



MINISTRY OF WATER AND ENVIRONMENT



# Operationalizing the Uganda NFSS. Lessons and experiences

Presented by Global Woods in  
Uganda.

**Hotel Africana**  
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## What global woods is and her interaction with the new standard



- Global woods is a tree farming company.
- Plants and manages trees in Kikonda Central Forest reserve in balance with social environmental and economic standards
- FSC certified since 2012 to date.
- Global woods was first audited against the new NFSS during her annual surveillance of 2019 (12<sup>th</sup> -14<sup>th</sup> March 2019) by SGS
- Being an annual surveillance, a sample from the principles, criteria and indicators was taken.



## Process of operationalizing the standard



- Started with review of the new standard as a team in the company
- Identified the compliance gaps which needed to be filled.
- These included: putting in place additional policies e.g hunting policy, updating SOPs, updating the management plan and files
- Specific timeframes were identified for closing the gaps and the responsible persons to close them.
- Where we could not immediately close the gaps by the time of the audit, CARS were opened



## Key issues from global woods experience



- **Being new, the audit exercise required more time than usual.** A lot of discussion had to be held between the auditor and the company staff to reach consensus about what specific indicators meant. e.g our auditors had asked for four days instead of the usual three.
- **The standard makes alot of referencing-** e.g indicator 8.2.1(a) which refers us to Annex G(I). While trying to understand G(i) again references are made to criterion 10. 1, 10.2, 10.3 up to 10.12. this makes everything too much interlinked.
- **Having annextures as part of the indicators or criteria alters norms of audit.** E.G under 74.1 (a) refers to Annex F directly, 8.2.1, refers to Annex G.(ii) also 9.1.1 refers to Annex (I) directly instead of providing the annextures as guidance/verifiers. This means the auditor has to go through each one –not sampling



## Key issues from global woods experience



- **The new standard added new things which would require more time to comply with:** E.g Whereas the old standard talked about High conservation value forests, the new standard introduced more High conservation values –from 1 to 6. which need to be assessed, identified and monitored. The time frame from the effect of the new standard to the audit time could not allow us put this right- A CAR was raised.
- **The new standard requires a lot of rigor in documentation.** E.G the concept of Free Prior and informed Consent(FPIC) In supporting communities we would do needs assessment, then implement say a project in tree planting but with PFIC the beneficiaries have to sign to indicate they were consulted, at every step including the fact that they are aware of the likely negative impact of such a project. Also need evidence that the community accepted the methods of engagements used



## Key issues from global woods experience



- The contribution of the new standard in improving the social, economic and environmental performance of the tree planting project compared to the generic standard used before is not yet clear.

## Lessons learnt.



- The SDG did a good job to domesticate the standard but it would require much more time at least a year to adjust the company policies and procedures to the new standard before one can be audited against the new standard.
- The new standard has a lot of detail which can easily lead on to pick a lot of non compliances
- It is important for the implementers of the new standard to review it internally as a team on indicator per indicator to identify the non compliance issues and be able to fix them before they are audited against the standard





## Un answered questions



- What is the clear mandate of the SDG after the approval of the standard?
- Is it possible to make adjustments to the standard when issues are identified? Like these of having annexures directly in the indicators and criteria? If yes what is the procedure. As global woods we are considering raising these concerns with SGS. What other avenues are available?

