



**Forest Stewardship Council *Plantations Review Stakeholder Submitted Discussion Paper*
by the Royal Society for the Protection of Birds, November 2004**

Introduction

The RSPB welcomes the opportunity to contribute to this initial informal consultation. We will also respond to the subsequent detailed 'Policy Phase' and 'Technical Phase' consultations, both as RSPB and as part of the BirdLife European Forest Task Force.

Next steps required by FSC

1. *FSC needs to protect and enhance biodiversity by revising Principle 10* to better reflect Principles 9 (HCVF), 6 (environmental impact), 5 (forest benefits) but also 3 & 2 (peoples & rights).
2. *Existing FSC certified plantations need reviewing* to determine their previous, current and potential biological status. A revised Principle 10 is needed to aid the case-by-case inclusion or rejection of these areas for certification. The current moratorium detailed in Criterion 10.9 must remain, but be extended to prohibit conversions from important non-forest habitats as well as 'natural forests' and remove certification from existing plantations on such areas.

Background – our concerns about FSC certification of forest plantations

FSC certification of plantations could drive the conversion of forests and non-forested land containing biologically important habitats and species into lower biodiversity value plantations.

We are concerned that FSC certification of plantations will drive the destruction of important forest and non-forest habitats and loss of important species. We would not welcome the FSC certification of such plantations created on land of higher environmental value, for example important grassland systems, peatlands, heathland or 'natural'/semi-natural forests.

The loss of plantation certification for the UK could mean the government and forest industry withdraw from commitments¹ and processes to work towards improving forest management.

In the UK there are large areas of plantation as well as semi-natural woodland certified under UK Woodland Assurance Standard (UKWAS)/FSC. This certification has brought increased stakeholder participation as well some biodiversity benefits to plantations, so we would initially be cautious of plans to remove FSC approval from all of the UK's certified forest plantation area.

But we are concerned about the rate of restoration and overall commitment to restore important non-forest habitats – such as blanket bog and lowland heathland – that were afforested by plantations before the November 1994 FSC moratorium, and continue to be retained and restocked under UKWAS/FSC certification. We are also concerned about the rate of restoration and overall commitment to restore ancient woodland sites currently UKWAS/FSC certified plantations ('PAWS'). Removal of FSC certification from afforested valuable habitats in the UK would help improve FSC's wider credibility (by reducing the plantation certification threat to important unplanted habitats), but may not aid the restoration of existing planted habitats in the UK and probably elsewhere. We need to see the detailed technical proposals to assess this issue.

The RSPB works for a healthy environment rich in birds and wildlife and is the UK BirdLife partner organisation. Our forestry-related work includes advocating changes to government policies, providing advice on conservation management to forest owners and managers, and undertaking research into birds and other biodiversity affected by forestry practices. We own and manage about 9,000 hectares of UK Woodland Assurance Standard (UKWAS)/FSC certified woodland (SA-FM/COC-1349). The RSPB is a member of the UKWAS Steering Group, but is not an FSC member.

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¹ Such as the increased certification commitment made at the 2002 World Summit on Sustainable Development, see: [http://www.forestry.gov.uk/website/pdf.nsf/pdf/ukforestpartnership.pdf/\\$file/ukforestpartnership.pdf](http://www.forestry.gov.uk/website/pdf.nsf/pdf/ukforestpartnership.pdf/$file/ukforestpartnership.pdf). From 2005 grants will be available to partially fund ecological survey and management planning towards UKWAS /FSC certification.