3. What is your interest in the Forestry and wood processing sector plan?

I represent FSC UK. FSC’s mission is to promote environmentally appropriate, socially beneficial, and economically viable management of the world’s forests. We pursue this mission by setting standards for responsible forest management, and by ensuring that claims made about forest management and forest products are credible through our system of Forest Management and Chain of Custody certification. FSC is considered to be the most credible certification system by NGOs including WWF and the Woodland Trust.

4. We outline four key points within our vision for the Forestry and wood processing sector plan. In your opinion, do you agree with our vision and level of ambition?

Disagree

Do you have any comments on the scope of the plan?

We fully support the vision for Scotland to have a resilient, sustainable forestry and wood processing sector. However, we contend that it cannot credibly be claimed that all actors currently contribute positively to ‘a resilient, sustainable forestry and wood processing sector that delivers environmental, social and economic success to Scotland’s people and businesses’, when SEPA’s own audits reveal failings in environmental performance in some instances. That said, we firmly believe that a strong partnership between regulators and credible voluntary certification schemes can result in a consistently resilient, sustainable sector in the future.

Further, as SEPA’s own audits show failures in compliance, simply buying Scottish forest products cannot be expected to guarantee high environmental standards. We suggest that this element of the vision be reworded along the lines of ‘Consumers are encouraged to choose locally sourced products where they can credibly be shown to have been grown, selected and managed to high environmental standards’.

5. Do you think the plan captures the main environmental risks and impacts of the sector, as outlined in Figure 7?

Agree

Are there any other environmental risks and impacts that should be included?

In addition to ‘Impacts on soil, water and air quality from inappropriate application of pesticides’, we suggest that impacts from inappropriate fertiliser use be considered.
In relation to ‘Impacts on water quality and soil from the management of brash and forestry residues’ and ‘Impacts on soil quality, structure and functionality from poor site management’, we suggest it be made clear that impacts on soil will have knock on impacts on long-term forest productivity.

6. Have we identified all the main partners and influences for this sector in order to achieve the vision, as outlined in Figure 8?

Agree

Are there other influences that you think should be included?

For clarity, instead of ‘accreditation bodies and schemes’, it would be better to refer to ‘certification schemes and certification bodies’, ideally explicitly mentioning FSC as an example of a certification scheme.

We suggest that the group you have identified as ‘Consumer demands’ might be better labelled ‘Customer demand’, and should include retailers, brands and others in the supply chain, as key drivers of higher social and environmental standards.

Please tell us about any relationships you have with any of the influences that we might be able to use to help implement the sector plan?

FSC has a key role, in the UK and around the world, as an honest, independent broker, bringing together a broad range of interests in the chamber-balanced democratic processes used to develop our policies and standards. In the UK, through our key role in the development of the UK Woodland Assurance Standard, we help to find consensus between the economic interests of large forestry companies, the environmental interests of NGOs such as the Woodland Trust and the RSPB, and social interests including public access and workers’ rights. We would urge SEPA to engage in and take advantage of those processes.

With over 2,000 chain of custody certificate holders in the UK, FSC has an important relationship with many actors in forest products supply chain who have the influence to leverage significant change. Demand for FSC-certified products from major retailers, brands, construction companies etc. drives uptake of FSC standards in forests, with all the benefits that brings in terms of independently audited improvements in environmental and social performance.

7. Have we identified all the actions we should take to solve compliance issues in the sector?

Agree

Are there other actions that you think we should be taking to improve compliance?

We welcome your commitment to review your ‘engagement with the planning system to streamline forestry consultations’, and suggest that, in line with your recent discussions with FSC UK, you continue to review your engagement in certification consultations to effectively influence the management of existing woodlands.
We warmly welcome your commitment to ‘explore with others how accreditation and certification bodies could be used to reward environmental excellence across the supply chain’, although we suggest a refinement of terminology to reflect the separate roles of certification schemes and certification bodies. (We suggest a similar change to the wording of ‘We will support Scottish Government, Scottish Forestry, Forest Research, Confor, accreditation bodies, trade associations, businesses, local authorities and organisations, and provide specialist evidence and advice, to assist the sector’.) We would also welcome an explicit mention of information sharing between SEPA, certification schemes and certification bodies, to enhance the effectiveness and consistency of regulation and voluntary certification.

While you later talk about promoting the benefits of certification to others, given that you recognise the potential positive interactions between regulation and voluntary certification, we would ask you to consider whether SEPA should directly promote independent certification/UKWAS to forest owners/managers.

8. Have we identified the correct opportunities we could take to help businesses to go beyond compliance?

Strongly agree

Please tell us about any other opportunities that you think could be included to help businesses in this sector to move beyond compliance

We strongly support SEPA’s ‘beyond compliance’ agenda, and warmly welcome your commitment to ‘work with the sector to promote the benefits of certification to others’. We would ask you to consider making an explicit commitment to greater involvement in standard setting, promotion of best practice etc. within voluntary certification.

9. Do you think the actions are ambitious enough?

Agree

Which of the actions and aspirations proposed in this plan do you consider to be of the highest priority?

We recognise the importance of many of these actions, but in particular we applaud and will be happy to support your commitments to ‘explore with others how accreditation and certification bodies could be used to reward environmental excellence across the supply chain’ and to ‘work with the sector to promote the benefits of certification to others’.

10. Do you have any other comments?

We fully agree with the statement in the preface that ‘poor forestry stewardship and site management can cause environmental harm’; FSC exists to promote good forest stewardship. FSC UK strongly supports SEPA’s aspiration to go ‘beyond compliance’,
and we believe that credible, independent certification has an important role to play therein.

We are very glad to have started to explore ways of working together more effectively, and hope to build on this in future. We believe that information sharing is key, as is making sure that certificate holders, certification bodies and the national standard development group are kept up to date on best practice. We would warmly welcome greater involvement from SEPA in standard setting.

In keeping with your commitment to explore how certification could be used to reward environmental excellence, we would ask you to consider a system of earned recognition, with a lighter regulatory touch for those who hold FSC Forest Management certification, especially for those with appropriate FSC Ecosystem Services certification for soil and water.

One final point. On page 6, you state that ‘Reducing their use of natural resources (except sustainably sourced wood) and reducing the creation of waste, will enable [businesses] to meet their legal obligations, drive further improvements and operate their business successfully’. We would argue that the use of ALL natural resources should be reduced, but that wood should make up a greater proportion of future resource use, and that if wood and other forest products are to be used they should be sourced sustainably.