

United Kingdom Woodland Assurance Standard

UKWAS Revision 2013-16 (Pre-approval Draft) Consultation Report

Annex 2 – unedited general comments on pre-approval draft

30th April 2016

www.ukwas.org.uk

Background

This document contains the full text of the general comments made in response to the public consultation on the Pre-approval Draft of UKWAS 4 which ran from 15 February to 16 March 2016.

Responses are given in the order in which they were received by the UKWAS secretariat. Numbers in square brackets relate to the list of respondents in the Consultation Report.

Comments which are general in nature or apply to several sections of the standard are summarised in the Consultation Report. Comments which clearly apply to specific sections of the standard are included in Annex 1 (Consolidated Feedback) to the Consultation Report, and are shaded grey. A number of respondents, indicated by asterisks, also provided detailed comments on specific sections in a copy of the draft standard; these detailed comments are also contained in Annex 1.

Roland Stiven, Timber Transport Forum [15], received 16/02/16

Good Practice Guidance on timber transport is here

<http://timbertransportforum.org.uk/work/good-practice/guidance>

The Forum shall be publishing a further good practice Guide on 10th march titled 'Loading Timber from Roadside Forests'.

Diana MacMullen, The Verderers [9], received 22/02/16

[By telephone, asked that there be a guide to changes between UKWAS 3.1 and UKWAS 4.]

David Atkinson, Edwin Thompson [5], received 24/02/16

I refer to the announcement for further consultation on UKWAS 4.

I note the dismal response of only 25 respondents to the earlier consultation. I also note the almost total failure to adopt any of the suggestions offered by consultees.

I also note that at least 15 of 25 consultee respondents are members of UKWAS or on the panel.

Clearly the time honoured process of making a review some cumbersome, boring and everlasting has worked its magic again. Only those who write the documents remain interested enough to comment and anyone else can be ignored. A consultation process that FIFA would be proud of.

Douglas Orr, SGS [24], received 08/03/16

I suggest that the Long Term Retentions and Natural Reserves be simplified even further and made more flexible. Essentially, LTRs be incorporated within NRs, along the lines of 'NRs shall constitute at least 2% of the WMU. NRs shall, where practicable, include a significant proportion of individual or clumps of mature trees of a size or age considered to be of environmental benefit.'

Ewan McIntosh, Tilhill Forestry [7], received 08/03/16

Just for info – I've asked every Group scheme member, all our staff and auditors for feedback. So far I've had one technical query from one of our senior managers that didn't really relate to the next version of UKWAS!

Hamish Macleod, BSW Timber [14], received 08/03/16

I'm helping our HR team write a statement for BSW to comply with the above Act [the Modern Slavery Act 2015] which we are obliged to publish for financial year ended March 2016, around the time we lodge our accounts. We have to declare compliance (or continuous improvement towards that) not only for our company but also for our supply chain. We have to identify risks and what measures we are employing to mitigate those.

The UK FS and UKWAS would actually be very good vehicles in which to demonstrate supply chain compliance if they were more explicit in recognising the Slavery Act. Of course, you have a UKWAS review currently and I believe there will be a light touch review of UKFS towards end of year. Maybe we can help each other in an endeavour to cover this? It doesn't need to be too complicated.

...

looking at the consolidated draft revision on the website, could suggest under section 5.6.1 c) *there shall be compliance with equality, anti-slavery and human trafficking legislation*

In the appendix draft version 2 Feb 2016 add in the reference *Modern Slavery Act 2015*

With those suggestions, businesses in sector can then refer to UKWAS as a means of awareness and continuous improvement

Stuart Wilkie, Scottish Woodlands [6] *, received 08/03/16

Just noticed a wee correction – in 2.12.1 I think it should read sections 4.1 and 4.2 not 4.1 to 4.3.

Can you make a note of this for the next Drafting Group?

Mike Seville, Country Land and Business Association [11]*, 09/03/16

A couple of general comments.

- I have concerns that the document does not reflect the changes that will be necessary to respond to climate change and pests and diseases.
- The document takes no account of the current discussions about what constitutes a valuable habitat (rewilding) i.e. that's what is happening when trees colonise open land.
- The land use changes that will be necessary to enable trees woods and forests to play a full role in improved water management

It would be a shame if this standard is used to hold back forest expansion.

I am also not sure why forests/forestry suddenly seem to have become dirty words and would ask that they be re-instated.

Finally, and most importantly I am not convinced that any of the changes that have made have certification more attractive to the vast majority of owners.

Paul Williamson, British Association for Shooting and Conservation [23], received 10/03/16

BASC does not have any comments to make on the UKWAS 4 draft. This reflects the excellent work the working group has done in considering all the consultation responses and the fine tuning thereafter of the UKWAS 4 draft.

Rachel Chamberlain, Natural Resources Wales [18], received 11/03/16

Three comments on the draft:-

First suggested update in blue:

The woodland management unit

The woodland management unit (WMU) is the area to which the management planning documentation relates – see section 2.1 of the certification standard. A WMU is a clearly defined woodland area, or areas, with mapped boundaries, managed to a set of explicit long-term objectives.

For example, a WMU might be a single ownership incorporating several areas of woodland that are managed within a woodland management plan; several separate ownerships managed within a woodland management plan; a community-managed forest; a management subdivision of a national forest service such as a forest district covered by a woodland management plan ; **woodland management planning for a forest district/equivalent can be fulfilled by strategic and work programme planning & monitoring at national or district/equivalent level as appropriate with forest design covered by individual or landscape grouped forest plans.**

Note: The terms ‘woodland management unit’ and ‘forest management unit’ are synonymous.

3.5.1

- Where appropriate, wildlife management and control shall be used in preference to fencing.
– Does this relate to deer fencing?

4.6.4

- In most hectares there should be a few standing and fallen stems contributing to the overall deadwood provision – not sure this makes sense?
- There should be no removal of existing deadwood. – as above? Could there be situations when there could be removal of deadwood if it does not impact on sensitive spp or within areas of high conservation value?

Siân Williams and Nick Phillips, Royal Society for the Protection of Birds [19], received 14/03/16

Introduction

The RSPB welcomes the opportunity to respond to this consultation. We recognise that a significant amount of work has been undertaken during the revision of the Standard and welcome the simplification of the structure of the document.

However, the RSPB remains concerned that the revision represents an easing of environmental standards and a movement towards being a certification scheme for large scale timber production. We also note that many of our comments from the second public consultation have been discounted. We continue to have many of these concerns, and seek to have them adequately addressed in order to retain our ongoing support for the Standard.

General

We would like to express concern that the UKWAS Steering Group appears to be comprised mainly of stakeholders with an economic interest in commercial forestry. We feel that the revisions to the Standard reflect this apparent imbalance, with a lessening of environmental and social content, compared to previous versions, being evident. We believe that the Standard must not prioritise

economic benefits, particularly where the benefits are directed towards private interests, as opposed to public good.

We remain concerned that the content and approach of the revised Standard does not sufficiently drive biodiversity enhancement for priority species and habitats. Indeed, this iteration of the Standard appears to represent a weakening of safeguards for environmental objectives compared to previous versions.

We share the concerns of other NGO stakeholders that the definition of “small woodland” has been removed. We would also like to express concern that the definition of a “woodland management unit” is not more specific. At present there is scope for an entire commercial forest to be considered as a single WMU, which we believe would not be in the spirit of the Standard.

Specific Concerns

The following section outlines outstanding concerns RSPB has relating to specific sections of the proposed revised Standard. All comments relate to the 123 page “full” consultation document.

Requirement 2.2.1

The phrase “environmental values” should be defined.

The inserted paragraph *“There should be a link between features and sensitivities identified in (b), (c), (d), and (e) and the setting of management objectives. Equally, monitoring should be linked to potential positive and negative impacts of management on these features and sensitivities and to the delivery of management objectives”* is very open and may allow economic objectives to over-ride environmental and social objectives.

Requirement 2.3.1

We would suggest that consultation with statutory bodies is most likely to occur when there is already a legal obligation to consult statutory agencies, for example when changes in management are proposed for a designated site. We would therefore suggest that the wording is altered to reflect that all relevant environmental stakeholders should be consulted when appropriate.

We would propose that the following text is inserted in the guidance column: *“for biodiversity issues, owners/ managers should seek to identify and consult local representative groups or bodies which can represent biodiversity interests, including the Local Biodiversity Partnership (or equivalent) where relevant”*.

Requirement 2.3.2

Grey squirrel control would only be supported by RSPB in woodlands where red squirrel conservation is a priority.

The phrase *“ecological damage”* is ambiguous and should be subject to an agreed definition.

Requirement 2.4.1

We believe that there is insufficient justification for the following statements in terms of public benefit:

“Timber harvesting and restocking plans shall not jeopardise the long-term productive potential of the WMU and are consistent with management objectives.”

“The long-term productive potential in plantations should be considered primarily in terms of timber production.”

The statement *“Woodland management shall not diminish the long term productive capacity of the site”* is potentially misleading. Habitat restoration may diminish long term productive capacity by reversing damage such as drainage or nutrient enrichment. This is acknowledged in the guidance column to an extent, so we would question why it is included as a standard.

Requirement 2.4.5

Although we welcome wording to conserve threatened species, we would suggest that the word *“priority”* could be used to cover all species that require protection. Such species are identified in the relevant country level biodiversity lists. The word *“priority”* should be defined to ensure that there is no ambiguity in terms of its definition.

“Proven detriment” is an ambiguous term, lack of evidence does not equate to lack of harm. An agreed definition should be included.

Requirement 2.5.1

Specialist advice for priority species and habitats may need to be sought and we would welcome some wording in the guidance section which acknowledges this.

Requirement 2.5.2

We would recommend that the guidance column includes a sentence recognising that new woodland planting should not fragment existing open habitats or break an existing ecological network.

Requirement 2.6.1

We are concerned that the standard now requires new woodlands *“Deliver economic goods and ecosystem services”*. Economic goods can be for private personal benefit only, and we would argue that such a statement has no place in this Standard. It should be entirely up to the owner if they want to deliver economic goods, and owners who deliver public benefits (non-monetary) should not be penalised. We would be concerned that this requirement could lead to the degradation of environmental features in order to maximise economic benefits (*“services”*).

Requirement 2.8.1

We would like to reiterate the point made in previous consultation responses that whenever the term *“resilience”* is used it should have a prefix of *“ecological”*. Resilience does not have an official legal definition. Economic resilience is often conflated with ecological resilience, and the actions taken can be heavily conflicting.

The Standard asks for *“Evidence of Ecological Site Classification analysis”*. This is a tool that primarily assesses yield class (i.e. timber production potential) in relation to climate change. It might indicate that a particular native tree species is unsuitable in future climate because it is likely to be low yielding, despite it still being able to function perfectly well ecologically. We would urge caution in the use of this tool.

We are concerned that the following statement has been removed from 2.8.1:

e) No more than 75% of the WMU shall be allocated to a single species in new planting or in regeneration plans for the next rotation of an existing woodland.

We believe the removal of specific percentage guidelines may result in some woodland managers allocating a higher proportion of planting to a single species, which would be detrimental to forest ecological resilience. We would expect that the higher the diversity of tree species within a woodland, the more ecologically resilient that woodland will be in the face of climate change and the emergence of new pests, disease and invasive non-native species. We would therefore wish to see, as a minimum, a retention of existing diversity. Although the Standard sets out the spirit of enhancing diversity, the removal of percentage requirements leaves the requirement vulnerable to being exploited by those managers seeking to reduce diversity for commercial profitability reasons.

With regard to the guidance which states “use should be made of natural regeneration or planting stock from parental material (...) **where appropriate and possible**”, we would expect that owners/managers should justify any situations where it is deemed inappropriate or impossible. Wording to this effect should be included in the guidance.

Requirement 2.8.2

*a) Non-native species shall only be introduced to the WMU when evidence or experience shows that any invasive impacts can be controlled effectively. We believe that this statement represents a **serious weakening** of the previous standard.*

We are also concerned that deliberately introducing some invasive species is in contravention of legislation. We would therefore welcome acknowledgement of which non-native species (in general terms) are being referred to in this requirement. For example, those which are exempt from legislation such as the Wildlife and Natural Environment (Scotland) Act 2011.

In reality:

- We cannot accurately predict which species will become invasive;
- Plants have a lag period during which they are established in the wild but don't have a detectable impact – there can be a century or more before invasiveness emerges.
- When invasiveness does become evident, it is often too late to take effective control action: this is why guidance emphasises prevention of introduction over remedial action.
- Climate change is expected (and evidence is showing this is right) to make conditions more conducive for the establishment and spread of more non-native species
- There are huge uncertainties over the efficacy of control measures for invasive plant species.

We would recommend that wording such as “*no plant shall be introduced or caused to grow in a WMU that evidence and/or experience shows may have invasive capacity*” is included in the requirement.

We recommend that a biosecurity response plan is in place, which sets out how managers/ owners will respond should new INNS/ pests/ diseases be encountered. This is linked to requirement 3.4.2.

Requirement 2.10

We believe that statutory protected areas should not count towards the 15% as there is already a legal obligation to manage these areas for their designated feature(s). The 15% should be an additional area to ensure that a balance between economic and wider environmental and social objectives is achieved. This is in the spirit of the Standard encouraging owners/ managers to go

beyond the minimum legal requirements. The 15% should be as consolidated as possible, not disparate features which are combined to meet the total. The exception to this would be where disparate features require protection in their own right.

Requirement 3.4.2

We would welcome clarification on the definition of a “notable” species.

Requirement 3.4.5/6

We would suggest that fertilisers are not used in areas with soils which are sensitive to nutrient enrichment. The suitability of such sites for woodland (commercial) planting should be seriously considered.

Requirement 4.1.1

The requirement to only maintain the most important sites is unacceptable and conflicts with national and international commitments - maintain might mean in keeping it in poor condition. This appears to be a weakening against previous standard.

Requirement 4.3

We believe that this section is a significant weakening compared to the previous standard. We believe that this section represents a change in emphasis from the progressive improvement of PAWS to one which advocates maintenance of the existing conditions. We would strongly suggest that the wording of this requirement from the current UKWAS 3 document is retained.

Requirement 4.4.2

We would suggest that freshwater habitats such as ponds are added to the list of “small-scale habitats within the WMU”.

*“Valuable semi-natural habitats (e.g. moorland, heathland, wood pasture and grassland) that have been colonised, planted, or incorporated into the WMU, but which have retained their ecological characteristics (or have a high potential to be restored), shall be identified and enhanced, restored or treated in a manner that **does not lead to further degradation to potential for restoration**”*

We recommend that the wording is altered to that shown in red. This could protect against moves towards continuous cover systems on important open habitats like heathland, where CCF would prevent the seed bank renewing. It would also guard against inappropriate broadleaf planting on open habitats or sites which currently have the potential to be restored to their natural open state.

Requirement 4.6.1

The current Standard (UKWAS 3) states “Natural reserves: areas of woodland have been set aside where biodiversity is the prime objective. Natural reserves shall comprise at least 1% of plantations and **5% of semi-natural woodlands.**” We would question why the 5% figure has been removed from the revised Standard? Ideally we would like to see at least 5% natural reserve in **all** woodlands so the removal of this figure for semi-natural woodlands appears to be a retrograde step.

Requirement 4.6.4

We believe that this requirement represents a weakening of the Standard in UKWAS 3. We believe that the importance of having a **variety** of deadwood types is not adequately reflected.

Requirement 4.9

We would once again state our **strong opinion** that the use of lead-free ammunition must be a part of a higher level voluntary sustainable forest management standard. The use of lead ammunition is environmentally unsustainable and we would welcome the introduction of an UKWAS requirement to restrict its use in all habitats, not just wetlands.

Conclusion

In general, we remain supportive of the UK Woodland Assurance Standard and welcome its spirit of stakeholder cooperation. Should you require any clarification on any of the points raised in this consultation response, please do not hesitate to contact us. We welcome the opportunity to engage in dialogue to resolve our outstanding concerns.

Simon Lloyd, Royal Forestry Society [12], received 14/03/16

1. Following concerns raised by RFS members about UKWAS, the RFS consulted its members about their views on UKWAS in general and the Fourth Edition specifically. UKWAS issued a final consultation on the latest draft of the standard in February. This draft was intended to respond to the feedback from woodland owners and managers to previous drafts of the standard.
2. The role of the RFS is to promote wise and sustainable management of woodland. Our goal is for all woods to be actively managed, and managed to a high standard. The Society shares and disseminates practical and applied knowledge and experience about all aspects of woodland management from multiple sources to its members and to the general public.
3. The Society does not have a position on certification. Certification is voluntary and the decision whether to participate is for individual the woodland owner or manager. If the woodland owner/manager views UKWAS as a useful decision support tool and source of information on responsible woodland management, and the benefits are balanced by the effort required, or it meets other management objectives, they will opt to participate. If not, there are many other sources of information on woodland management that they can turn to. It is therefore in the interests of the organisations operating certification schemes to make them as attractive as possible to the target audience.
4. The RFS consulted 2,200 members by email on UKWAS certification and asked three questions:
 - Having reviewed the standard would you be inclined to certify the woods you own or manage? (YES/NO)
 - If you answer to (1) is yes, what is the benefit to you of certifying your woods with UKWAS?
 - If your answer to (2) is no, what is preventing you from certifying your woods with UKWAS? Where possible please reference those parts of the draft standard that concern you.

The views expressed by members on this consultation (*in italics*) are their own and do not represent RFS policy. We are feeding these views into the UKWAS consultation to provide additional supporting evidence which is intended to help inform the standard.

5. 64 responses were received (3% response rate). This is considered a relatively low level of participation compared with previous RFS member surveys. For example, a survey of members on grey squirrel control in 2014 generated over 700 responses. This would indicate that for the majority

of RFS members' certification is not an issue they feel strongly about, are not interested in, or are unaware of.

6. Of the responses received

i. 33 or 52% do not support certification. This includes members whose woods are already certified.

ii. 8 or 12% support certification.

iii. 8 or 12% engaged with the detail of the draft standard and provided specific comments and feedback.

iv. 15 or 24% expressed no interest in certification.

7. Of the 63 responses, the majority (52%) are not persuaded by the revised standard. The views expressed are not based on a close (or any) examination of the draft standard, but are nevertheless strongly held. This would indicate that despite efforts to make the revised standard more simple and accessible, it will not have a material, if any impact on levels of participation. Barriers to participation expressed by RFS members are:

i. Current regulations (management plan, felling licence etc.) ensure responsible woodland management and are the best assurance of compliance with UK Forest Standard guidelines. UKWAS is viewed by many as an additional, duplicative and unnecessary burden. A sample of typical comments are:

I believe that the forestry authority should be the authority for controlling what happens in the state and private woodlands in the UK. I do not believe that private organisations should demand higher standards and so am strongly opposed to the principle of certification.

I would have thought that as woodland owners need permission from the Forestry Commission before felling can take place the Commission is in a perfect position to say if the woodland is being managed correctly. Is UKWAS just another unnecessary level of bureaucracy?

I follow the FC requirements and get their assent to thinning. I therefore feel that I conform to the essence of forest stewardship by maintaining the integrity of the woodland. Frankly, going into the nitty gritty of getting certification, would in my circumstances achieve very little and be of little help to the concept of Certification.

We did try the Certification route, and found that to be incredibly bureaucratic covering inter alia areas e.g. Health and Safety which would have been covered elsewhere in the general H and S procedures. As a result, we didn't feel the need to become certified since we are regulated by the FC. They monitor the situation, and we have just had a 20-year Management Plan adopted. If that isn't good enough forestry regulation for the UK Government, I don't know what is!!

Bearing in mind the extremely strict rules that already govern forestry practice in the UK I cannot understand why ALL UK forestry cannot be declared Certified as sustainable without having to go through further testing, examination and cost.

It seems to me that woodland certification is a solution looking for a problem. The legal constraints on woodland management are many and various, from Health & Safety to European Protected Species, felling licences to planning permission for forestry extraction roads. Enough is enough

ii. The cost (time and money) and complexity of certification are not balanced by a perceived timber price premium. Some respondents acknowledge that certification provides better access to markets

and only one sees a clear, measurable financial benefit. If there is a genuine price premium for certification, timber processors and merchants will have to do a better job establishing and communicating transparent timber pricing mechanism which demonstrates this convincingly to woodland owners. Until this happens, current perceptions will persist. A sample of typical comments are:

My woodlands are certified and quite frankly I do not think it makes any difference as to the price I obtain, not only in my own woods, but those for whom I sell timber.

There has never been any financial advantage to woodland owners for certifying their woods. The brunt of the operation is borne by the agent who will never properly be compensated for the time spent certifying his or her client's woods.

The extra admin costs far outweigh any perceived timber value premiums. UKWAS would be another unnecessary layer of admin. I would only consider UKWAS further if the admin reduced and there were real timber premiums to be had.

I have a large and diverse range of clients who have no interest in further red tape burden to running their businesses. Many clients feel that this burden is not worth the additional management requirement or perceived/potential increase on timber sales. They are also concerned about the ongoing costs of audit or possible impacts on how their woodlands are managed and possible restrictions on how they wish to use them for personal recreational use and enjoyment.

The cost of certification cannot be justified as the premium paid for "certified" timber is minimal or non-existent and is only likely to apply to certain grades of timber, which will only form a small part of a woodland's output

Unless and until there is a premium price for certified wood and timber then I really have no interest in certifying my woodlands. It does not help us to manage our woodlands better or more productively. Indeed, it could well act as a disincentive for smaller woodland owners.

iii. Small woodland owners are least likely to participate. There is a disproportionate burden on small woodland owners, especially those with complex stand structures. If small woodland owners are not the target audience for the UKWAS, this should be made clear. There are alternative, lower cost routes to certification, for example via the Grown in Britain scheme. TA sample of typical comments are:

Our wood is only 40 acres and has no high value trees such as oak or other more valuable commercial timber, its mainly Sika Spruce. For us to join any UKWAS scheme, would be too expensive with no added value, either commercially or financially.

The information required doesn't appear to differ substantially from that for a Forestry Commission Management Plan so I don't see how it will improve the quality of my forestry. The bureaucracy, however slimmed it may be, is still far too much to consider for an 8 ha woodland.

It may be OK if certifying hundreds of acres and totally non-beneficial to small woodland owners. If it is worth doing more owners would certify their woods.

8. A small number of respondents (8 or 12%) are open minded or supportive of certification on the grounds of:

- i. The business case is strong
- ii. Access to markets justifies the effort

iii. It is seen as a useful tool to improve the quality of woodland management

iv. It supports UK forestry and is a safeguard against illegal logging

Examples of comments from members in support of these views are:

Yes, we certify woodlands for clients who harvest significant volumes of timber year on year as the economics remain favourable. I would prefer not to but the business case is very strong. For smaller woodlands or where there is limited timber production we very much avoid certification and we run our own group scheme. I would advise that the noises suggesting that certification will be easier in the future are ignored and owners must look at the business case very, very closely

I am putting increasing volumes of timber onto the market and my timber merchants pointed out to me it is becoming more difficult to place uncertified timber with the sawmills and that marketing is considerably improved if the UKWAS standard is achieved and Certification granted. There is always the question of increased price for the timber being sold but it is not so much that that has been driving me as the need to find markets.

If you are selling a lot of timber, then it is better to be certified otherwise your market is limited and if there is a lot of timber available the mills will take certified first.

The main reason for going down the certification route was because I was concerned about non-certified material being subject to a price penalty; to put that another way, I did not seek certification in anticipation of a premium price being paid. I do not have sufficient knowledge of timber markets to know whether or not there is a significant price differential to justify the cost of certification, but even if this is not significant I am still a supporter of certification because of the discipline it brings to forest management. For example, the need to have a written forest management plan and to maintain records, to think about all three elements of sustainability and not just the economics, to broaden the specie mix, to reduce the use of chemicals, improve communication with neighbours and the wider community etc.

I am finding it professionally stimulating to be involved in certification and it has certainly sharpened up some of my management practices both in the silvicultural field and in the environmental management of my woodlands.

At the time the UK first got involved (in certification) forestry had been through a near fatal clash over its environmental record and certification was a major factor in its rehabilitation to the extraordinary success of today. Linked to the domestic position has been the widespread concern over timber sourcing amongst the general public because of the rainforest story. In addition, it is worth remembering that UKWAS has protected forestry from all sorts of bodies which would have liked to impose their own, usually spectacularly ignorant, standards on the industry. The danger to the industry is that a feeling that certification is unnecessary takes hold and processors can't get the proportion of certified wood they need. Sadly, it won't mean a price rise for certified wood, just a great opening for Scandinavian exporters.

My son's woods are certified, and have been for many years. As a result, we derive some benefit in terms of timber prices, but this has to be weighed against the subscription. Probably in strictly financial terms we would prefer not to be involved. But we have regard to the position in developing countries. Certification is one of the few safeguards against illegal logging and consequent rainforest diminution and damage. It seems difficult to justify preaching certification to developing countries if we do not follow it ourselves.

9. Eight respondents (12%) have provided detailed feedback on specific provisions in the draft standard which the UKWAS drafting committee should consider. This feedback is provided in full and unedited below. Numbers refer to sections of the standard.

i. There are some off-putting bits that have crept in, either jargon or bits that are gobbledygook which I feel could be tidied up. A couple of examples

2.4.3 Authorised harvesting of non-timber woodland products and use of ecosystem services shall not permanently exceed, or diminish, the long-term productive potential of the WMU.

2.8.1 Natural or artificial regeneration shall restore stand composition in a timely manner to pre-harvesting or more natural conditions.

Or

Environmental values Why introduce this terminology when all it really means is “the environment”?

Precautionary approach. What does this mean in practice and how will an external auditor interpret this? A potential black hole at audit.

The standard could benefit from a review to ensure it is written in plain English

ii. 2.3.1: I have misgivings about unqualified public access; for instance, I don't want my badger setts to become widely known for fear of illegal digging. Kingfishers also very prone to disturbance at nesting time. And dogs not on leads can disturb ground nesting birds but may deter roe deer from settling in. The ecological sensitivities of some woodlands are not therefore adequately recognised in this document.

iii. 5.1.1 Gathering wild fungi: This is becoming a major problem and FC has been criticised for not pressing for more stringent conditions than the high 1.5kg per person limit per day. If one's land has some sort of Nature Reserve status, it is possible to ban picking except for identification purposes. I do believe the text needs modification here, at the very least to state the present limit which may be unknown to many woodland owners. The owners, it should be recognised, should be able to take down details of indiscriminate collectors, e.g. car numbers or photos. This should have the support of UKWAS.

iv. 1.3.1: Whether we can use GMOs is a matter for government, not UKWAS.

2.6.1: why can't I plant a 20ha block of pure eucalyptus on non-forestry land?

2.8.1: it really is time to move on from 'native is best'. This does not represent government policy which is “right tree, right time, right place”

3.4.1: There's plenty of protective legislation on pesticides and no need for UKWAS to add to the burden.

Generally, there is quite a lot of common sense in the document, but then they simply can't resist 'nanny knows best' in the detail.

v. The sections which cause me most concern are as follows

2:71 A presumption in favour of Continuous Cover Forestry is difficult to accept. It is relatively untested in English conditions and gives rise to both high supervisory and harvesting costs.

2:81: A presumption in favour of native species may render difficult a response to global warming by introduction of alternatives.

2:32: The involvement of adjoining woodland owners in joint action plans will inevitably lead to delays in agreeing and implementing plans

2:92: Semi natural woodland. The condition that conversion will be limited to 10% in any five-year period is an inhibiting stipulation when time may be of the essence

2:10: The condition that 15% of the WMU be managed for conservation or the enhancement of biodiversity is impractical in that not all woods are suitable for this treatment

2:12: The restriction upon non forestry use inhibits the construction of glades and loading points

2:14: Monitoring. The establishment of records of treatment, timber volumes, and progress against targets on a wide range will inevitably require a data base which will be expensive to implement and administer.

3:13: Difficulties are likely to arise in the supervision and monitoring of staff employed in harvesting operations in standing sales.

3:24: A presumption against burning of lop and top will give rise to problems in preparing felled sites for replanting.

4:6: The plotting of veteran trees is a time consuming operation and a treatment programme is both difficult to implement and difficult to record and monitor.

4:6:4: The management of standing deadwood frequently clashes with public safety issues and is difficult to monitor.

4:8:1: A growing number of consul tees in this area particularly locally, make this excessively time consuming thus making agreement difficult.

5:12: Where Public access exists via rights of way they frequently become a target for extended public use demands. This provision suggests a presumption in favour of such demands.

vi. The specific thing that concerns me is the level of detail regarding HAPS / SAPS on a property by property basis that has been introduced – to what extent will an owner have to comply / deliver on all the implied targets that HAP/SAP plans are intent on? I am concerned about the constant ebbing away at productive forestry – as if Forestry was a highly damaging activity, and as if it was making dreadful contributions to biodiversity and climate change – when compared to nearly all other land uses it has many climate change and biodiversity merits.

vii. I have looked at the draft proposals for Certification, but not the other papers. A point I suggest requiring reconsideration concerns the provisions under 2.2 and 2.3. The object of certification is to ensure sustainability in all aspects. A good owner or manager will do that anyway- it is fundamental to good forestry practice. However, another principle for a manager is that management complies with the owners wishes (if these are unsound then a manager will advise the owner accordingly and if his advice is not accepted should decline to act). However, the owner has property rights. If he accepts grants from the State, then he may be required to accept some restrictions on those rights to obtain the grant - that is his choice. He may also choose not to accept the grants. It would then be an infringement on his property rights to expect compliance with the provisions under 2.2 and 2.3 before certification is granted. The requirements under these sections concerning consultation etc. have NOTHING to do with sustainability and at best can only be described as SOCIAL ENGINEERING. As a

woodland owner I would not expect to give my views or advise on cropping patterns in a neighbours' fields or for that matter on the colour of a house to be seen in the distance.

viii. The good points in my view (member of UKWAS drafting committee) are.

- *The reordering gives the standard a more logical flow*
- *The Requirements are now the only compulsory elements of the standard so it is much clearer. Previously some elements of Guidance and some Means of Verification were actually compulsory. This change is also intended to put the owner or manager in the position of bringing forward evidence to support what they have done rather than the auditor picking holes and seeking specific pieces of information. i.e. Auditing should be less box ticking and more practical forestry.*
- *Allied to the above the standard is now size neutral. So the smaller and lower impact your activities the less supporting evidence you should need. Also generally speaking evidence can be more field based and less paper based. At least that is the intention.*
- *Although not completely eliminated there is less 'Forestry by Numbers' We want good decisions not decisions to meet artificial thresholds.*

All of this is intended (at least by the foresters on the drafting group) to shift the power back towards the forest manager so that they can comply with the standard but still feel they can make good silvicultural decisions. It remains to be seen if this is what happens!

David Williams [1], received 14/03/16

Here are my comments on the latest draft.

1. The panel are to be commended for keeping it relatively brief, and resisting calls from non-productive-forestry interests to add further verbiage.
2. Nonetheless, it remains a document to which the FSC has had much input, and productive forestry has had little. For instance, Clauses 2.8.1(c) and 2.8.2 are extremely hostile to non-native species, despite the fact that the UK timber industry is mainly reliant on these.
3. Many of my comments to the previous draft remain valid. Small woodland owners will still view it with dismay, and farmers will still be discouraged from planting woodland. Clauses 1.1.1, 1.1.3, 1.2.1, 3.3.1, and 5.4.1 first bullet point, all just amount to "obey the law": but everyone should obey the law anyway, so these clauses are pointless.

Robert Gladstone, Royal Scottish Forestry Society [13], received 15/03/16

I am responding on behalf of the Royal Scottish Forestry Society to the consultation on the 4th Draft edition of the UKWAS standard.

The Society supports sustainable forest management, and the use of UKWAS certification to demonstrate sustainability.

It is important that the standard is simple, straightforward, and easy to understand. We would welcome any revisions that achieve these ends, and that encourage forest owners to certify their woodlands. On the other hand, any revisions which impose increased administrative burdens and costs on the industry are most unwelcome.

In the UK there is already a robust regime of felling controls administered by the Forestry Commission. In addition, many woodlands are managed under some form of Forestry Commission grant contract, and this assists in ensuring high standards of management.

In summary, we welcome any moves towards simplification, and oppose any changes which make UKWAS certification more onerous.

Angus Mackie, Forest Enterprise Scotland [17]*, received 15/03/16

Length of Guidance

The guidance text against several of the requirements is lengthy and we feel there would be benefit in making the guidance, and thus the Standard itself, shorter and more succinct.

Guidance vs Requirements

There are instances where the guidance is effectively being presented as part of the requirement. In these cases, if appropriate, it would be helpful for the requirement itself to be amended to incorporate the relevant aspects covered in the guidance.

Clarification with regard to Obligations on 3rd Parties

There is a disparity between the requirement at 1.1.5 and the “Third party rights - Leases, burdens in title, ownership rights and legal restrictions on management” section in the Introduction as they relate to the extent to which leaseholders must conform with the Standard. The wording in the Introduction reflects what we consider to be the intended meaning i.e. that is, whilst they should be made aware of those requirements of the standard which are relevant to the rights they hold and how they can assist with compliance conformance, it is not necessary for third parties to formally agree to conform to the requirements.

Productive Potential of the WMU (Section 2.4.2)

In our view the Requirement at 2.4.2 not to jeopardise the long term productive potential of the WMU would be more appropriately focused on maintaining the long term potential productivity of the site/soil, rather than the level of timber production per se.

Andrew Heald, Confor [10], received 15/03/16

Thank you for the opportunity to comment on the final draft of UKWAS 4. This submission is a combined effort from Confor’s country managers for Scotland, Wales and England and from myself.

I believe that whilst the latest draft is a significant improvement, it should not be forgotten that the primary purpose of certification is to enable the communication that forest products have been harvested from a well-managed forests. The emphasis of certification should be to facilitate active management to produce a range of products. There are a number of issues which I wish to highlight

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- Certification in the UK needs to be increasingly focussed on risk and on outcomes, I believe this latest draft has moved away from the overly prescriptive “forestry by numbers” approach in the current version 3. It is imperative that Forest Managers are encouraged to

seek new and innovative solutions to work towards sustainable forest management, rather than becoming hamstrung in a paper-work chase of providing evidence and procedures.

- The reordered standard gives UKWAS a much more logical flow; and the compilation of all actual “requirements” into the column requirements is a welcome improvement.
- The development of “size neutrality”, reflects my earlier comment on risk; the focus on certification should be on activities with the highest potential for impact, not simply those which are easily audited.
- I remain concerned about the discussion on species composition and set percentages; whilst understandable and welcome in some circumstances it can also be a perverse driver for decision making. The focus should be on good forest management to sustainably meet the owner’s objectives, not simply “box ticking”. UKWAS should promote *good decision making not decisions to meet artificial thresholds*.

UK Certification has become the norm for the FC, NRW and the large investment plantation companies, however it has struggled to gain traction and has in fact alienated many other forest owners. The next 12 months is crucial for certification to demonstrate that it is appropriate and applicable for all forest owners and managers, not just the biggest and simplest.

Patrick Mannix [2], received 15/03/16

UK WOODLAND ASSURANCE STANDARD 3.1 - A WOODSMAN'S ANATHEMA

For the last 15 years, I have been the fortunate owner, manager and operator of 32ha of part ancient, largely broadleaf, woodland (Sandhurst Copse & Sheepwalk) in the Surrey Hills AONB. Several years ago the management of the site was commented upon following a Royal Forestry Society visit as an example to other such woodland owners. Revenue generation to support the woodland is a key objective, I have a sawmill on site. My largest customer is Surrey Council and hence accreditation as a sustainable source is a matter of interest.

I am greatly concerned regarding the UK Woodland Assurance Standard 3.1. I have read the whole document and have the following observations.

The document is much too long (60 pages), it needs to be much more succinct, maybe 5 or 6 pages. If you took a fresh piece of paper and had to write down (only) the two most important issues to ensure the sustainability of forestry or woodland operations (in supplying wood products), the ones I would write would be:

- **Understanding and management of the soil, including management and replenishment of nutrients, micronutrients and minerals and understanding and care of the microbiome of the soil, evolved over hundreds of millions of years, about which we know little and to which we can inadvertently do so much harm. Without the soil and its support, the woodland or forest would not exist.**
- Understanding and management of the appropriate trees and associated plants, insects, etc. Without such understanding we cannot hope to succeed.

Unfortunately, UKWAS 3.1 does not address these issues. The second is indirectly referred to via various Forestry Commission and other edicts, which may or may not adequately address the subject. ***The first and more fundamental, however, is not referred to at all!***

I would appreciate your comments.

Accreditation for the standard as proposed for a woodland and operation of my size is completely unmanageable. It expects everything to be documented, even that which is directed by instinct and intuition. It would appear to be a lawyers' and box tickers' paradise and a woodsman's anathema!

If I can be of any assistance in the necessary deliberations I would be happy to try to assist.

Robert Smith, Carbon Neutral Solutions [3], received 16/03/16

As I have not been present at the last 3 meetings it makes it difficult for me to make comment on all the changes that have been made, however I can agree whole heartedly that there has been a considerable amount of work that has gone into the revision which is all to the benefit of the UKWAS scheme and hopefully making it more accessible to wider more diverse woodland / forest areas.

My only comment is as follows

Having worked in the private sector for most of my forestry career I still see significant barriers for small wood land owners and private estates. From what I can see the guidance notes are key to the process and the interpretation of that guidance by the assessor (s). A lack of fundamental understanding by the assessor could be a complete turn off for the owner / manager.

I feel that any changes (if any) should focus on making the guidance notes more flexible or at least ensuring that assessors have the relevant experience of the woodland or forest under assessment. If it's purely a book exercise, then the reluctance of owner / mangers to sign up will continue.

Please let me know if I have got this completely wrong but it's my personal opinion and experience.

Simon Hart, Egger Forestry [8], received 16/03/16

I have read the pre-approval draft of UKWAS 4 and on behalf of Egger Forestry I am happy with this draft.

Gordon Pfetscher, Woodland Trust [20]*, received 16/03/16

The Woodland Trust welcomes the opportunity to comment on the pre-approval draft of UKWAS 4. This response to the pre-approval draft UKWAS 4 from the Woodland Trust should be read in conjunction with the detailed comments submitted on the pro-forma itself. The comments below highlight more generic points which were difficult to address on the template as they are often points of principle.

Positives

The restructure of draft UKWAS 4 is the most radical since its conception. It's a brave move which has meant significantly more work but we believe has been worth it and our successors will thank us for it (those impacted by the re-ordered sections in the short term probably won't). We believe draft UKWAS 4 is more logical and will make more sense to those using UKWAS in practice, including during audits.

In particular, we welcome the greater emphasis on protecting certified woodlands from being converted to alternative land-use, the inclusion of a requirement on veteran trees, the cessation of

operations and consequent repairing damage to sensitive habitats and features and the greater protection of non-timber woodland products during harvesting. The section on monitoring by bringing all the requirements together in one place is also positive.

Remaining concerns for the Woodland Trust

General

Stakeholder (im)balance

We are very mindful of the imbalance of stakeholder interests attending both the review group meetings and steering group meetings. In our opinion, draft UKWAS 4 reflects this imbalance. Would draft UKWAS 4 look different if (for example) social representatives outnumbered economic representatives by several factors? Is the weighting of stakeholder feedback from those sectors under-represented at meetings being influenced by those attending the meetings?

The imbalance may be an issue for both FSC and PEFC once it comes to ratifying UKWAS 4 by their respective international boards.

Small woodlands

Draft UKWAS 4 proposes to be size neutral and this is being sold as a positive. We disagree and feel that UKWAS as our national sustainable forestry standard should be fully fit for purpose and genuinely reflect the actual woodland resource in the UK, whether certified or not. For example, there are many tens of thousands of woodland holdings less than 10 hectares in size in the UK. Draft UKWAS 4 treats these low risk woods virtually the same way as intensively managed and/or extensive forests such as (but not confined to) the holdings of our state forest services.

Having an UKWAS which at least recognises and even better caters specifically for genuinely small woods, is the first step towards making certification more accessible and ultimately more affordable to an audience of owners and managers who quite understandably do not engage – there is little if any incentive for them to do so at present. The Woodland Trust and FSC-UK feel there is much more that could be done to make UKWAS more accessible and attractive for small woodland owners/managers. FSC-UK have been very supportive to date but it's disappointing that there seems no appetite to engage amongst others attending the meetings. It's not a positive message for UKWAS.

At the very least there should be the retention of a definition of a small woodland in the Glossary. UKWAS 3.1 currently defines the term Very Small Woodland as one of 10ha or smaller whereas a Small Woodland is one of 500ha or smaller, a definition we've never supported – quite simply because a 500ha wood in the UK is not a small woodland, even in the uplands.

Retain a definition for "Small Woodland" in the glossary. Deleting all reference to small woodlands sends out a negative message by UKWAS given that this is the reality of woodland ownership in the UK. The evidence and statistics confirm that a small wood is not one of 500ha but more likely one of around 10ha in size. Both the Woodland Trust and FSC-UK are prepared to do more to help genuine small woodlands so shutting the door completely at this stage is unhelpful.

Definition of Woodland Management Unit (WMU)

Although helpful to now have a definition of this fundamental unit of measure, it does at the same time provide scope to interpret and apply Requirements at an enormous scale. A WMU can be a 10ha wood or a whole forest district covering tens of thousands of hectares. Even a whole country

within the UK could quite feasibly be classed as a single WMU. This is attractive for larger enterprises (like ourselves) because it can simplify administration and potentially reduce auditing costs but equally concerning from an environmental perspective because some requirements such as Natural Reserves and Long-Term Retentions are expressed as minimum percentages by area. With very large WMUs, it's possible to meet the Requirements for these (low) percentage thresholds in a certain geographic part of the WMU which then releases the rest of the WMU from these constraints. As a result, this is regrettably now a weakness of UKWAS.

The very large scale of some WMUs, something the proposed definition is likely to encourage further causes significant concern because some (particularly environmental and social) requirements can be fulfilled in a tiny proportion of the WMU only to leave potentially many tens of thousands of hectares legitimately unaffected by them. This is not right for a voluntary standard purporting the highest standards.

Restructuring

The maximum clearfell thresholds for plantations which are currently 5ha in the lowlands and 20ha in the uplands have been removed. Landscape and its design is a subjective matter but ecologically the value of large clearfell areas is highly questionable. This relaxation is not something we wish to see in a voluntary standard.

Clearfell coupes of significant size (over the thresholds set in UKWAS 3.1) have significant negative impacts on social and environmental values. For the public, large clearfell sites are the poorest advert for forestry and are of questionable ecological and social benefit, particularly for deadwood dependent invertebrates and bird-life and recreational values.

Tree species selection

Draft UKWAS 4 still does not do enough to recognise the wider and multiple (economic, social and environmental) benefits of greater tree species diversity; particularly in the uplands. The new Requirement on tree species selection fails to recognise the very real and obvious threats posed by tree diseases and effects of climate change. With complete respect to different owners' management objectives, if the prime objective is financial return (commendable in itself) the new Requirement makes it possible to reduce tree species diversity from the current level to a true mono-culture at significant scale (see WMU definition above). We find this approach incredible given the very real lessons ash dieback and *Phytophthora ramorum* are surely teaching us now. Especially given that UKWAS is voluntary and should therefore go beyond the minimum statutory requirements stated within the UKFS. UKWAS insisting on greater tree species diversity is not likely to be a realistic constraint in the lowlands but should be a constraint in the uplands if mono-culture plantation forestry is seeking certification. The current minimum threshold percentages of 75% and 65% have been proposed for deletion which means it would be relatively easy to end up with tree species compositions no different to those required by the UKFS. This is a lowering of the UKWAS requirement and a retrograde step. Furthermore, by manipulating (increasing) the scale of a WMU, it could be quite easy to meet the proposed requirement with significant expanses of a pure monoculture.

At the very least existing tree species diversity should be maintained, especially in upland plantations and wherever possible enhance woodland areas of poor tree species diversity. Removing minimum threshold percentages is desirably but not if the result could be lower tree species diversity.

Natural Reserves & Long Term Retentions

The point to make is that after what will be almost 20 years of certification, voluntary as it is, the thresholds for Natural Reserves and Long-Term Retentions are still at only 1% of a WMU; WMUs as mentioned earlier which could now cover a whole country in extreme cases. From a resilience perspective, it is in exotic plantations where Natural Reserves and Long-Term Retentions are particularly important.

The very low minimum percentage thresholds for Natural Reserves and Long-Term Retentions, together with the cumulative effects of more relaxed species selection criteria, maximum clearfell thresholds gone and scope to increase the size of WMUs all combined sends out a negative message because it would appear that UKWAS 4 favours those wishing to certify large scale plantations.

Deadwood

The draft deadwood requirement has changed considerably, not for the worse necessarily but it does rely very heavily on guidance now so that much of the rigour within the current Requirement is not there anymore. For biodiversity, it is critical that the wording as proposed “in all wooded parts of the WMU, including felled areas” is retained otherwise there is a real threat of no deadwood left at all on extensive clearfell sites.

It is very important to ensure that both standing and fallen deadwood is maintained and enhanced throughout all wooded parts of a WMU, especially on extensive clearfelled areas.

Mark Aitken, Scottish Environment Protection Agency [22]*, received 16/03/16

Thank you for providing the Scottish Environment Protection Agency (SEPA) with the opportunity to comment on the above pre-approval Consultation of an UKWAS Fourth Edition.

SEPA strongly supports the important role that sustainable forest management has to play in the implementation of the Scottish Forestry Strategy so that the multiple environmental, social and economic benefits of forestry can be achieved. The UKWAS standard is an essential independent certification standard for verifying sustainable woodland management across the UK and SEPA supports the UKWAS approach. SEPA welcomes this new draft edition, although we would like to see the final version have a more clearer reference to the River Basin Management Plan (RBMP) and also on flood risk.

Well managed forestry provides opportunities to protect and improve the water environment and deliver the targets set in the river basin management plans for the Scotland and Solway Tweed river basin districts. There are a number of options for using forestry to control runoff and reduce soil erosion and sediment delivery. These include targeted woodland planting to protect erosion sources, the use of woodland shelterbelts or buffer areas to interrupt the transport and delivery of sediment to watercourses, and the restoration of riparian and floodplain woodland to protect river banks and enhance sediment retention by slowing down the flow of flood water.

There must be a commitment by all the forestry sector to adhere to the UK Woodland Assurance Scheme standards, as well as the UK Forest Standard and the Forest Stewardship Council trademark standards. Compliance with statutory legislation such as the Water Environment (Controlled Activities) (Scotland) Regulations and Environmental Impact Assessment (EIA) Regulations 2011 is also imperative.

We would like to highlight the following omissions/opportunities which we believe will improve the direct relevance of UKWAS Fourth Edition to RBMP and flood risk strategies.

- Conversion to non-forested land (2.13.3) Conversion to non-forested land may be a way of meeting RBMP objectives, for example it could contribute to the reduction of acidification in particularly sensitive catchments. If we could include a reference to the RBMPs it would be very positive. Something along the lines of 'The conversion of the site contributes to the objectives set out in the river basin management plans.'
- Forest roads and associated infrastructure (3.3.2) SEPA has found a number of barriers to fish movement associated with haulage routes. These can be substantial structures (such as pipe bridges) or just poorly maintained culverts which have become perched above the water course. There does not appear to be any references to fish barriers in the document and this is a significant omission. We could add an additional clause here, something along the lines of: 'The impact of existing water crossing points on routes and haulage tracks is assessed and any barriers to fish movement documented and easement measures put in place.'
- There is no reference to river basin planning and water body objectives and it would be highly relevant to include this in the final version. The most obvious place is in 2.5 Assessment of environmental impacts. Under 2.5.1 we could add something like: 'Assessment of current state of water environment and opportunities for improvement and restoration as identified in river basin management plans and supporting strategies and regulations.'
- Restoration regulations, by including supporting strategies and regulations in the statement above we can encompass the new restoration regulations when they go live. Although we have no morphological downgrades linked to forestry, that does not mean that there are no opportunities for re-meandering or restoring watercourses damaged by out-dated forestry practices.

Ian Irwin, Forest Service [16], received 16/03/16

I have comments to make on sections 2.1, 2.8.2 and 5.7.1;

Section 2.1 – Woodland planning should include the following clarification highlighted in blue text;

For example, a WMU might be a single ownership incorporating several areas of woodland that are managed within a woodland management plan; several separate ownerships managed within a woodland management plan; a community-managed forest; a management subdivision of a national forest service such as a forest district covered by a woodland management plan ; **woodland management planning for a forest district/equivalent can be fulfilled by strategic and work programme planning & monitoring at national or district/equivalent level as appropriate with forest design covered by individual or landscape grouped forest plans.**

Section 2.8.2 – Reference to non-native species in this section has a detrimental effect on the new version of the standard in comparison to Version 3.1 as it applies to trees only. I would suggest that this section would be more appropriately located within 2.11 Protection and worded as follows;

2.11.3 a) Non-native plant (non-tree) and animal species shall only be introduced to the WMU when evidence or experience shows that any invasive impacts can be controlled effectively.

b) All new introductions shall be carefully monitored, and effective mitigation measures shall be implemented to control their spread outside the area in which they are established.

Section 5.7 – The Department of Agriculture and Rural Development carries its own risk and does not take out third party public liability insurance. A form of words to cover this scenario may include; The owner/manager and workers shall be covered by adequate insurance including public liability and employer’s liability insurance where required.

I’m happy to provide further clarification on any of the issues if needed.

Rob Green, Natural England [21]*, received 16/03/16

As you will see most of the comments [in Annex 1] relate to the environmental requirements. As it’s late I haven’t really got time to write more of a general covering note, other than to say that: the vast majority of the proposed changes look fine; most of our comments are minor and hopefully helpful; but we do have a small number of more serious concerns which presumably will be less straight forward to reconcile.

I know I haven’t been actively involved throughout all the work that’s been going on, but if you do what further explanation or do discuss/challenge any of the points made, please let me know.

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