



Environmental Land Management - Policy Discussion Document

Response from FSC UK

July 2020

The Forest Stewardship Council® (FSC®) is a global, not-for-profit organisation dedicated to the promotion of responsible forest management worldwide. Our vision is that the world's forests meet the social, ecological, and economic rights and needs of the present generation without compromising those of future generations, and our mission is to promote environmentally appropriate, socially beneficial, and economically viable management of the world's forests.

FSC UK is the national office of the Forest Stewardship Council in the United Kingdom. FSC UK is independent of FSC international. It sets forest management standards for the UK by inputting into the UK Woodland Assurance Standard (UKWAS), promotes the FSC system, and provides an information service. FSC UK (Ephesea UK) is a charity registered in England and Wales (No. 1130203) and a non-profit making company limited by guarantee registered in England and Wales (No. 06792524).

6. Do you have any comments on the design principles on page 14? Are they the right ones? Are there any missing?

FSC UK supports the design principles proposed to guide the development of the ELM scheme and the overarching focus on supporting the provision of environmental outcomes, although we would also welcome explicit recognition of the importance of social outcomes, particularly given the inclusion of 'beauty, heritage and engagement' in the list of targeted public goods.

We ask Defra to recognise the important contribution that responsible, sustainable forest management can make to realising these aspirations in the context of integrated land management and the valuable role that FSC can play in independently promoting and assuring such management.

7. Do you think the ELM scheme as currently proposed will deliver each of the objectives on page 8?

The strategic objectives should recognise and encompass all land uses, not just 'environmental challenges associated with agriculture'. Throughout the document, there is a lack of clarity whether the document and design elements of the scheme are referring to agriculture or wider land management. This would help strengthen the design of the scheme by recognising the importance of land uses other than the production of food.

Other than reference to local community consultation, the social dimension of land use and its contributions to human well-being, environmental justice, equity and fairness are currently missing from the document and its objectives. It is critical that Defra commit to providing equal access to the benefits of its scheme for landowners and community members, regardless of landholding size and income levels. This requires, including the concept of equity into the objectives outlined on page 8, as well as



pro-active efforts to support smallholders and target the provision of environmental and social outcomes for disadvantaged communities. FSC, both in the UK and globally, continues to explore various approaches to engaging smallholders in responsible forest management, and we would be happy to share what we have learned.

8. What is the best way to encourage participation in ELM? What are the key barriers to participation, and how do we tackle them?

In terms of supporting and encouraging participation in ELM, we recognise previous schemes have been perceived as burdensome and complex due to administrative and regulatory requirements. FSC certification provides credible, independent assurance that high standards of responsible forest management are being met. The national forest stewardship standard is closely linked with the UK Forestry Standard, which sets out the government's approach to sustainable forestry, and also addresses other legal requirements, for example in relation to environmental regulations, health and safety, equality and living wages. As such, FSC forest management certification could be a recognised means to demonstrate compliance with entry requirements and thus simplify the process of applying for the ELM scheme for certificate holders. As stated previously, it is also important to monitor the distribution of scheme benefits and take necessary steps to prevent the exclusion of smallholders and those with limited capacity to follow complex rules and procedures. Such steps might range from support for certification to alternative methods of verification for small and low intensity land management.

9. For each tier we have given a broad indication of what types of activities could be paid for. Are we focussing on the right types of activity in each tier?

FSC UK welcomes the inclusion of payments for the management and restoration of existing woodland, as well as to fund the creation of new woodland where appropriate. We support the targeting of payments for activities at multiple spatial scales, although we push for clarity on how activities between tiers would interact and align.

We question the focus of Tier 1 on actions to be delivered by farmers only rather than all landowners. We would at a minimum push for clarity as to the rationale for this design structure, although we suggest extending the scope of Tier 1 to include foresters and other landowners as eligible for the same level of basic support as farmers. We would welcome the recognition of foresters and landowners as key partners in delivering environmental outcomes by making support accessible to them at all levels and spatial scales. In relation to supporting the delivery of environmental benefits from woodland management, we propose adopting activities stated in the UK Woodland Assurance Standard (UKWAS). Examples of relevant activities include deadwood habitat management, species diversification and adoption of appropriate silvicultural systems.

To ensure alignment between woodland management standards and aspirations of the ELM scheme, we would encourage Defra to engage and offer input into the revision process of UKWAS. The first public consultation for UKWAS 5 is planned for Spring 2021.

10. Delivering environmental outcomes across multiple land holdings will in some cases be critical. For example, for establishing wildlife corridors or improving water quality in a catchment. What support do land managers need to work together within ELM, especially in tiers 2 and 3?

In relation to responsible woodland management in the UK, requirements of the UK Woodland Assurance Standard promote the coordination and cooperation of management activities with neighbouring woodlands and landholdings where appropriate and relevant (UKWAS 2.3.2). As such, FSC certification offers assurance that forest managers have taken the appropriate steps to collaborate with neighbouring landholdings.

In addition, there is an opportunity for Defra to propose stronger requirements for collaborative land management in the UKWAS revision process.

11. While contributing to national environmental targets (such as climate change mitigation) is important, ELM should also help to deliver local environmental priorities, such as in relation to flooding or public access. How should local priorities be determined?

Local environmental and social priorities should be determined through local stakeholder consultation and participation. FSC certification requires landowners or forest managers to provide the opportunity for local people, relevant organisations and other interested parties to engage in the management planning process.

There is the opportunity for Defra to input into the revision process of UKWAS as a means of aligning public consultation requirements of woodland management standards and ELMS.

12. What is the best method for calculating payments rates for each tier, taking into account the need to balance delivering value for money, providing a fair payment to land managers, and maximising environmental benefit?

No response

13. To what extent might there be opportunities to blend public with private finance for each of the 3 tiers?

FSC UK welcomes the proposal for future policy to be underpinned by payment of public money for the provision of public goods. In the context of woodland management, FSC's Principles and Criteria promote the listed environmental outcomes. In addition to the baseline delivery of these environmental outcomes established by FSC forest management certification, specific claims verified under the FSC Ecosystem Services Procedure, including biodiversity conservation, carbon sequestration and storage, watershed services, soil conservation and recreational services could form the basis for both public and private sector investment in these outcomes. The FSC Ecosystem Service

Procedure provides a proven mechanism for demonstrating and communicating positive impacts of forest management activities on the conservation or restoration of ecosystem services. As such, verified ecosystem service impacts could be recognised as showing the delivery of required outcomes to meet payment requirements. The Procedure also provides the opportunity to enhance the impact of ELMS payments by helping landowners to engage in ecosystem service markets and attract complementary private investment or sponsorship of claims. We suggest that clear guidance is given on the alignment of the various ELMS tiers with other initiatives to allow for blending of public and private finance mechanisms.

14. As we talk to land managers, and look back on what has worked from previous schemes, it is clear that access to an adviser is highly important to successful environmental schemes. Is advice always needed? When is advice most likely to be needed by a scheme participant?

We agree that access to an adviser is necessary. It may not be required by some applicants but for many, it will be, although it is likely that those who need it most are the least likely to ask for it. Hence the importance of robust monitoring combined with clear guidelines, standards, and anticipated outcomes.

From our experience with forest management certification, we understand that it can be daunting and off-putting for potential applicants to understand what is appropriate in their unique situation. For advice to be effective it should be available from the initial stages of application and throughout the process. Advice should be available at one of many key stages: understanding the objectives of the scheme, the application process itself, to plan what action is best for the individual to propose and undertake (either in isolation or jointly with others) and how to implement and monitor the proposed action.

15. We do not want the monitoring of ELM agreements to feel burdensome to land managers, but we will need some information that shows what's being done in fulfilling the ELM agreement. This would build on any remote sensing, satellite imagery and site visits we deploy. How might self-assessment work? What methods or tools, for example photographs, might be used to enable an agreement holder to be able to demonstrate that they're doing what they signed up to do?

FSC UK fully supports the use of credible, voluntary assurance schemes such as FSC as evidence for monitoring the delivery of ELM scheme agreements.

FSC certification provides credible, independent assurance that high standards of responsible forest management are being met. As such, FSC forest management certification could be used to demonstrate compliance with requirements and thus facilitate targeted, risk-based inspection and enforcement. To meet FSC certification requirements, inspections of forestry activities and monitoring of environmental outcomes are conducted regularly.

Payments should be linked to actions taken and outcomes achieved, and for this, a robust monitoring and compliance scheme is required. A greater recognition of certification and assurance schemes could contribute to reduce the monitoring burden for regulatory authorities. Apart from credibility, the



most important feature of any monitoring system must be that its requirements are accessible and feasible for landowners of all sizes and types.

16. Do you agree with the proposed approach to the National Pilot? What are the key elements of ELM that you think we should test during the Pilot?

We agree with the approach to the planned National Pilot and we would welcome involvement in trials with a forest management element. This could offer an opportunity to test the value of FSC certification and ecosystem service claims in contributing to scheme mechanics, such as meeting entry requirements, demonstrating compliance and delivery of outcomes.

The pilot should assess the barriers and opportunities of access facing landholders of different size and description, as well as effective means for inclusive community consultation.

17. Do you have any other comments on the proposals set out in this document

No response