

**FSC UK submission to the Welsh Government Consultation
Sustainable Farming and our Land
October 2019**

Question 1 - Sustainable Land Management (refer to chapter 3)

What are your views on the Sustainable Land Management framework? You may want to consider:

- whether the structure of benefits, outcomes and actions is a useful tool
- whether the benefits and outcomes sufficiently cover the broad contribution of farmers, foresters and other land managers
- how we have described the Sustainable Land Management outcomes
- whether it is right to focus an income stream on environmental outcomes
- whether an alternative policy framework would be more appropriate

Comments

In broad terms, FSC UK supports the Sustainable Land Management framework. The structure of benefits, outcomes and actions, while differing in detail, is broadly comparable to the theory of change approach taken in our Ecosystem Services certification procedure and guidance, and many of the benefits and outcomes described in the consultation document are aligned with requirements of our Principles and Criteria, for example delivering diversified products and/or services, or protecting water quality.

We have some reservations about the focus of funding on paying for environmental outcomes (paragraphs 3.27 and 3.28), which we feel downplays the importance of social outcomes, but we are reassured to some extent by the recognition in Figure 3.5 that there may be a need to support some social outcomes directly.

We understand that the language of the consultation document is geared primarily towards farmers, and we appreciate such explicit statements as connect the proposals directly to forestry. However, when it is stated that 'the true value of sustainable food production is rarely reflected in the price a farmer receives for their produce' (paragraph 3.26), we feel it would have been appropriate to point out that the same is very much true of forest products.

Question 2 - Sustainable Farming Scheme (refer to chapter 4)

What are your views on the proposed Sustainable Farming Scheme? You may want to consider:

- how the Farm Sustainability Review and Farm Sustainability Plan could be delivered in a proportionate manner
- how best to reward farmers for outcomes through their actions
- how the Sustainable Farming Payment should operate
- what business support should be offered to farmers
- what eligibility criteria are needed
- whether there is a role for capped or diminished payments
- how best to design the scheme to leverage additional private finance
- alternative ideas for supporting farmers in a manner consistent with Sustainable Land Management

Comments

FSC UK supports the concept of rewarding action rather than outcomes which may be beyond a land manager's control (paragraphs 4.12 and 4.13) in the interests of fairness. However, for this approach to be credible there must be a meaningful assessment of the appropriateness of actions; there should be no payment for an action, however well-intentioned, if external factors mean that there is no realistic prospect of the action ever having the desired outcome. We note that the 'evidence of causality' approach is largely consistent with the 'theory of change' approach in our Ecosystem Services certification procedure.

FSC UK fully supports the emphasis on 'delivery of outcomes above and beyond the requirements of regulation' (paragraph 4.15), which is consistent with our overall approach to Forest Management certification.

FSC UK agrees that support should be 'available for both "maintenance" and "creation"' (paragraph 4.16), which is consistent with our Ecosystem Services certification procedure.

FSC UK supports the aspiration 'to give farmers more flexibility in implementation' (paragraph 4.18), which is in keeping with the ethos of the most recent revision of the UK Woodland Assurance Standard (UKWAS 4).

We firmly believe that FSC Forest Management certification will be one of the key mechanisms for streamlining the woodland equivalent of a 'Farm Sustainability Review' (paragraph 4.27). We also believe that there is a clear overlap between FSC management planning requirements and a 'Farm Sustainability Plan' (paragraph 4.36). Explicit recognition by Welsh Government of the value of FSC's market led assurance mechanisms could greatly streamline the scheme for woodland owners and managers.

We firmly believe that there is a role for the independent third-party auditing required by FSC to supplement or substitute some of the self-assessment or Welsh Government monitoring requirements (paragraphs 4.47 to 4.52).

FSC UK supports the approach of collaborative action (paragraphs 4.90 to 4.93), which is consistent with moves at the international level in FSC to consider landscape approaches, and with existing requirements for co-operation in UKWAS 4 (section 2.3.2). FSC Forest Management group schemes may provide a platform for such collaborative action.

FSC UK would support capping of payments if it could be clearly shown to benefit owners and managers of smaller woodlands (paragraph 4.104).

FSC UK fully supports designing the scheme 'in a way which supports farmers benefiting from additional revenue streams (for example, Payments for Ecosystem Services)' (paragraph 4.109), and recommend our Ecosystem Services certification procedure as a mechanism for woodland owners and managers to access such markets.

Question 3 - Advisory service (refer to chapter 5)

What are your views on an advisory service? You may want to consider:

- whether you agree an advisory service should be established
- the functions of the service
- what the relationship should be between the advisory service and the Welsh Government
- the appropriate scale of delivery

Comments

FSC UK supports the ongoing provision of advisory services through a combination of WG staff and independent specialists. We would be happy to work with WG on joint provision of targeted advice where this supports compliance with FSC requirements. We would ask WG to consider how holistic advice can be provided to farmers with woodlands, so that not only the individual requirements of agriculture and silviculture are better understood but also their positive and negative interactions.

Question 4 - Industry and supply chain (refer to chapter 6)

What are your views on providing support to the industry and supply chain? You may want to consider:

- whether it is right for support to be subject to Sustainable Land Management
- whether the proposed priorities reflect the right areas of focus

Comments

We urge Welsh Government to recognise FSC Forest Management certification (including, where appropriate, FSC verified Ecosystem Services claims) as the most credible independent guarantee of responsible woodland management (paragraph 6.15).

FSC UK would be happy to collaborate with Welsh Government in helping woodland owners and managers to consider a wider range of timber and non-timber forest products (which is consistent with Principle 5 of our Principles and Criteria), as well as marketable ecosystem services claims (which is consistent with our Ecosystem Services certification procedure) (paragraph 6.18).

FSC UK fully supports the approach to farm woodland set out in paragraph 6.21, particularly in the context of FSC Forest Management group schemes suitably tailored to the needs of small woodland owners.

Question 5 - Regulatory framework (refer to chapter 7)

What are your views on our proposals to improve the current regulatory system and develop a new regulatory framework? You may want to consider:

- how the current regulatory framework can be improved upon
- the scope of a future regulatory framework
- the role a future regulatory framework would play in championing Welsh standards
- how compliance with regulation should be monitored
- how breaches can be fairly and proportionately enforced

Comments

FSC UK supports the maintenance of the UK Forestry Standard as a consistent regulatory baseline for UK forestry (paragraph 7.9). We also commend to Welsh Government the UK Woodland Assurance Standard (UKWAS) as a consistent voluntary standard.

In Scotland, FSC UK is discussing with organisations such as the Scottish Environment Protection Agency (SEPA) how to better align regulatory inspections and certification audits to maximise benefits in terms of compliance while minimising the burden on responsible land managers; we would be very happy to explore, with Welsh Government or NRW, similar issues in Wales (paragraph 7.33).

Question 6 - Transition and funding (refer to chapter 8)

What are your views on the purpose and design of a transition period? You may want to consider:

- the proposed principles for transition
- the relative merits of the three transition options
- alternative proposals for transition
- how the CAP can be simplified and improved while it is still in operation

Comments

No comment.

Question 7 - Analytical approach (refer to annex A)

What are your views on the analytical approach set out? You may want to consider:

- the different stages of analysis
- the different tools and techniques which may be necessary for different aspects of the analysis
- the range of impacts which we propose to consider with the Integrated Impact Assessment

Comments

No comment.

Question 8 - Welsh language

We would like to know your views on the effects the proposals in this document would have on the Welsh language, specifically on opportunities for people to use Welsh and on treating the Welsh language no less favorably than English. What effects do you think there would be? How any positive effects could be increased, or negative effects be mitigated?

Comments

No comment.

Question 9 - Other comments

- If you have any related issues that we have not specifically addressed, please let us know.

Comments

No comment.