

FSC UK Standard Users' Feedback Review

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1. Executive summary

FSC UK has received relatively little unsolicited feedback on UKWAS 4, but general feedback from certificate holders and certification bodies has been positive, and the revised standard structure is felt to be good. Certification body staff have raised some specific concerns about flexibility in meeting requirements being achieved at the expense of clarity. They have suggested that some clarification or additional guidance may be necessary in relation to plantations on ancient woodland sites, deadwood, watershed management and erosion control, monitoring, and appropriate means of verification. A specific issue has been raised regarding operator exposure to chemicals when handling pre-treated trees. Engagement with other stakeholders suggests that it may be beneficial to clarify the scope of the standard in relation to coppice systems and products, and to extend the scope to specific non-timber forest products.

2. Brief and approach

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

- a consideration of feedback made directly to the UKWAS Steering Group
- a consideration of feedback made to the certification schemes from certificate holders and accredited certification bodies. (To be provided by the certification schemes.)

In an e-mail dated 7 July 2020, it was clarified that accredited certification bodies were 'to be asked by schemes for feedback to be provided directly to UKWAS'. Accordingly, an e-mail was sent to representatives of Control Union, SGS and the Soil Association, the three certification bodies currently providing FSC Forest Management certification in the UK, encouraging their participation in the standard users' feedback review.

This document represents FSC UK's input to the UKWAS Standard Users' Feedback Review. It is based on feedback from certificate holders received between April 2018, when UKWAS 4 came into effect, and July 2020. It also includes feedback received from certification bodies prior to July 2020, primarily from discussions held in April and May 2019 to consider lessons learned from the first year of implementation of UKWAS 4. Finally, it includes relevant feedback from other stakeholders, such as potential certificate holders; while this is not strictly feedback from current standard users, it does seem pertinent to the future development of UKWAS.

3. Feedback from certificate holders

What little solicited and unsolicited feedback FSC UK has received from current Forest Management certificate holders has been positive; while the major changes to the structure of the standard between versions 3.1 and 4.0 are noted, the outcome is considered to be good. No specific issues with the content of the standard have been raised.

4. Feedback from certification bodies

Overall, feedback from certification bodies has been positive, and apart from the initial disruption caused by the re-ordering of the standard, no particular issues were found to arise during the transition to UKWAS 4.

There are some concerns among auditors that the (intended) flexibility granted to certificate holders in meeting UKWAS 4 requirements leads to very different interpretations of the standard; indicators still need to be clear.

Specific areas where certification bodies have suggested that there may be a need for clarification or further guidance are plantations on ancient woodland sites (PAWS, UKWAS 4.3.1) and deadwood (UKWAS 4.6.4). (There may be scope to provide greater clarity on PAWS through a revised National High Conservation Value Framework; see the separate *FSC UK Risk Review*.) The adequacy of certificate holder approaches to watershed management and erosion control (UKWAS 4.5.1) can be difficult to assess in the absence of feedback from statutory stakeholders. There is a feeling that some certificate holders are not making the link between monitoring and objectives (UKWAS 2.2.1(g), (n) and guidance, and 2.15.1(c) and guidance).

There are also some concerns regarding verification and reliance on verbal communication; while it is accepted that verification should be appropriate to the scale and intensity of management, it may be necessary to state explicitly (in 'Using the certification standard') that conveying information verbally might not be sufficient to demonstrate compliance in some cases.

A specific point has been raised by one certification body about the recording of operator exposure to chemicals such as acetamiprid when handling pre-treated trees. While recording in general terms is addressed in UKWAS 3.4.2(d) and 3.4.3, an explicit reference to pre-treated trees may help to ensure that this exposure pathway is given due consideration when assessing potential health impacts.

5. Feedback from other stakeholders

A number of enquiries received by FSC UK between April 2018 and July 2020 have related to certification of willow production or other coppice products. These have referred variously to hazel coppice, 'willow coppice on a 3-4 year rotation', 'willow rods' harvested 'every year for around 60 years' and 'willow plantations', and have come from a coppice worker, two landowners/businesses, a basket maker and a major retailer.

While UKWAS already refers to coppice, it may be beneficial to specify under what circumstances coppice areas, in particular those managed on very short rotations, can be included in a woodland management unit; this would be analogous to the clarification of scope in relation to Christmas trees in UKWAS 2.13.3. Although the enquiries received recently have been in relation to craft uses of coppice products, a clarification of scope might also be relevant to biomass production.

This should be considered in the context of FSC interpretation INT-STD-01-001_16 on the application of certification to 'other vegetation types'; see the separate *FSC Requirements Review*. An early UKWAS interpretation (*UKWAS Interpretation Note 1 – Species diversity in poplar plantations*, dated 28 February 2000) addressed the relationship between management objectives and reliance on a single species, but did not address intensity of management/shortness of rotation. The existing UKWAS definition of 'Short rotation coppice' is not referenced in the body of the standard, and is only referred to in the definition of 'Coppice'.

Finally, FSC UK is represented on the steering group of [Dewis Gwyllt](#), a project which aims to develop new supply chains for sustainably harvested wild produce in Wales. The project team believes that FSC certification could provide crucial assurance that non-timber forest products are sustainably sourced, if such products are included in the scope of UKWAS. FSC's requirements around including non-timber forest products in the scope of National Forest Stewardship Standards have been clarified since UKWAS 4 was produced, and it is now necessary to list the products in scope and to consider the need for product-specific requirements in various parts of the standard; see the separate *FSC Requirements Review*.