

RED Benchmark of existing RTFO QS

ACCS	Recommendation	RED Article
5.16	Provide clarification of 'uncultivated' and 'semi-natural' land (for example as a footnote). Strengthen text to be more in-line with RED requirements on 17.3 b (area designation) if ACCS intend the standard to be used outside of the UK,	17.3
5.11	because UK EIA regulation is then no longer is applicable (i.e. reference to SSSI).	17.3 b
5.16	Strengthen text so that not only is an assessment required, but prevention of raw material being obtained from high carbon stock land. Inclusion of criterion to state that no destruction / drainage of peatlands permitted.	17.4, 17.5 17.5
FSC	Recommendation	
6.2	No FSC criterion which specifically addresses 'highly biodiverse grasslands'. Criterion 6.2 is the closest, but would need to be updated to meet the requirements of the RED. No FSC criterion which specifically addresses wetland conversion. FSC would need to develop a new criterion (or adapt an existing one) in order to achieve RED compliance.	17.3 c 17.4 a
6.10	Update/clarification of 'very limited portion of forest' in line with RED requirement of 1ha. No FSC criterion which addresses peatland conversion or peatland drainage. FSC would need to develop a new criterion (or adapt an existing one) in order to achieve RED compliance.	17.4 b 17.5
Genesis	Recommendation	
3.12	Provide clarification of 'uncultivated' and 'semi-natural' land (for example as a footnote). Strengthen text to be more in-line with RED requirements on 17.3 b (area designation) if Genesis intend the standard to be used outside of the UK,	17.3
3.37	because UK EIA regulation is then no longer is applicable (i.e. reference to SSSI).	17.3 b
3.12	Strengthen text so that not only is an assessment required, but prevention of raw material being obtained from high carbon stock land. Inclusion of criterion to state that no destruction / drainage of peatlands permitted.	17.4, 17.5 17.5
LEAF	Recommendation	
6.5	Inclusion of reference date of January 2008.	17.3, 17.4, 17.5
6.1	Strengthen text so that it is not only a requirement to "demonstrate awareness of the distribution of the key wildlife habitats (e.g. wetlands)."	17.3 a
6.5	Provide clarification of 'rainforests'. (High carbon stock land can also be other wooded areas or secondary forest.)	17.3 a, 17.4 b
RSPO	Recommendation	
7.3	Clarification of whether RSPO's HCV relate to forest areas only or also to non-forest areas. Some inconsistency in the standard: Criterion refers to HCV areas, while Definitions refer to HCVF areas. It is necessary to clarify this for compliance with RED designated area and highly biodiverse grassland criteria. (Note: RSPO confirm that HCV does cover non-forest areas and intend to rectify in the next version of the standard.)	17.3 b, 17.3 c
7.1 / 7.3	Update/clarification - carbon stocks requirement in RED is valid for land conversion over 1ha. RSPO recommend 50ha as part of SEIA (7.1).	17.4 b
7.3	Include more specific requirements on conversion of areas with high carbon stocks. It is unclear whether the concept of 'HCVs' covers this. Strengthen text so that it more explicitly states that conversion of peatland is not permitted ("unless evidence is provided that the cultivation and harvesting of that raw material does not involve drainage of previously undrained soil".)	17.4 17.5
RTRS	Recommendation	
4.5	Cut-off date to be January 2008.	17.3, 17.4, 17.5
4.5	Include more specific requirements on conversion of areas with high carbon stocks. It is unclear whether the concept of 'HCVs' covers this.	17.4, 17.5
SAN/RA	Recommendation	
2.2	Include more specific requirements on conversion of areas with high carbon stocks. It is unclear whether the concept of 'high value ecosystems' covers this.	17.4, 17.5