

The Impacts of Certification on UK Forests

A report for the UKWAS Support Unit

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Acronyms

FSC	Forest Stewardship Council
UKWAS	UK Woodland Assurance Standard
FC	Forestry Commission
CAR	Corrective action request
UKFS	UK Forestry Standard
C&I	Criteria and indicators
FE	Forest Enterprise
PAWs	Plantations on Ancient Woodlands
ATC	Alternatives to clearfell
WGS	Woodland Grant Scheme
LT plans	Long-term plans
SFM	Sustainable forest management
UKAS	UK Accreditation Service
PEFC	Pan-European Forest Certification
H&S	Health and Safety

1. Introduction

The UKWAS (UK Woodland Assurance Standard) was adopted three years ago (UKWAS Steering Group 2000) and has rapidly become a major factor for many in the business of managing forests. Over 40% of the UK's forests have been certified, accounting for over 60% of UK timber production. There are currently 31 FSC forest management certificates held in the UK, covering 1,060,927 hectares of forest and woodland. Demand for certified timber is on the increase, so more owners and managers will need to decide whether or not to apply for certification against the UKWAS.

But what difference is UKWAS certification really making? Is it achieving what it set out to? Are forests and woodlands being better managed, and at what costs and with what benefits? This study responds to recognition by the UKWAS Steering Group and the Forestry Commission that it is time to report on the impacts certification is having on forest practice, forest enterprises and on delivery of government forest policy goals.

The study sets out to answer the following main questions:

- ❑ What changes has certification brought about in enterprises' organisation, systems and procedures and management practice in the forest?
- ❑ What have been the impacts of certification on enterprises' costs, income and market position?
- ❑ What are the challenges that enterprises face in achieving certification?
- ❑ What lessons can we learn about the appropriateness of the certification standard and interpretation of the standard by certification bodies?
- ❑ In what ways and to what extent is certification supporting the achievement of government policy objectives?

In addressing all these questions, the study seeks to identify areas for improvement, of both the impact certification can have and its uptake.

2. Methodology

The study builds on earlier work that analysed the corrective action requests (CARs) of all the UK forest management certificates (Jeffreys, 2002) and follows the approach used in a similar international study (Bass *et al*, 2001).

A set of themes and indicators of change were designed to assess the impacts of certification, based on the C&I laid out in the UK Forest Standard (UKFS) (Forestry Commission and Department of Agriculture Northern Ireland 1998) and expanded by reference to the indicators developed by Bass *et al* (2001). Annex 1 shows how these themes and indicators reflect the sustainable forestry requirements of the UKFS and the objectives of the country forestry strategies.

All UK certificate holders were contacted to seek their willingness to be included in the study. Pre-assessment reports of certified enterprises were requested, and those received were analysed to compile into a database of 'gaps' (i.e. areas requiring attention in preparation for the main assessment). This complemented the earlier CAR analysis (Jeffreys, 2001) and was supported by gap analyses of two group schemes, provided by forest management companies (Tilhill and Scottish Woodlands). We have assumed that gaps provide evidence of change, as

compliance is required for certification. The information in the databases was then compared against the themes and indicators to identify areas of change (Annex 2).

Individual perspectives on certification were gathered through a process of questionnaires and interviews through meetings and telephone discussions. A cross-section of certified enterprises (small-large, public-NGO-Private, geographic) were selected for interview (Northern Ireland was not able to be included). A list of interviewees is provided in Annex 3. The questionnaire (Annex 4) was designed to reflect the themes and indicators, and was used as the basis for the semi-structured interviews. Eleven questionnaires were sent and six received, 28 people were interviewed from 15 organisations. Information was gained from three-quarters of all UK certificate-holders. Others did not respond. Inputs from a broad cross-section of enterprises was sought; interviewees included those responsible for certification across whole organisations, district-level forest managers, and some individual members of group schemes. There were some constraints in the sample; for example, it was not possible to include the Northern Ireland Forest Service, and only a limited number of Forest Enterprise (FE) FDMs were consulted. A summary of the outcomes of the questionnaire and interviews is shown in Annex 5; this is the main source of direct information used in the report.

This report is based on the information received directly from certified enterprises and indirectly from the analysis of pre-assessment and audit reports.

3. Expectations and motivations for certification

Motivations to certify forest management have varied significantly, and particularly between different types of enterprise. Table 1 summarises the drivers of certification.

Table 1. Main motivations to certify.

Trusts	Primarily wanted to support the principle of certification. Market benefits sometimes expected but not the main reason.
Small woodlands and estates	An even mix of market and 'principle' drivers. Many have responded to market pressure or felt it was an opportunity. Others, and especially those certified earlier, were interested in certification from an ethical point of view.
Large woodlands and forest management companies	Perceived and real market pressures have been significant motivations. Those certifying before real demand believed certification to be 'the shape of things to come' and saw it as an opportunity to gain market advantage (in sales or reputation). More recently, certification has become necessary to continue to access certain markets; the certification of the FE was clearly an important step in changing the market and thus pressures on other large suppliers.
FE	A mix of two key drivers: <ul style="list-style-type: none"> • Desire to demonstrate sector leadership and create good political will – to change internal and external perceptions of FE's management, demonstrate that certification was possible in the UK, and to secure government support for the FC and the forest sector as a whole. • Market pressures for high volumes of certified timber – a perceived risk of encouraging imports otherwise.

Significantly, relatively few people stated that they expected price premiums, though the fact that there was some expectation of this at forest operational level (i.e. amongst forest management staff) demonstrates a level of misconception about this within organisations.

Summary:

For commercial enterprises, the market has been the main driver. Earlier certifications responded to perceived or anticipated market pressure and were seeking to 'get ahead of the market'. More recent certifications have responded to real pressures – requests and preferences from buyers for certified timber. This market pressure has been more 'certify or we'll buy from elsewhere', rather than about increasing prices. For enterprises without a commercial imperative, the principle and demonstration (of good management) value of certification has been the driver.

Most certified enterprises are those at or near the end of rotations, with products to harvest and sell. There is little incentive to certify where an enterprise is not near to production.

4. Impacts and changes due to UKWAS certification

The detailed information in Annexes 2 and 5 shows the full range of areas of change. The major areas are highlighted here. In all cases we have tried to differentiate changes that are due to certification alone from changes due to other influences (e.g. markets, ongoing organisational change, policy changes, technology or information changes).

4.1 Forest management practices

Almost invariably, respondents and interviewees stated initially that certification has had little or no impact on operations at the forest level. However, further discussion and the analysis of pre-assessment and certification reports provided suggests otherwise. Table 2 highlights the key areas of change in forest operations.

Table 2. Key trends of change in forest operations due to certification.

Change area	Types of change	Impact
Chemicals and pollution	<ul style="list-style-type: none"> ▪ Higher awareness of and adherence to legislation and guidelines. ▪ Pollution control kits (more in place), better storage of chemicals. ▪ More thorough environmental assessments and consideration of options. ▪ Tighter control of contractors on use and management of chemicals and waste. ▪ An increase in the use or consideration of biodegradable lubricants. ▪ A better understanding of legal requirements on waste. 	<p>Positive (but limited) impact, with a generally improved use of chemicals.</p> <p>A 'hot' issue of discussion, and problems remain in terms of the interpretation of the standard.</p>
Alternatives to clearfell	<ul style="list-style-type: none"> ▪ More systematically considered. ▪ Increasing consideration and use of continuous cover forestry. 	<p>Positive impact, mainly on coniferous plantations. (Also influenced by poor market and long-term plans.)</p>
Thinning and structural diversity	<ul style="list-style-type: none"> ▪ More thinning done ▪ Creation of more open space. 	<p>Positive (thinning in FE mainly).</p>

Operations (Harvesting and roads)	<ul style="list-style-type: none"> ▪ General reduction of negative impacts of operations. ▪ More compliance with guidelines, less impact on soils. ▪ Better minimisation of ground damage. 	Positive, but limited evidence.
Biodiversity and conservation	<ul style="list-style-type: none"> ▪ More identification, management and focus on enhancement of important sites. 	Positive impact, especially in large private sector.
PAWS	<ul style="list-style-type: none"> ▪ Better identified, prioritised and planned. 	Positive, especially for estate woodlands and FE.
Contractors	<ul style="list-style-type: none"> ▪ Higher levels of supervision and control of contractors; more detailed contracts. 	Better forestry, but negative impact on viability.
Consultation	<ul style="list-style-type: none"> ▪ Broader and more consultation. ▪ More mapping of rights of way. 	Positive, but limited change
Management plans	<ul style="list-style-type: none"> ▪ Objectives more thought through and identified. ▪ More management plans in place. ▪ More coherent management, especially for dispersed holdings/estates. ▪ More and better maps 	Very Positive, but also linked to WGS and LT plans in some cases.
Monitoring	<ul style="list-style-type: none"> ▪ More recording of information. ▪ Improved operational monitoring. ▪ Better reconciliation of forecasts and production (better estimates of sustainability) ▪ Improved tree health monitoring. 	Significant change.
H&S	<ul style="list-style-type: none"> ▪ Improved compliance. ▪ More monitoring of H&S practice, qualifications and insurance. 	Very positive, mainly in estates.

Few respondents and interviewees felt the changes were significant. The exception is in the areas of health and safety (significantly) and contractor management, where certification requirements have systematically enforced a change in behaviour. This has been largely brought about prior to certification through pre-assessment and preparation, and through the improvement of operational monitoring which has highlighted problem areas. Biodiversity and conservation management has also been encouraged, particularly amongst the larger estates; private sector forest managers believe that without certification this would revert to a low priority.

However, it is felt that most impacts are mainly about changing procedures, rather than actually changing operations. For example, most managers felt that enough area was previously being managed with conservation objectives, but that it was not identified or prescribed as such. Whilst many operational changes have been seen in UK forests in recent years, they are attributed to other factors; such as market changes and long-term felling plan agreements with the FC. For example, managing under a WGS ensures that environmental impact and landscape and design issues are already covered.

A key observation is that certification has speeded up positive changes in forestry practice. This was implied broadly by all types of enterprise, but was especially the case for the FE. For the FE, certification brought 'five years worth of change in one year'. Also, almost without exception, it was felt that certification has definitely improved overall standards of forest management.

4.2 Organisation, systems and procedures (enterprise level)

Universally, this is where the main immediate impacts have been felt for all types of organisations. Table 3 summarises the main trends.

Table 3. Key trends of change in systems and procedures due to certification.

Change area	Types of change	Impact
Compliance	<ul style="list-style-type: none"> ▪ Better awareness of legislation, guidelines, codes of practice, especially at operational level. 	Positive.
Chemicals and pollution	<ul style="list-style-type: none"> ▪ Clearer instructions and contract specifications regarding chemical use. ▪ Better systems and records of chemical use. ▪ More strategies and guidance on reduction of chemical use. ▪ Documentation of top-and bottom practices. 	Some improvement of current practices. Limited actual chemical reduction in practice.
Thinning	<ul style="list-style-type: none"> ▪ Improved thinning policy. 	Major change of written policy for FE, but limited impact in terms of changes on the ground.
Species and silviculture	<ul style="list-style-type: none"> ▪ More calculation and documentation of species distributions. ▪ More documentation of silvicultural prescriptions. 	Positive impact, but limited.
Deer	<ul style="list-style-type: none"> ▪ More documentation of deer management strategy 	Not felt to be making a difference to practice.
Biodiversity	<ul style="list-style-type: none"> ▪ Better collaboration/liaison with authorities. ▪ More definition, recording and mapping of conservation areas (PAWs, long-term retentions, natural reserves etc). ▪ Documented strategies introduced for key issues (e.g. deadwood, PAWs, natural reserves). ▪ Monitoring systems introduced. ▪ Improved consultation with neighbours over game management and better records of culls. 	Major improvement for all, contributes to better management.
Workforce and contractors	<ul style="list-style-type: none"> ▪ Clearer written instructions, emergency procedure notes given, better records of supervision visits. ▪ More detail on requirements in contracts. 	Positive impact for all, contributes to better management but more work.
H&S	<ul style="list-style-type: none"> ▪ Clearer instructions and more detailed contract specifications. 	Major change, especially for estate woodlands. 'It's a safer place'
Consultation	<ul style="list-style-type: none"> ▪ Some introduction of procedures. ▪ More documentation. 	Significant. No change for Trusts.
Management plans	<ul style="list-style-type: none"> ▪ Documentation of policy and objectives. ▪ More detailed management plans. ▪ Inclusion/reflection of policy objectives in plans. 	Significant, though typically documentation of what's already done.
Monitoring	<ul style="list-style-type: none"> ▪ More record keeping for monitoring. ▪ Better understanding of monitoring needs. ▪ Introduction of formal monitoring procedures and systems. 	
Internal procedures	<ul style="list-style-type: none"> ▪ Completely new internal information systems and or management procedures for some. ▪ Most required overhaul or review. 	Significant and mostly positive, sometimes linked to ongoing change.

	<ul style="list-style-type: none"> ▪ Better centralised procedures and policy (large orgs). ▪ Increased management efficiency and professionalism. ▪ Higher workload, with specific jobs/roles created in management companies. 	
Documentation	<ul style="list-style-type: none"> ▪ Much higher levels of paperwork and admin. 	Negative.

The majority of changes observed or noted in reports relate to documents, policies, procedures, strategies and communication. Many of the 'gaps' noted in pre-assessment and certification reports relate to a lack of evidence to verify compliance. This does not necessarily mean that requirements are not being met in practice; demonstration on paper has been the problem. Almost without exception, people report a higher level of paperwork and a higher workload as a result of certification, related to level of records needed. Whilst some of this may contribute (or may in future) to improved practice on the ground, there is limited real evidence that it does so yet. Again, the exceptions lie in H&S and contractor management; for other forest operational issues there is little evidence of change.

However, whilst the higher burden is seen as negative, most people state that certification has been positive in making them 'more professional' and able to do their job better, through improved information and management systems and especially through ensuring proper and justified decision-making. Some managers have updated and improved their systems to meet certification requirements, making them more efficient and sometimes less paper-reliant, but in some places new systems introduced for certification run in parallel to old systems. FE staff particularly noted the importance of new and more coherent systems across the organisation.

4.3 *Costs, incomes and markets*

Enterprise level

At the level of the individual enterprise a number of key impacts and issues were raised, as shown in table 4 below. Limited benefits are seen, particularly given the cost issues.

Table 4. *Key trends of change in costs, incomes and market position due to certification*

Change area	Types of change	Impact
Costs	<ul style="list-style-type: none"> ▪ See below for detail. ▪ Typically 5-20% increases in costs for owners and/or managers. 	Negative on the 'bottom line', but sometimes seen as an 'intensification of spend', not additional spend.
Incomes and sales	<ul style="list-style-type: none"> ▪ No direct price premiums. ▪ Inverse premiums available – lower prices often paid for uncertified timber, whilst certified timber maintains the market price. ▪ Limited increase in sales due to certification. 	No/limited impact. Incomes and sales maintained.
Market position	<ul style="list-style-type: none"> ▪ Demand for certified timber increasing (from merchants and millers, especially in Scotland, especially for softwoods, especially for pulpwood and chips). ▪ Certification prevents market loss, maintains market share. ▪ Very limited evidence of access to new markets. 	Limited impact. Only improves market position vs enterprises that are not certified, in some cases. No 'better than before' market position.

Costs are a key concern. Certification has increased both direct (fees for audit) and indirect (management to prepare for audit) costs, without clear financial benefits. The significance of the direct costs depends on the scale of the enterprise and whether or not they are in a group scheme. Small enterprises not within, or running their own, group scheme found the costs significant. Few others found the direct costs a problem. Indirect costs have been a bigger issue. Key areas of time and resource use indicated were:

- ❑ Writing-up management plans – collecting information, time to prepare.
- ❑ Time spent ensuring H&S requirements with contractors.
- ❑ Administration and procedures – getting records and systems in place.
- ❑ New practices – e.g. biolubricants, chemical storage, special management of biodiversity sites.
- ❑ Time on consultation and collaboration.

Sector-level

A number of comments made about market issues relate to the broader sector, not to individual enterprises.

Demand trends: Demand for certified wood (and thus for producers to get certified) varies across the country. In Scotland demand for certified wood is high, having increased significantly in the last couple of years. In South West England demand remains limited to one of two larger mills (pulp and board). This largely reflects other differences – the Scottish market is based on large volumes of softwood for pulp and fencing, whilst England still has a much higher focus on hardwoods, and small, local sawmills. A forest owner of a mature coniferous plantation in Scotland would have problems selling his/her timber if it was not certified, whilst a mixed hardwood estate in Cornwall (or Wales) can sell most timber on the basis of quality; local product and certification remains irrelevant.

Certifying small wood: The only constraint in terms of sales for these smaller producers is in selling their small wood (e.g. pulpwood, chips, etc.). Few paper or board mills anywhere in the UK will now accept uncertified wood; so small producers are having to consider certifying only to sell their lowest value products. As the price earned on these products is very low, the costs of certification are unlikely to justify it, and small wood supplies from these producers may cease.

Market pull: Many people noted their disappointment in the market benefits and blame this on a lack of end-user demand for certified products 'on the shelf'. There is a perception that certification is being demanded of producers, in a difficult economic period, without it working throughout the supply chain. A number of people stated that only a very small proportion of their certified timber ends up with a label on it "in the shop". Producers are disappointed that those who have put pressure on them to be more responsible foresters (i.e. retailers and the FC) have not similarly invested in encouraging more responsible consumption. They are frustrated that the real costs of SFM remain undervalued in the market.

4.4 Further issues

Non-cash benefits

A number of benefits of certification have been observed, mainly relating to better management and better relationships, which are difficult to place a financial value on. However, these benefits are clearly widely appreciated by certified enterprises and make certification 'worth it' for them.

Management: People feel strongly that they have become more professional managers, able to provide better services. Almost all observe that standards of forest management have increased, and that management is more coherent (especially across dispersed estates) and long-term than it was before. Some of this emerges from the benefit of useful external inputs from auditors – this was widely welcomed by forest managers, typically working in isolation. Where forestry sits in a broader estate context, more responsible management has extended across the whole estate, benefiting more than just forest management. Staff have pulled together to meet requirements resulting in better team-working, a morale-boost from successful certification, and a broadly better understanding of SFM. Broadly, certification has been seen to be a cost-effective management review.

Relationships: For many, certification has both encouraged more communication and provided a higher level credibility that supports better relationships. There are numerous observations of better relationships with neighbours and external bodies (statutory authorities), which avoid later conflict and make grant applications easier. Similarly, certification compliance provides assurance that all operations are legal, especially important in terms of H&S in case of accidents or injuries – 'it keeps us out of court'. Certification brings an added credibility that brings management companies more clients and small enterprises and Forest Districts more fund-raising opportunities. The FC has a better credibility and profile in government, which brings the opportunity to improve the profile of and support to the forest sector as a whole.

Scale issues

Areas of major impact were typically different for enterprises of different scale. Small and estate woodlands noted particularly large changes in H&S, management planning and mapping, and identification of special sites. Larger organisations were more focused on contractor management, biodiversity management, monitoring and restructuring issues. Contractor issues were a particular concern for the larger operations for whom the contractors are the operational face of the enterprise.

Forest Industry

Limited impacts on the wider forest industry were observed. A key concern was related to the impacts of certification on contractors and small mills. Certification is requiring that contractors are more heavily supervised with more spent time recording activities (e.g. for H&S) and taking more care on certain operations (e.g. reducing ground and site damage). The contracting business is already financially marginal, so taking on the certification burden means that contractors either have to charge more for being responsible or risk going out of business. A number of producers also noted that in future they would be much more selective about contractors, giving the more responsible ones a market advantage. There is a clear perception that contractors not performing to the acceptable level will be squeezed out of the market by certification. Whilst this is not good for contractors, it is positive in terms of maintaining high standards throughout the forest management cycle.

Small mills are also already finding existence in the current markets difficult. There is evidence that certification is a double-edged sword for them. On the one hand, their buyers may be demanding certified products (e.g. chips and fencing) when they can neither access certified

wood from their suppliers (and have not enough influence to push it) nor afford to get certified. Their profitability is low enough for a small reduction in sales or increase in costs to have serious impacts on them. On the other hand, with some producers not wanting to get certified, there may be a niche for sawmills who will take and can sell *uncertified* wood. However, whilst this was raised as a possibility there is no evidence for it.

A further issue for the industry is an increase in road transport. Uncertified producers are in some cases having to transport their wood greater distances to mills that will accept uncertified wood.

Conclusions

Generally, forest operational practices are little changed by certification. This probably reflects that most enterprises certified so far were well managed already, with most already operating under and WGS or a LT agreement that demanded many of the certification requirements. The main impacts have been on systems and procedures within the enterprise, for demonstrating compliance. That said, some key operational impacts have been observed (see below) and the majority of enterprises do believe that their standards of forest management have improved. Whilst the documentation requirements ('burden of proof') and overall resource inputs (especially time) are higher, people feel that certification has encouraged and better considered and justified decision-making and more thorough practice.

There is justifiably less positivity about market benefits. Costs have increased, prices and sales have not, and markets have been maintained rather than any real advantage gained. Whilst there have been significant increases in demand recently, this is mainly from larger softwood mills and especially in Scotland. Smaller downstream enterprises are typically finding certification a significant additional burden in an already tight economic environment and those not able to certify (mills) or meet certification requirements (contractors) are being squeezed. However, whilst most commercial enterprises would not certify without market pressure, wider benefits of being certified are recognised – better relationships, avoidance of conflict, better public and governmental profile, ease of grant applications.

Key impacts on forestry enterprises:

- Better compliance, especially relating to use and management of chemicals, pollution and waste, health and safety practices.*
- Significantly tighter supervision and control of contractors.*
- Significantly better management planning, with clearer objectives and long-term coherence, and consequently better attention to monitoring, biodiversity conservation, and reconciling forecasting with production. Certification 'delivers action' especially on much talked about biodiversity and conservation issues.*
- On some issues better strategies on paper but not necessarily better practice on the ground (e.g. chemical reduction and deer management).*
- Heavier workloads, especially in terms of management plans and documentation, and higher costs.*
- Limited or no market benefits, but positive wider benefits (especially better relationships)*

5. Key challenges remaining

5.1 *Constraints to the uptake of certification*

A number of issues were raised as influencing the ease with which an enterprise can get certified, or whether or not an enterprise would even consider certification in the first place.

Costs, time and paperwork

Unsurprisingly, this was raised often, especially for small enterprises. All those we communicated with suggested an increase in overall cost (fees and management) of around 20%, but there were observations from managers that some of their clients would have much higher costs to certify because management would need more significant change. In an already difficult market climate, enterprises cannot take this on.

Scale issues

There are some clear differences in uptake and accessibility (how easy or difficult it is, or is perceived to be) of certification between enterprises of different scale. A number of larger organisations felt that it was difficult enough for them, and could not imagine how small woodlands could make certification worthwhile. There is a perception that the standard is designed mainly around large enterprises. Group certification has helped – none of the small enterprises would have certified outside a group scheme – but forest management companies still have only a small proportion of certified clients. However, there are some success stories of Group Managers making membership of the group extremely simple and accessible.

Management objectives.

Objectives of management are also an issue. A number of people felt that the standard was designed around production forestry and therefore included some unnecessary and irrelevant requirements. Woodlands for which timber is not a priority (e.g. conservation or shooting) find some of the requirements do not fit or conflict with their own objectives.

Lack of guidance

Forest owners and forest managers observed that the UKWAS and requirements for certification are difficult to get to grips with for many. Without a forest manager or consultant it is difficult to 'translate' the standard into what is needed on the ground. Poor consultancy advice has led to inappropriate additional work in some cases. This is especially important given that a number of people felt that many owners were put off by the fear of imposition of changes in management, particularly on issues of silvicultural system, species and access.

Management planning

Widespread observation noted that the WGS and long-term plan requirements significantly eased the certification process. A number of people felt that if these were not in place, having to write a management plan from scratch would make certification very difficult. The observation was also applicable to UKWAS requirements in relation to consultation.

Audit detail

Comments regarding the invasive nature of audit were frequent. The level of detail of information required in an audit surprised many people – 29 pages of questions were reported for a 25 hectare woodland managed solely by its owner. This is generally uncomfortable and unwanted by those already certified, and seen as off-putting for those not yet certified. This is felt by

auditors to be inherent to the UKWAS – objective evidence must be provided for every requirement. Some of the requirements and questions are seen as an affront to managers, made worse in some cases by ‘bad’ auditors. Several people found the style of individual auditors aggressive and rude, and there is evidence of auditees making complaints about auditors in earlier certification inspections. This kind of ‘bad news’ (though relatively rare) spreads easily, and is bound to be off-putting.

5.2 *Ongoing stumbling blocks*

There are a number of areas in which certification is not having an impact despite the requirements of the standard and in which problems remain in achieving standards. These are largely concerned with questions about the rationale or effectiveness of the requirement, lack of alternative options, or lack of clarity in the standard. The following are the key issues.

Chemical reduction strategy

Whilst putting a strategy in place is not a problem (though a new thing) for most enterprises, the reality of reducing chemical use is. Typically, the strategy rationalises current practice; the outcome of certification is that options are better considered and the decision-making process made transparent. In the end, usage is usually the same because there are already few options, or because change would require a radical rethink not written in to the strategy. Many enterprises already minimise chemical usage (especially Trusts and estates) for reasons of principle or cost efficiency. Further change would often be a significant cost, directly or in terms of crop losses, and are not felt to be a possibility. The main problem is that the UKWAS requires enterprises to ‘reduce’ chemical use – in reality they either already do or there is no perceived cost-effective alternative.

Natural reserves, long-term retentions

This continues to cause confusion and raise questions, largely because definitions in the standard are not clear or the terminology is new to the forest manager; what is a natural reserve vs what is a retention. However, an important issue is how these are designated – several enterprises noted that setting aside areas for these purposes was initially seen as a problem, but that in reality it meant they could just designate unproductive areas that were not managed already. This risks designating areas that have no conservation value. This is not necessarily the norm; other enterprises observed that doing this seemed pointless and that they tried to justify conservation areas ecologically.

PAWS

Similarly, enterprises have been confused by a lack of clarity and room for interpretation of the standard. A further issue is the relevance of PAWS to local context; the rationale to restore all plantations is not felt to be the same for all areas (further detail in 6.1). A number of enterprises expressed their ongoing concern that the PAWS requirement would oblige them to restore large areas of their woodland, changing species, silviculture and returns. These fears are off-putting and likely to cause debate between enterprises and auditors if the standard is not clarified.

Deer

Whilst the introduction of deer management plans has been a major step forward, few people have confidence that these plans are realistic to implement. Management of deer on a single estate in a landscape where no other landowners manage deer is seen as having little point or effect. Even if all woodland was certified, there is still a problem with agricultural holdings.

Numerous enterprises also noted that deer are not actually a problem, so a management plan is irrelevant; this depended on location.

Monitoring

People remain confused about the level of detail and recording required for their scale of enterprise. The perception of high information recording needs means that people feel they may be collecting too much information. Clarification of this issue (see 6.1) could reduce the negativity felt about the documentation burden of certification, and contribute to improving efficiency rather than encouraging unnecessary activity.

Paper trail

There were a number of observations of the unequal balance between checking documentation and site visits. There is widespread scepticism about the effectiveness of relying on documentation – people feel that verification can only really happen through seeing things in the forest. For very small woodlands, it is generally felt that a two-hour visit to the forest would be more effective than an afternoon checking documents that may or may not truthfully represent activities on the ground. An example raised relates to contractors: certification has resulted in clearer contracts between forest owners/managers and contractors, but there is some scepticism as to whether simply writing things down on paper will change their practice on the ground. This scepticism is thought to reduce consumer confidence in certification. Time will tell whether documentation does change practice; whilst it is still relatively early in the process for new procedural systems set of for certification to have trickled down, this must be monitored.

Markets

Whilst certification is impacting on the producer end of the market, there is limited demonstrable consumer demand. Many producers are disappointed in this and are beginning to feel that without 'labels in shops' certification is pointless.

Conclusions

This study communicated only with enterprises already certified, so conclusions regarding uptake are constrained. Limited uptake of certification amongst the private sector is likely to remain in the current tight economic situation until/unless market pressure becomes more widespread. Significant changes in both market pressure and costs will be needed for change.

Simplifying procedures for small enterprises and clarifying UKWAS requirements will help, but for those not supplying to markets where there is pressure for certification, the additional costs remain an unacceptable burden. Meanwhile, clarifications made within UKWAS (about the requirements and the process) need to be communicated to reduce the 'fear' of certification.

6. Appropriateness of UKWAS and its interpretation

6.1 What clarifications are needed in the standard?

Two sets of issues were raised. Some related to guidance for interpretation of the standard and others related to specific requirements.

Guidance.

More assistance is needed to help enterprises interpret the requirements appropriately to their scale. Key issues highlighted, that guidance needs to address, are:

- ❑ *Flexibility*. How much is allowed in an audit to account for different scale of enterprise, area of management or objectives of management? And can enterprises question the auditor's interpretation? Can auditors 'give and take', allowing good performance in some areas to compensate for poor performance elsewhere, if the overall performance is good?
- ❑ *Level of detail*. More guidance is needed on how much detailed information and documentation should be given to prove that audit requirements are being met. Examples include: whether compartment information should be given for all compartments, or only for those under current operation; whether a 20 year management plan needs to be a detailed schedule of activities or a paragraph of broad objectives for the period; whether it is really necessary to write down a fire management plan that is 'call the fire brigade'? Many people feel they went too far beyond the standard initially, because they did not fully understand the standard and auditing procedures. This is off-putting to others and a waste of resources.
- ❑ *Minimum requirements*. What are they: specifically for monitoring, chemicals, records, access, and consultation? People need guiding targets to aim for.

A number of people suggested that UKWAS should encourage sharing of certification experiences to help people through it, for example through a certification forum or seminars including enterprises already certified and those thinking about certification. Additional written guidance was also noted as potentially useful if it was specifically simplified and targeted to different types of UK enterprise (a 'what does this mean for me' approach was suggested) and gave background information about audit in general. Material already available for 'small enterprises' was not felt to be appropriate to the UK context.

Specific requirements of the UKWAS

A number of requirements of the standard were raised repeatedly. They are:

- ❑ *20-year plans*. These are seen to be 'academic' in most cases, especially for small and mixed woodlands, because markets change and climatic or pest events may be highly influential. Whilst an outline plan of operations may be appropriate for large conifer plantations, for small and mixed estates it is felt that it would be better to state 'what we're aiming at' in a broader sense.
- ❑ *Game standard, ATC, Biolubes*. Felt to be too open-ended to interpret easily, and could be more specific (i.e. give target numbers or proportions to aim for).
- ❑ *Open space and species*. Proportions stated are felt to be too fixed, and not always appropriate. Preference for the standard to reflect different needs of different management regimes and local ecologies was noted; for example, building in a 'minimum of 10%' open space was felt in some cases to be unnecessary and of no additional conservation benefit.
- ❑ *Deadwood*. Needs to incorporate emerging new knowledge on what is effective, otherwise people may leave deadwood that is unsightly and of little or no value to biodiversity.
- ❑ *Natural reserves/Long-term retentions*. Definitions were repeatedly said to be unclear, and more guidance is needed to ensure that people do not designate inappropriate areas. For example, where a rotation is 120 years for lowland

broadleaves, what is 'long-term retention'? In addition, where conservation is the primary management objective, are designations needed?

- PAWS. A universal area of contention, this not felt to be equally applicable to every site. In the south-west of England there are lots of areas of PAWS and it is generally thought to be excessive to expect all of them to be restored, whilst in other areas even small areas of restoration would make a difference. The standard (and auditors) need to be more sensitive to local variation.

Some of these points show interesting contrasts regarding the level of specificity (e.g. game vs open space). People want more precision, but they also want flexibility – the desired balance appears to be the provision of guiding targets (something to aim for) with flexibility to local situations (pragmatic application of target figures by auditors).

6.2 *How varied is interpretation and how could it be improved?*

There are three key issues: interpretation, discussion/negotiation of interpretation, and distinctions between types of corrective action requests (CARs).

Interpretation

This was raised a major area of confusion and concern. Many observations show that auditors have used the standard pragmatically and with flexibility. This is highly valued, for some of the reasons noted above (according to scale and objective of management). However, the standard itself does not clearly build in this flexibility of interpretation (except in areas which are generally too open), and it relies on good auditors. A problem is that there is evidence of different interpretations of the UKWAS even with the same certification body, especially in the early stages of audit to UKWAS. This is thought to have improved with time. Observations of 'bad' auditors are linked to reports of inflexibilities and an unbalanced focus on either specific interest issues or issues not relevant outside developing countries. At least in the early stages of certification in the UK, auditors may have tended towards the more familiar FSC definitions and interpretations, which may not have exactly matched UKWAS, and hence caused some confusion.

Discussion and negotiation

A number of enterprises reported some discussion with the auditors to clarify and negotiate interpretations of the standard, and this is built into the process of at least some of the certification bodies. Some felt that this should be more clearly encouraged and built into the UKWAS process – not all enterprises have evidently done it, and it has occasionally added to the audit costs. The feedback provided by the enterprise could help UKWAS in reviewing its standard and maintains a link to the reality of forest management.

CAR distinctions

There were a number of reports of unclear distinction between minor CAR, major CAR, and pre-condition within UKWAS documents and in certification reports. It is also unclear how many minor CARs an enterprise can have and still be certified. Without this information, enterprises have no basis for discussion of CARs with auditors or to prioritise remedial action. Some of this confusion may arise from the slight differences between the FSC audit procedures that most auditors use and the UKWAS guidance documents.

6.3 *Audit process*

A number of comments were made by enterprises on the audit process itself and how that affects achievement of the UKWAS.

Pre-assessment

This often failed to prepare people fully for audit. The main observation was that it had limited detail, with not enough guidance on the minimum requirements or on interpretation. This meant that enterprises still went into main audit without a clear idea of what their targets were. In addition, pre-assessments were reported often to be more of a discussion of practices, and rarely carried out in an audit-like ('harsh') way. Many enterprises think pre-assessment is not necessary, so there is pressure for it to be brief (to minimise costs). As a result, the audit visit itself was often somewhat of a shock in its approach, though probably less so than if no pre-assessment was carried out.

Feedback and discussion

A few enterprises felt that they were rushed into signing the final auditors report, without time to discuss it with the auditors or within the organisation. Others noted that a 'cooling down period' between audit period and audit report was valuable for both the enterprise to review the audit and auditors to rationalise their report and decisions, especially after the stress involved in an audit. Again, this feedback would help both auditors and the UKWAS keep in touch with reality. In addition, the better communication engenders better (2-way) understanding of the issues and process, and creates a more positive perception of certification.

Auditors' roles

A number of enterprises noted the great value of the inputs and shared knowledge brought by some auditors. The UKWAS needs to clarify that auditors can give these inputs as well as taking a hard line to auditing – there is evidence that some don't. Clearly this links to the fine and difficult line between the role of an auditor and of a consultant – knowing where the boundaries are requires training and experience. If auditors were to restrict themselves to "ticking boxes" a major benefit of certification would be lost.

There were a number of observations of 'difficult' (rude, impolite, poor communication) auditors in the early stages of UKWAS certification, though this has eased with time. This should be avoided - 'bad' auditors cause resentment and do not encourage wider uptake.

Documentation

There is an undercurrent of feeling that paper proves nothing, and does not always demonstrate the reality of practice. Many enterprises encourage more emphasis on site/field visits as the starting point of audit, followed by checks of documentation, rather than vice-versa. Starting with the paperwork puts a heavy emphasis on documentation, when they feel that many of the things to be verified could be more quickly and effectively be seen on a site visit, particularly for a small woodland.

Conclusions

There is a general unclear understanding of audit requirements (e.g. the need for documentary evidence vs subjective opinions of what is seen) – better communication on this would resolve some of the problems and clarify expectations. The requirements of the standard need clarification on the issues specified. At this relatively early stage of experience with the standard,

major changes are likely to be more confusing than helpful and should be avoided. The interpretation issue is probably more problematic than actual performance standards and links to the subtle differences between UKWAS and FSC standards. The 'bad auditor' issue, which threatens certification, is in the UK linked to the scope for inconsistency of approach due to varied interpretation. Resolving the interpretation problems based on experience to date should be prioritised.

It will be key to communicate the improvements well. Targeted information and guidance tailored for different user groups is recommended.

7. Certification and government policy

7.1 *Fit with regulation*

Overall, there is a general perception that certification does complement and extend other forest regulation, but with some reservations. In particular there are issues of duplication and confusion between requirements for grants and requirements for UKWAS that could be better linked up.

Key issues are as follows.

Recognition/matching of WGS and long-term plans within certification

It is widely recognised that having already gone through the planning procedures for WGS and/or long-term plans makes certification easier, to varying extents. However, there is no indication that these grants in themselves count for anything within the UKWAS requirements. Some people suggest that the grant-aid from the FC simply subsidises the costs of certification, and a number feel there is duplication in the two processes. There is frustration that the grant requirements and the UKWAS requirements do not seem to be matched – certification appears to require a revisit of long-term plans in particular, and in general more detail than the FC requirements for grants.

Recognition of certification in applications for grants

UKWAS makes you have better records and plans and thus makes the process of demonstrating planning to get grants (e.g. WGS and long-term plans) easier. However, there is also a widespread feeling that it should also allow some 'leapfrogging' of the application process – the grants system should recognise UKWAS and either streamline the application process or make a grant automatic to those with UKWAS certification. It was widely suggested that this would ease the burden on both enterprises and the FC's conservancy staff, who at the moment are not well informed about certification. There was also an underlying perception that UKWAS was anyway a better way of ensuring that work and plans are carried through. This was also held within the FE – several people felt that FC monitoring of the FE was now redundant.

Duplication of UK Forestry Standard and UKWAS

It was generally unclear why there are two standards, and a feeling that review should merge (or at least better link and explain) the two. The UK Forestry Standard is generally not used, whilst the UKWAS is a useful guide to management.

Certification as the root of regulation

Some people felt that all forestry regulation should flow from UKWAS, feeling that if you have certification no further proof of performance should be required, for example for WGS annual

maintenance grants. UKWAS is generally perceived to be more 'truthful', effective, and better reflective of local differences than FC regulation and monitoring.

There were some observations that did not support too close a linkage between UKWAS and regulation. For example, it was noted that if UKWAS were a requirement for grant aid, shooting estates would have a problem because of the conflicts between UKWAS requirements and management objectives. In addition, making certification a requirement for woodland grants for early stages of rotation (planting or management) could be a problem as market drivers (and benefits) for certification only take effect at production age – requiring certification could be a disincentive to plant or manage young woodland. A further caution was that direct grant aid to get certified would be a disadvantage to those already certified.

7.2 *Achieving government forest policy objectives*

The UK has set out national and forest level requirements for sustainable forestry in the UK Forestry Standard. Since 1997 forestry policy has been a devolved matter; the forestry objectives of the four countries of the UK are set out in their respective forestry strategies. We have identified a large number of objectives that are supported by the UKWAS (Annex 1). However, certification will only help deliver those objectives if it leads to changes that would not have occurred otherwise.

It was generally felt by respondents that certification is having a positive impact on achieving government forestry objectives, and has helped to focus on key problem areas, benefits beyond timber, and how forestry fits into the wider rural development agenda. Table 5 notes which policy objectives are being most impacted by certification – most significantly in Scotland. However, it is also recognised that there is still a significant way to go – for example, the impact would be much greater if there were more private sector enterprises on board; the predominant proportion of private enterprises remain uncertified. Many uncertified enterprises still operate without management plans or production forecasts, and therefore cannot contribute to planning developments in the sector or to market development. Certification is still only really bringing in the better producers (those who can easily achieve certification) and, given that most non-certified enterprises are not bad performers, certification has yet to come close to influencing the worst performers.

There was an observation from the FE that certification flags up where policy and regulation are weak; FE has developed numerous new procedures and guidelines as a result of certification. However, there needs to be a way of linking up such lessons from practice into wider policy development, and of sharing the lessons with the broader forest sector.

Table 5. Areas of policy most impacted by certification.

<i>Indicators with significant positive change</i>	<i>Relevant policy objective (Forest strategies: SFS = Scotland, WFS = Wales, EFS = England)</i>
Change in balance between clearfell and alternatives.	UKFS - Landscape quality enhanced. SFS – Encourage ATC WFS – Move to a greater use of continuous cover forestry.
Change in thinning practices	SFS – Improve timber quality by following good forestry practices.
Biodiversity recording, management and conservation	UKFS – Biodiversity conserved or enhanced according to EU directives and BAPs.

	<p>SFS – Improve management of semi-natural woodlands, extend and enhance native woodlands.</p> <p>WFS – Increase quality of native woodlands, encourage incorporation of different habitats, prevent further loss of ASNW.</p>
Contractor sector security (negative impact)	SFS – Improve competitiveness by developing a strong forest industries network.
Changes in H&S practice	UKFS – Safe and efficient practices are promoted and their effectiveness kept under review.
Community relations	<p>UKFS – Increased awareness and participation and community involvement.</p> <p>EFS – Engage with the public to promote the benefits of trees, woods and forests, promote greater appreciation of the environmental benefits.</p> <p>SFS – promote opportunities for greater community involvement in forestry.</p> <p>WFS – Create mechanisms to involve local people and build consensus among communities.</p>

Conclusions

There are lots of connections between the UKWAS and the UK's national and devolved objectives. Certification has so far had only a small number of significant impacts. Nevertheless, the fact that certification demonstrates and improves achievement of UK policy objectives even to this degree is important:

- ❑ *Firstly, the positive impacts support the concept of integrating certification into regulation. Certification clearly has the potential to link more closely and strategically into government (FC) regulation of forestry. Respondents did not support making certification in any way a requirement of grant aid, but they did support giving regulatory “rewards” (i.e. a lighter touch) to certified enterprises; this would allow a streamlining of FC regulatory activities and would relieve the burden of multiple layers of proof for enterprises.*
- ❑ *Secondly, this integration could provide an incentive for more private sector enterprises to certify.*
- ❑ *Finally, the demonstration value could raise the profile of the sector and its products as ‘green’ and responsible. However, there needs to be a mechanism for generating, using and disseminating the lessons learned from practice to date into both the political and the private sector arenas.*

8. Summary and recommendations

8.1 Certification trends

Certification is rapidly increasing in the UK as more large mills (especially in Scotland) begin to demand or prefer certified wood in a marginal market. Whilst early expectations may have been for price, or at least market position, benefits, enterprises now ‘coming on board’ are those who have forests that have reached productive age and cannot sell their timber (at all or for the

market price) without getting certified. The market (at least some parts of it) is beginning to push. There are few enterprises with only early rotation forests that are interested in certification.

8.2 *Positive impacts*

Overall, certification can be seen to be having a positive impact on the standard of forest practice in the UK. Whilst there is a sense that the impacts are not significant and relate more to documentation than practice, enterprises recognise tangible improvements on the ground in the following areas:

- Management planning and sustainability
- Contractor management and operations
- Health and safety
- Biodiversity conservation and monitoring
- Planning of chemical use
- Silvicultural practices

Forest operational and silvicultural practice is probably most enhanced in large and upland forests (plantations) whilst health and safety is more improved in small and estate woodlands.

These positive changes are enhanced by an overall improvement in management systems amongst forest managers, with a consequent improvement in their capacity for practising SFM, and by improved relationships and communications between foresters and other stakeholders (public and government). This improved understanding has the potential to be of great value in improving the image of forestry as a responsible land-use activity.

8.3 *Opportunities*

The positive impacts and increasing uptake of certification in the UK bring a number of opportunities. Amongst enterprises already certified there is support for a closer integration between UKWAS certification and regulation, in particular for 'rewarding' certification with a 'lighter touch' (essentially easier grant and felling licence applications). Currently certification is not linked at all into regulation of directly into policy. Certification (particularly of the FE) has highlighted weak areas in policy, and demonstrates a way of ensuring policy is kept up-to-date.

Another key opportunity is for the forestry industry to 'trumpet its successes' – something rarely done. In demonstrating responsibility towards the environment and society, certification provides the opportunity for the forest sector to raise its profile in government and with NGOs, especially against competing land-uses (a far greater proportion of forest enterprises are FSC-certified than farms organically certified), with the associated potential of greater funding and support.

Recommendation 1

The FC needs to now better market the achievements of certification (its own and for the forest sector in general) to raise the profile of the sector, and of certification and certified forest products.

8.4 *Problem areas.*

Whilst the positive impacts are agreed and valuable, a number of problems are evident. Some relate to the standard and certification itself; there are areas requiring clarification, and there are questions about the interpretation of the UKWAS requirements and process. Others relate to market issues, including the lack of consumer demand, weak market benefits, the need for significant additional inputs in a difficult economic environment, and inconsistent demand trends.

The requirements of the UKWAS

Few certified enterprises feel the standard is difficult to achieve – understanding it is the main problem. Documentation is complex and long, especially for the small forest manager and there is no simplified guidance available, except through consultancy advice. Interpretation of some areas of the standard has caused problems, with much debate and uncertainty as to what is actually required. For some, this delayed getting certified, for others it has probably made them decide against certification. Key problem areas are:

- ❑ Long-term planning requirements – how much detail is needed and realistically useful?
- ❑ Silvicultural prescriptions – what is appropriate varies depending on the context, but this is not allowed for in the standard.
- ❑ Biodiversity conservation - definitions and relevance of application to local and objective contexts are not clear. Particular problems are: PAWS, long-term retentions, natural reserves and deadwood.
- ❑ Chemical reduction – is this always possible and does a ‘strategy’ actually make a difference? Requires updating.

Recommendation 2

The UKWAS steering group needs to review the standard based on experience to date, prioritising the issues highlighted by this study for clarification and improvement. Major changes in the standard are not recommended at this early stage – people are still getting to grips with the standard. It will be crucial to communicate the improvements to owners and managers and to certification bodies.

Recommendation 3

Provide support to particular problem areas, for example by networking new information, encouraging sharing experiences through a forum, or developing decision-support-systems (e.g. for chemical use).

Recommendation 4

Focus on the key barriers to encourage a greater uptake of certification and thus more widespread benefits in terms of forestry and policy achievements.

The certification process

Difficulties in interpretation have been a problem in the audit process, with different interpretations between the auditors and the enterprise, and even between auditors in the same certification body. As well as a lack of clarity on the specific issues noted above, there is little clarity on how much flexibility is appropriate (according to difference scale/objective of management) and what ‘targets’ should be aimed for - the minimum requirements and level of detail expected. Many enterprises remain uncertain about the boundaries between different levels of CAR and find it difficult to negotiate this with the certification body.

Recommendation 5

Consider the production of simple, targeted information and guidance tailored for different user groups. Two thrusts are evidently needed:

- ❑ Information on certification and audit – to help people understand the need for paper systems.
- ❑ Guidance on the requirements - should ideally, for each requirement, provide examples of what is appropriate performance/target for different types of enterprise, and what would constitute what level of CAR.

Recommendation 6

Clearly build discussion and negotiation of the audit report into the process, and ideally, develop a mechanism for feeding back query areas to UKWAS for future review of the standard and process.

Market issues

Market issues are perceived as a key problem and are a significant threat to the uptake and success of certification. Without an evident 'market pull' from the high street people see little economic benefit in getting certified and feel that the point is lost. The ongoing government procurement review could be very influential on marketing and consumption in the future (ERM 2002). In the meantime, certification continues to be a perceived and sometimes real squeeze on the profitability of the sector.

Recommendation 7

The UKWAS steering group should keep abreast of market developments and actively solicit greater publicity for UK certified timber where possible.

Recommendation 8

Consider the utility of a comprehensive study of the market for certified forest products, to better inform enterprises about the need to certify (promotion of certification) and to inform improved marketing of certified products.

Other threats

Lastly, conflicts regarding certification (different systems, etc) were of serious concern to the majority of the interviewed certified enterprises. It was widely felt that the energy being expended by competition between FSC accredited and UKAS accredited certification and between FSC and PEFC labelling schemes would be better spent resolving problems faced by forest managers.

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Annexes

[Attached in separate documents]

1. Indicators and Policy objectives (print in A3)
2. Indicators and CARs/Pre-assessment observations
3. List of interviewees
4. Sample questionnaire
5. Summary of discussions and questionnaire responses

Themes	Indicators of certification's impacts	Relevant UKWAS requirements	Pre-assessment observations (based on 12 reports)	Main assessment CARs etc (based on 29 audit reports)
A. Soil, water and air	1. Change in the extent to which the use of cultivation, drainage, herbicides and fertilisers is selective with potential impacts taken into account.	4.1.1.; 5.2.1.; 5.2.3	No instructions on sensitivities (6); No documented assessment of impacts of operations (5)poor awareness on chemical rules (9); weak/no strategy to reduce chemicals(17).	Poor protection of special features (3); Chemical guidelines not used (2); No/inadequate chemical reduction strategy (16); poor chemical use records(3).
	2. Change in the extent to which anti-erosion precautions are planned and carried out in vulnerable situations	3.1.1.; 3.1.3., 4.2.1.	No or poor guidelines on EIAs (4); -	Inadequate environmental impact assessments (3); non-compliance with forest and soils guidelines (1)
	3. Changes in the handling of and disposal of substances and containers to avoid pollution	5.2.1.; 5.2.2.; 5.5.1.	Poor awareness on chemical rules (9); below best practice on chemical Use (15); poor disposal practices or procedures(14)	Chemical storage guidelines not used (2);Below best practice, poor records (1), enregistered incinerator us (1); no documentation on minimising waste disposal and pollution (3)
	4. Changes in establishment, maintenance, harvesting and roading methods to minimise soil damage	4.2.1.; 4.3.2.	Harvesting not compliant with guidelines, guidelines not used or no records (10); Poor roading procedures, policy or plans (7)	Non-compliance with harvesting and soils guidelines (5); poor roads/extraction tracks (3)
	5. Changes in silvicultural practice to improve soils of damaged or reclaimed sites	4.2.1.?	Harvesting not compliant with guidelines, guidelines not used or no records (10)	non-compliance with forest and soils guidelines (1)
	6. Increase/decrease in local liaison between forest managers and water users/managers, and changes in planning practice at	?		
	7. Increase/decrease in the extent to which agreements for water are respected	?		
	8. Changes in the management of riparian zones	6.1.1.?	\	
	9. Increase/decrease in disturbance to water courses and increase/decrease in pollution and siltation as a result of forest operations	4.2.1.?.; 5.5.3.	Harvesting not compliant with guidelines, guidelines not used or no records (10); lack of spillage guidance, procedures or plans (9)	Non compliance with water guidelines (1) inappropriate storage of urea (1); no spillage plan(2), spills kits needed (5).
	10. Changes to emergency control procedures that apply when high risk operations are carried out	5.5.3.	lack of spillage guidance, procedures or plans (9)	inappropriate storage of urea (1); no spillage plan(2), spills kits needed (5).
	11. Increase/decrease in site potential for biomass increment	?		
	12. Increase/decrease in the burning of lop and top	4.2.3.	Lack of documents or policy (11)	Lack of documents, consideration or policy (5)
	13. Changes in practice with regard to the disposal of waste materials that are potentially damaging to the atmosphere	5.2.1.; 5.2.2.; 5.5.1	Poor awareness on chemical rules (9); below best practice on chemical Use (15); poor disposal practices or procedures(14)	Chemical storage guidelines not used (2);Below best practice, poor records (1), enregistered incinerator us (1); no documentation on minimising waste disposal and pollution (3)
	1. Increase/decrease in structural diversity (eg species proportion and open space)	3.2.2.; 3.2.3.; 3.3.1.; 3.3.2.	Plantings must meet species requirements (3); documentation on species must be available (7)	inadequate restructuring proposals (1);restock species don't match UKWAS (5)

Themes	Indicators of certification's impacts	Relevant UKWAS requirements	Pre-assessment observations (based on 12 reports)	Main assessment CARs etc (based on 29 audit reports)
B. Forest structure	2. Change in balance between clearfell and alternatives to clearfell	3.4.2.; 3.4.3.; 3.4.4.	Weak design planning (4); silvicultural prescriptions required (1); poor consideration of low impact systems (6)	Inadequate or unclear consideration of low impact systems (6)
	3. Changes in thinning practice.	3.4.1.	see FE	Thinning regime not appropriate or justified (5)
C. External impacts on the forest	Increase/decrease in the effectiveness of deer [and other threats] management	5.1.	Weak tree health monitoring (8); deer documentation weak - strategy or cull records (17); no/weak fire plan (13); no procedures for staff (7)	Sheep strategy needed (1); Poor tree health monitoring system (4); no liaison on squirrels(1); inadequate deer strategy and monitoring (10); fire plan (1)
D. Production	1. Increase/decrease in the timber production potential of the forest arising from changes in stocking, species, balance between timber, non –timber species and open space	(3.3.2.)	(Possible species changes)	(Possible species changes)
	2. Increase/decrease in waste of marketable material during harvesting	4.2.2.	\	\
	3. Increase/decrease in non-timber outputs			
E. Forest Industries	1. Increase/decrease in support to forest industries network, for example by providing continuity of work to contractors	8.3.	\	\
	2. Increase/decrease in support to investment in wood processing, for example through the offer of supply guarantees			
	3. Increase/decrease in cubic metre miles on public roads			
	4. Increase/decrease in support for market development	7.3.1.?	\	Lack of evidence of integration
F. Biodiversity	1. Changes in the extent and quality of recording of important sites and species	6.1.1.	weak information, identification or mapping of important sites or species (35)	No identification, mapping or information on special areas (8); limited consultation (1); inadequate management plans (2)
	2. Changes in the quality of management of important sites and species	6.1.2., 6.1.3.	No agreed or demonstrated management in place (5); Old growth management not defined (1); management must prevent degradation of SNW (2).	SSSIs - no plan or management (2); Inadequate management plans (2); unaware of appropriate management(1)
	3. Increase/decrease in liaison with nature conservation agencies and non-governmental nature conservation organisations	6.1.2.	No demonstration of agreement (1)	SSSIs - no plan or management (2)
	4. Increase/decrease in the area managed primarily for nature conservation	6.3.1.	Weak demonstration of area, mapping or rationale of areas managed for biodiversity (17)	Define, distinguish, designate and map LT retentions and Natural reserves (17); identify/justify 15% area for biodiversity (4)
	5. Increase/decrease in the area and quality of management of native woodland	6.4.1.; 6.4.2.	SNW not defined or identified (3); poor management prescriptions for SNW (3); PAWS not identified, prioritised or strategised (15)	Unspecified management to restore ASNW/PAWS restoration(2); inadequate appraisal and strategy re PAWS (9)

Themes	Indicators of certification's impacts	Relevant UKWAS requirements	Pre-assessment observations (based on 12 reports)	Main assessment CARs etc (based on 29 audit reports)
	6. Increase/decrease in connectivity between native woodlands at a landscape scale	6.4.2.??	[link to weak PAWS strategies.]	
G. Forest workforce competency and safety	1. Increase/decrease in the proportion of the enterprise's employees and contractors that have relevant qualifications, training.	8.2.1.; 8.2.2.	Certificates not kept, training not recorded, or no training policy (10);	No system for recording certificates (2); no training record (1)
	2. Changes in health and safety practice	8.1.1.; 8.1.2.	Poor records, written procedures or policies (13); Breaches (2); poor/no checking of certificates or safety (20)	Do risk assessments (1), no compliance with guidelines (4); lack of evidence of H&S and contractor competence (5); inadequate understanding of safety precautions and emergency plans (3)
H. Rural development	1. Increase/decrease in economic benefits to communities neighbouring the forest, including employment in and income from forest operations including timber and NTFP harvesting, processing of timber and NTFPs, and in recreation and tourism activities supported by the forest.	7.3.1.	\	
I. Access and recreation	1. Increase/decrease in opportunities for public access, recreation and education	7.2.	No documentation or mapping of access (4); Unclear provision (1)	No provision of access (1)
	2. Increase/decrease in the promulgation of information about access and recreation opportunities	7.2.1.	No documentation or mapping of access (4)	
	3. Changes in practice with regard to illegal or unauthorised use. Increase/decrease in the incidence of illegal or unauthorised use	1.2.1.	No demonstration of tackling illegal use(1); illegal activities observed (5)	Fox-hunting without consent (1); no sheep removal (1)
J. Community relations	1. Increase/decrease in community involvement in planning and management	7.1.1.	Poor information about certification (12); Poor consultation system(4).	No consultation system (4); inadequate consultation (6)
K. Conservation of heritage features	1. Changes in the extent and quality of recording of important sites	7.4.1.	Poor records/mapping of cultural sites (5);	inadequate identification(1)
	2. Changes in practice with regard to the management of heritage features	7.4.1.	no documented protection of sites (2)	lack of management plan (2)
L. Landscape quality	1. Changes in practice with regard to managing the visual landscape	3.1.2.; 3.2.1.; 3.2.4.	Design plans to consider adjacent areas and landscape (5) No procedures for contacting neighbours (1)	inadequate landscape planning (1); inadequate consultation with neighbours(5)
M. Enterprise organisation and administration	1. Change in the extent of legal compliance	1.1.1.	No system for awareness (2)	non-compliance (4),
	2. Change in management objectives	(2.1.1.)	(Only documentation)	inadequate objectives (2)
	3. Changes in internal systems of communication, co-ordinations and documentation			
	4. Changes in personnel management policies			
	5. Changes in attitude towards and understanding of SFM			
	6. Changes in co-ordinations and collaboration with external agencies and partners			

Themes	Indicators of certification's impacts	Relevant UKWAS requirements	Pre-assessment observations (based on 12 reports)	Main assessment CARs etc (based on 29 audit reports)
N. Enterprise management and planning	1. Changes in scope and detail of management plans and maps	2.1.1.	Various and numerous: key areas - lack of long-term or proper management plan(17); Inadequate maps (30); lack of documented strategy (6).	Various and numerous, key areas- inadequate long-term planning (9); no/poor management plan (6); inadequate planning of special features (2), inadequate forest design or strategic plans (3).
	2. Changes in the area under adequate forest management plans	2.1.1.?	(Assumed)	
	3. Changes in monitoring implementation of plans	2.3. (and 4.1.2.)	Numerous: key areas - inadequate monitoring plan/system (28); poor monitoring records (12);no system of plan for 5 year public summaries (16)	Numerous, key areas- inadequate monitoring, system or records (19); No public summary (4);
	4. Changes in scale and intensity of monitoring growth, yield and production	2.2.	Poor compartment records (4); No records/reconciliation of forecasts, production, sales, growth rate, or regeneration (20)	Inadequate production/forecast info and reconciliation (4); No growth and yield estimates, felling and restocking plans, or evidence of sustainability (4); poor CoC documentation (6)
	5. Changes in the scale and intensity of monitoring biodiversity, environment and social impacts	(6.4).	(no monitoring observations)	Inadequate biological monitoring (4)
O. Enterprise costs and revenues	1. Changes in costs of forest management and production (including technical services)			
	2. Changes in the cost of capital and labour			
	3. Changes in sales revenues			
	4. Changes in profitability			
P. Enterprise market position	1. Changes in marketing strategy (target markets, product range, pricing and advertising).			
	2. Changes in (relationships with) main buyers			
	3. Changes in market share (amount sold)			

Annex 3. People interviewed

<u>Name</u>	<u>Organisation/Enterprise</u>	<u>Interview by</u>
Ian Hodge	Woodland Trust	Meeting
Ray Hawes	National Trust	Meeting
David Jenkins	Coed Cymru	Telephone
Peter Solly	Dartington Hall Trust/Silvanus	Meeting
Steve Connolly	Cawdor Estate(Tilhill)/Cawdor Forestry	Meeting
Rob Shaw	Scottish Woodlands	Meeting
Ian Robinson & Alison Wallace	Scottish Woodlands	Meeting
Alastair Sandels & Ranuld Lamb	Fountain Forestry	Meeting
Richard Tugwell	Fountain Forestry	Meeting
Julian Ohlsen	Tilhill	Meeting
Philip Roper	Pryor and Rickett Silviculture	Telephone
Michael Tinsley	Tinsley and MacMullen	Telephone
David Ogg	Independent Forestry	Meeting
Harry Wilson	Smiths Gore	Telephone
Douglas Orr	Douglas Orr	Meeting
Geraint Richards	Duchy of Cornwall	Telephone
Euan Brodie	Lethen Mains Estate (Tilhill)	Meeting
Philip Adlard	Cheltenham (Tilhill)	Meeting
Ian Forshaw	FE, Director, Forest Operations	Meeting
Jo O'Hara	FE, Forest Planning, HQ	Telephone
Alan Stevenson	FE, Environment & Communication	Meeting
Peter Weston	FE, Forest Planning, HQ (ex S.Scotland)	Meeting
Moira Baptie & Chris Nixon	FE, N.Scotland & FDM Dornoch	Meeting
Rod Leslie	FE, Environment, England	Meeting
Chris Marrow	FE, FDM Peninsula	Telephone

28 interviewees
15 organisations

UKWAS STUDY ON THE IMPACTS OF CERTIFICATION ON THE UK FOREST SECTOR

Questionnaire for certified enterprises

Background

The UKWAS was published three years ago and has rapidly become a major factor in the business of managing forests. The UKWAS Steering Group needs to know the impacts that it is having on forestry enterprises, and the FC needs to know whether certification is helping to deliver government forest policy goals. This questionnaire is part of an independent study intended to respond to these needs and to help identify what UKWAS is achieving and how it may need to improve. The results will be publicly available in September 2002.

Notes for filling in the questionnaire

- We anticipate this questionnaire will take around 30 minutes to complete.
- Please briefly read all the questions before beginning.
- The notes in brackets below each question are to help stimulate thought rather than to constrain your response. Please give as much or as little detail as you feel necessary.
- If you think a question is not relevant to your business, please give a short explanation.
- Please return before 12 August by either email, fax or mail (SAE enclosed) to:

Kirsti Thornber, LTS International,
Pentlands Science Park, Bush Loan,
Penicuik, EH26 0PH.
Tel 0131 440 5500. Fax 0131 440 5501. Email kirsti-thornber@ltsi.co.uk

A. Expectations

1. Why did you decide to have your management independently certified?
(e.g. What were your expectations from it?)

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2. How easy or difficult did you think it would be?
(e.g. Did you think you would have to make any changes? If so, which changes did you think would be the most challenging?)

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B. The certification process

Pre-assessment (if applicable)

3. What were your expectations of the pre-assessment and were they met?
(e.g. Did you expect it to prepare you for the main assessment? Did it do this?)

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4. Did anything surprise you about the results of the pre-assessment? (e.g. Were unexpected changes recommended?)
Main assessment
5. What were the main differences between the pre-assessment and the assessment? (e.g. types of observation or the way the certification body approached the assessment)
6. Did anything surprise you about the results of the main assessment? (e.g. Did you have to make further changes that were not noted in the pre-assessment?)
C. Changes in practice
7. What key changes in practice have you made, because of certification, that influence the following:
a. Soil, Air and Water (e.g. use of chemicals, cultivation, roading, burning, waste disposal)
b. Forest structure (e.g. species mix, open space, balance between clearfell and alternative systems, thinning)

c. Management of external impacts (e.g. deer management, control of other pests, diseases)
d. Production (e.g. timber production changes from changing species, productive area, balance between timber and non-timber species, minimising waste from harvesting)
e. Forest industry (e.g. support to contractors, supply guarantees, enabling transport off public roads, enabling the development of new markets)
f. Biodiversity (e.g. recording and managing important sites and species, liaison with conservation bodies, changes in management of native woodlands, etc)
g. Forest workforce competency and safety (e.g. qualifications and training, health and safety practices)

<p>h. Rural development (e.g. economic benefits to local communities –income to communities neighbouring the forest from direct employment, contracting, local processing, tourism associated with forest recreation etc)</p>
<p>i. Access and recreation (e.g. information and opportunities for access, education and recreation)</p>
<p>j. Community relations (e.g. communication with and involvement of local communities)</p>
<p>k. Conservation of heritage features (e.g. recording and management of important sites and features)</p>
<p>l. Landscape quality (e.g. changes in planning and practice that affect the visual landscape)</p>
<p>m. Enterprise organisation and management (e.g. legal compliance, management objectives, communication, co-ordination, documentation, personnel management, understanding of SFM, and external collaborations)</p>

<p>n. Enterprise management and planning (e.g. management planning and maps, areas under management plans, monitoring)</p>
<p>D. Impacts on costs and benefits to the business (these may be cash or non-cash costs and benefits)</p>
<p>8. Would you say that the costs of achieving certification have been significant or not significant to your business? (If possible, please state actual changes in costs in £ or as a percentage relative to the total)</p>
<p>9. In what areas have your enterprise costs changed? (e.g. management and production costs, labour, administration, etc.)</p>
<p>10. Has certification provided value for money?</p>
<p>11. Have your prices and/or sales increased as a result of certification? (If possible, please state actual changes in prices/sales income in £, or as a percentage relative to the total)</p>
<p>12. Have your markets changed as a result of certification? (e.g. new products, new buyers, stronger relationships with existing buyers, etc)</p>

13. What other benefits have you seen from certification?
(e.g. better relationships, specific areas of forest management, enterprise efficiency, etc)

E. About UKWAS certification

15. What have been the main stumbling blocks or challenges to UKWAS certification for your enterprise?

16. What could be better about the UKWAS and/or the process of getting your forest certified?

17. Do you think certification to UKWAS helps to achieve National forestry objectives, in a way that complements FC regulation?

18. Do you intend to renew your certificate, and why?

F. Any further comments?

Thank you for your time.

Summary of discussions and questionnaire responses

Issue/question	Small/estate Woodlands	Trusts	Large woodlands/managers	FE
EXPECTATIONS AND PROCESS				
Why certify	<p>Expected increased timber prices. Support to principle of certification.(2)</p> <p>To service market demands for certified timber. (2)</p> <p>Continued from earlier FSC certification</p> <p>Market pressure within long-term sales agreement.</p> <p>Were offered it for free by Group Scheme manager – so why not?! Good principle, follow on from organic certification of farms. Independent verification of high management standards – important when you are a ‘different’ operation.</p> <p>Thought it would be a market opportunity (it hasn’t been really as the market demands have been for large quantities).</p>	<p>The principle of certification – ‘it was a good thing to do’. No market advantage perceived.</p> <p>Always supported FSC.</p> <p>Expected some increase in prices and better market access.</p> <p>Valued opportunity for external review and input.</p> <p>Felt that selling timber may become impossible without certification.</p>	<p>Expectation that certification would become a market norm (required for any sales). (3) ‘Shape of things to come’</p> <p>To improve market penetration and management service.</p> <p>Best market opportunity.</p> <p>Some clients – just for status.</p> <p>FE created ‘critical mass’ and wider demand for it. (2)</p> <p>To sell timber – retain market share/access. (3)</p> <p>Would have lost mkts without it.</p> <p>Follow-on from ISO.</p> <p>Kudos of being first., environmental respect (2)</p> <p>Little choice after FE certified – 70% of timber on mkt now certified – stimulated widespread CoC and buyer demand. (would have done it after ISO 14000 otherwise).</p> <p>Recently, real market pressure. (2)</p> <p>Opportunity for independent acknowledgement of good for.mgt (2)</p>	<p>Political imperative, PR, ministerial pressure/support, market pressure for good volume of certified timber. Government credibility.</p> <p>Some customer requests.</p> <p>If we don’t certify the UK market would be threatened.</p> <p>FE, as government, should take the lead.</p> <p>Sector leadership.</p> <p>Off the fence – support to FSC.</p> <p>International credibility.</p> <p>Good way to change perceptions (internal and external) and promote what we do as good – we’re not good at that.</p> <p>District level expectation of price premium.</p>
How easy or difficult did you think certification would be?	<p>Straightforward.</p> <p>Understood (thru prev FSC certification) the requirements.</p> <p>The standard document was daunting, didn’t know where to start, had to seek advice.</p>	<p>Were very nervous about it – apprehensive.</p>	<p>Expected the LT plan to help (it did) but expected things to be a challenge anyway.</p> <p>Fundamental practices already in place, just needed to ‘smarten up’.</p> <p>Knew that more formal practice manual was needed.</p> <p>Practice OK, but hard to integrate needs into management so would be cheap to run.</p> <p>Not difficult – practices = certification.</p> <p>Resented another layer of bureaucracy.</p> <p>Were almost there anyway – without earlier ISO (75% of UKWAS) would have been v difficult.. (2)</p>	<p>Were very nervous about it – apprehensive. No assumptions that we would ‘pass’.</p> <p>Significant internal negativity – not used to being checked.</p> <p>Knew what we were getting into centrally – involved in debates.</p> <p>Different in different districts – quite variable in terms of systems in place and readiness for certification.</p>
Expectations and outcomes of pre-assessment	<p>Good preparation for main assessment.</p> <p>More onerous than earlier FSC certification.</p> <p>Didn’t expect to have to include</p>	<p>Paper systems highlighted as a major issue.</p> <p>Useful, but quite ‘gentle’.</p> <p>Cosy, client-consultant process. Not a ‘mock audit’ so didn’t act on all</p>	<p>Formidable exercise – long list of requirements.</p> <p>A paper exercise.</p> <p>But no real surprises (3)</p> <p>Prepared the ground for the main assessment – got us all thinking along the same lines.</p>	<p>No major surprises, (3)</p> <p>Knew what we were getting into centrally – involved in debates</p> <p>Very helpful and useful (2) – saved embarrassment at main assessment</p>

	<p>20-year plan. Useful – helped get documentation in order and to fill major gaps. Would have failed without it. No surprises – went straight into main assessment (CB expected a gap to fulfill requirements).</p>	<p>observations, as didn't want to have to have two rounds of reaction. Not confident enough it was picking up all issues so not the lever for change.</p>	<p>Useful in highlighting where difficulties would be.(2) Difficult to get flexibility to integrate into existing management systems. Useful preparation. Observations not preparation for main assessment. Lack of guidance on how to set up a group scheme. Re-wrote internal procedures and training manuals etc after pre-assessment, before main assessment.</p>	<p>stage. Allowed us to tackle some issues early on. Easier interpretation of standard for main assessments. Pre-assessment essential for a large organisation like FE. One District assessed – efficient and useful process – outcomes shared with other Districts to benchmark in prep for main assessment. Territories shred pre-assessments prior to others – useful prep. Didn't really prepare us for the real 'test' (main assessment) as still didn't indicate what the acceptable standards were, actual targets were not clear. Impressed by breadth and depth of standard. Highlighted good practice, poor local policy, lack of monitoring. Would have been very difficult 10 years ago.</p>
<p>Expectations and outcomes of main assessment</p>	<p>A repeat of pre-assessment – frustrating! Felt I was trying to comply with requirements for large-scale forestry areas. No major surprises Expected 'ticking in book' for such a small woodland (25ha) and was surprised at the level of detail required (29 pages...) by auditors, when they could have just walked round the woodland and seen it all. Debate on PAWS issues. Getting it all on paper a key challenge. Audit process should start in forest, then go to office – not vice-versa – many questions answered there.</p>	<p>Formal audit sometimes harsh, with auditors appearing rude – fodder for sceptics. No time given for internal discussion of audit before it was finalised – bad for bringing people on board. Very stressful! Paper systems highlighted as a major issue. But difficult to justify major expenditure when there are no problems on the ground and forestry is not a major part of what we do – would prefer to invest in broader site visits. Lack of clarity between major and minor CARs. Picked up much more than the pre-assessment and/or in more detail.</p>	<p>Much larger degree of demonstration required than in pre-assessment. Helped us see (the pre-assessment didn't) that in practice what we were already doing was acceptable. Uneven emphasis of interpretation of requirements – ecological aspects emphasised most. Pre-assessment was a discussion, main assessment was an audit – big difference. Not well prepared! Surprised by focus on areas not connected to efficiency or sustainability of forest (H&S, compliance etc). 75% of audit focus on systems etc, only 25% on silviculture and forest operations. Got a lot out of the audit as procedures not fully in place at the time. Helped clarify a lot of the requirements – not easy before.</p>	<p>Main assessment inspected every district. CB good at auditing against the standard, not against perceptions of FE. FE responded to themes of CARs with internal working groups to improve things, CB invited. Main assessment clarified the actual targets, though the auditors were also not always clear/sure about this either. (improvement and increased pragmatism through surveillance audits). Over-focus on specific issues by 'specialists' in auditing team, not experienced in auditing. A feeling we were contributing to the development of the standard. Expectation that what was excellent in one District should be excellent in all</p>

				(cf good). Paws issue difficult. Unclear if being assessed against the standard or own internal objectives (more ambitious and long-term than UKWAS). Positive experience. WAS NOT easy – fast and major changes, not quick fixes.
CHANGES IN PRACTICE				
Chemicals, cultivation, roading, burning, waste	No change. (2) Change to bio-oils for chainsaws. Always aimed to reduce. Pollution control kits now in place.(2) Better awareness amongst contractors of these issues. Already 'eco-friendly', few chemicals used. Still encouraging/persuading contractors to use bio-lubes. Better contracts and discipline/supervision of contractors. More analysis of options and how they work. Certification galvanised (not stimulated) change. Better collaboration with environment agency.	Already minor /minimal use, so no records or policy previously. Spillage kits added, and supervision of contractors. Full environmental assessment now in place for all operations – makes people think more about the issues. No/ltd alternative to herbicides. No more harvesting in winter (less damage), harvest managers supervise contractors better re damage. Less burning.	More formalised register of purchase and use of chemicals. No changes. (2) Not a big difference. More awareness – Reducing chemicals remains a problem. Tighter control of contractors on environmental issues. Better chemical records etc. Chemical reduction difficult – and usually due to economics not certification. Certification makes you justify your choice and assess options. So some reduction. Greater awareness of environmental impacts and of relevant legislation (chemicals). And of FC F&W guidelines. More consideration of biolubes where possible. (2) ISO 14000 made the (chemical) (all) changes. Better awareness re soil and water issues amongst hvting managers, options assessed. Spirit of chemical reduction adopted but reality is lack of options and difficult to measure real difference (cf agric etc). Better decision-making process. Score-sheets introduced for assessing ground damage risks.	Limited real changes. Significant reduction of chemicals in some areas where wrong species were being used anyway. Faster change on chemicals. More of a policy change to better consider all options – ie about decision making. Generally same decision made.. Has helped Districts keep up with legislation (storage of chemicals, disposal etc) and improve contracts. Moving towards bio-lubes (spend more on bars and chains).
Forestry structure (silviculture, species etc)	Faster conversion of AWS to broadleaves (but poor softwood prices and English Nature paid for conversion). No change – all OK. (3) Very limited change. Committed to ccover systems	Best practice already in place. Moving away from clearfelling to Ccover, esp on ASNW.	No change – credibility. Different silvicultural systems required – more complex management now. Less SS in future. (2) LT plans and WGS address this – so change already ongoing. (2) More consideration of ATC, always have to	Major issue for auditors – leading to change in thinning policy. Have had to detail and describe why and what we do. We do more thinning now. Some managers affronted as felt their practice was good and didn't need justification.

	15years ago! Estate woodland generally very good on species and open space. Clarified rationale of silvicultural systems but no change in practice.		justify clearfell. (2) Cont.cover more considered, partly due to UKWAS, partly trend, partly poor market makes clearfell and restock less attractive.(2) C-cover more considered – partly WGS Species and open space are LT plan considerations. Already following UK FS. Open space a major change in large plantations – a focus of thinnings.	ATC – better consideration, policy development, less ad hoc PAWS issue bringing silvicultural change - encouraging return to broadleaves on coniferous sites (where conifers clearly not working – rethink); increased use of natural regen. Brought faster focus on ATC. Will be using more ATC (also influenced by market)
Deer and other pests	More professional approach to deer management. (2) Practices already OK, already doing it (2) Problem where neighbours do not control – why should we. Certification has little effect.	Deer management plans being introduced, and guidance notes for managers. Introduced systems to assess populations and effects of culls.	Already good management. No change. Now have written deer management plans. (3) ie just doc change. Still a big difference between std and reality – slow change, getting there slowly. Better cull records all round. Adaptation of shooting leases. Contractors now document squirrel culls. But investment in cull resented where pointless because neighbour doesn't. Ensures consultation, membership of deer management group and development of plan, tho not much change in practice. Could threaten certificates if plans not implemented. Deer now better considered – focus reqd for cn. Big change. Problem where conflicting objectives (e.g shooting estate next to forestry) – still no joined up thinking. Beetles – needs chemicals.	No difference through certification. In South England the FE would be the only deer managers and cannot manage the deer range – an issue. External collaboration prompted. Now have strategies that justify ongoing practice, and better cull records. More management plans in place.
Biodiversity	Set up a recording system for ground flora. Practices already OK. (2) Have defined 'sensitive areas' but its a bit arbitrary. Better awareness of what they've got and how should be managed. Encouraged better collaboration/liaison. And seeking of advice. Now are aware of and have a plan	Already a focus of management – monitoring requirements of certification seem inappropriate. Already manage ALL with a conservation objective so no need to identify specific sites. Strategy for deadwood introduced. Important sites better identified, documented and planned for centrally, not ad hoc, and have a process for decision-making	Have always involved other organisations and experts where necessary. Biggest change area – more formalised approach to identification and monitoring. And active enhancement (2). More consultations (e.g badgers) No change Better control of contractors. Better identification of important species. More recording of important sites and consultation to ensure best mgt. (ie more sites	Already good practice – formally agreed mgt plans for most special areas, has ensured ALL do. Not necessarily better management as funds lacking at district level. More attention to the paperwork of monitoring and communication. Game – better shooting leases, encouraging more information from rangers (difficult to get). Deadwood working group developing

	for the PAWS. Already have an FC Native Woodland Plan – more detail in certification. PAWS and LT retentions better identified.	(justification/rationale). Already manage ALL with a conservation objective so no need to identify specific sites. PAWS restoration sites will be prioritised and strategised, more links to regional initiatives. Better game management.	managed) Identified sites often just where production not possible anyway, and were already 'non-intervention areas' or 'biodiversity sites' but not named as such. Good benefits – would slip without certification. Managers are more aware of important species and biodiv issues. (2) More rationalisation and useful inputs from auditor's experience. Better mgt of sensitive areas More recording of important sites and consultation to ensure best mgt. (ie more sites managed) (3) Better thinking and planning, but ltd change.	new policy, stimulating better thinking and systematic approach across organisation. Ancient woodland and natural reserves – development of better thinking, plans and monitoring. PAWS – major response – thorough plan developed, some restoration of PAWS on every site, being advised by ecologists. Now have more sensitive management prescriptions. Unclear definition of Natural Reserves. Natural reserves (non-intervention) – have identified areas we don't manage and set aside those with a scientific rationale for conservation. Trying not to just opportunise on poor sites. Deadwood policies better.
Conservation and heritage	Better recording of features. More cohesive recording of work now, for monitoring requirements. Already good.	Small change - Better and more systematised management plans for special sites.	Already in place and a requirement for LT plans. Little added effort for UKWAS. No change in practice, more recording. (2) More formal monitoring – will help practice. More consultation, but not always necessary/helpful. Better ID of designations and archaeology etc – 'wouldn't go looking for it' without certification. (2)	Already good practice – formally agreed mgt plans for special areas. More attention to the paperwork of monitoring and communication.
Landscape	No change. Practices already OK. Dealing with communities resolves this, and LT felling plan. In LT plans/grants.		A feature of LT plans. And WGS (4) No change in practice – more recording. Increasing issue for forest mgrs. No change. Better awareness raised. Proper landscape plans.	No impact – other initiatives.
Production	No change. (2)		No change.(4) Limited change, reflecting change in silviculture. Higher production costs. Less SS in future, less commercial timber resource, better forecasting. Has made FE thin more (and thus more c'fied	PAWS response will mean changes in future – species and productive area, but not radical.

			pulpwood available and thus c'fied pulpmills) so will be more sawlogs eventually. Less felling in general if uncertified – can't sell.	
Workforce	No change. Practices already OK. Big changes in H&S (4) – with forms and clear agreements with contractors, better supervision. Risk assessments now done H&S and records better – but mgt by selves. H&S has changed, speeded up the needed change. H&S etc already good.	Best H&S already in place. Contracts tightened up on this. New manual on H&S, more rigour in application.	Better records of contractor practice, justification for emphasising better practice. No changes.(2) More detailed risk assessments (3) Difficult to use traditional contractors. Risk assessment now embedded in contractors. H&S a major improvement, incl sole worker procedures.. Greater awareness of H&S legislation. More thorough training (e.g. first aid) given to workers. More focus on ensuring people have right training for job. Useful checklist for checking what's needed by law. Better, clearer contracts. Lots of time on taking contractors through all risk, pollution, chemical etc docs. Better trained to write plans – big change/improvement. Useful Clarity of responsibilities on H&S and checking certificates. Every manager has a H&S checklist. Contractors are improving – better H&S, understanding of SFM and envt issues.	H&S and training is better – policy improvements are resulting in changes in practice, some of which (20%) is due to certification. Contractors are a concern – an added pressure for a fragile industry. UKWAS requirement has given managers the confidence to deal with H&S problems. Hazardous trees – a problem because of resources.
Industry	No change. Contractors (or the buyer) are more aware of H&S, environment, pollution, tree damage etc. Small sawmills already thin on ground, certification is an added pressure (2) – not good for a 'wholesome' industry. Has not (and cannot) eased pressure on small sawmills. Means that in a shrinking contracting industry, the responsible ones have advantage.	[Not because of certification but - Lots of local mills are closing, and instead importing sawn timber and cross-cutting – how can certification combat this??] Risk [no evidence] that small owners will stop managing because of poor market and certification demands. Could lead to contractors being paid more – if we expect higher standards.	No benefit from certification (just another burden). Label rarely reaching 'shelf' – lack of link between market and certificate. Many contractors feel even more squeezed by certification and may quit. No changes. (3) No changes to contractor practices. Increased haulage costs for no-certified produce.(2) Clearer contracts – roles and responsibilities clarified. (3) Ensures higher (legal) standards of contractors – makes their costs higher. Not paid more, means best performers have more secure opportunities and worst will be dropped (2). Non-certified wood is having to travel further to	More and better communication with contractors re SFM requirements.

			find markets, or be used for different products (ie prev.fencing now pallets) No mktg of certification through supply chain. Loss of old traditional 'travelling forester', social history etc. (2)	
Rural development	No change. (3) Why should it? (just jobs in certification)	More thought given to local employment and local sales, but no change in practice. (In theory, certification will make woodlands more attractive and draw in more tourism...)	No improvement/changes (5) Ensures consideration of local contractors, ensures they are eligible to tender. Not what certification addresses.	Rural development requirement made us think about what we can contribute, and use of local contractors etc. But it conflicts with getting cheapest. No attributable changes. Small business and sawmills disadvantaged in certification. Devolution will help integrate forestry and rural development – but not a certification influence??
Access and recreation	No change. (2) Better considered, but more about FC Annual Management Plans. Has made us more aware of what we can do. More consideration of it.	Better use of visitor centres (beyond the standard seems to be expected) Access already OK, but better consideration of how and why.	Already above minimum standard. No/limited change (4) Overall improvement – forces owners to provide access if there is none (but most have it already). (2) Some have added annual guided walks as their access. Litigation issue. More 'upfront' about it with owners. More pro-active in certified woodlands. Yes a change area – but a concern to clients, for many its their 'garden' – need to more clearly match UKWAS to clients objectives.	Ahead of the standard.
Community relations and consultation	No change.(3) Already good. Change in documentation not in practice (already fundamental) Better consultation with other bodies (2) – 'head up, not down'.	No change – what we do.	Already in management before UKWAS. No significant change yet. No change.(2) More pro-active in certified woodlands but not major change. (2) Improved consultation – a stage further than LT plans, and takes it across whole estates, not just felling areas. Better identified stakeholders, tho no more consultation than for WGS. Some stakeholders get irritated by regular consultation. A problem where too much consultation conflicts	Significant change area. Better thinking about who our stakeholder are and how to deal with them appropriately. Better consultation procedures, each FD has a stakeholder consultation strategy. Better public and stakeholder (incl NGOs) as a result. Process has helped relationships and perceptions of stakeholders, NGOs have a better understanding of FE realities and can lobby government

			<p>with owners' objectives – puts owners off going any plans if they have to consult public. Talk to people more since certification (e.g. community councils). Improved policy/procedures on consultation. More open to feedback. Much better, more open. Significant changes, has saved hassles. LT felling plan reqts are higher, but has made us consult on non-felling issues. More comprehensive consultation (ie more people/orgs). Standard procedure introduced.</p>	<p>not FC for change. Fewer complaints and better procedures for dealing with them. More time-consuming to produce forest design plans due to consultation, therefore slowing felling.</p>
Enterprise organisation, management and planning	<p>Small change in invoicing. Practices already OK. Total change in procedures! Great to have everything recorded and have easy access to info, easy to maintain now. Generally much more record keeping. More efficient woodland management team. Big increase in paperwork and recording, some would have been done anyway with change in forester. Large change in procedures - more professional, also linked to change in staff. Much improved record-keeping, still ongoing – very good discipline. Big change – better business management. Existing systems adapted to fit certification and to better record and monitor. More efficiency. Useful external inputs. Huge paperwork increase – now levelled out.. Better owner/manager</p>	<p>A whole new 'Woodland Policy' is now in place – more about documentation that ethos/practice change. No overall change to internal organisation, but an increase in thinking about what we do and why we do it. New marketing structures required to deal with CoC. Useful framework to fundamentally review /question internal practices and policy, and has improved systems and discipline. Reviewed internal communication and information systems, better matching of resources to needs. Lots of additional documentation. Better understanding of SFM.</p>	<p>Stimulated a company Standard Practice Manual to improve overall management procedures. More emphasis on formalised plans. Easier compliance management. HUGE documentation increase, record-keeping, big admin load. (+++) Overhauled admin and monitoring systems. More management time (better management, discipline). Better communication between forest managers and other professionals so better info exchange. No real change. (2) More external consultation and collaboration. (2) LOTS of additional time on contractor issues. ISO mainly helped internal org change. (2) Generally improved env awareness. Internal management database set up partly to reflect UKWAS and make demonstrating compliance easier – big job. Overall raised standard of management. More cohesive thinking throughout company. Better paper systems and info mgt, better compliance. Approx one extra fulltime job (out of 100). (2) Big cultural change for operational managers. Better u'standing of SFM. UKWAS a catalyst of LT change. Bigger mgt burden on company.</p>	<p>Large impact. Now have a 'total management system' for audit. More coherent policy, planning and practice, not just ad hoc, hobby projects etc. Internal morale boost. '60%' new policies. Improved use of IT for reporting and monitoring. Improved uniformity and approach, more consistency of systems. UKWAS requirements now built into policy and systems are settling in. Strategies put in place, reduced ad hoc activities, developments and successes shared between Territories. Highlighted where we had inadequate policies that did not reflect up to date best practice. Could learn from ground and incorporate experience into new policies. Introduced Forest District Strategic plan – 'what does broader policy mean for us' – developing. Helped/encouraged all staff to better consider the broader objectives, not just economic focus. Cn has brought everything (dispersed policy docs and practices) together,</p>

	communications.			forming a framework than has become embedded. Better consistency of procedures between District - though outcomes may be different., clear decision-making process justifies it. Already a time of major organisational change – difficult to pullout what's due to certification. More documentation. Complete review at District level – systems and policies, and documentation load heavy. Centralised policy guidance now, not all districts having own.
Management/ planning	Habitat survey commissioned for better mapping. Added policy to plans already there for WGS etc. Proper compartment records have allowed more cohesive (not ad hoc) management, and better thinking on planning and forecasting. Already had mgt plan, but more details were needed (e.g. on sensitive areas). Monitoring – more formal now, with forms supplied by Group holder. More recording for monitoring, better measurement of crops. Previously had only WGS plan, now have more policies and objectives stated and more monitoring. Each group member has a management plan – would like to bring all under one plan for simplicity of grants etc. Management plans put in place, objectives clarified, monitoring info required.	More record keeping for monitoring. Much better - 5 year time-bound programme developed, supported by numerous policy and practice notes to guide implementation. Included monitoring plan. Basic data collected for monitoring. Major improvement, from 'rubbish' to certifiable. Better consistency of management over dispersed properties. Mgt Plans all on database for whole org to see. Each woodland has clear objectives and mgt process – more consistency and efficiency of resources. Progress is monitored.	Monitoring systems needed to give evidence that what we were doing adhered to sound principles. Helped to focus on shortfalls. Maps and mapping much improved. LT plans had put planning in place. More monitoring of management. Better forward planning (also linked to LT plans), transparency of plans and discipline of record keeping for monitoring. More uniform across managed properties. Much of mgt planning reqt covered by LT plans and WGS. Better mapping, esp of biodiv areas, etc.. Better focus on coherent and LT planning. Big change – lots of work to bring estates into plans. (3) Prescriptive management planning is a big step up, getting beyond silviculture. Esp. big step in SWest England as LT felling plans not widespread. Better record-keeping – monitoring. More thorough mapping. (2) Management planning – many estates didn't really have compartment schedules or objectives. – Now coherent mgt. Good focus on taking management from mid-rotation to felling plan and beyond.	Better understanding of what monitoring means and requires, especially environmental monitoring and yield monitoring. Less ad hoc, more recording, information more available, little actual change on ground. Improvement of site planning systems to better reflect policy objectives and link to a concept of sustainable harvest (putting inventory data into planning - AAC). Introduction of strategic plans to link local (site) to District, and District to regional (only partly due to certification).

	'Declaration of intent' for group scheme is useful as objectives/ rationale.			
COSTS AND BENEFITS				
Costs changes	<p>Significant costs (e.g. £1200 every 2 years on a timber sales turnover of £4000 pa), plus significant management time. Management and admin time. Not significant costs (1 extra day a week, £500 a year to group manager on av annual sales of +£100,000) 'Free' certification service, paperwork time, buying cheap plastic buckets. Direct £1000/yr on 1000ha – significant chunk of profit. Larger early costs, and additional time costs make it about £2000. Cost not significant, and manageable - £5000 initially (sponsored), £8-900 each year. 10-15% extra cost to get certified, less in subsequent years.</p> <p>'Lunch charges' not appreciated.</p>	<p>Limited additional management time (all done already), main cost is audits and time of manager on them - but this adds +20% to management costs.</p> <p>Cost is £25000 over 5 years, vs £600 000 in WGS annually, and £2,5M annual costs – so not significant, even with some time added (things we should have been doing anyway). Problem: if issues are raised with CB over the audit report it costs us more – interesting customer relationship! Cost increased on admin, info collection and management planning.</p> <p>Direct costs insignificant relative to total, indirect costs 30% addition – but necessary for best practice (what we should be doing anyway). Main areas – mgt planning, admin.paperwork, monitoring, supervision of contracts.</p>	<p>Few significant costs – all ongoing practice. Main burden falls on contractors. Significant cost Mainly on admin. (3) Not significant – clients pay. Significant - Costs (indirect) shared between client (10% increase in costs) and own 'investment' (+10% increase in costs). Some of additional cost is linked to LT plans. High costs of doing more planning. Not significant direct costs over large areas. Significant indirect costs, but not significant in terms of asset value. Main cost in getting (not maintaining) certification – management planning, 'policy' statements, mapping biodiversity sites. Significant (2) to both clients (10-15%) and business (10+%) Many of costs are actually costs of compliance (e.g H&S and chemicals). Costs>benefits so far. Av 10% increase to management costs (during felling period – low over whole rotn), mainly on extra mgt time needed to attain stds. Many of extra costs inevitable part of LT felling plans etc. 2-5£/ha to achieve certification. 10-20% mgt cost increase for small woodlands. (2) Company carries more costs than it passes on to clients. High mgt costs to achieve std. Higher costs just stay in market and make ANY margin.</p>	<p>Very resource expensive – a lot of early staff time (but now its 'what we do'). Much would have been put in place gradually, but certification intensified spend/resource use. Made 5 years progress in one year! Actual cost in fees and time etc probably 10s of thousands of pounds. But not significant in terms of overall costs. Staff time the main cost – impacted on almost everyone in FE. Difficult to differentiate what was done for certification and what would have been done anyway. HUGE time inputs around main assessment.</p>
Prices	No change.(3)	No change. (3)	No price increases for certified timber, just decreases, especially for uncertified timber. (2) Inverse premiums available. Ie say will pay more for certified, but this means will pay less (20%) for uncertified. (3)	No price premium. Lower prices for uncertified.

Sales and markets	<p>Have had a new buyer wanting certified timber. No change. Mills working towards 100% certification puts pressure on all local producers to certify management. Not everyone asks for certification (2) – wouldn't have certified if had to pay for it. Market share maintained, no new buyers, no added sales. Pulpmills requiring certification, few sawmills demanding it. If you can still sell logs why certify just to sell cheaply to pulpmills? Very difficult for small suppliers to get into good certified markets (mass production). Lots of products couldn't be sold without certification – eg charcoal. No change in markets – but no problem with markets. Useful links to CoC group members.</p>	<p>There is opportunity to sell to other, bulk buyers, but they offer a lower price so would only use that opp if needed to shift lots of timber. Local sales preferred. Mostly sell to round timber markets, few are demanding certification. Market share maintained, and some additional sales (would not have been able to sell as much if uncertified – difficult markets).</p>	<p>No change. (4) Allows continued sales where certificated timber is required.(3) (mkt access) Restricted intake of non-certified timber by some mills. Small producers disadvantaged as can't supply to certified mills. Some better relationships. No change. (3) Market pressures and demand for certification higher in South Scotland than North, but it's catching up. Markets maintained. – no sale without certification. Limited demand for uncertified timber across Scotland. (2) In England there's still markets for non-certified (products different). Sawmills – no demand from timber buyers but from pulp and chip buyers so must have certified supply. Because merchants need some flexibility they put more pressure on big suppliers to provide the certified supply, can still get uncertified if wanted from small guys. Certification is demanded by small wood (pulp and chips) and green wood buyers. Mid-range millers will take uncertified, but everyone needs to sell all their products so pressure to certify is there.</p>	<p>Has brought us closer to our buyers, supply chain more visible, better understanding of the markets. Increasing need to be certified in order to sell timber at all, certification secured market share. Not all buyers care, depending on location and product. Certification ensures you can access them all. Scotland and England very different – bigger mills in Scotland, more of an 'industry', more certified. Need to communicate that plenty of certified timber is available or will lose out to imports and recycling. FE certification allowed mills to get CoC – especially in Scotland. In England the label gets 'lost' as mills not certified. Need to market beyond SS – sell the certified hardwoods as well. Limited new market interest.</p>
Other benefits	<p>More professional approach to management process. Demonstrates owners' commitment to good management. Certification as a 'common language' in collaborations. Better relationships with neighbour who helped us through certification. Better safety and more professional management across whole estate, better working conditions appreciated.</p>	<p>'Feelgood factor', demonstrates we're at the forefront. No commercial benefit seen in certification, especially in West Country, estate woodland sense. Raised profile of forestry within wider organisation – morale boost for forest managers. Management more cohesive, less individual. FSC label in documentation.</p>	<p>PR – highlights our good management. (2) Good PR for forest mgt consultancy services. (3) Better service of forest management to clients. None. 'Green credentials', promotes industry. Mgt co.s starting to see it as an opportunity, not a burden. Definitely raises management standards. (4) Opportunity for using certification to get more funds into forestry ("You can't get more green than this – give us tax benefits!") could be better used (e.g. TGA). Greater awareness and application of legislation. Eases getting grants later – brings effort forward.</p>	<p>Clarity on key needs - Strengthened policy, rapidly developed. Credibility within government – useful in greening government group and procurement group. Improved ministerial support, important to maintain/achieve a positive profile for FC. (impact in devolution review??) Encourages the organisation to question, think and be 'learning and cutting edge'. Morale and confidence booster for staff. (3) Team-building in whole</p>

	<p>Good for getting mgt of small woodland from ad hoc to long-term.</p> <p>Provides good respect in any communication/negotiation with public.</p> <p>Encourages best management – makes you do everything you know you SHOULD do.</p> <p>Auditors bring useful suggestions and shared experience – this should be encouraged.</p> <p>Better records make us more efficient service provider.</p>	<p>Accountability and credibility to members and collaborators.</p> <p>Useful in fundraising.</p> <p>Good way to open dialogue.</p> <p>Potential use in policy influence – helping to generate more government funds for forestry.</p> <p>Rethink of own consumption.</p>	<p>Re-assurance re liabilities - Can demonstrate it was an accident not negligence (2) 'Keeps us out of court'</p> <p>Accountability</p> <p>Clarity of management instructions thru clear objectives (owners)..</p> <p>Better relations with clients, better understanding by clients of forestry.</p> <p>Good social and biodiversity benefits.</p> <p>Helped us win consultancy.</p> <p>Demonstrates professionalism.</p> <p>Better management across all forests managed, not just certified ones.</p> <p>UKWAS framed and added clarity to new procedures.</p> <p>Consultation has helped avoid conflicts that would have arisen – people more on our side. (2)</p>	<p>organisation and confidence – better sharing of info and assurance that SFM IS possible. Positive attitudinal changes.</p> <p>Demonstrates professionalism.</p> <p>Highly valued at District level.</p> <p>Better understanding of SFM (vs production) and whole range of FC objectives, and how individuals (e.g. harvesters) fit in,</p> <p>Makes you do better management – planning cycle (objectives, implementation, review, etc) – and make better use of resources.</p> <p>Very useful opportunity to review assumptions and targets, with external inputs.</p> <p>Demonstrates env/sust credentials of wood vs other materials.</p> <p>Has pushed forestry standards up by '5%' and improved management systems and policy by '15%'.</p> <p>Better sharing of best-practice between FDs.</p> <p>Good for developing partnerships and linking into funding at District level (but FC needs to promote certification more).</p> <p>Forcing the long-term view.</p>
'Value for money'???	<p>Not worthwhile economically. (2)</p> <p>Not yet.</p>	<p>The 'value' has been achieved by the external inputs of initial audits – no further added value now.</p> <p>Definitely – the organisation is far superior as a result.</p>	<p>NO!</p> <p>Time will tell. Not yet.</p> <p>Only 'value' if you have large volumes of SS to sell.</p> <p>Only in that without we would have lost mkt. (2)</p> <p>OK as long as sales>certif.</p> <p>No (no obvious env , social or mkt benefits), we just have to.</p> <p>No, but it's a good thing.</p>	
ABOUT UKWAS				
Key stumbling blocks	<p>Cost</p> <p>Removing Xmas trees.</p>	<p>Systems and paper trail – especially for small estates/enterprises.</p>	<p>Written evidence of monitoring.</p> <p>Downturn in timber prices – makes relative costs</p>	<p>Too much emphasis on documentation, vs what's going on in</p>

	<p>Wouldn't do it if we didn't already have a management plan – too costly and difficult. Were worried we'd have to change species because of AWS – but working on a cont cover basis with right objectives was OK. Getting to grips with PAWS – making it appropriate to local conditions. Level of paperwork not approp for small, scattered woodland estate – why document a fire plan that is 'Call the fire brigade'? Level of recording and paperwork required – but practical issues must be prioritised in practice. Often don't know about legislation. H&S, Risk assessment, use and storage of chemicals, polln control, staff competencies. 20 year mgt plans – why bother, useless (except indicative for large plantations) – scrap. Management plans – but it depends on detail required – need to be clear about what is acceptable ie 1 page on 20 year objectives, direction and approach. Idea of monitoring system unnecessary when only one person doing all the management. Guidance provided so far for small ents seems to be (a) offputtingly complex and large, and (b) targeted to people who can't read!! Not relevant to UK – more help please.</p>	<p>Level of detail required in standard – bigger picture plus local context/specifics would be better. If every detail of the standard need so much discussion re interpretation then it will put people off and cannot be right. Initial panic to put everything down in paper systems has eased – overdid things in early days - this needs to be avoided. Getting management plans in place and consistent.</p>	<p>higher. Cost in staff time. Cost to owner. Owners objectives may not be timber/forestry but shooting – at odds with std. Open space – a concern to pure commercial investments; can be difficult to demonstrate on paper, better to see/inspect. Access – some owners won't sign up to LT felling plans because of access reqt. Keeping up with compliance. Complexity – needs to be more streamlined. 20ha clearfell threshold - not always appropriate or realistic. UKWAS standard difficult to understand/interpret without access to a professional forester. Many owners find the long list of reqts a problem, don't understand 'why do you have to that' – need a 'ladybird guide' through the requirements and about certification. Lack of detailed mgt planning and record keeping a key gap – WGS OK but no detail. Knowing how much detail/info the std really reqd, depending on scale of operation. How much detail for manplan of small dispersed woodland vs single lrg one? Difficulty is 'policing' lots of small contractors and securing good contractors. Contractors are 'weak link' but are the visible end of what we do. (2) Audits are too intensive and invasive – overdetailed. Proof burden needs to be reduced if UKWAS is to become the norm. Getting info e.g. re conservation sites etc can be difficult – conservation agencies want to charge for the info (incl FC! – designation maps available for LT plans but not for UKWAS). (2) Implementing deer mgt plans is a problem – conflicting objectives, owners don't want to control deer, deer mgt groups not consistently active. PAWS continues to be a problem. High burden – beyond normal mgt obligations (to owner), costs</p>	<p>the forest. Getting better as auditors get more experienced. Lots depends on having a good auditor. Fear of standards being raised - if FE can't do this, who can?? Some people don't see why forest industry should change – agriculture has a much bigger impact, and forestry is just one part of the sustainable countryside. Big (and difficult) changes in forestry will make little difference if no changes in agric. Big problem that certification seems to be only about getting woodlands certified – not being carried through the whole chain to the consumer. Needs to be dealt with – people losing confidence in the reality of the market pull. Internal conflicts in the sector – we're better at fighting amongst ourselves than dealing with the real problems and maximising opportunities. This was first really large scale certification in UK – issues on interpretation needed exploration and discussion. Not enough funds at District level to do it all – key ongoing issue. Species requirements – not always appropriate – on some sites (often marginal) very few species will grow. Open space – lots might be appropriate in moorland areas, but not in lowland former woodland sites. Flexibility needed. Monitoring – what level is needed? Minimum standard not clear.</p>
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			<p>money to get expert in, no benefit in it. Chemical returns are lots of work. Tendency to over-complicate interpretation and requirements at first – gets simpler as you go on. With time we have understood that we can be flexible and interpret the std to fit our management – reduces costs. Without an agreed LT plan you'll get nowhere with UKWAS.</p>	
What could be better	<p>Cheaper and less bureaucratic for small woodlands. The diversity of private forestry needs to be recognised against the standard of large-scale forestry. Must incorporate (and communicate) flexibility to deal with local and context reality and scale of enterprise – you can't expect the same from small estate as from FE, or from SW England as from Nscotland. Auditors can be flexible (and are) but the document is not. A gradual change approach is valued. The standard needs 'translating' - could be better presented (e.g. step-by-step flow charts), with practical advice or pointers on where to get it, to help us realise we had most of requirements. Audits focused more on conservation aspects and didn't look at any commercial forest areas – all part of SFM. Timber is part of sustainability (2). 20 year plan is a bit academic – should just be objectives and approach ('what we're aiming at') Small woodlands are often managed for pleasure, its not</p>	<p>Landowners are put off certification because they are wary about access and consultation issues – better explanation of minimum requirements would resolve fears. More guidance on minimum requirements (e.g. monitoring – how much needs to be documented?) How do you reduce chemicals when their use is already minimised? Game standards too open to interpret. Too high a reliance on documents – look more at ground reality. Encourage more feedback from auditees on the audit – they CAN debate interpretations and the feedback helps UKWAS and keeps certification realistic. No explanation of the boundary between a major and a minor CAR (2), thus nothing for us to negotiate the outcome on. Likewise, no guidance on how many minor CARs you can have. Add 'cooling down period' into certification process, ie time after audit visit for discussion and contemplation. (2) Certifiers need to (be able to) better consider the objectives of the enterprise (e.g. conservation vs commercial) in the process. Seems to be an element of expecting</p>	<p>Ukwas could recognise other achievements(e.g. the FC 'Centre of Excellence Award'.) Interpretation of UKWAS. Don't interfere in mkt. Making it easier for small woodlands risks lowering the standard, and making people wait till it gets easier to join. Lobby for link btwn grant aid and UKWAS. Avoid sudden changes – long 'but-in time' UKWAS needs to be more clear about how much detail is really needed and what the minimum reqts are. (2) UKWAS is excellent at making certification work for UK conditions. Some stds loose or unclear: 3.4.4. (ATC) could be tighter; 5.2.3. (chem records) needs clarification on minimum requirements, more guidance and examples re scale of mgt(2) 4.4.1. (ops)would be useful to state requirement of contracts to clarify meeting standard and resps; 5.2.2. (Biolubes) could be tighter; 6.3.1. (LT retns and NRsvs) is confusing and better definition is required(what is LT, when can it be felled, when does it become a NRsv); 6.3.2.(deadwood) needs to integrate the new scientific evidence available and review how it best adds value. Auditors not always consistent – some have strong interests in single issues. Standard seems to be based on the forestry of upland plantations. If all your woodland is managed on 120yr rotation why do you need LT retention areas</p>	<p>Marketing issue needs to be resolved – customers are not driving demand. 'Sustainability' needs to be marketed. People/buyers still don't know about or where to get certified timber. Label still can't be seen 'on the shelf'. UKWAS/FSC Industry should work together. UKWAS steering group disappointing – not dealing with problems due to internal conflict – not constructive or helpful for anyone. Need to help people trying to certify, and update standard as promised (chemicals, monitoring) Need to ensure existing good systems are used – quickly set-up systems may not be sustainable. Clarify standards where confusion is happening – review experience and integrate lessons (e.g. chemicals is a fudge). More encouragement to private sector – overall UK volume not enough and lots of improvement still needed. The process is good – expensive, but time is needed to make the audits credible and useful. The inclusion of the FSC international perspective on issues is not always helpful in a UK context. UKWAS needs to promote 'how certification can help you' (ie helps</p>

	<p>about prescriptions but working knowledge, 'feel' and 'gut'. Chemical standard demands 'reduction' – cannot do this when your policy is already 'minimal'. And there must be alternative options where reductions (chemicals, burning) are required. FSC is what means something to the consumer – why put UKWAS on top of it? Market the international (vs national) credibility.</p> <p>Keep it simple – every woodland is different with different context – how do you interpret requirements to each one?</p> <p>Writing everything down is pointless if it sits in a file waiting only for next audit. Need to optimise use of managers time not waste it and drain the industry.</p> <p>Simple, targeted guidance. Ensure pragmatism of auditors, and practical foresters preferred. Minimise paper chase – documents prove no more than words with single manager – again, pragmatism please.</p> <p>Standards are good – 'dressed up good forestry'.</p>	<p>continuous improvement against own objectives not just cross check against minimum standards. Inconsistent approach to interpretation and relevance even within same CB.</p> <p>Documentation PROVES nothing – why not move away from proof by documentation to use of key indicators in woodland, certification of contractors etc.</p> <p>Certification of contractors to save small owners the H&S burden.</p> <p>Sharing knowledge on how to comply. Simplified std for small operators. Stop arguing and get focused on delivery again.</p> <p>'Sell' social as well as environmental benefits – more interesting to the public.</p>	<p>IDD?</p> <p>Documentation of contractor agreements means nothing on ground – better to have forester supervising contractors than dealing with paperwork.</p> <p>Compliance issues seem to come from an international perspective and assume that we are breaking law – better to focus on silvic, env and social issues.</p> <p>Open Space too fixed – 10% not always appropriate or necessary.</p> <p>UKWAS needs to be updated to reflect experience to date.</p> <p>Its OK for large forest areas, but too onerous for small/farm woodlands, even in group scheme. Need something in between WGS and UKWAS. Standard implies all PAWS sites should be restored – is this always appropriate?</p> <p>Deadwood standard could be more precise. LT Retns and Non-intervention areas etc have been difficult and confusing – more guidance needed. Standard expects you to treat every situation the same – but they are not (e.g. PAWS).</p> <p>Pragmatic auditors preferred over mechanistic. Did FE really go through same process of certification? (they never consult us)</p> <p>Keep people informed on developments (in UKWAS, and general certification in UK and internationally)</p> <p>Take UKWAS out of FC – not impartial in that seat.</p> <p>Allow/promote flexibility, recognise the 'spirit' of certification as pragmatic (2). More people would come on board if they felt UKWAS would fit around them not vice versa.</p>	<p>you improve your mgt etc, planning cycle)</p> <p>PAWS needs attention – look at it on a landscape level. Seems over-emphasised in Std. England and Scotland very different.</p> <p>Chemicals issues – standard says it will be reviewed – it needs it, unclear. Standard is vague in places and 'the line' is unclear – people need to know what they are aiming for.</p> <p>Recreation not emphasised. Std needs to better reflect (or allow flexibility for) difference between countries.</p> <p>Full-time auditors especially good, pragmatism valued.</p> <p>Is it a standard (baseline) or is it aiming for continual improvement, we feel we are being expected to continually improved – do other organisations have to demonstrate improvement?</p> <p>Support getting label into market place – little of our certified timber gets out there. Makes it all seem pointless.</p> <p>Support more sharing of ideas on getting certified – FC training? Forum for info sharing amongst enterprises?</p> <p>Clarify that the standard can be interpreted.</p> <p>Don't get stiffer on chemicals! Cost of alternatives will make certification unviable.</p> <p>Good to have a standard that is not absolute – but MUST have confidence in auditors.</p> <p>Different degree of audit seems fair for different objectives of management and thus different levels/types of activity.</p> <p>Monitoring – scale and intensity</p>
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				needs clarification, and needs to fit with FC proposals. And note that information is not free...
Complements FC regulation	<p>Probably Yes</p> <p>UKWAS makes you have better records and makes WGS easier to keep/get/renew – not a duplication.</p> <p>WGS management plans should be recognised and go towards UKWAS, otherwise it unnecessary and confusing duplication.</p> <p>Better integration of WGS, LT plans, Native Woodland plans etc and UKWAS are needed.</p> <p>WGS helped, but certification wanted much more detail.</p> <p>No real replication/duplication, WGS is of some help to getting certification.</p> <p>Certification a useful add-on to ease pressure on an under-resourced FC (Private Woodland Staff) but FC /WGS needs to be better linked into and recognise UKWAS.</p> <p>Why spend public money on WGS – certification more effective at ensuring work is carried through.</p> <p>Annual audit for certification could g'tee annual management grant.</p> <p>Grants should be costs based not hectare based.</p> <p>Takes regulation beyond forest and to H&S and social issues.</p> <p>LT felling plans are too bureaucratic and academic anyway, could use UKWAS as an entry to grants instead.</p> <p>The industry in the UK is already well regulated, so UKWAS should be simpler to reflect that.</p>	<p>Yes, WGS goes some way to readying you for UKWAS, but it is another layer of proof.</p> <p>FC support WGS, whilst UKWAS costs – good to do WGS first and make UKWAS easier and thus cheaper.</p> <p>Why not have automatic WGS if you have UKWAS? Would save FC the cost of administering grant aid. (Especially good with lots of properties under one trust – each goes through WGS)</p> <p>FC documentation (e.g on PAWS and chemicals) is very complex – the 'spirit' of UKWAS is important, not tiny detail.</p> <p>UKWAS challenges the UK Forest Standard.</p> <p>Certification should remove need to check on WGS recipients.</p>	<p>Yes, LT plan puts certification requirements in place, but they should be linked. Costs of achieving UKWAS duplicates the LT plan process – grant from that contributes to paying for certification.</p> <p>Yes, but another layer of bureaucracy with no benefits (e.g. streamlined WGS).</p> <p>Yes.</p> <p>All regulation should flow from UKWAS – if you have Cn you don't need regulation as proof already ensured.</p> <p>Some duplication, but UKWAS takes FC reqts a step further – more detail and more requirements (e.g. than WGS)</p> <p>Having WGS and LT plans does help implement UKWAS. (5) But would prefer just one of them! (2)</p> <p>Would make sense for WGS/LT Plans to be more easily approved if you have UKWAS – would reduce FC and enterprise' work.</p> <p>UKWAS could underpin and annual mgt grant.</p> <p>If UKWAS was a reqt for WGS then mixed lowland shooting estates (birds) would have a problem.</p> <p>LTPlan requirement should be better fitted/matched to UKWAS (2) – at moment you have to re-do LT Plans for UKWAS.</p> <p>No added value of LT plan AND UKWAS in terms of better planning or management. Why not merge them? (2)</p> <p>UK Forestry Std not used, UKWAS is – merge the two.</p> <p>Complement – helps ensure and keep up to date with legislation etc.</p> <p>Duplicates all, re-writes much.</p> <p>WGS and LT plans don't fit with certification – different, and different purposes. Only form a small element of Cn. Need to be better matched/merged.</p> <p>FC WGS people not very aware re UKWAS (FE</p>	<p>UKWAS translates the UK Forestry Standard into a set of requirements. Does the FC need to check FE's activities now it has certification? Good case for 'lighter touch' on monitoring of UKWAS certified estates. UKWAS more effective and 'truthful' than FC inspections. Would be especially good for private sector to get recognition for UKWAS (e.g grant jumping)</p> <p>Complementary.</p> <p>Certification flags up where regulation is weak/not working – but does it link into the policy process.</p> <p>UKWAS is more pragmatic and holistic than FC regulation which does not allow for regional differences.</p> <p>UKWAS is harder on us where practices are bad than FC regulation is.</p> <p>FC regulations inflexible and foster a poor relationship with private sector</p> <p>Continued existence of UK Forest Standard is confusing, no need for both – it needs to be developed/reviewed, UKWAS more usable.</p> <p>UKWAS could become a means of regulation – would be simpler and more efficient for many enterprises, including FE.</p> <p>Possibility of grant aid for maintaining certification for small private owners.</p>

			deal with that). Grant aid to get certification would be a blow to those already certified.	
Achieves national policy objectives?	Especially in ensuring legal requirements, especially H&S. Would be IF more enterprises on board. (private sector – many have no man.plans and no forecasts – difficult to assess and change the sector, very difficult for them to certify.).	Certification is having a major impact, but with such a tiny FSC budget. Very good in getting people to discuss best practice and embrace it. Certification delivers more than just TIMBER benefits!	Certified enterprises should receive a 'lighter touch' of regulation, allowing more FC support to non-certified woods and more efficient achievement of policy objectives. Yes, but not bringing in bad producers – only taken up by good ones.	Getting there (e.g. Wales change in ATC objectives) UKWAS has helped focus on key issues. Rural development requirement made us think about what we can contribute in a wider sense than just forestry. Some of policy didn't really meet UKWAS – now improved objectives. How will UKWAS respond to any policy divergence with devolution?
Will you renew?	Despite lack of economic benefit, demonstration value important to owner. Yes, or earlier investment will be a waste. Will now need to pay so it depends on returns and costs – currently only just break even anyway. Depends on cost and funds available. Might prefer a cheaper group scheme.	Probably for principle. But certification only just breaks even when harvesting softwoods – when there's no softwoods to harvest.... Yes, and even if UKWAS wasn't FSC – it's a useful framework and label.	Yes – to demonstrate good management and to reduce market risk. Yes – market needs (3) and to attract clients. Yes – to sell timber.(3) Yes. Some owners will not if costs (e.g. more expensive contractors) go up more in this market situation. More will come into group as they reach felling age and need certification (and big difference can made to management of these conifer blocks). Yes, it's the way we want to do business.	
OTHER	Forest industry will be unable to have high standards of management if the economics continue to fall. You'd have to be doing BAD management not to be able to meet the standards. When management is by the owner, records of everything seems silly – is what I've written more believable than what I say, or what I can show you? We do it but it is irrelevant for our scale. Is certification about "you're in, you're out" (which puts people	Need to encourage dialogue between people who have been certified and those thinking about it where possible, and build confidence of auditees to interpret the standard and question the auditors. UKWAS a better document for the forester than FSC.	Forest owners amongst the most responsible in rural Britain – need more recognition/grants, to support them vs less sustainable imports. The forest industry can only be sustainable if it has money coming in. Certification takes you back to basic questions and justifications of what you do – LT plans do not. Going back to basics could make you come up with a different plan – good IF its not a quick fix. What people say and write down is not necessarily what happens on the ground – it hasn't all yet filtered down to ground. Timber growers would be more positive about certification if they could see some benefit (no	Where is the consumer demand – we are changing our performance/behaviour, but are consumers? Can UKWAS do more? Retailers need to give 'payback', e.g. promotion, mktg of British timber, support to forestry initiatives here (like BP have done for PR) Risk of FSC promoting imports (e.g. Latvian) unless we can get more certified volume.

	<p>off) or is it about improving forest management. The latter is more positive, but needs a softer touch and more flexibility than is written into the documents. TIME – needed for forestry operations to catch up with new systems and for supply/demand to meet up.</p>		<p>mkt benefit) e.g. grant additions, easier eligibility with certification.</p>	
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General notes:

The industry is under lots of pressures – poor market, regulation, legislation, ISO certification, UKWAS – it’s difficult to separate the absolute difference UKWAS makes. Certification generally unlikely to be considered before first thinning (25 years in) – whole rotation unlikely to be certified. In Scotland there’s lots of young forests so certification is not yet the norm. Certification only usually acceptable within 5years of felling.

In a bad market, certification is more important – gets that extra price that makes it all worth selling.

Chemicals – is change in forestry really making a difference? (such low usage anyway, compared to chemical use in other industries and land-uses) and if not why bother, because applying chemicals makes such a difference to the profitability of our industry.

Small woodlands will always be able to sell to firewood – no need for certification or good management standards – in England a lot of conservation value is in small woodlands.

People would feel better about imposition of certification if ALL imports were certified.

Cost of certification needs to reflect benefits, not just levels of paperwork – e.g. difference in prices between certified and uncertified bars. Otherwise why bother.

Certification continues to separate forestry from the broader landscape, rather than integrated benefits – especially an issue where lots of small scattered woodland – incentives need to be linked.

Linking certification to management grants would give wider confidence in good management and would allow better forecasting for mills and thus a healthier forest industry (better coordination of resources).

Only the bulk markets require certification, and they offer lower prices anyway, so unless you rely on those markets, why bother?

Timber imports are a concern – lots of landowners don’t want certification, but if they thought it would keep exports out they might!

If Group members have to be individually audited, then FE should be audited on a District by District basis – ie FE hold ‘group certificate, Districts as members.

Traditional estate woodlands are well managed because ‘over-staffed’ or managed carefully by owner who knows them well. The level of detail possible is higher than for FE because not planning over a large area – scale issue works both ways. But can’t expect same detail of recording/systems for estate as for FE, who must have it because of scale.

Market FORCE (ie no sale without certification – blackmail tool) risks increasing the antagonism. People feel they are being dragged into something pointless when the label does not reach the shelf.

More public awareness of certification is NEEDED – can FC help FSC?

Certification adds a ‘stop and think’ philosophy into management.

LT plans not widespread in S.West England and more targeted at large forests (landscape issues etc) – management planning requirements for certification are hard without this.

Highest demand for certified timber is for lowest grade product (pulpwood) – not quite the spirit. No demand for high quality c’fied sawlogs – quality more important.

Seen as an additional burden in an already highly regulated industry. But brings credibility to forestry that will help get support/grants etc.