United Kingdom Woodland Assurance Standard

UKWAS Revision 2013-16 (Consultation Draft) (October 2015)

Consultation Report & Steering Group Responses

12 February 2016

The Steering Group responses reflect discussions as follows:

- UKWAS Steering Group – 02.12.15
- UKWAS Drafting Group – 14-15.01.16
- UKWAS Drafting Group – 28-29.01.16
- UKWAS Steering Group – 10.02.16

Key:

Proposals highlighted in green are those where a change has been made, those highlighted in red are those where no change has been made. Steering Group responses to the consultation feedback received are shown in red.

www.ukwas.org.uk

This page has been left blank

Contents

This page has been left blank

1. Introduction

1.1 Background

A public consultation to generate feedback on the Consultation Draft of the UK Woodland Assurance Standard was carried out for 60 days between 1 September 2015 and 30 October 2015; at the request of some consultees, later submissions were also accepted.

The following documents were made available on the UKWAS website:

- A Consultation Paper
- The Draft Standard in two versions:
    - A short version which included requirements only.
    - A full version which included a consultation feedback column.

The responses were analysed in November 2015.

The Draft Standard is broken down into Requirements as follows:

- 5 principal sections (e.g. 3: *Forestry operations*)
- 40 sub-sections (e.g. 3.1: *General*)
- 83 clauses (e.g. 3.1.1)

The Consultation Paper requested answers to the following questions:

1. Does the new structure of the standard assist use and comprehension of the standard?
2. What might be done to further improve the new structure?
3. Are there further opportunities to amalgamate or simplify requirements?
4. From the perspective of medium-sized estates, do the changes made assist in the ease of applying the standard?
5. From the perspective of small woodlands and all woodlands managed at a low intensity:
    a. Does the revision simplify the application of the standard?
    b. What further guidance or tools might make using the standard easier?
6. Is the shorter Introduction comprehensive enough?
    a. Is anything now missing?
    b. Is further guidance needed?
7. Please make any additional comments on the draft standard citing the relevant Section and Requirement numbers as appropriate.

Answers to these questions are summarised in Part 2 of this report. General comments made by respondents have been included in Part 2 as other observations. Part 2 also contains a summary checklist of the main issues raised.

The specific comments received have been assigned to each section and are presented as consolidated feedback in Annex 1 to this report with the respondent's identity shown for each, using the identifying numbers in Appendix 1 (no respondents requested that their names be withheld). These comments have been summarised in Part 3 of this report, which is intended as the working checklist to make it easy for the drafting team to consider each issue without recourse to the raw

responses. However, the reader is recommended to refer to each respondent's full comments given in Annex 1 since these often contain important elaboration on the summary point.

1.2 Characteristics of respondents

25 organisations or individuals responded to the consultation.

All the comments were from organisations based in the UK and can be characterised as follows:

- Woodland owners and forestry practitioners (13)
- Country forestry authorities and forestry enterprises (4)
- Environmental organisations (2)
- UK countryside, environment and heritage agencies (1)
- Forest user organisations (2)
- Other (3)

Where an organisation has two or more roles, the organisation's most relevant role was taken as its primary interest category.

A full list of respondents is given in Appendix 1.

2. General overall comments

Only five respondents answered one or more of the specific questions in the Consultation Paper, although most respondents made other general comments.

2.1 Standard structure (questions 1-3)

2.1.1 Does the new structure of the standard assist use and comprehension of the standard?

Three respondents [13, 15, 24] stated that the new structure does assist use and comprehension of the standard; a fourth respondent saw a 'slight improvement' but stated that the guidance 'remains turgid & verbose' [2].

2.1.2 What might be done to further improve the new structure?

Some respondents felt that the structure was clear [15] and that nothing further could be done to improve it [24].

One respondent asked that a clear indication be given of what was new, what had been changed and what had been deleted [13]. (Note that the Consultation Paper states that 'Because the draft standard is so different to the current version and because of the complications of text being moved as well as deleted, there is no version showing 'tracked changes'.')

Other responses to this question dealt with specific issues and are addressed in section 2.5.

2.1.3 Are there further opportunities to amalgamate or simplify requirements?

Here respondents were divided, answered both yes [2] and no [24]. One respondent [15] gave specific suggestions relating to PAWS, which are addressed in the consolidated feedback in Annex 1.

2.2 Medium-sized estates (question 4)

The two respondents who answered this question were not sure whether the changes to the standard would make much difference to medium-sized estates [2] and felt that the proof would be in the way the new standard was applied by auditors [13].

2.3 Small woodlands and woodlands managed at a low intensity (question 5)

The one response to this question was clear: 'The new draft remains thoroughly unattractive to most small woodland owners. There is much talk about encouraging farmers to get involved with forestry: but farmers are not enthusiastic about increased bureaucracy.' [2]

2.3.1 Does the revision simplify the application of the standard?

Two respondents [15, 24] believed that the revision would simplify the application of the standard, while a third felt that the proof would be in the way the new standard was applied by auditors in mixed size groups [13].

2.3.2 What further guidance or tools might make using the standard easier?

One respondent reiterated a call for cross referencing between the old and new standards [13].

Another respondent [15] made a specific recommendation to include the document *Small Woodlands on Farms* in guidance: 'Although we recognise that this document was developed by Forestry Commission Scotland and it is available on our website, it is applicable to different parts of the UK and therefore relevant in a UK context.'

2.4 Standard introduction (question 6)

Two respondents [13, 24] agreed that the new introduction was comprehensive enough, although one raised an issue related to Interpretation Panel notes [24] which is addressed in sub-section 2.4.2.

2.4.1 Is anything now missing?

Responses here were mixed. One respondent felt that nothing was missing [15]. Another felt that this would only become clear at audit [13]. A third respondent suggested that a reference needed to be made to Natural Resources Wales 'in the glossary and possibly in the document e.g. at 4.4.2' [24]. (Note that NRW is included in the draft definitions of 'Forestry authority' and 'Statutory body'.)

2.4.2 Is further guidance needed?

Again, responses here were mixed. One respondent felt that no further guidance was necessary [15]. Another felt that this was hard to judge since they weren't able to compare their audits with others' [13]. A third respondent asked for clarification of the status of Interpretation Panel (IP) notes, for example 'IP note 8 on wind farms which involved extensive discussion among the IP members seems equally relevant to the new edition' [24].

2.5 Other observations

Other general comments are summarised in the four sub-sections below. Any remaining comments have been incorporated into the consolidated feedback in section 3 and Annex 1.

2.5.1 Certification in the UK

One respondent [1] described having been put off certification previously by the paperwork required, 'especially the requirement to have a written policy for endless activities and a monitoring regime for each to ensure that I complied with the policy', and noted that the paperwork burden in the current draft had if anything appeared to have grown. The respondent suggested that few small woodland owners would embrace certification until it was focussed on outcomes: 'We love our woods and actually managing trees and the environment, not filling more forms.' However, another respondent [5] observed that 'It is perhaps the plethora of guidance, legislation and regulation which is… more at fault than UKWAS', with even simple UKWAS requirement still entailing 'a raft of meaningless forms, procedure and legislation which is simply not workable'. This respondent suggested that the forest industry needs to lobby for further work on the Forestry Regulation Task Force.

Another respondent [13] expressed incredulity that the Forestry Commission had withdrawn the requirement for certification to underpin previous management grants or the current Countryside Stewardship grants and that 'there is no requirement to be UKWAS Certified to receive substantial capital grants for harvesting and burning woodfuel'. The respondent felt that this had undermined the time and energy they had expended in setting up a forest management group scheme, supporting the ethos behind UKWAS and supporting the Forestry Commission using UKWAS to underpin grant schemes, and they were now considering closing their group.

One respondent [2] called for similar assurance standards to apply to all major rural land uses: '[T]here should be a Farm Assurance Standard and a Grouse-moor Assurance Standard, with similar provisions to UKWAS. Neither landscape nor wildlife terminates at the woodland boundary, so it is unreasonable for forestry to adhere to standards different from adjacent & competing land uses.'

One respondent [18] expressed concern that UKWAS was moving closer to being a certification standard for large-scale timber production only with reduced environmental content and rigour. The same respondent stated that they would be concerned about any moves to reduce the environmental content of the standard or any proposals to separate UKWAS from FSC accreditation, and stressed the value they attached to independent third party certification, the FSC Principles and Criteria and FSC governance processes for standard setting.

Finally, one respondent [8] gave the following succinct feedback on the draft standard: 'My only comment on the review is to ask [is it a] practical workable document. You must allow the use of the necessary pesticides & herbicides to allow the establishment & protection of our forests.'

2.5.2 Structure and content of the standard

Several respondents commented favourably on the new structure, particularly the rationalisation into a smaller number of principal sections [7, 12, 13, 14, 16, 17, 19]. Some had particular praise for the clearer distinction between requirements and guidance and for the clarification of the status of means of verification [13, 14, 16, 17], and pressed for these improvements to be preserved through the remainder of the revision process [14, 17]. One respondent [16] suggested that there were 'still instances where the guidance could more accurately echo and flow directly from the requirement' and gave specific examples (see consolidated feedback in Annex 1). The same respondent suggested that verification should have a greater focus on evidence of the outcomes delivered rather than the process itself, noting in this connection the reference in the introduction to flexibility and local adaptation in meeting the requirements.

Despite the generally positive feedback on the structure of the standard, one respondent [18] urged caution, in particular stressing that any changes to the means of verification and guidance must maintain 'the integrity, content and purpose of the standard and it application, rather than being used to reduce the scope and effectiveness of requirements in practice'. The same respondent noted that 'The existence, content and applicability of the guidance column for each requirement is a key part of the standard in two ways: 1) it helps with the interpretation, implementation and application of the standard requirements by woodland owners/managers as well as their auditors; and 2) FSC consider guidance (and means of verification and the requirements) part of the standard so has to be assessed by site auditors. 'Guidance' is an integral part of the requirements as is 'means of verification' and the requirement itself. If the 'guidance column' were to be dropped this could reduce the content, meaning and depth of the standard.' The respondent also asked for 'further clarity on the difference between 'Means of Verification' in UKWAS 1, 2, 3, and 3.1 and the proposed 'Example Verifiers' column in draft UKWAS 4'.

Two respondents [14, 17] welcomed the revised introductory sections regarding 'Flexibility in meeting requirements' and 'Third party rights'.

One respondent [7] requested clearer definitions, in particular noting an isolated remaining use of SLIM terminology in the introduction.

One respondent [9] praised the majority of requirements, but suggested that the opportunity should be taken to split them into two categories:

- Those requirements to which the owner/manager must both conform and be able to evidence conformance.

- Those requirements to which the owner/manager must conform, but because of either the very low risk of non-conformance or the low implications for sustainable forestry, verification could be restricted to sampling (by either the manager or the auditor) or observation of 'no evidence of non-conformance'.

The respondent considered there to be several requirements falling into the latter category which are of less significance because the risk of non-conformance in the UK is very low and the costs of evidencing conformance for some owners/managers may be disproportionate to the risk, citing UKWAS 1.1.3 as an example.

Another respondent [5] also praised the majority of requirements as being generally 'tighter and better organised', though with scope for further improvement. The respondent singled out UKWAS 5.4.1 for particular praise, despite (or perhaps because of) being 'a very significant area heavy with legislation and best practice', and suggested that other requirements be reworded in a similar manner. However, the same respondent noted that 'Several sections are encouraging further written strategies and reports which are probably never going to be written and give auditors ammunition to find fault'. The respondent suggested 'adding a further column to the table, titled

documentary evidence, and then recording what separate documents will be needed to evidence the requirement. If this exceeds 7 documents then it is too many.'

Two respondents expressed concerns about weakening environmental requirements. One [18] expressed the concern 'that the quest for simplification in the structure of the revision of the standard has been at the expense of detailed and rigorous environmental content' giving as examples species diversity, deadwood, biodiversity protection as well as enhancement, and the management of small and/or low intensity managed woodlands. The same respondent was concerned that 'consecutive revisions of UKWAS have not really embodied the idea of continual environmental improvement. We even have concerns that this revision may seek to reduce the environmental content and effectiveness of the standard, as part of wider 'de-regulation' agendas.' Another respondent [19] stressed that 'Simplification of text… must not equate to a simplification or reduction of UKWAS Requirements, in particular environmental Requirements which have been secured, proven and effectively delivered in certified UK woodlands since UKWAS's first iteration'. They stated that they would not support 'any environmental requirements within UKWAS 4 which (planned or unplanned / directly or indirectly) result in the erosion of environmental values of UKWAS certified forests – for example, reductions in species diversity or deadwood either at the local (coupe) or Woodland Management Unit (WMU) level'. The specific concerns of these two respondents are addressed in the consolidated feedback in Annex 1.

In contrast to this feedback on environmental requirements, one respondent [12] felt that changes to the standard provided 'greater clarity and streamlining of UKWAS without detracting from the content' while another [13] welcomed the simplification of PAWS restoration requirements.

Several respondents highlighted specific issues, which are addressed in the consolidated feedback in Annex 1. Many saw a need for further work on the consolidated monitoring requirements [7, 10, 14, 16, 17].

One respondent [16], while welcoming the broadening of the scope of the standard to include such issues as historic environment, climate change mitigation, adaptation and the delivery of ecosystem services, noted that, 'due to the current limited state of knowledge and common understanding of some of these topics, we believe rapidly-developing areas such as these demand very careful explanation and definition when linked to requirements within the Standard'.

Another respondent [22] welcomed the inclusion of public access issues in UKWAS and the inclusion of ecosystem goods and services as a factor within decision making, and expressed support for 'the work of the Natural Capital Committee and its efforts to correct under-valuation of nature and the benefits society derives from it in decision-making'.

One respondent [18] asked that a number of omissions be considered:

- 15% of woodland area to be managed for biodiversity. (Note that this may be a misunderstanding resulting from the movement of this requirement from the conservation section to the planning section.)

- Open space provision in new woodlands section.

- Minimum size ride widths.

- Flood risk management.

- Climate change adaptation and mitigation.

- Landscape-scale wildlife conservation.

Specific issues related to these omissions are addressed in the consolidated feedback in Annex 1.

Finally, one respondent [13] expressed disappointment that a document with tracked changes was not provided and suggested that at the very least a detailed list of the following was required:

- Completely deleted sections giving UKWAS 3.1 section numbers.
- Newly added sections giving UKWAS 4 section numbers.
- Substantially changed sections giving the numbers of old sections incorporated into new sections.

2.5.3 Auditing

A small number of comments related to auditing against the draft standard, with one respondent [13] observing that it will not be possible to judge how positive an effect UKWAS 4 will have on the information required of forest management group scheme members until it is tested in the field and a comparison can be made with the current audit procedure, which the respondent considered overly burdensome. Two respondents [14, 17] welcomed the emphasis on owner/manager justifying 'what they have done and why (as opposed to a more rigid set of prescriptions and rules)', and the associated text on flexible interpretation of standard by auditors. However, they noted that this would make the role of the auditor 'far more subjective and open to interpretation', and that this could require greater involvement from the Interpretation Panel.

One respondent [25] raised a general concern that compliance with legislation mentioned only in the UKWAS Appendix (specifically, the Environmental Impact Assessment (Forestry) Regulations 1999) was not being audited in the field.

2.5.4 Small or low intensity managed (SLIM) woodlands

Some respondents [12, 13] welcomed the decision to make the standard 'size neutral' and the flexibility to select verifiers proportional to the scale of woodlands, features and operations. Others, however, expressed reservations.

One respondent [19] expressed disappointment that 'at the June 2015 Steering Group meeting… other than the Woodland Trust and FSC-UK there was no commitment from any of the stakeholders present to make UKWAS 4 more accessible for SLIMF owners/managers. We would like to see UKWAS not neglect the genuinely small and low intensity managed woodlands. We have never supported the 500 hectare size threshold as representing small woodlands in the UK, this is not evidence based and cannot be considered a small woodland in the UK context. The Woodland Trust are prepared to commit time and resource to pursue considering ways of making UKWAS 4 more accessible to what UKWAS defines as 'very small woodland' e.g. those of 10 hectares or under in size.'

Another respondent [18] also expressed their concern that the threshold for the 'small' woodland category in UKWAS 3.1 'was set at 500ha, not 100ha, ignoring the sensible recommendations of the small woodland working group to UKWAS at a previous revision. The reduced requirements on 500ha woodlands may stretch credibility in terms of size and type of woodland that is deemed 'small', meanwhile there may be little benefit of enhanced access to certification for native and community woods of 10-100ha.'

The respondent saw the certification of SLIM woodlands 'as a potentially useful mechanism to assist the restoration and onward management of native woodlands to help regain and protect their wildlife value', and expressed concern about the uptake of UKWAS by the owners/managers of such woodlands.

The same respondent was concerned that 'the removal of woodland size categories in the draft UKWAS Version 4 may be a drive to reduce the rigour and scope of the standard requirements for all woodland, as well as reducing the suggested audit evidence needed for all woodland types'. They

stressed that means of verification must be appropriate to assessing conformance to requirements, as well as to the scale and intensity of woodland management. The respondent also noted that 'the inclusion of small and or low intensity managed (SLIM) woodland size categories in means of verification requirements was a response to FSC International's request for the UKWAS standard to fully consider SLIM requirements as an aid to improve access to certification for owners of such woodland. This change to UKWAS was incorporated into UKWAS Version 3 to produce the current UKWAS 3.1 that is under revision now. It is uncertain how SLIM compliant the draft UKWAS 4 is.'

The respondent stated that they would welcome 'SLIM group scheme development by the certification bodies as well as the adoption of the proposed EU Rural Development Regulation co-operative measures in country grant schemes to aid ecological survey, monitoring and management planning towards UKWAS SLIM certification'.

They suggested a 'SLIM Woodlands Review' quantifying UKWAS uptake, the influence of previous measures in UKWAS, barriers to woodland management and certification, and wider management issues related to the restoration and management of SLIM native woodlands. This review could suggest ongoing work for the Steering Group or its members.

2.6 Summary of general comments

This is a summary of the comments in the preceding sections, provided for the convenience of the drafting team when considering the issues raised. Individual respondents are not identified.

2.6.1 Standard structure

Issues:

- Refine guidance.
  Steering Group response: Guidance will be further refined where possible.

- Provide a summary of changes to the standard.
  Steering Group response: A narrative statement will be provided at the end of the revision process.

- Consider further opportunities to amalgamate or simplify requirements.
  Steering Group response: Any such opportunities will be considered as drafting continues.

2.6.2 Small woodlands and woodlands managed at a low intensity

Issues:

- Consider attractiveness to small woodland owners, especially farmers.
  Steering Group response: This issue has been discussed at great length by the Group and will be subject to further consideration.

- Add reference to the document *Small Woodlands on Farms* in guidance.
  Steering Group response: This document will be added to the Appendix, in the context of woodland creation and design.

2.6.3 Standard introduction

Issues:

- Add reference to Natural Resources Wales.
  Steering Group response: NRW is included in the glossary definition of 'Forestry authority'.

- Clarify status of existing Interpretation Panel notes.
  Steering Group response: The status of Interpretation Panel notes is clear in the standard, but it will be necessary to clarify validity on the UKWAS website and in the existing note on windfarms. The Group intends to adapt the interpretation note on windfarms into a guidance note, either as a stand-alone document or as an appendix to the main standard.

2.6.4 Other observations

Issues:

- Focus on outcomes.
  Steering Group response: Agree that this should be the aim wherever possible.

- Consider lobbying for further work on the Forestry Regulation Task Force.
  Steering Group response: Beyond the scope of this revision.

- Consider working towards similar assurance standards for all major rural land uses.
  Steering Group response: Beyond the scope of this revision.

- Consider whether UKWAS is becoming a certification standard for large-scale timber production only with reduced environmental content and rigour.
  Steering Group response: The Group is mindful of the need for an appropriate balance.

- Consider practicality of stance on pesticides.
  Steering Group response: UKWAS reflects best practice, legal requirements and international norms, and signposts users to the fact that certification schemes may have different rules.

- Maintain distinction between requirements and guidance and maintain clarified status of verifiers.
  Steering Group response: Agree.

- Make clearer links between requirements and guidance.
  Steering Group response: A valid point, which will be taken into account where relevant.

- Focus verifiers on evidence of the outcomes delivered.
  Steering Group response: Agree.

- When separating requirements and guidance, maintain the integrity of the standard and its application.
  Steering Group response: Agree.

- Further clarify the status of example verifiers.
  Steering Group response: The Group believes that the explanation of example verifiers is clear, but it has been simplified by removing the superfluous reference to suggested verifiers being neither exclusive nor exhaustive.

- Clarify definitions.
  Steering Group response: Agree.

- Consider splitting requirements into those where conformance must be evidenced and those where verification could be restricted to sampling or 'no evidence of non-

conformance'.
Steering Group response: This is not permitted by the certification schemes, but the Group notes that current surveillance procedures do not require all requirements to be assessed at every surveillance audit.

- Reword requirements in the style of UKWAS 5.4.1.
  Steering Group response: Agree that this is a good, clear style, which should be the aim wherever possible.

- Add a column for 'documentary evidence'.
  Steering Group response: Where specific documents are required, this will be clearly stated in the requirement text; all other documents are optional verifiers.

- Consider whether environmental requirements have been weakened.
  Steering Group response: The Group is mindful of this issue.

- Consider clarification on issues such as historic environment, climate change mitigation, adaptation and the delivery of ecosystem services.
  Steering Group response: Agree that these terms should be used with caution. Forest resilience, as defined in the glossary, will be used in preference to mitigation/adaptation.

- Consider omissions including open space provision in new woodlands section, minimum size ride widths, flood risk management, climate change adaptation and mitigation, and landscape-scale wildlife conservation.
  Steering Group response: See the responses to detailed comments below.

- Consider whether compliance with legislation mentioned only in the Appendix is adequately audited.
  Steering Group response: UKWAS requires compliance with the law. Relevant legislation is listed in the Appendix; all other issues are a matter of auditing.

- Reconsider 500 ha SLIM threshold.
  Steering Group response: Now that SLIM-specific measures have been removed from the standard, this threshold is an auditing issue rather than an UKWAS issue and any proposals for changes should be discussed with FSC UK.

- Consider requirements for 'very small' woodlands.
  Steering Group response: The Group remains of the opinion that the needs of smaller woodlands are best met by making UKWAS size neutral rather than by introducing a tailored set of requirements. Further guidance from FSC on acceptable means of addressing scale, intensity and risk in standards is awaited.

- Consider effects of size neutrality on overall standard rigour.
  Steering Group response: The Group is mindful of this issue.

- Consider a 'SLIM Woodlands Review'.
  Steering Group response: An extensive SLIM woodlands review has been carried out previously, and the Group is not aware of any significant changes which would justify a further review.

3. Detailed comments

The full text of comments on specific points in the standard are contained in the consolidated feedback in Annex 1, with individual respondents identified as per Appendix 1. The following sections summarise the main issues in these comments, and do not identify individual respondents.

Introduction section

Sub-section 1: Background and purpose

Issues:

- Consider how the relationship between the standard and legislation is conveyed.
  Steering Group response: Introduction text makes it clear that it is UKFS requirements which are incorporated in UKWAS. UKFS does make explicit reference to Environmental Impact Assessment regulations.

Sub-section 2: Procedures for use of the certification standard

Issues:

- Reword regarding complicity with illegal activity by holders of third party rights.
  Steering Group response: No better wording has been found, but this line has been separated out from the bulleted list for editorial reasons.

- Broaden 'design plan' terminology.
  Steering Group response: Agree that reference to design plans is superfluous when management planning documentation is already included; explicit mention of design plans deleted.

- Broaden 'forest district' terminology.
  Steering Group response: The list of examples of WMUs is not exhaustive list, so there is no need to list all possibilities or variations in terminology.

- Some standard requirements could be met at the level of the public forest estate rather than at district level.
  Steering Group response: The Group does not feel that there is any justification for changes to the standard in this context; this is a matter of how certificate holders define their WMUs.

- Delete reference to SLIM.
  Steering Group response: Agree that reference to SLIM is superfluous and potentially confusing; deleted.

Sub-section 3: Interpretation of the certification standard

Issues:

- Clarify status of existing Interpretation Panel notes.
  Steering Group response: No need for clarification in the standard, but there is a need to clarify the status of the existing note on windfarms on the UKWAS website and by adding a reference to UKWAS 4 in the interpretation note itself.

Certification Standard

Issues:

- Reinstate or add requirements on:
  - 15% of woodland area to be managed for biodiversity.
    Steering Group response: This requirement is still in the standard, but has been moved from 6.1.1 to 2.10.1.
  - Open space provision in new woodlands section.
    Steering Group response: Protection of priority habitats, including open habitats, is covered in 4.4. Other open space requirements previously explicitly included in the standard are covered by UKFS. It would be inappropriate for UKWAS to provide detailed guidance on the tension between timber quality and other objectives in determining initial stocking densities; standard users should refer to best practice guidance.
  - Minimum size ride widths.
    Steering Group response: The Group does not believe that a new requirement is justified.
  - Flood risk management.
    Steering Group response: A new reference to 'Catchment level impacts on water flows and flood risk' has already been added to 2.5.2 guidance. Floods have been added to the natural hazards covered by 2.5.4. Reference to watersheds has been retained in 3.1.2(d). In 4.5.1, explicit reference to 'Areas and features of critical importance for watershed management' has been moved from guidance to the requirement. Regulation of floods is explicitly included in the new glossary definition of ecosystem services. Taken together, the Group believes that these provisions are adequate to address flood risk management.
  - Climate change adaptation & mitigation.
    Steering Group response: The Group's position on considerations of forest resilience has been made clear in this draft. Any further additions on climate change would have to be based on specific proposals.
  - Landscape-scale wildlife conservation.
    Steering Group response: An addition has been made to 2.3.2 to address cooperation on landscape-scale initiatives where appropriate and possible.

Using the certification standard

No issues.

Key to icons

No issues.

Section 1

Legal compliance and UKWAS conformance

There were relatively few comments on this section, mostly seeking clarification or guidance. The comments were not all uncontroversial, however, with one respondent calling for the deletion of the first line of UKWAS 1.1.1: 'There shall be compliance with the law.'

Sub-section 1.1: Compliance and conformance

Issues:

- Incorporate third party issues throughout.
  Steering Group response: Third party issues are deliberately included in the introduction to the standard so that there is no need to refer to them in specific instances.

- 1.1.1 Requirement: Delete 'There shall be compliance with the law'.
  Steering Group response: Explicit reference to legal compliance, along with the list of applicable laws in the Appendix, is crucial to demonstrating that UKWAS meets the requirements of the certification schemes. Further, there must be scope within the standard to raise non-conformances if there are issues with legal compliance.

- 1.1.1 Example verifiers: Delete 'A system to be aware of and implement requirements of new legislation'.
  Steering Group response: Given that example verifiers are not mandatory, the Group considers it appropriate to retain this verifier as one possible means of demonstrating conformance.

- 1.1.1 Guidance: Add guidance on public rights of way and open access.
  Steering Group response: In most cases it is not appropriate for the standard to provide detailed guidance on compliance with specific legislation, but relevant legislation and guidance will be added to the Appendix in relation to sub-section 5.1.

- 1.1.1 Guidance: Interpretation Panel may on occasion need to seek legal advice.
  Steering Group response: The Group agrees with this statement, but does not believe that any changes to the standard are necessary.

- 1.1.2 Example verifiers: Delete 'A system to be aware of and conform to new codes of practice and good practice guidelines'.
  Steering Group response: As for 1.1.1, given that example verifiers are not mandatory, the Group considers it appropriate to retain this verifier as one possible means of demonstrating conformance.

- 1.1.2 Guidance: Check repetition of 1.1.1 guidance.
  Steering Group response: Guidance has been edited to match the requirement.

- 1.1.2 Guidance: Add that workers should "understand, to the degree that is appropriate for their role and level within the organisation or the action being undertaken", in keeping with 1.1.5 guidance.
  Steering Group response: Guidance changed to make it clear that understanding should be relevant to 'roles and responsibilities' (1.1.1 guidance also changed for consistency).

- 1.1.2 Guidance: Meet Scottish Outdoor Access Code or non-statutory codes in other countries.

Steering Group response: Relevant codes will be added to the Appendix in relation to sub-section 5.1.

- 1.1.3 Requirement: <mark style="background:lime">Clarify</mark> to which tenants this applies.
  Steering Group response: 'Tenant' has been replaced with 'forestry leaseholder', and a definition added to the glossary.

- 1.1.3 Example verifiers: <mark style="background:lime">Clarify</mark> which verifiers are intended to prove the identity of the owner.
  Steering Group response: A verifier has been added to address situations where the owner is an organisation.

- 1.1.5 Requirement: <mark style="background:red">Follow</mark> or replace 'in the long term' with 'throughout the term of ownership or lease (or until its surrender)'.
  Steering Group response: Development is covered by conversion requirements.

- 1.1.5 Requirement: <mark style="background:lime">Clarify</mark> meaning of 'forestry tenant'.
  Steering Group response: 'Forestry tenant' has been replaced with 'forestry leaseholder', and a definition added to the glossary.

- 1.1.5 Requirement: <mark style="background:red">Clarify</mark> form of statement of commitment.
  Steering Group response: Given the intention stated in the introduction that the standard should be size neutral and that means of demonstrating conformance should be proportionate to the nature of woodland management, it is not appropriate to define the precise form of a statement of commitment.

Sub-section 1.2: Protection from illegal activities

Issues:

- 1.2.1 Example verifiers: <mark style="background:red">Reconsider</mark> inclusion of 'potential' problems.
  Steering Group response: The Group does not perceive an issue here.

Sub-section 1.3: Genetically modified organisms

Issues:

- 1.3.1 Requirement: <mark style="background:red">Delete</mark> as superfluous.
  Steering Group response: The certification schemes have clear positions on the use of GMOs; given that the respondent recognises that there are some circumstances under which GMOs might be considered, it is relevant to retain this requirement.

Section 2
Management planning

As the largest section in the draft standard, it is unsurprising that this should have attracted the greatest volume of comments. The sub-section on the productive potential of the WMU divided respondents, as did tree species selection, but respondents were united in calling for further changes to monitoring requirements.

Issues:

- Review requirements on:
    - Demonstrating that long-term environmental, economic and social impacts have been fully accounted for.
    - Maximising the productive potential of the tree crop and non-timber woodland products.
    - Demonstrating that the use of ecosystem services will not permanently exceed, or diminish, the long-term productive potential of the WMU.
    Steering Group response: See comments on specific sub-sections below.

Sub-section 2.1: Long-term economic, environmental and social viability

Issues:

- 2.1.1 Requirement: Consider similar over-arching principle for other sections.
  Steering Group response: The Group agrees with this suggestion in principle, but given time constraints and the desire to restrict the length of the standard is not able to act upon it during this revision.
- 2.1.1 Requirement: Refer to 'sustainable delivery of objectives' instead of 'long-term economic, environmental and social impacts'.
  Steering Group response: The 'long-term impacts' terminology is considered appropriate.

Sub-section 2.2: Documentation

Issues:

- Clarify link between assessment of resource, objective and monitoring throughout.
  Steering Group response: Guidance to this effect has been added to 2.2.1.
- 2.2.1 Requirement: Change 'policy' to 'vision' in (a).
  Steering Group response: Long-established use of 'policy' retained.
- 2.2.1 Requirement: Consider overlap between (c) and (m).
  Steering Group response: The Group considers it appropriate to retain both, particularly given that (m) applies to specifically to what would be considered high conservation values. (m) moved to (d) to ensure these points are considered side by side.
- 2.2.1 Requirement: Delete 'and appropriate treatments' in (c).
  Steering Group response: This is retained as an important part of management planning.

- 2.2.1 Requirement: Consider duplication of section 2.3 in (d).
  Steering Group response: The Group considers this assessment to be distinct from, though clearly related to, consultation, and that it should therefore be retained.

- 2.2.1 Requirement: Consider difficulty of addressing NTWPs in (h).
  Steering Group response: The Group acknowledges the difficulties presented by the lack of objective evidence, but does not believe that this removes the obligation to consider annual allowable harvests. Guidance is added to this effect in 2.4.4.

- 2.2.1 Requirement: Delete (l).
  Steering Group response: Retained as part of explicitly recognising the relationship between management planning, particularly objective setting, and monitoring.

- 2.2.1 Requirement: Delete (m).
  Steering Group response: See comment on the overlap between (c) and (m) above. Given that calls to delete this point are balanced by calls to expand upon it, the current text is retained.

- 2.2.1 Requirement: Add detail to (m).
  Steering Group response: See above. Given that calls to expand this point are balanced by calls to delete it, the current text is retained.

- 2.2.1 Example verifiers: Change 'Long-term management objectives will suffice to meet (a)' to apply only to smaller WMUs.
  Steering Group response: Sub-section 2.1 now makes more explicit the distinction between a long-term policy and management objectives; as such this verifier is not consider appropriate and is deleted.

- 2.2.1 Example verifiers: Refer to 'long term management aims' rather than 'objectives'.
  Steering Group response: See above.

- 2.2.1 Example verifiers: Add 'Operational Site Assessments'.
  Steering Group response: The Group feels that this verifier is more appropriate in the context of operational planning, so has added it under 3.1.2.

- 2.2.1 Guidance: Add 'Objectives should be specific and measurable, achievable within the foreseeable future, and relevant to the time period covered'.
  Steering Group response: This is covered by guidance added to 2.1.1.

- 2.2.1 Guidance: Add guidance on level of detail required in (d).
  Steering Group response: This is a matter for owner/manager and auditor professional judgement, as per the introduction.

- 2.2.1 Guidance: Reconsider 'biological, physical and human environment' terminology (also in 2.4.5).
  Steering Group response: This was placeholder text, now removed as 'environmental values', as defined in the glossary, are explicitly referenced in the requirement text.

- 2.2.2 Requirement: Simplify so that only a summary is required to be publicly available.
  Steering Group response: This requirement has been formulated so as to provide maximum flexibility to owners/managers in meeting it. The wording has been retained, but guidance has been added to explain the intent.

- 2.2.2 Example verifiers: Clarify public contact point.
  Steering Group response: Guidance added.

- 2.2.3 Guidance: Add 'Wind blow, pest or disease outbreaks'.
  Steering Group response: The requirement and guidance have been changed to take

account of the FSC Principles and Criteria, but guidance on changed circumstances has been added which incorporates windthrow, pests and diseases.

Sub-section 2.3: Consultation and co-operation

Issues:

- 2.3.1 Requirement: Consider burden for small woodlands in well-populated areas.
  Steering Group response: The Group considers there is sufficient flexibility in practice, but more guidance has been added on appropriate consultation.

- 2.3.1 Requirement: Delete 'clause about consulting all and sundry each time you apply for a grant'.
  Steering Group response: The Group agrees that the bullet point on grant applications can be deleted without affecting the intent or outcomes of the requirement.

- 2.3.1 Requirement: Define 'high impact operations' in (a).
  Steering Group response: High impact operations cannot be concisely defined as so much depends upon context, but guidance has been added on demonstrating that impact has been assessed.

- 2.3.1 Requirement: Clarify whether (b) and (c) extend to non-forestry development by third parties.
  Steering Group response: This requirement applies to all operations within the WMU; no changes made to the standard.

- 2.3.1 Requirement: Add 'for forest management proposals' to (b).
  Steering Group response: See above.

- 2.3.1 Requirement: Add 'forest' to (c).
  Steering Group response: See above.

- 2.3.1 Requirement: Delete 'and shall demonstrate how the results of the consultation including community and social impacts have been incorporated into management planning and operations' in (d).
  Steering Group response: The Group agrees to change 'incorporated into' to 'taken into account in'.

- 2.3.1 Requirement: Clarify phrase ending 'before certification' in (d).
  Steering Group response: This refers specifically to pre-certification consultations; no changes made to the standard.

- 2.3.1 Requirement: Change minimum consultation period to 28 days in (d).
  Steering Group response: See above. This relates to certification scheme requirements for pre-certification consultation.

- 2.3.1 Guidance: Add local representative groups or bodies for public access and statutory Local Access Forum.
  Steering Group response: Agree.

- 2.3.2 Requirement: Move (b) to guidance.
  Steering Group response: Retained as requirement, but 'and practicable' added.

- 2.3.2 Requirement: Place all deer management requirements in one section.
  Steering Group response: Although there is an argument for placing 2.11.1 next to 2.3.2, the current arrangement, which emphasises the element of cooperation in 2.3.2 and of protection in 2.11.1, is considered valid.

- 2.3.2 Example verifiers: Add 'Felling Design Plan'.
  Steering Group response: As there is a move away from the use of design plan terminology in the standard, the verifier 'Felling plan' has been added instead.

- 2.3.2 Example verifiers: Change 'Membership of a wildlife management group' to 'Membership of a wildlife group e.g. Wildlife Trust, RSPB, Raptor Study Group'.
  Steering Group response: This is not the intended meaning of 'wildlife management group'; guidance has been added for clarification.

- 2.3.2 Guidance: Clarify 'vulnerable flora'.
  Steering Group response: Given the range of potential impacts, it is not considered appropriate to restrict the definition of vulnerable flora.

Sub-section 2.4: Productive potential of the WMU

Issues:

- 2.4.1 Requirement: Clarify 'within the constraints of their objectives'.
  Steering Group response: This requirement split the opinions of consultation respondents and of Steering Group members; ultimately it was decided that it would not achieve its intended aim, and the requirement was removed.

- 2.4.2 Requirement: Reword to reflect that productive capacity declines in nearly all woodlands.
  Steering Group response: This requirement is intended to minimise such decline and is retained on that basis.

- 2.4.2 Requirement: Delete as 'unnecessary waffle'.
  Steering Group response: Maintenance of site productivity is not necessarily an inevitable outcome of implementing other requirements of the standard. This requirement is retained to ensure due consideration for protection of soils and hydrology, particularly since explicit references to soil and water guidelines previously in 3.4.2 in UKWAS 3.1 have been removed, but guidance is added to clarify the intent.

- 2.4.2 Guidance: Change 'production' to 'productivity'.
  Steering Group response: The Group feels that the current wording is the more appropriate in this context.

- 2.4.2 Requirement/Guidance: Clarify requirement or add guidance to address lower input management.
  Steering Group response: Intent has been clarified in guidance.

- 2.4.3 Requirement: Delete as not 'readily auditable'.
  Steering Group response: This is a long-standing requirement which has been audited in the past.

- 2.4.3 Guidance: Consider balance of objectives.
  Steering Group response: The balancing of occasionally conflicting objectives is an unavoidable part of forest management.

- 2.4.3 Guidance: Change 'woodlands of planted origin' to 'plantations'.
  Steering Group response: Agree.

- 2.4.3 Guidance: Provide further guidance on 'productivity' in its widest sense.
  Steering Group response: Productivity here is largely restricted to timber; the maintenance of productivity in a wider sense is addressed in 2.4.2.

- 2.4.3 Guidance: Add 'or in response to disease'.
  Steering Group response: Agree.

- 2.4.4 Requirement: Consider difficulty of addressing NTWPs.
  Steering Group response: The Group recognises this difficulty, and has added guidance.

- 2.4.4 Requirement: Define 'ecosystem services' in the Glossary.
  Steering Group response: Agree. A glossary definition has been added which is based on the Millennium Ecosystem Assessment.

- 2.4.4 Requirement: Consider separate requirement for delivery of ecosystem services.
  Steering Group response: In the interests of brevity, ecosystem services will be retained in the current requirement rather than being separated out into a new requirement.

- 2.4.4 Requirement: Clarify the use of ecosystems services diminishing long term productive potential in this context.
  Steering Group response: In the context of sub-section 2.4, productive potential may be considered in its widest sense and no further clarification is given here.

- 2.4.4 Guidance: Delete surplus 'include'.
  Steering Group response: Agree.

- 2.4.4 Guidance: Consider whether grazing rights should be considered an ecosystem service.
  Steering Group response: See above re. glossary definition of 'Ecosystem services'; the definition adopted does not include grazing rights.

- 2.4.4 Guidance: Delete guidance or reword to better match requirement.
  Steering Group response: Agree. Guidance on ecosystem services has been deleted.

Sub-section 2.5: Assessment of environmental impacts

Issues:

- 2.5.1 Example verifiers: Delete 'Design plans'.
  Steering Group response: Agree.

- 2.5.1 Example verifiers: Change 'Design plans' to 'Forest management plans'.
  Steering Group response: See above; deleted as superfluous as verifiers already include 'Management planning documentation'.

- 2.5.1 Example verifiers: Change 'Design plans' to 'Design plans or equivalent'.
  Steering Group response: See above; deleted as superfluous as verifiers already include 'Management planning documentation'.

- 2.5.1 Guidance: Add expected level of checks against BAPs.
  Steering Group response: This is context dependent and should be considered in the light of the introductory section on scale and intensity of management; further detail here would be inappropriate.

- 2.5.1 Guidance: Add 'specialist advice with regards to flood risk mitigation potential in accordance to local flood risk plans or strategies'.
  Steering Group response: Agree.

- 2.5.1 Guidance: Add guidance on what constitutes 'recognised cultural, landscape, hydrological or ecological value'.
  Steering Group response: Assessment of values is addressed at various points in the standard.

- 2.5.1 Guidance: Add aspects to be included in a 'brief environmental appraisal'.
  Steering Group response: As above, this is context dependent and further detail here would be inappropriate.

- 2.5.1 Guidance: Add threshold for an 'extensive' operation.
  Steering Group response: The Group considers this to be a sufficiently widely understood term to be used in guidance without qualification.

- 2.5.1 Guidance: Clarify 'priority habitats' and 'priority species' in devolved country contexts.
  Steering Group response: Terminology has been updated in line with the new glossary definition of 'Priority habitats and species'.

- 2.5.2 Requirement: Delete as 'very vague'.
  Steering Group response: This is a long-standing and valuable requirement.

- 2.5.2 Example verifiers: Delete 'Design plans'.
  Steering Group response: Agree.

- 2.5.2 Example verifiers: Change 'Design plans' to 'Design plans or equivalent'.
  Steering Group response: See above; deleted as superfluous as verifiers already include 'Management planning documentation'.

- 2.5.2 Guidance: Change 'Nature of historic landscapes and links with similar historic environment sites outside the woodland' to 'Historic landscapes and the historic environment sites outside the woodland'.
  Steering Group response: New wording has been adopted to clarify the intended meaning.

- 2.5.3 Requirement: Clarify 'environmental assessments' and provide guidance.
  Steering Group response: This requirement has been moved to 2.5.1(b) to clarify its context.

- 2.5.4 Requirement: Reword 'minimise' and/or make clearer link to management objectives.
  Steering Group response: 'Minimise' replaced with 'mitigate'.

- 2.5.4 Requirement: Reword to include 'as appropriate' or move to guidance in sub-section 2.2.
  Steering Group response: See above; addressed through the use of the term 'mitigate'.

- 2.5.4 Requirement: Reword to 'Planting and restructuring should consider and balance the risks from wind etc. with other objectives, reducing risk to an acceptable level'.
  Steering Group response: See above; addressed through the use of the term 'mitigate'.

- 2.5.4 Requirement: Add climate change and long-term forest resilience.
  Steering Group response: 'Climate change adaptation' in guidance has been replaced with 'Long-term forest resilience', as defined in the glossary.

- 2.5.4 Example verifiers: Delete 'Design plan'.
  Steering Group response: Agree.

- 2.5.4 Example verifiers: Change 'Design plan' to 'Design plans or equivalent'.
  Steering Group response: See above; deleted as superfluous as verifiers already include 'Management planning documentation'.

Sub-section 2.6: Woodland creation

Issues:

- 2.6.1 Requirement: `Change` to 'New woodlands shall comply with current best practice and guidance'.
  Steering Group response: The detail consolidated from 3.2.1 and 3.2.2 in UKWAS 3.1 remains relevant, and the inclusion of goods and services is considered pertinent to encouraging the productive functions of woodlands were relevant.

- 2.6.1 Requirement: `Change` 'Deliver ecosystem goods and services' to 'Deliver ecosystem and economic goods and services'.
  Steering Group response: Changed to 'economic goods and ecosystem services'.

- 2.6.1 Requirement: `Consider` environmentally sustainable delivery of ecosystem services.
  Steering Group response: The Group is mindful of this issue, but would argue that the balancing and sustainable delivery of objectives is the essence of the standard.

- 2.6.1 Example verifiers: `Delete` 'Design plan'.
  Steering Group response: Agree.

- 2.6.1 Example verifiers: `Change` 'Design plan' to 'Design plans or equivalent'.
  Steering Group response: See above; deleted as superfluous as verifiers already include 'Management planning documentation'.

- 2.6.1 Example verifiers: `Add` 'An archaeological survey has been undertaken in areas of high archaeological potential'.
  Steering Group response: Too specific.

- 2.6.1 Guidance: `Change` 'Water catchment or soil protection' to 'Water catchment management or soil protection'.
  Steering Group response: Guidance on ecosystem services deleted as now covered by glossary definition, which includes provision of water and regulation of floods and land degradation.

- 2.6.1 Guidance: `Clarify` 'Management designed to avoid the need for felling over a very limited period'.
  Steering Group response: Deleted as covered by other bullet points.

- 2.6.1 Guidance: `Add` 'Identifying and protecting historic environment features as part of the forest planning process before new woodland creation is very important. An archaeological walkover survey may be necessary. It will create the baseline record that will guide all future management in relation to UKWAS certification and in regards to the UKFS 'Forests and the Historic Environment' guidance note.'
  Steering Group response: The Group considers this to be excessive detail.

- 2.6.1 Guidance: `Add` 'Recreational access' to examples of ecosystem goods and services.
  Steering Group response: Guidance on ecosystem services deleted as now covered by glossary definition, which includes recreational benefits.

Sub-section 2.7: Woodland restructuring

Issues:

- 2.7.1 Requirement: `Consider` that restructuring can take place over 1 to 2 rotations.
  Steering Group response: Reference to gradual restructuring allows for appropriate timescales.

- 2.7.1 Example verifiers/Guidance: <mark>Delete</mark> or reword 'Design plan'.
  Steering Group response: Agree; deleted.

- 2.7.1 Guidance: <mark>Clarify</mark> whether 'large' means over 500 ha.
  Steering Group response: Replaced with 'larger', to be interpreted in context.

Sub-section 2.8: Tree species selection

Summary Steering Group response: Requirement 2.8.1 was the subject of a great deal of feedback, and has been extensively reworded and restructured. Although changes may not be as per the consultee suggestions below, all suggestions were taken into account during the redrafting.

Issues:

- 2.8.1 Requirement: <mark>Consider</mark> flexibility to allow using 'off-site' areas to make better use of productive ground within the WMU.
  Steering Group response: Requirements must be met at the WMU level.

- 2.8.1 Requirement: <mark>Add</mark> reference to disease and mitigation measures.
  Steering Group response: This is addressed through reference to long-term forest resilience (see below).

- 2.8.1 Requirement: <mark>Define</mark> 'Long-term forest resilience'.
  Steering Group response: 'Forest resilience' is defined in the glossary.

- 2.8.1 Requirement: <mark>Add</mark> link to 4.7.1 in (c).
  Steering Group response: Section 4 in its entirety is explicitly referenced in the new paragraph (a).

- 2.8.1 Requirement: <mark>Consider</mark> constraints imposed in (c).
  Steering Group response: The Group considers the explicit reference to objectives and long-term resilience to provide appropriate balance to the general presumption in favour of native species.

- 2.8.1 Requirement: <mark>Restore</mark> detailed species and open space breakdown in (e).
  Steering Group response: Percentage limits have been removed. The new paragraphs (a) and (b) place greater emphasis on selecting a range of species, site suitability, long-term forest resilience, conservation requirements, and regeneration to pre-harvesting or more natural conditions.

- 2.8.1 Requirement: <mark>Merge</mark> (e) and (f).
  Steering Group response: Paragraphs (e) and (f) have been replaced by the new paragraph (b).

- 2.8.1 Requirement: <mark>Change</mark> (f) to UKFS text 'Where more than one species is suited to the site and matches the management objectives, opportunities must be taken to further diversify the above species composition'.
  Steering Group response: Paragraph (f) has been replaced by the new paragraph (b).

- 2.8.1 Requirement: <mark>Restore</mark> requirement to have a secondary species and a maximum of 65 % of a primary species where possible.
  Steering Group response: Percentage limits have been removed. However, the redrafted requirement places greater emphasis on selecting a range of species.

- 2.8.1 Requirement: <mark>Prefix</mark> 'resilience' with 'ecological'.
  Steering Group response: The glossary definition of 'Forest resilience' encompasses both ecological and economic resilience.

- 2.8.1 Requirement: Add 'There should be no loss of species diversity. Species diversity should be maintained and where possible enhanced over time.'
  Steering Group response: The new paragraph (b) is intended to ensure that there is no retrograde change in species diversity. This is reinforced by new guidance.

- 2.8.1 Requirement: Add a requirement for greater tree species diversity in (upland) plantations in preference to a nominal open ground percentage.
  Steering Group response: The new paragraph (b) and associated guidance are intended to address this issue.

- 2.8.1 Requirement: Take greater account of climate change guidelines and do not allow 75 % of a single species.
  Steering Group response: Percentage limits have been removed. However, the redrafted requirement places greater emphasis on site suitability and long-term resilience when selecting a range of species.

- 2.8.2 Requirement: Specify how long monitoring should continue in (b).
  Steering Group response: This would depend on context and the risk of invasive impacts.

- 2.8.2 Guidance: Refer to both plants and animals.
  Steering Group response: The entire requirement has been redrafted to address all non-native species, thus also replacing 2.8.1(d).

- 2.8.2 Guidance: Change 'The requirement includes the re-introduction of once native animals not currently present within the United Kingdom' to 'Species that were once native, but are now absent should only be introduced with approval by the relevant statutory bodies and UK/Country Governments'.
  Steering Group response: Legal requirements are covered by 1.1.1.

Sub-section 2.9: Silvicultural systems

Issues:

- 2.9.1 Requirement: Delete 'Where species, sites, wind risk, tree health risk and management objectives allow, a range of silvicultural approaches including lower impact silvicultural systems shall be adopted with the aim of diversifying ages, species and stand structures'.
  Steering Group response: The Group does not see a need to change this requirement, which is a good balance between the views expressed by respondents.

- 2.9.1 Requirement: Change 'Where species, sites, wind risk, tree health risk and management objectives allow, a range of silvicultural approaches including lower impact silvicultural systems shall be adopted with the aim of diversifying ages, species and stand structures' to 'Where species, sites, wind risk, tree health risk and management objectives allow, a range of lower impact silvicultural systems shall be adopted with the aim of diversifying ages, species and stand structures'.
  Steering Group response: The Group does not see a need to change this requirement, which is a good balance between the views expressed by respondents.

- 2.9.2 Requirement: Change felling limit to 75 % of 'low value other semi-natural woodlands'.
  Steering Group response: This established requirement is retained for its importance in maintaining the integrity of semi-natural woodlands.

- 2.9.2 Requirement: Change 'In semi-natural woodland lower impact silvicultural systems shall be adopted' to 'In semi-natural woodland lower impact silvicultural systems shall be adopted where they improve woodland condition'.

Steering Group response: The Group feels that the current wording is in line with the best practice in Forestry Commission Practice Guides, given that LISS encompasses small coupe felling.

- 2.9.2 Requirement: Allow greater flexibility for unavoidable clearfelling.
  Steering Group response: Guidance has been added, referring to best practice guidance.

- 2.9.2 Requirement: Add references to 'successor documents' to FC Practice Guides.
  Steering Group response: These are key documents for the management of semi-natural woodlands; although the Group recognises that they may be subject to change in future, and although as a rule specific documents are not referred to in requirement text, in this instance it is considered appropriate to retain the explicit reference.

Sub-section 2.10: Conservation

Issues:

- 2.10.1 Requirement: Remove 15 % area requirement.
  Steering Group response: This is a vital part of the conservation provisions in UKWAS, and is important in meeting the requirements of certification schemes.

- 2.10.1 Requirement: Change 15 % to 10 %. Allow open space to contribute to the 10 %.
  Steering Group response: See above. Existing guidance makes it clear that some open space may contribute to the 15%.

- 2.10.1 Guidance: Delete reference to (c).
  Steering Group response: Agree.

Sub-section 2.11: Protection

Issues:

- Add Deer Initiative Best Practice Guides to the UKWAS Appendix.
  Steering Group response: Agree.

- 2.11.2 Requirement: Reword to more general 'incident plans'.
  Steering Group response: Agree. The requirement is now for a more general emergency response plan.

- 2.11.2 Example verifiers: Change 'heeded' to 'taken into consideration'.
  Steering Group response: Agree.

Sub-section 2.12: Conversion

Issues:

- 2.12.1 Requirement: Clarify why date has changed from 1985 to 1994.
  Steering Group response: This will be set out in the narrative account of changes to the standard.

- 2.12.1 Requirement: Add 'Woodland identified in sections 4.1 – 4.3 shall not be converted to plantation or non-forested land'.
  Steering Group response: Agree.

- 2.12.2 Guidance: `Expand` height guidance to include area threshold and definition of height.
  Steering Group response: Trees greater and less than 4m in height are already addressed in the bulleted guidance.

- 2.12.3 Requirement: `Add` requirement for full compensatory planting.
  Steering Group response: While supportive of the sentiment, the Group does not believe that a requirement for compensatory planting is appropriate in the context of UKWAS.

- 2.12.3 Requirement: `Allow` for positive management for e.g. peatland restoration.
  Steering Group response: This is allowed for in the current wording.

- 2.12.3 Requirement: `Add` reference to climate change mitigation (carbon storage) in (a).
  Steering Group response: 'Important carbon stores' have been added to the list of features which may be protected and enhanced.

- 2.12.3 Guidance: `Add` reference to Interpretation Panel note on forest conversion and wind farms.
  Steering Group response: It is not considered appropriate to refer explicitly to the interpretation note here. However, the Group recognises its continuing relevance and intends to reissue it as a guidance note which may be referenced in the Appendix.

Sub-section 2.13: Implementation, amendment and revision of the plan

No issues.

Sub-section 2.14: Monitoring

Issues:

- 2.14.1 Requirement: `Change` 'The owner/manager shall devise and implement a monitoring programme appropriate to the scale and intensity of management' to 'The owner/manager shall devise and implement a monitoring programme appropriate to the scale and intensity of management and clearly related to the management objectives identified within the plans'.
  Steering Group response: Guidance has been added to this effect.

- 2.14.1 Guidance: `Clarify` relationship between monitoring programme and management planning documentation.
  Steering Group response: Guidance has been added to this effect.

- 2.14.1 Guidance: `Clarify` requirements for different scales of operator.
  Steering Group response: Existing guidance lists factors to consider and potential methods; any more detailed considerations would be context specific and a matter of professional judgement.

- 2.14.1 Guidance: `Clarify` that some objectives cannot be monitored objectively.
  Steering Group response: Monitoring should be appropriate to the context, whether objective or subjective.

- 2.14.2 Requirement: `Shorten` list.
  Steering Group response: Agree. This requirement has been merged with 2.14.1, and detailed points in the list have been moved to guidance.

- 2.14.2 Requirement: `Delete` 'Implementation of operational plans' and 'Economic viability'.
  Steering Group response: 'Economic viability' has been removed, and 'Implementation of

operational plans' has been changed to 'Implementation of woodland operations', which remains an important part of monitoring the achievement of the aims of management.

- 2.14.2 Requirement: <mark>Reword</mark> for clarity and to emphasise 'where applicable'.
  Steering Group response: This requirement has been merged with 2.14.1, but the wording has been retained as sufficiently clear.

- 2.14.2 Requirement: <mark>Make</mark> a clear link between management objectives and monitoring.
  Steering Group response: Addressed in guidance to 2.14.1.

- 2.14.2 Requirement: <mark>Change</mark> extensively, beginning 'The owner/manager shall where applicable monitor and record the delivery of objectives set out in management planning documentation (2.2.1)'.
  Steering Group response: This requirement has been merged with 2.14.1 and the relationship with objectives clarified in guidance.

- 2.14.2 Requirement: <mark>Add</mark> new requirement on tree health linking surveillance with appropriate actions.
  Steering Group response: Tree health is included under changes in environmental condition.

- 2.14.2 Requirement: <mark>Recognise</mark> that objective setting and monitoring are at different scales.
  Steering Group response: These are matters for professional judgement.

- 2.14.2 Guidance: <mark>Provide</mark> more guidance.
  Steering Group response: This requirement has been merged with 2.14.1 and further guidance provided.

Section 3

Forestry operations

This section was not especially controversial, although there were a number of calls for clarification or simplification. However, clause 3.6.2, on the removal of redundant materials, provoked an interesting range of responses, with one respondent considering it 'vague and meaningless' and another shocked by the potential cost implications.

Sub-section 3.1: General

Issues:

- 3.1.1 Requirement: <mark>Consistently</mark> use 'forest operations' or 'woodland operations' [or 'forestry operations'], or add new terms to Glossary. State clearly that 'operations' include harvesting and non-harvesting operations.
  Steering Group response: The terminology 'woodland operations' has been adopted consistently throughout the standard. The term 'operations' is considered to be sufficiently widely understood as to require no further explanation; the broad meaning of the term is further emphasised by the fact that there is a sub-section specifically relating to harvest operations.

- 3.1.2 Guidance: <mark>Delete</mark> 'the forestry workforce has been involved in the planning of operations'.
  Steering Group response: The Group considers that the inclusion of workers in operational planning is both necessary for health and safety and desirable for good forestry practice, but the timing of the involvement of workers has been clarified in the guidance.

Sub-section 3.2: Harvest operations

Issues:

- 3.2.1 Requirement/Guidance: <mark>Clarify</mark> 'with minimum loss or damage' versus 'seek to avoid' and 'efficiently' versus 'with minimum loss'.
  Steering Group response: The Group has not encountered any issues with the interpretation of this requirement at audit.

- 3.2.1 Example verifiers: <mark>Add</mark> 'Compliance with UKFS on soil management' or 'Compliance with industry standards on soil management'.
  Steering Group response: This is covered by 1.1.2, field observation and guidance to 3.2.1 (now moved to be part of the requirement).

- 3.2.1 Guidance: <mark>Add</mark> brash management guidance.
  Steering Group response: The Forestry Commission Technical Note 'Protecting the Environment during Mechanised Harvesting Operations' will be added to the Appendix.

- 3.2.2 Requirement: <mark>Change</mark> 'to be sold as certified' to 'to be sold by the woodland owner/manager as certified'.
  Steering Group response: This is unnecessary wording in the context of the standard.

- 3.2.3 Requirement: <mark>Change</mark> to 'Lop and top can be burnt where it is legal and appropriate'.
  Steering Group response: The Group does not feel that this wording would be appropriate. Instead, uniform wording has been adopted for 3.2.3 and 3.2.4 (and the order of the two requirements has been reversed).

- 3.2.4 Guidance: <mark>Change</mark> 'Soil carbon' to 'Soil carbon loss'.
  Steering Group response: Agree.

- 3.2.4 Guidance: <mark>Acknowledge</mark> the value of whole tree harvesting in circumstances such as the restoration of open habitats from existing plantations.
  Steering Group response: The Group does not consider it necessary to address this specific issue explicitly; the reworded requirement calls for 'demonstrable management benefit' to be balanced against 'any significant negative effects'.

Sub-section 3.3: Forest roads

Issues:

- 3.3.1 Requirement: <mark>Note</mark> that consent is also required for road upgrades.
  Steering Group response: This is recognised in expanded requirement text.

- 3.3.1 Requirement/Guidance: <mark>Consider</mark> recreational access provision alongside and on new roads.
  Steering Group response: Access provision is addressed in 5.1.2.

- 3.3.1 Example verifiers: <mark>Add</mark> 'Pre-consultation with Local Authority and EIA Determination for new roads, upgrades and quarries'.
  Steering Group response: Verifiers have been kept deliberately broad, but both requirement and guidance have been expanded to address these issues.

- 3.3.1 Guidance: <mark>Delete</mark> as covered by 3.3.2.
  Steering Group response: This guidance has been moved to 3.3.2.

- 3.3.1 Guidance: <mark>Change</mark> to refer to planning permission etc.
  Steering Group response: Guidance now refers in broad terms to 'planning, environmental impact assessment or construction regulations'.

- 3.3.2 Example verifiers: <mark>Note</mark> that in National Parks pre-consultation with the NPA may be required for forwarder routes.
  Steering Group response: Other infrastructure is now covered by 3.3.1.

- 3.3.2 Guidance: <mark>Consider</mark> implications of 'Ensuring that verges and ditches are created and managed to promote their habitat value'.
  Steering Group response: This is not a new requirement, but guidance carried over from UKWAS 3.1.

Sub-section 3.4: Pesticides, biological control agents and fertilizers

Issues:

- 3.4.2 Requirement: <mark>Change</mark> to 'Pest management will conform to best practice and legal requirements. The Forest Management plan will consider pest management.'
  Steering Group response: While the Group appreciates the suggestion in terms of its brevity and simplicity, the detail in section 3.4 is necessary to address the requirements of certification schemes and the expectations of some stakeholders.

- 3.4.2 Requirement: <mark>Clarify</mark> and combine Integrated Pest Management strategies and chemical minimisation strategies.
  Steering Group response: There is no separate requirement for a chemical minimisation strategy; this should be a part of the IPM strategy.

- 3.4.3 Guidance: Reduce detail.
  Steering Group response: Guidance has been clarified, and some detail removed.

- 3.4.4 Requirement: Delete 'for use of pesticides and biological control agents'.
  Steering Group response: The text of this requirement has been significantly reduced and incorporated into 3.4.3.

- 3.4.6 Guidance: Clarify how fertilizer use can be justified in (a).
  Steering Group response: Professional judgement, combined with foliar samples where relevant, is adequate; it is not considered necessary to clarify this in the standard.

Sub-section 3.5: Fencing

Issues:

- 3.5.2 Guidance: Add reference to best practice on gaps, gates and stiles.
  Steering Group response: Guidance added, and best practice will be added to the Appendix.

Sub-section 3.6: Waste

Issues:

- 3.6.2 Requirement: Delete as 'vague and meaningless'.
  Steering Group response: This requirement is an important development of the UKWAS 3.1 statement that 'Plastic tree shelters should not be allowed to create a litter problem at the end of their effective life', which recognises economic and practical constraints.

- 3.6.2 Requirement: Consider costs.
  Steering Group response: See above; this requirement is a deliberate attempt to relieve pressure on owners/managers to immediately deal with redundant tree shelters etc. A further concession has been made by allowing for redundant materials to be 'managed' as well as removed, while explicit recognition has been given to the need to prioritise work taking into account not only social and environmental but also economic impacts.

- 3.6.2 Requirement: Delete 'progressively' as 'open to interpretation'.
  Steering Group response: The concept of progressive removal is vital to this requirement.

Sub-section 3.7: Pollution

Issues:

- Add new requirement on lead-free ammunition.
  Steering Group response: While recognising the large body of evidence available on this issue, as summarised by the Oxford Lead Symposium, the Group does not feel that it is appropriate to pre-empt the outcome of a review of legal requirements.

- 3.7.1 Requirement: Change to 'Owners/managers must take reasonable steps to prevent diffuse pollution arising from forest operations'.
  Steering Group response: The current wording is more in line with that used by regulators.

- 3.7.1 Example verifiers: Change 'Operation plans' to 'Operational plans'.
  Steering Group response: Agree.

- 3.7.1 Example verifiers: Add 'Site design' and 'Work plans'.
  Steering Group response: These are covered by 'Operational plans'.

- 3.7.1 Guidance: <mark>Add</mark> 'or drains that connect to watercourses'.
Steering Group response: Agree.

- 3.7.1 Guidance: <mark>Clarify</mark> examples which include both point-source and diffuse pollution.
Steering Group response: Guidance clarified.

- 3.7.1 Guidance: <mark>Add</mark> guidance on 'minimise'.
Steering Group response: This is a matter for professional judgement; ultimately, it is the opinion of the regulatory authorities that counts.

Section 4
Natural and historic environment

Some of the reorganisation and rationalisation of conservation requirements proved to be controversial; changes to deadwood requirements attracted particular attention.

Issues:

- Add cultural environment to section heading.
  Steering Group response: Agree.

- Give greater attention to hydrological systems in this section.
  Steering Group response: The Group recognises the highly topical importance of hydrological systems. In 4.5.1, explicit reference to 'Areas and features of critical importance for watershed management' has already been moved from guidance to the requirement. Regulation of floods is explicitly included in the new glossary definition of ecosystem services.

- Consider parity with requirements for farms and grouse moors.
  Steering Group response: The Group is justly proud of the high environmental standards set by UKWAS; it is unfortunately beyond the remit of the Group to consider how similar standards might be extended to other land uses.

Sub-section 4.1: Protection of rare species, habitats and natural resources including statutory designated sites and protected species

Issues:

- Recognise impacts by third parties and actions taken by owners/managers to avoid or ameliorate those impacts.
  Steering Group response: The Group does not feel that this issue merits explicit recognition in this requirement.

- 4.1.1 Requirement: Delete 'and/or through assessment on the ground' in (a).
  Steering Group response: This is an important part of the requirement; not all features of high conservation value may be covered by statutory designations.

- 4.1.1 Requirement: Strengthen beyond 'maintained' in (b). Promote, rather than allowing, restoration of priority habitats.
  Steering Group response: The Group does not accept that this requirement has been weakened; the wording 'shall be maintained and, where possible, enhanced' is unchanged from UKWAS 3.1. While recognising the importance of priority habitats (e.g. in 4.4.2), the primary emphasis on the maintenance and enhancement of nationally and regionally important sites is considered appropriate.

- 4.1.1 Requirement: Delete (d) or restrict to SSSI, SAC or NNR.
  Steering Group response: Agree; restricted to statutory designated sites.

- 4.1.1 Requirement/Guidance: Restore 'Areas supporting priority habitats and species listed in the UK Biodiversity Action Plan'.
  Steering Group response: Priority habitats are addressed in 4.4.2.

- 4.1.1 Guidance: Change 'Special Areas for Conservation' to 'Special Areas of Conservation'.
  Steering Group response: Agree.

- 4.1.1 Guidance: Delete 'Biological' from 'Biological Sites of Special Scientific Interest'.
  Steering Group response: Agree.

- 4.1.1 Guidance: Add 'and for which consent will be required from the statutory nature conservation agency within sites designated as SSSIs'.
  Steering Group response: Having identified designated sites, owners/managers will be bound by statutory restrictions on potentially damaging operations.

- 4.1.1 Guidance: Add 'Features include breeding sites, resting places and display sites of protected species'.
  Steering Group response: Agree.

Sub-section 4.2: Conservation of ancient semi-natural woodlands

Issues:

- Add '(ASNW)' to sub-section heading.
  Steering Group response: Agree.

- 4.2.1 Guidance: Change 'need not' to 'should not'.
  Steering Group response: Agree.

Sub-section 4.3: Plantations on Ancient Woodland Sites (PAWS)

Issues:

- 4.3.1 Requirement: Change to 'Owners will restore or enhance a minimum of 20 % of PAWS woodland'.
  Steering Group response: This requirement has already been radically shortened. The proposed wording would completely alter the intent of the requirement.

- 4.3.1 Requirement: Delete 'Adopting a precautionary approach'.
  Steering Group response: FSC requires a precautionary approach to be taken to the management of high conservation values.

- 4.3.1 Requirement: Restore PAWS requirements from UKWAS 3.1.
  Steering Group response: This requirement has been deliberately shortened because much of the detail in UKWAS 3.1 is now covered in best practice guidance. Recent Forestry Commission Practice Guides on PAWS restoration will be added to the Appendix, which already contains Woodland Trust guidance.

- 4.3.1 Requirement/Guidance: Delete 'Identify and evaluate threats' from requirement and move to guidance.
  Steering Group response: This is a vital part of planning the management of PAWS.

- 4.3.1 Example verifiers: Delete 'including a long term policy'.
  Steering Group response: Agree.

- 4.3.1 Guidance: Add 'damage to veteran trees from woodland operations'.
  Steering Group response: Agree.

- 4.3.1 Guidance: Change 'prescription' to 'prescriptions'.
  Steering Group response: Agree.

- 4.3.1 Guidance: <mark>Recognise</mark> the benefit of drastic interventions in some circumstances.
  Steering Group response: Some further guidance provided on situations where this may be necessary.

- 4.3.1 Guidance: <mark>Change</mark> 'A precautionary approach is appropriate in most instances' to 'A precautionary approach is maybe appropriate'.
  Steering Group response: The Group favours the existing wording.

Sub-section 4.4: Protection of conservation values in other woodlands and semi-natural habitats

Issues:

- <mark>Delete</mark> 'other' from sub-section heading.
  Steering Group response: This distinction is important in the context of the preceding sub-sections, and is clarified in 4.4.1 guidance.

- <mark>Recognise</mark> impacts by third parties and actions taken by owners/managers to avoid or ameliorate those impacts.
  Steering Group response: 'Visitor pressure' added to 4.4.1 guidance.

- 4.4.1 Requirement: <mark>Change</mark> 'conservation value' to 'high conservation value'.
  Steering Group response: High conservation value is used in a specific context in the standard. The Group does not agree that there will be interpretation issues at audit.

- 4.4.1 Example verifiers: <mark>Change</mark> 'management plan' to 'management plans'.
  Steering Group response: Verifier simplified to 'Management planning documentation'.

- 4.4.1 Guidance: <mark>Change</mark> 'planted origin' to 'plantation origin'.
  Steering Group response: The existing terminology is consistent with glossary definitions.

- 4.4.2 Requirement: <mark>Consider</mark> whether requirement is too open-ended.
  Steering Group response: The Group considers the limits to be clear from both the requirement and guidance.

- 4.4.2 Requirement: <mark>Add</mark> 'peatland'.
  Steering Group response: List of example habitats moved to guidance and peatland added.

- 4.4.2 Requirement: <mark>Change</mark> 'treated in a manner that does not lead to further loss of biodiversity or cultural value' to 'treated in a manner that does not lead to further degradation to potential for restoration'.
  Steering Group response: The current wording is considered to be more appropriate and to implicitly address the concern expressed here.

- 4.4.2 Guidance: <mark>Change</mark> 'Areas with a rich ground flora' to 'Areas with a species-rich ground flora'.
  Steering Group response: This is implicit.

- 4.4.2 Guidance: <mark>Add</mark> reference to FC Practice Guide *Managing open habitats in upland forests*.
  Steering Group response: This will be added to the Appendix.

- 4.4.2 Guidance: <mark>Add</mark> 'Drainage' to list of potential adverse impacts.
  Steering Group response: Agree.

- 4.4.2 Guidance: <mark>Change</mark> 'historic environment sites' to 'significant historic environment sites'.
  Steering Group response: The Group does not agree; rather, the scale of open ground should be proportionate to the importance of the site.

- 4.4.2 Guidance: <mark>Clarify</mark> 'Woodland removal to facilitate infrastructure or built development...' in this context.
  Steering Group response: The guidance text has been retained, but moved to the bottom of guidance next to the reference to section 2.12.3 to make it clearer that it is to be considered in the context of forest conversion.

- 4.4.2 Guidance: <mark>Add</mark> reference to Natural Resources Wales peatland policy.
  Steering Group response: Guidance has been changed to refer generically to country level peatland policies.

- 4.4.2 Guidance: <mark>Clarify</mark> advice to owners/managers.
  Steering Group response: This advice, which also appears in 2.12.3, has been removed as potentially confusing in this context.

Sub-section 4.5: Watershed management and erosion control

Issues:

- 4.5.1 Guidance: <mark>Add</mark> guidance on assessing what is 'critical'.
  Steering Group response: The requirement makes it clear that owners/managers should defer to the judgement of the relevant statutory bodies.

Sub-section 4.6: Maintenance of biodiversity and ecological functions

Issues:

- 4.6.1 Requirement: <mark>Change</mark> to 'Within the WMU, a minimum of 1 % of the plantation area and 5 % of the semi-natural woodland area shall be designated as natural reserves'.
  Steering Group response: The interpretation of this requirement has been debated at considerable length. To ensure a consistent and stable interpretation (i.e. not changing as the proportions of plantation and semi-natural woodland in a WMU change), the requirement has been simplified to 'a minimum of 1% of the WMU'.

- 4.6.1 Requirement: <mark>Reflect</mark> guidance that the requirement may be met across the estate as a whole.
  Steering Group response: On reflection, the Group has concluded that this guidance is inappropriate. Requirements must be met at the WMU level, and issues of this nature should be considered when defining WMUs. Guidance has been redrafted for clarity on the application of this requirement at the WMU level.

- 4.6.1 Requirement: <mark>Consider</mark> flexibility to offset a lack of area in plantations with excess area of semi-natural woodland.
  Steering Group response: See above re. simplification of this requirement. The owner/manager is now at liberty to concentrate natural reserves where they will give rise to the greatest benefit.

- 4.6.1 Guidance: <mark>Add</mark> 'Plantation woodlands can be comprised of either conifer stands or broadleaved stands (for example beech plantations)'.
  Steering Group response: This is unnecessary.

- 4.6.1 Guidance: <mark>Clarify</mark> paragraph referring to long-term retentions.
  Steering Group response: Paragraph deleted.

- 4.6.2 Requirement: <mark>Clarify</mark> basis for increasing the natural reserve area where long-term retentions or lower-impact silvicultural systems are impractical.

Steering Group response: This concession is based entirely on considerations of practicality, as indicated in the requirement; where long-term retentions or LISS are not practicable, for example because of wind risk, minimum intervention areas may be a viable alternative.

- 4.6.2 Requirement: Reflect guidance that the requirement may be met across the estate as a whole.
  Steering Group response: On reflection, the Group has concluded that this guidance is inappropriate. Requirements must be met at the WMU level, and issues of this nature should be considered when defining WMUs. Guidance has been redrafted for clarity on the application of this requirement at the WMU level.

- 4.6.3 Requirement: Expand requirement to create veteran trees in all woodlands.
  Steering Group response: This is not feasible in some woodlands; the alternatives, in terms of natural reserves and long-term retentions, are addressed in 4.6.1 and 4.6.2.

- 4.6.4 Requirement: Better reflect deadwood guidance and how it can be met.
  Steering Group response: This requirement has been rewritten to separately emphasise the need for some deadwood in all parts of the WMU, while concentrating the highest quality deadwood habitat in areas where it has the greatest value for conservation. For the detail of deadwood management, the standard relies on published best practice.

- 4.6.4 Requirement: Reflect the need for maximum volumes, maximum diversity, and connectedness.
  Steering Group response: See above re. separately emphasising concentrating the highest quality deadwood habitat in areas where it has the greatest value for conservation; for the detail of deadwood characteristics and the identification of areas of greatest value, the standard relies on published best practice.

- 4.6.4 Requirement: Add 'taking into account connectivity'.
  Steering Group response: Connectivity is addressed in best practice guidance on the identification of areas of greatest value, and is also mention in 4.6.4 guidance.

- 4.6.4 Requirement: Add 'Produce a deadwood strategy and/or an indicative map appropriate to the WMU that forms part of the MP'.
  Steering Group response: The Group does not consider it appropriate to insist on a formal strategy or map for all scales of woodland management.

- 4.6.4 Requirement/Guidance: Restore requirement for 20 cubic metres per hectare and the exclusion of stumps as contributing to this target.
  Steering Group response: A statement to this effect has been added to guidance, based on published best practice guidance.

- 4.6.4 Example verifiers: Add 'Documentation or a map showing areas of greatest ecological benefit where deadwood will be concentrated'.
  Steering Group response: This is considered too specific, and adequately covered by 'Management planning documentation'.

- 4.6.4 Guidance: Add clear guidance on how much deadwood is expected in a typical conifer clearfell.
  Steering Group response: See above; the intent of the requirement has been clarified, and guidance given which draws on published best practice guidance.

- 4.6.4 Guidance: Note importance of continuous input of new deadwood.
  Steering Group response: This is reflected in the use of the term 'accumulate' in this requirement.

- 4.6.4 Guidance: Note importance of dying trees, including windthrow.
  Steering Group response: Deadwood in living trees and windthrow are already mentioned in guidance; deadwood in living trees has been added to the requirement text.

- 4.6.4 Guidance: Reflect the key parameters of abundance (volume), tree species (diversity), size (diversity), decay class/inputs (diversity), and position (diversity).
  Steering Group response: These are reflected in best practice guidance.

- 4.6.4 Guidance: Change 'When thinning or clearfelling, and where safe to do so, creating snags and providing fallen deadwood where insufficient has already accumulated' to 'When thinning or clearfelling, and where safe to do so, creating standing deadwood and dying wood and providing fallen deadwood where insufficient has already accumulated'.
  Steering Group response: For further detail, the standard defers to best practice guidance.

- 4.6.4 Guidance: Change 'Stems of greater than 20 cm diameter, particularly large dimension timber from native species' to 'Stems of greater than 20 cm diameter of all species, particularly large dimension timber from native and broadleaf species plus Scots pine where it is not native'.
  Steering Group response: For further detail, the standard defers to best practice guidance.

- 4.6.4 Guidance: Change 'Deadwood in living trees' to 'Deadwood in living trees, i.e. the inclusion within a deadwood strategy of future deadwood from dying, damaged and identified mature trees retained from future harvesting'.
  Steering Group response: For further detail, the standard defers to best practice guidance.

Sub-section 4.7: Maintenance of local native seed sources

Issues:

- 4.7.1 Requirement: Do more to promote climate change adaptation.
  Steering Group response: The latest thinking suggests that this requirement is appropriate for semi-natural woodlands.

- 4.7.1 Requirement: Allow sourcing of native seeds from more southerly regions.
  Steering Group response: The requirement ('where appropriate and possible') and guidance ('clear justification', including long-term forest resilience) make it clear that this is permissible where justified.

- 4.7.1 Guidance: Recognise difficulties of acquiring appropriate planting stock.
  Steering Group response: This is already addressed in the requirement ('where… possible').

Sub-section 4.8: Cultural and historical features/sites

Issues:

- 4.8.1 Requirement: Delete (b).
  Steering Group response: This is a vital step in planning the management of sites and features.

- 4.8.1 Requirement: Delete 'relict text'.
  Steering Group response: Comment withdrawn.

Sub-section 4.9: Game management

Issues:

- 4.9.1 Requirement: <mark>Change</mark> to 'Shooting, other country sports and associated activities shall be carried out in accordance with the "Code of Good Shooting Practice" and the spirit of codes of practice produced by relevant organisations.'
  Steering Group response: It is inappropriate to refer to a specific document in this context, but the Code of Good Shooting Practice is included in the Appendix.

- 4.9.1 Guidance: <mark>Change</mark> '*Lyrurus tetrix*' to '*Tetrao tetrix*'.
  Steering Group response: This guidance text has been deleted (see below), but the genus name has been corrected in 3.5.1 guidance.

- 4.9.1 Guidance: <mark>Change</mark> 'Consider impacts on native species principally priority habitats and priority species' to 'Recognise, within the woodland environment, the positive impacts game management has on native species principally priority habitats and priority species'.
  Steering Group response: The current wording is sufficiently broad to encompass both positive and negative impacts.

- 4.9.1 Guidance: <mark>Delete</mark> 'Species that currently have local or regional restrictions on shooting include Black grouse (*Lyrurus tetrix*) and wild hares (*Lepus timidus*)'.
  Steering Group response: Agree.

- 4.9.1 Guidance: <mark>Change</mark> 'Feeding and rearing areas' to 'Release and feeding areas'.
  Steering Group response: Agree.

- 4.9.1 Guidance: <mark>Change</mark> 'The use of lead shot over wetland is restricted in relevant codes of practice' to 'The use of lead shot over wetland is restricted by regulations'.
  Steering Group response: Agree.

Section 5

People, communities and workforce

This section attracted relatively little comment, although a number of clauses were felt to be unnecessary, particularly where they addressed legal requirements.

Sub-section 5.1: Woodland access and recreation including traditional and permissive use rights

Issues:

- 5.1.1 Requirement: Consider relevance of water supplies and clarify use of precautionary principle.
  Steering Group response: Water supplies are included to address rare instances where they are not covered by legal agreements. FSC requires a precautionary approach, as defined in the glossary, to be taken to the management of 'Sites and resources fundamental for satisfying the basic necessities of local communities', which in a UK context is taken to be limited to water supplies.

- 5.1.1 Guidance: Delete 'footpaths'.
  Steering Group response: 'Footpaths and bridleways' replaced with 'access routes'.

- 5.1.1 Guidance: Consider consultations with local representative groups or bodies for public access and statutory Local Access Forum.
  Steering Group response: Addressed in 2.3.1.

- 5.1.2 Requirement: Delete 'relict text'.
  Steering Group response: This comment relates to the relationship between this requirement and the introductory section addressing third party rights; it is accepted that there is no contradiction between the two.

- 5.1.2 Example verifiers: Add 'Evidence of access provision, path maintenance, conservation management (particularly in regard to visitor erosion) and interpretation at significant historic environment assets'.
  Steering Group response: Agree.

- 5.1.2 Guidance: Add Scottish Outdoor Access Code to Appendix.
  Steering Group response: Agree.

- 5.1.2 Guidance: Add 'Woodlands containing or adjoining notable historic environment or ecological features may attract large numbers of visitors even to small properties. Enhancing and / or maintaining public access (paths), conservation management initiatives and presentation (interpretation media) to significant features should be included within forest planning and considered a key element of attracting public grants. Additional funding streams may be available in regard to designated historic assets.'
  Steering Group response: This very specific guidance is not considered appropriate, but see below.

- 5.1.2 Guidance: Consider positive guidance including management solutions.
  Steering Group response: Generic, positive guidance has been added.

Sub-section 5.2: Minimising adverse impacts

Issues:

- 5.2.1 Example verifiers: <mark>Add</mark> 'Use of safety signs and diversions around active operational sites'.
  Steering Group response: Agree.

- 5.2.1 Guidance: <mark>Change</mark> 'unsafe trees' to 'hazardous trees'.
  Steering Group response: Agree.

Sub-section 5.3: Rural economy

Issues:

- 5.3.1 Requirement: <mark>Delete</mark> or change to 'Owners/managers shall not adversely exclude local people from…'.
  Steering Group response: The current wording is considered to be more appropriate and positive.

- 5.3.1 Guidance: <mark>Add</mark> 'An example of a recreational activity which supports the rural economy is shooting. Shooting is worth £2 billion per annum to the UK economy and supports the equivalent of 74,000 full time jobs. Shooters' maintenance of woodlands provides 1,500 FTE jobs. http://www.shootingfacts.co.uk/.'
  Steering Group response: While recognising the economic value of shooting, the Group considers it inappropriate to give such a specific example.

Sub-section 5.4: Health and safety

Issues:

- 5.4.1 Requirement: <mark>Change</mark> 'FISA' to 'current National Guidance Body'.
  Steering Group response: While recognising that such organisations can and do change, the Group considers it appropriate to promote FISA explicitly rather than referring to a generic body.

- 5.4.1 Example verifiers: <mark>Consider</mark> 'more proportionate' verifiers.
  Steering Group response: This issue is addressed in the introductory section on 'Application of the certification standard to different scales of woodland management unit and intensities of operation'.

Sub-section 5.5: Training and continuing development

Issues:

- 5.5.1 Requirement: <mark>Delete</mark>.
  Steering Group response: This is a vital requirement, not limited to legal compliance.

- 5.5.2 Requirement: <mark>Define</mark> 'large'.
  Steering Group response: The Group considers that it is evident which are large enterprises in a UK context, particularly in relation to the widely understood concept of small and medium enterprises.

Sub-section 5.6: Workers' rights

Issues:

- 5.6.1 Requirement: Delete (c).
  Steering Group response: Workers' rights, including equality, are important elements of the certification schemes.

Sub-section 5.7: Insurance

Issues:

- 5.7.1 Requirement: Delete.
  Steering Group response: The wording of the requirement has been clarified.

Glossary of terms

Issues:

- Area of Special Scientific Interest (ASSI): Delete second 'statutory'.
  Steering Group response: This definition was been replaced with one based on the description of ASSIs on the JNCC website.

- Clearfelling: Change '0.25 ha' to '5 ha'.
  Steering Group response: This definition is consistent with that in UKFS. Small coupe fellings under LISS may be greater than 0.25 ha but they are still clearfellings, as distinct from continuous cover forestry.

- Design Plan (Forest Design Plan): Add 'For woodlands managed by NRW, referred to as a Forest Resource Plan'.
  Steering Group response: This glossary entry has been deleted as the term is rapidly falling out of favour.

- Felling licence: Change entry to 'Licence issued by the Forestry Commission or Natural Resources Wales to permit trees to be felled. With certain exceptions it is illegal to fell trees in Great Britain without prior Forestry Commission or Natural Resources Wales approval. Similar arrangements are anticipated in Northern Ireland.'
  Steering Group response: This entry has been updated to refer to relevant forestry authorities and to reflect the changed situation in Northern Ireland.

- Interested parties: Define 'significant'.
  Steering Group response: This is entirely context dependent.

- National Nature Reserve (NNR): Change entry to 'A statutory designation that offers protection to habitats, species, geology or landform or a combination of these'.
  Steering Group response: This definition was been replaced with one based on the description of NNRs on the JNCC website.

- Add new entry 'Natural Resources Wales (NRW) The government department responsible for the regulation of forestry and the management of the state woodlands in Wales. *Also see Forest Service*'
  Steering Group response: Entries for individual forestry authorities have been removed. NRW is included in the generic entry for forestry authorities.

- Priority habitats and species: <mark>Update</mark> entry to reflect devolved country contexts.
  Steering Group response: This has been done in very broad terms.

- Site of Special Scientific Interest (SSSI): <mark>Change</mark> entry to 'A statutory designation in Great Britain that offers statutory protection to habitats, species, geology, landform or a combination of these'.
  Steering Group response: This definition was been replaced with one based on the description of SSSIs on the JNCC website.

- Special Area for Conservation (SAC): <mark>Change</mark> to 'Special Area of Conservation (SAC)'.
  Steering Group response: Agree.

- Statutory body(ies): <mark>Change</mark> 'English Heritage' to 'Historic England'.
  Steering Group response: Agree.

- Woodland: <mark>Change</mark> ancient woodland threshold to AD 1860.
  Steering Group response: This is not the case; while nineteenth century mapping is used when generating ancient woodland inventories, it is interpreted in the context of the 1600 threshold.

Appendix

Proposed additions to the UKWAS Appendix are covered in the comments on specific sections.

Issues:

- <mark>Consider</mark> the relationship between the Appendix and the standard, how this relationship is conveyed, and how far legislation, regulations, guidelines etc. should be referred to within the standard.
  Steering Group response: The extremely limited appendix which forms part of the main standard includes only the main forestry and plant health acts; the separate Appendix contains a much fuller list of relevant legislation etc. Symbols in the standard indicate where there are relevant Appendix references; this removes the need to refer to individual documents in the standard. All of the legislation, regulations, guidelines etc. in the Appendix should be taken into account by auditors.

Appendix 1
Full list of respondents

Id #	Respondent	Organisation	Nature of interest	Location
Woodland owners and forestry practitioners				
1	Ralph Assheton	Individual	Woodland owner	Lancashire
2	David Williams	Individual	Woodland owner	Aberdeen
3	Andrew Heald	Confor	Trade association	UK
4	Caroline Harrison	Confor England	Trade association	England
5	David Atkinson	Edwin Thompson	Forest management company/ group scheme manager	Scotland and Northern England
6	Simon Hart	Egger	Forest management company/ group scheme manager	Scotland and Northern England
7	Alex McAuley	Institute of Chartered Foresters (ICF)	Professional body	UK
8	Peter Atkinson	Kingan Forestry	Forest management company	Scotland
9	Harry Wilson	RTS	Forest management company/ group scheme manager	Scotland
10	Stuart Wilkie	Scottish Woodlands	Forest management company/ group scheme manager	UK
11	John Gallagher	Tilhill	Forest management company/ group scheme manager	UK
12	Paul Sandys / Phil Webb	UK Forest Certification Group	Forest management company/ group scheme manager	UK
13	Diana McMullen	Verderer's Group Scheme	Forest management company/ group scheme manager	England
Country forestry authorities and forestry enterprises				
14	Jonathan Spencer	Forest Enterprise (FE) England	Government department/ national forest service	England
15	Maida Ballarini	Forestry Commission (FC) Scotland	Government department/ national forest service	Scotland
16	Chris Nixon	Forest Enterprise (FE) Scotland	Government department/ national	Scotland

			forest service	
17	Rachel Chamberlain	Natural Resources Wales (NRW)	Government department/ national forest service	Wales

Environmental organisations

18	Mike Wood	Royal Society for the Protection of Birds (RSPB)	Woodland owner/ environmental NGO	UK
19	Gordon Pfetscher / Beatrix Richards	Woodland Trust / World Wide Fund for Nature UK (WWF UK)	Woodland owner/ environmental NGO	UK

UK countryside, environment and heritage agencies

20	Rob Green	Natural England	Countryside agency	England

Forest user organisations

21	Paul Williamson	British Association for Shooting and Conservation (BASC)	Social NGO	UK
22	Justin Cooke	Ramblers Association	Social NGO	GB

Other

23	Bill Mason	Continuous Cover Forestry Group (CCFG)	Silvicultural interest group	GB
24	Roger Cooper	Individual	Chair of UKWAS Interpretation Panel	UK
25	Susan Bowen and Doug Somerville	Individuals	Interested parties	Trawsfynydd

UKWAS Support Unit

59 George Street

Edinburgh

EH2 2JG

T: 0131 240 1419

E: ukwas@confor.org.uk