific health and safety issues, rather than referring in general terms to legislation, codes of practice and guidance
- Communicating protections for environmental values to workers
- Adopting something akin to the Danish concept of 'untouched forest'
- Addressing the balance between native and non-native species
- Promoting more natural forest conditions

Finally, FSC UK recommends that, for the sake of practicality and usability, the UKWAS Working Group should resist any pressure to quote legislation directly in the standard, and should continue to refer to published guidance.