

United Kingdom Woodland Assurance Standard

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

Unedited general comments

12 February 2016

www.ukwas.org.uk

This document contains the full text of general comments made in response to the public consultation on the draft of UKWAS 4 which ran through September and October 2015. The responses are unedited apart from one sentence which has been redacted because it relates to an ongoing complaint against a specific certificate holder. 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 summary Consultation Report. 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 contained in the Annex to the Consultation Report.

John Gallagher, Tilhill [11], received 05/10/15

I have made the following comments:

2.3.2 “Membership of a wildlife management group”. This might be better as “Membership of a wildlife group e.g. Wildlife Trust, RSPB, Raptor Study Group”.

2.4.4 “Include” is repeated. Is rights to graze an ecosystem service?

2.6.1 Added “management” to “Water catchment management or soil protection”.

3.2.4 Added “loss” to “Soil carbon”.

3.3.1 This refers to new roads requiring all necessary consents. Forest road upgrades may also require EIA Determination or Prior Notification to the planning authority. Add bullet point in column 3 stating: “Pre-consultation with Local Authority and EIA Determination for new roads, upgrades and quarries”.

3.3.2 In bullet point 2 it might be worth saying that in National Parks we have been asked for pre-consultation by the NPA for forwarder routes.

3.7.1 “Operation Plans” should be Operational Plans”. After “Siltation of water courses” add “or drains that connect to watercourses”.

4.1.1 Should be Special Areas of Conservation. Remove “Biological” from in front of “Sites of Special Scientific Interest”.

After “has been completed for an area prior to significant woodland management operations taking place” add “and for which consent will be required from the statutory nature conservation agency within sites designated as SSSIs”.

4.2.1 Establishing the validity of the site’s status need not solely rely on ancient woodland inventories. Replace “need” with “should”.

4.3.1 “Threats may include shading, deer browsing, windthrow and ground damage from harvesting”. Not only ground damage but damage to veteran trees from woodland operations.

Also 4.3.1 “prescription” should be “prescriptions”

4.4.1 “Plan” should be “plans”

Also 4.4.1 “planted origin” should be “plantation origin”

4.4.2 Add “peatland” after “moorland”.

Also 4.4.2 “Areas with a rich ground flora and shrub layer are heavily thinned” Add “species-“ in front of rich.

Also 4.4.2 Add Cross-refer to FCs Managing open habitats in upland forests.

Also 4.4.2 Add “drainage” to “Potential adverse impacts may include”:

5.1.2 Add Scottish Outdoor Access Code to Appendix..

Glossary of terms

ASSI “A statutory designation in Northern Ireland that offers statutory protection to habitats and species”. Remove second “statutory”.

Reword the following:

National Nature Reserve (NNR)

A statutory designation that offers protection to habitats, species, geology or landform or a combination of these.

Site of Special Scientific Interest (SSSI)

A statutory designation in Great Britain that offers statutory protection to habitats, ~~and~~ species, geology, landform or a combination of these.

Special Area ~~for~~ of Conservation (SAC)

The statutory historic environment agencies: Historic England ~~English Heritage~~, Historic Scotland, Cadw (in Wales) and the Northern Ireland Environment Agency or their successor bodies.

Simon Hart, Egger [6], received 15/10/15

Background: Simon Hart of Egger forestry sits on the UKWAS Steering Group and has been actively engaged with the revision since the first step in the process. Egger generally welcomes the changes that are being propose. The alteration to a smaller number of sections gives the Standard a more logical flow and is particularly welcomed.

A few specific comments on the latest draft are set out below:

Page 8 Refers to Small as in SLIM. However, the glossary only refers to Low Intensity and not SLIM. I suggest we don't use SLIM on page 8 as this could confuse owners, particularly as size was more explicitly relevant in the previous version of the Standard.

2.5.1 Guidance advice on expected level of checks against BAPS, etc would be useful.

2.5.4 Is this too broad because of the use of word "minimise" and therefore open to interpretation? For example, would 75% one species meet the requirement (not in the eyes of some)? Use alternative word to minimise and/or perhaps make clearer link to management objectives.

4.6.4 Deadwood. I believe the revised wording will lead to even less standing deadwood than the current low levels already seen in certified woods and needs to be changed. The Standard should give a clear guide on how much (numbers, volume, dimension) is expected in a typical conifer clearfell. This is the one part of a rotation where a manager can make a big impact on levels of deadwood. Feedback from eg English Nature, stresses the value of having deadwood throughout the site and not just concentrated in certain areas. Compliance with current UKWAS deadwood is variable and often poor. As worded in the draft I believe this will exacerbate the situation.

Ralph Assheton [1], received 16/10/15

As the owner of some 60ha of mixed woodland in Lancashire I write to comment on UKWAS.

My woodland is largely within an AONB, partly in an SSSI, adjoining various listed and scheduled monuments and split into 60 physically separate blocks.

I looked into certification when it first appeared, but was completely put off 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! Having today re looked at the standard I can see that the paper trail has hardly shrunk (if not grown!), so I will not attempting to join a scheme. Until the scheme is focussed on the outcomes of what is actually happening on the ground and not on a paper trail I see little chance of many small owners ever getting involved. We love our woods and actually managing trees and the environment, not filling more forms.

David Atkinson, Edwin Thompson [5], received 22/10/15

Please find attached comments on the draft Requirements.

Generally these are tighter and better organised. However, there remains some scope to tighten these further. Several sections are encouraging further written strategies and reports which are probably never going to be written and give auditors ammunition to find fault.

I would suggest it may be worth 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.

I would like to highlight section 5.4 below, which is a very significant area heavy with legislation and best practice. This is an excellent example of how the document should be written, please consider rewording many other areas in a similar manner.

5.4 Health and safety

5.4.1 There shall be:

- a) Compliance with health and safety legislation.
- b) Conformance with associated codes of practice.
- c) Conformance with FISA guidance.
- d) Contingency plans for any accidents.
- e) Appropriate competency.

It is also clear that one thing the Forest industry needs to do is lobby for further work on the Forestry Regulation Task Force. It is perhaps the plethora of guidance, legislation and regulation which is perhaps more at fault than UKWAS. Hence simple UKWAS statements like 5.4 above can still entail a raft of meaningless forms, procedure and legislation which is simply not workable.

The following are comments made to the short version, "requirements only".

Section	Comments
2.3.1	Remove the clause about consulting all and sundry each time you apply for a grant. This is not practical or useful. Grant bodies have their own consultation.
2.4.2	Productive capacity declines in nearly all woodlands. Reword.
2.5.2	Very vague - remove

2.6.1	Vague and meaningless statement. Suggest – “comply with current best practice and guidance”.
2.7.1	Restructuring can take place over 1 to 2 rotations.
2.8.1	Good
2.9.1	Remove second sentence which is potentially quite restrictive.
2.9.2	Limiting felling of semi natural woodlands to 10% is very restrictive. This now encompasses many low value, regenerated birch woods where significant clear felling is desirable and not detrimental. Suggest a maximum of 75% for low value other semi – natural woodlands.
2.10.1	Change 15% to 10%. Allow open space to contribute to the 10%
2.14.2	Generally too prescriptive and needs trimming. Remove - Implementation of operational plans Remove – Economic viability
3.2.3	Suggest – Lop and top can be burnt where it is legal and appropriate.
3.4.2	Too wordy and over the top. See section 5.4 which is a good example of how sections should be worded. Suggest – Pest management will conform to best practice and legal requirements. The Forest Management plan will consider pest management.
3.6.2	Remove. Vague and meaningless statement
4.1.1a	Remove “the need for assessment on the ground”
4.1.1d	Remove or restrict to SSSI, SAC or NNR
4.3.1	Over the top Shorter and tighter statement needed. Suggest – Owners will restore or enhance a minimum of 20% of PAWS woodland.
4.6	Good revision
4.7	Good
4.8.1b	Remove
5.4	Excellent concise wording – consider rewording the rest of the document in a similar style. Remove FISA. Replace with current National Guidance Body.
5.5	Good

Peter Atkinson, Kingan Forestry [8], received 23/10/15

My only comment on the review is to ask it is practical workable document. You must allow the use of the necessary pesticides & herbicides to allow the establishment & protection of our forests.

Roger Cooper [24]*, received 23/10/15

I have the following comments on the latest draft

1. Does the new structure of the standard assist use and comprehension of the standard? YES
2. What might be done to further improve the new structure? NOTHING
3. Are there further opportunities to amalgamate or simplify requirements? NONE THAT I CAN SEE
4. From the perspective of medium-sized estates, do the changes made assist in the ease of applying the standard? NO COMMENT
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? YES
 - b. What further guidance or tools might make using the standard easier? NO COMMENT
6. Is the shorter Introduction comprehensive enough? YES BUT SEE BELOW ON IP NOTES
 - a. Is anything now missing? YES REFERENCE NEEDS TO BE MADE TO NATURAL RESOURCES WALES IN THE GLOSSARY AND POSSIBLY IN THE DOCUMENT E.G AT 4.4.2
 - b. Is further guidance needed? I'M UNCLEAR OF THE STATUS OF IP NOTES WITH REFERENCE TO THIS NEW EDITION. E.G. IP NOTE 8 ON WIND FARMS WHICH INVOLVED EXTENSIVE DISCUSSION AMONG THE IP MEMBERS SEEMS EQUALLY RELEVANT TO THE NEW EDITION AS WELL AS THE CURRENT EDITION.
7. Please make any additional comments on the draft standard citing the relevant Section and Requirement numbers as appropriate. PLEASE SEE ATTACHED. COMMENTS MADE ON 1.1.2; 2.12.3; 4.4.2

Rachel Chamberlain, Natural Resources Wales [17]*, received 28/10/15

General comments and expressions of support for changes

1. Natural Resources Wales welcomes the clarity and improved accessibility generated by the adoption of the brigaded approach to requirements used in drafting Version 4 of the UKWAS Standard
2. We very much welcome the opening statement on p.6 promoting the flexibility to allow local adaptation in situations where it is either not physically possible to achieve the requirement within a woodland or where a more effective way of achieving the objectives may have been identified.

3. We also very much welcome the clear statement of intent on p. 6 that certification bodies may themselves make professional judgements about the acceptability of such flexibility in the interpretation of the Standard.
4. We particularly welcome the clarity now given to the status of third party rights and the legal restrictions on management that might be imposed on those operating forestry only leases, or having to comply with other burdens in title, restrictions on action etc. generated by some pre-existing leases as outlined on p.7.
5. We welcome the timing guidance on p.7 but are concerned about the reference to design plans as these no longer exist with NRW. Would suggest changing this to add the words 'or equivalent'. Have also update glossary to include forest resource plans in Wales.
6. We welcome the identification of Forest Districts as identifiable and functional Woodland management Units and would want to see region added as the term forest district no longer applies to the national forest service in Wales, though there are occasions when we consider the NRW estate as the most appropriate unit within which to address some requirements (for example the deployment of Natural Reserves or the documentation of some resource management).
7. We particularly welcome the much stronger clarity with which the drafting group has separated the Requirements from the means of verification from the guidance provided in the text and urge that this clarity is retained through the last iteration of the Standard as its revision nears completion.
8. The Monitoring commitments identified in Version 4 are regarded as considerable and onerous, and while recognising that Version 4 has not added to such commitments, the brigading of requirements adopted in Version 4 has exposed the extent of the demand placed on certificate holders for ongoing monitoring of a very wide range of issues. NRW would welcome much clearer statement connecting the monitoring effort and resource only to the objectives of the Forest Plan. NRW also would wish to see recognition that objectives setting and monitoring is at different scales.
9. Throughout section 2.2 documentation there is a pressing need to be much clearer that only those things identified in point b) about resources and c) and d) about characteristics, needs and sensitivities should inform the objectives in e), **and that as such only these would require monitoring.**
10. NRW observe that Version 4 of the UKWAS Standard places a higher emphasis on the manager to justify what they have done and why (as opposed to a more rigid set of prescriptions and rules). NRW welcomes this approach and the associated text on the importance of flexible interpretation of the standard by Auditors and assessors. This will however make the role of the assessor far more subjective and open to interpretation, which could require more involvement from the Interpretation Panel.
11. NRW believe that new woodland should also be promoted with a strong emphasis on the future role of timber and woodfuel as part of the emerging low carbon landscape, as well as the regulating role of flood reduction, and hence we recommend a slight change to requirement 2.6.1 to stress the delivery of ecosystem and economic goods and services in the creation and expansion of woodland, as we believe the Standard as currently drafted overemphasises the biodiversity benefits of new woodland and underplays the other

ecosystem services, and in particular their future provisioning and regulating roles, both of which have economic benefits.

Andrew Heald, Confor [3], received 28/10/15

Specific Comment by Clause

Number	Requirement	Comment
1.1.3	The identity of the owner/tenant and their legal ownership or tenure shall be proven.	There is a need for clarity as to which tenants this applies to. Does it include all shooting and recreational tenants for example?
2.2.2	Availability of management plan documentation	Simplify so that only a summary is required to be publicly available.
2.8.1	Tree species selection, within a Woodland Management Unit	Is there opportunity for flexibility in the definition of a WMU, to include “off-site” areas to make better use of productive ground within the main WMU.
2.14.2	The owner/manager shall where applicable monitor and record. ...	This is an extensive list of requirements, however the key phrase is “where applicable” – is this list too long? Is more guidance needed?
3.2.2	Harvesting documentation	Add (words in bold) - that are to be sold by the woodland owner/manager as certified
4.4	Protection of conservation value in other woodlands ...	This clause is confusing if read separately from 4.3 – suggest that it is simplified to read “Protection of conservation values in woodlands “
4.4.2	Restoration of semi-natural habitats	Is this requirement to “open-ended” – much planted moorland has a “high potential” to be restored?
4.7.1	Local Seed Sources	Is this too restrictive and impractical, give the impact of climate change. Should we be sourcing “native” seeds from more southerly regions?

Paul Williamson, British Association for Shooting and Conservation [21], received 28/10/15

Introduction

The British Association for Shooting and Conservation (BAS) welcomes the opportunity to comment on the UKWAS Fourth Edition (consultation draft).

BASC is delighted to have been approved as UKWAS members and awaits formal ratification at the UKWAS AGM in December. Through our experience of representing amenity/recreational users of woodlands and the associated value shooting and conservation has in the woodland environment, we look forward to being a proactive and informed partner in the assurance scheme going forward.

Consultation commentary

2.11 Protection

2.11.1 – Management of wild deer. BASC agrees with the wording within this section. BASC recommends that in addition to the Appendix reference to SNH Best Practice Guides that the Deer Initiative Best Practice Guides are also referenced as follows:

http://www.thedeerinitiative.co.uk/best_practice/deer_management.php

4.9 Game Management

4.9.1

A) BASC recommends the current “Requirement” wording is changed from:

Game rearing, shooting and fishing shall be carried out in accordance with the spirit of codes of practice produced by relevant organisations.

To now read:

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.

Reference to “**Game rearing**” is removed as animals and birds are not reared in a woodland environment. Game birds are released into a woodland environment and BASC believes this activity together with other shooting related management will be covered by the “**associated activities**” wording.

Reference to “**fishing**” has been removed as the act of fishing is not referred to as “**Game Management**”. If fishing is important to UKWAS then BASC recommends a separate subsection within Section 4.

BASC recommends additional robustness with respect to the references made to codes of practice. BASC suggests “**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.**” The “Code of Good Shooting Practice” is supported by all the shooting organisations and therefore provides the definitive guidance which all member organisations then interpret for their respective memberships. Please note BASC provides the Secretariat to the “Code of Good Shooting Practice” and is therefore in a position to provide direct support to UKWAS on issues relating to the code.

Please note within the *Appendix 4.9 Game management – (2012) Code of Good Shooting Practice*, on page 103, the list of organisations should also include “The Moorland Association”.

B) BASC recommends the current “**Guidance**” wording:

“Consider impacts on native species principally priority habitats and priority species identified under biodiversity/environment strategies in England, Northern Ireland, Scotland and Wales.”

Should now read:

“Recognise, within the woodland environment, the positive impacts game management has on native species principally priority habitats and priority species identified under biodiversity/environment strategies in England, Northern Ireland, Scotland and Wales.”

In 2014 BASC together [with] 15 other shooting organisations commissioned an independent survey (<http://www.shootingfacts.co.uk/>). The results indicated that Shoots manage 500,000 hectares of woodland and manage 100,000 ha of copses specifically planted to shelter game. Woodland management for shooting improves habitat for a broad range of wildlife and increases biodiversity, particularly species of birds and butterflies.

C) BASC does **not** believe the bulleted “**Guidance**” commentary regarding “***Species that currently have local or regional restrictions on shooting...***” adds value and should be deleted.

D) BASC recommends the current “**Guidance**” wording:

“Feeding and rearing areas should be located in areas where there will be low impact on ground flora.”

Should now read:

“Release and feeding areas should be located in areas where there will be low impact on ground flora.”

E) The “**Guidance**” commentary concerning “The use of lead shot over wetland...” is no longer restricted by codes of practice but by government regulations. BASC recommends the following new wording

“The use of lead shot over wetland is restricted by regulations.”

5.3 Rural Economy

5.3.1 BASC wholeheartedly supports the UKWAS wording within this very important section. In particular BASC endorses the “**Guidance**” that relates to

“The woodland’s potential products include non-timber forest products and recreational activities.”.

BASC recommends that further clarity is given to this guidance by specifically using shooting as an example and propose the following wording:

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/>.

Summary

We trust our response will be of assistance and please make contact if further clarity is required. We will look forward to working with UKWAS members in finalising the UKWAS Fourth Edition ahead of the planned release in autumn 2016.

Maida Ballarini, Forestry Commission Scotland [15], received 29/10/15

Forestry Commission Scotland welcomes the opportunity to input to the revision of the UK Woodland Assurance Standard. We have already discussed our comments with Richard Howe, who has expressed support for our response.

First of all we would like to thank you the UKWAS Steering Group and the drafting sub-group for all the work done to date on the revision of the Standard. The changes to both structure and the language of the revised draft Standard, and in particular the consolidation of the sections, have simplified the Standard and it is now very clear.

You have asked consultees to answer specific questions in your Consultation Paper, Section 5. Please find below the comments from Forestry Commission Scotland:

1. Does the new structure of the standard assist use and comprehension of the standard?

Yes.

2. What might be done to further improve the new structure?

We believe that the structure is clear.

3. Are there further opportunities to amalgamate or simplify requirements?

Please refer to comment below under question 7 with regards to PAWS.

4. From the perspective of medium-sized estates, do the changes made assist in the ease of applying the standard?

No comment.

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?

We believe it will.

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

You might want to mention the excellent publication [Small Woodlands on Farms](#) in the Guidance column. 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.

6. Is the shorter Introduction comprehensive enough?

a. Is anything now missing?

No.

b. Is further guidance needed?

No.

7. Please make any additional comments on the draft standard citing the relevant Section and Requirement numbers as appropriate.

2.5.1 Assessment of Environmental Impact

In the Guidance column, we would recommend the inclusion of a reference to flood risk 'specialist advice with regards to flood risk mitigation potential in accordance to local flood risk plans or strategies'.

2.8.1 Under point c) 'native species shall be preferred to non-native species' we recommend the inclusion of reference (link) to 4.7.1.

2.8.1 We refer to points e) and f). In order to place the emphasis on increasing diversity in forestry, we would recommend merging the two points and placing the recommendation included in f) at the forefront as such 'Where site conditions allow and where more than one species is suited to the site, no more than 65% of the WMU shall be allocated to a single species. However, where site conditions are challenging, 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'.

2.9.2 We recommend amendment of the first sentence to read 'In semi-natural woodland lower impact silvicultural systems shall be adopted where they improve woodland condition. All felling shall be in accordance with the specific guidance for that type of native woodland in the relevant Forestry Commission Practice Guide. In semi-natural woodlands over 10 ha, no more than 10% shall be felled in any five-year period unless justified in terms of priority biodiversity enhancement or lower impact.'

3.2.1 We recommend the inclusion of brash management guidance in the Guidance column.

3.7.1 The guidance refers to both point-source pollution and diffuse pollution- please clarify.

3.7.1 Pollution. We recommend amending the first sentence to read 'Owners/managers must take reasonable steps to prevent diffuse pollution arising from forest operations'.

4.3 Plantations on Ancient Woodland Sites (PAWS) We believe that this section is contradictory in places and open to confusion. We recommend amending the third bullet-point to remove reference to the precautionary approach in the Requirement column to read 'Prioritise actions based on the level of threat and the value of remnants.

In the Guidance column amend to read 'A precautionary approach is maybe appropriate even if initially no remnant features may appear to be present. A gradual approach should be the default where remnants are threatened'.

David Williams [2], received 29/10/15

As a woodland owner, I wish to comment on the UKWAS Draft Standard.

Dealing with the questions posed in Section 5 of the Consultation Paper:-

1. The new draft seems a slight improvement on the old version, but the guidance nonetheless remains turgid & verbose.
2. There is a clear need for similar assurance standards to apply to all major rural land uses. I.e. there 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.
3. Yes.
4. I am not sure whether the changes will make much difference to medium-sized estates.
5. 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.
6. No comment.

Dealing with some detailed points:-

Section/Requirement	Comment
1 1.1.1	First sentence is superfluous, pointless and should be deleted. We are all required to comply with the law, irrespective of whatever it says in UKWAS.
1.3.1	I am not aware of any proposals to introduce GMOs into UK forestry, so this requirement is currently superfluous. It is conceivable that GM technology might in future be acceptable if there is no other way of resisting a disease, e.g. <i>Chalara</i> .
2 2.3.1	This provision is extremely burdensome for small woodlands in a well-populated area, and would not be tolerated by farmers.
2.4.1, 2.4.2, 2.4.3	I fully agree with these requirements: for sustainability we <u>must</u> ensure an equal harvest for future generations. Regrettably, the associated guideline includes the statement “ <i>It is recognised that...replacing conifers with broadleaves or creating additional open space, will reduce the productive potential of the woodland</i> ” suggesting it is acceptable to prejudice sustainability if political fashion so dictates.
2.10.1	Farmers are not required to dedicate at least 15% of their farms primarily to conservation & biodiversity. Forestry should not be treated differently.
2.12.3	Full compensatory planting should be required, before deforestation can be approved.
4 (in its entirety)	Farms & grouse moors are only expected to comply with a fraction of this!

Caroline Harrison, Confor England [4], received 29/10/15

Confor's England members welcome the opportunity to comment on the UKWAS 4 consultation.

Please see specific comments by clause.

Number	Requirement	Comment
1.1.3	The identity of the owner/tenant and their legal ownership or tenure shall be proven.	There is a need for clarity as to which tenants this applies to. Does it include all shooting and recreational tenants for example?
2.2.2	Availability of management plan documentation	Simplify so that only a summary is required to be publicly available.
2.8.1	Tree species selection, within a Woodland Management Unit	Is there opportunity for flexibility in the definition of a WMU, to include "off-site" areas to make better use of productive ground within the main WMU.
2.14.2	The owner/manager shall where applicable monitor and record. ...	This is an extensive list of requirements, however the key phrase is "where applicable" – is this list too long? Is more guidance needed?
3.2.2	Harvesting documentation	Add (words in bold) - that are to be sold by the woodland owner/manager as certified
4.4	Protection of conservation value in other woodlands ...	This clause is confusing if read separately from 4.3 – suggest that it is simplified to read "Protection of conservation values in woodlands"
4.4.2	Restoration of semi-natural habitats	Is this requirement too "open-ended" – much planted moorland has a "high potential" to be restored?
4.7.1	Local Seed Sources	Is this too restrictive and impractical, given the impact of climate change. Should we be sourcing "native" seeds from more southerly regions?

Harry Wilson, RTS [9]*, received 30/10/15

Please find attached our comments on the draft.

In general the draft advances and clarifies UKWAS.

I have commented on only 15 or so of the requirements. The other 60 plus reasonably clearly set out the necessary requirements for sustainable UK forest management.

I am disappointed that the opportunity is not being taken to recognise two categories of requirements:

1 - those requirements to which the manager must both adhere and be able to evidence adherence.

2- those requirements to which the manager must adhere, but because of either the very low risk of non-adherence or the low implications for sustainable forestry, verification could be restricted to sampling (by either the manager or the CB auditor) or observation of "no evidence of non-conformance". There are several "lesser significance" requirements which fall into this category because the risk of a non-conformance in the UK is very low and the costs of evidencing compliance for some types of manager/grower in particular as disproportionate to these risks.

Requirement 1.1.3 - shall prove ownership - is one example. Firstly, are there any/many meaningful examples of a claim to own someone else's forest? Secondly - what are the risks to sustainable forest management of doing so? However it might be disproportionately costly for FC and Crown Estate to prove ownership or tenure of significant tracts of land.

Jonathan Spencer, Forest Enterprise England [14]*, received 30/10/15

FE England's formal response as requested and as discussed. I have collated responses from FE England staff from across the country and the attached documents are thus a collective view of the benefits (and some concerns) of the redrafted UKWAS Standard. We look forward to the next phase of redrafting and eventual adoption of UKWAS V4 and are more than happy to contribute time towards the work of completing the task.

General comments and expressions of support for changes

1. Forest Enterprise England welcomes the clarity and improved accessibility generated by the adoption of the brigaded approach to requirements used in drafting Version 4 of the UKWAS Standard.
2. We very much welcome the opening statement on p.6 promoting the flexibility to allow local adaptation in situations where it is either not physically possible to achieve the requirement within a woodland or where a more effective way of achieving the objectives may have been identified.
3. We also very much welcome the clear statement of intent on p. 6 that certification bodies may themselves make professional judgements about the acceptability of such flexibility in the interpretation of the Standard.
4. We particularly welcome the clarity now given to the status of third party rights and the legal restrictions on management that might be imposed on those operating forestry only leases, or having to comply with other burdens in title, restrictions on action etc. generated by some pre-existing leases as outlined on p.7.
5. We welcome the identification of FEE Forest Districts as identifiable and functional Woodland management Units, though there are occasions when we consider the FEE estate as the most appropriate unit within which to address some requirements (for example the deployment of Natural Reserves or the documentation of some resource management).

These occasional situations are identified in the detailed responses in the draft standard with comments submitted by FEE.

6. We particularly welcome the much stronger clarity with which the drafting group has separated the Requirements from the means of verification from the guidance provided in the text and urge that this clarity is retained through the last iteration of the Standard as its revision nears completion.
7. The Monitoring commitments identified in Version 4 are regarded as considerable and onerous, and while recognising that Version 4 has not added to such commitments, the brigading of requirements adopted in Version 4 has exposed the extent of the demand placed on certificate holders for ongoing monitoring of a very wide range of issues. FEE would welcome much clearer statement connecting the monitoring effort and resource only to the objectives of the Forest Plan.
8. Throughout section 2.2 documentation there is a pressing need to be much clearer that only those things identified in point b) about resources and c) and d) about characteristics, needs and sensitivities should inform the objectives in e), **and that as such only these would require monitoring.**
9. FEE observe that Version 4 of the UKWAS Standard places a higher emphasis on the manager to justify what they have done and why (as opposed to a more rigid set of prescriptions and rules). FEE welcomes this approach and the associated text on the importance of flexible interpretation of the standard by Auditors and assessors. This will however make the role of the assessor far more subjective and open to interpretation. We look forward to discovering whether this makes reaching the standards set by UKWAS more or less attainable in coming years!
10. FE England believe that new woodland should also be promoted with a strong emphasis on the future role of timber and woodfuel as part of the emerging low carbon landscape and hence we recommend a slight change to requirement 2.6.1 to stress the delivery of ecosystem and economic goods and services in the creation and expansion of woodland, as we believe the Standard as currently drafted overemphasises the biodiversity benefits of new woodland and underplays the other ecosystem services, and in particular their future provisioning role.
11. In section 4.7.1 we welcome the acknowledgement of the importance of mitigating against the impacts of climate change. However, whilst acknowledging the case for addressing climate change there is a clear preference within the standard for maintaining the status quo, which does not demonstrate progressive forward thinking. FEE staff are clearly of the view that the Standard should be promoting climate change adaptation measures far more forcefully than it does at present.

Mike Wood, Royal Society for the Protection of Birds [18], received 30/10/15

Introduction

The RSPB welcomes the opportunity to respond to this consultation. RSPB's response to the initial public consultation in March 2014 can be downloaded from:

https://www.rspb.org.uk/Images/response_to_UKWAS_2014_revision_tcm9-369226.pdf

The RSPB is concerned 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. For example on species diversity, deadwood, biodiversity protection as well as enhancement, and the management of small and or low intensity managed woodlands.

The RSPB is also concerned that UKWAS is moving even closer to being a certification standard for large-scale timber production only with reduced environmental content and rigour. This proposed revision may result further reduced applicability of the UKWAS standard to the full range of environmental, social and economic aspects of management of all woodland types found in the UK, and to owners and managers of these many and diverse woodlands.

The RSPB values independent third party forest management certification against robust environmental standards that include biodiversity protection and enhancement for priority habitats, priority species and designated wildlife sites. This needs to be audited at forest, not just regional, level. We also value associated traceability requirements and auditing – ‘chain of custody’ certification - to aid transparency and certainty in the specification and sustainable procurement of forest products.

It is important to the RSPB that the UK Woodland Assurance Standard (UKWAS) meets the Forest Stewardship Council (FSC) International principles and criteria for sustainable forest management as a credible and robust way to assist biodiversity protection and enhancement within sustainable forestry.

The RSPB also values the FSC’s governance processes for standard setting (as well as for audit of forest management and chain of custody which fall outside UKWAS’s standard setting competence). This includes the ‘three chamber approach’ of environmental, social and economic representation at standard setting and its interpretation, for FSC audit of forest management and chain of custody, and through FSC governance.

Within the UKWAS standard the RSPB has concerns about the approach to, and requirements for biodiversity protection and enhancement, and the definition of, and the approach to the certification of Small and/or Low Intensity (SLIM) woodlands. We also have wider concerns about as uptake of UKWAS by owners and managers of SLIM woods, either audited as individual certificate holders, or within co-operative or collaborative forest management as part of combined ‘group’ certification.

The RSPB would be concerned about any moves to reduce the environmental content of the UKWAS standard, or any proposals to separate UKWAS from FSC accreditation. This would be a retrograde step in sustainable forestry. UKWAS has been a positive, not perfect, environmental improvement mechanism with a constructive multiple stakeholder approach.

The RSPB would like to see UKWAS improved in terms of content, effectiveness and uptake to protect and enhance the biodiversity associated with native woodlands and appropriately located and designed forestry plantations.

Our detailed comments on the draft UKWAS standard Version 4 which we wish to see addressed in this revision of UKWAS 3.1 follow. We look forward to constructive dialogue with the UKWAS Steering Group to address these issues.

1. UKWAS revision – biodiversity protection & enhancement

RSPB welcomes the continued inclusion in the standard of requirements for the conservation of priority habitats, priority species and designated wildlife sites.

The RSPB, however, is concerned that the proposed requirement 4.1.1 is only to maintain the most important designated wildlife sites. This is unacceptable as it conflicts with country, UK and international biodiversity and sustainable forestry commitments – ‘maintain’ might mean in keeping it in poor ecological condition. This appears to be an unacceptable weakening of what is in the current UKWAS standard.

The RSPB also remains concerned that the content and approach of the UKWAS standard does not sufficiently drive biodiversity enhancement for priority habitats and priority species, for example the restoration of peatland and lowland heathland habitats from inappropriately located forestry plantations, as well as native woodland habitat restoration. The UKWAS approach allows restoration rather than pushing it.

UK Forestry Standard requirements should not be used solely in UKWAS to try to meet FSC Principles and Criteria for high conservation value forests.

We are looking for the revision to address these important biodiversity protection and enhancement aspects, while recognising that UKWAS is not the complete delivery plan for country biodiversity/environment strategies. UKWAS should, however, encourage owners/managers to go further than the UK Forestry Standard minima for biodiversity enhancement, as well as the protection of designated wildlife sites and species.

2. Lack of prohibition of the use of lead ammunition

The RSPB is of the strong opinion that the use of lead-free ammunition has to be part of a higher level voluntary sustainable forest management standard, rather than relying purely on what is legal, but environmentally unsustainable.

The RSPB would welcome the introduction of an UKWAS requirement related to the restriction of the use of lead ammunition for control of vertebrates.

There should be a presumption against the use of lead ammunition with consideration of alternative materials and methods. This is due to the toxicity to wildlife, in particular wild birds, from spent lead ammunition left in the environment.

This could be written into Section 5 ‘Protection & Maintenance’ in a requirement under pollution control (5.5) with cross-referencing from the deer management requirement (5.1.5).

The time from when the revised UKWAS standard is introduced and the time that all certified owners/managers are given to comply would provide a phasing in period for such a requirement.

3. Comments on particular proposed requirements in draft UKWAS version 4

2.6.1. Woodland creation

We note that this has been introduced to “*Deliver ecosystem goods and services*”

This does not introduce anything additional or helpful to standard in terms of biodiversity protection and enhancement, and could even be detrimental in its application to biodiversity. Some ‘ecosystem

services' could require degradation of habitats to maximise their production. It is important that 'ecosystem services' are planned, created and managed in environmentally sustainable manner.

Note that UKWAS 3.1 is already considering a range of 'ecosystem services' in the content and breadth of its existing requirements, and the underlying elements of the UK Forestry Standard and its integral Forest Guidelines that it draws upon.

2.8.1 Tree species selection

The RSPB is concerned about the removal of the existing requirement (UKWAS Version 3.1, Requirement 3.3.2) to have a secondary species and a numeric maximum; i.e. 65% primary species where at least two species are suited to the objectives, the site and meet the other UKWAS requirements.

The proposal for UKWAS to reduce its species requirements to the UK Forestry Standard minima by increasing to a maximum of 75% primary species is ecologically unhelpful in both biodiversity conservation and plant health risk terms. This would reduce species diversity, particularly as this is across the whole of a Woodland Management Unit which can be a large area. This seems to be a retrograde step for a voluntary sustainable forest management standard that should be operating at a higher level beyond the UK's minimum mandatory standard requirements for all woodland owners.

Whenever the term "resilience" is used it should have a prefix of "ecological". NB 'resilience' does not have a formal definition. Economic resilience is often conflated with ecological resilience, and the actions taken can be heavily conflicting with potential threats to important wildlife values.

4.1.1 Natural and Historic Environment

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 ecological condition. This appears to be a weakening of the current standard.

4.3 Plantations on Ancient Woodland Sites (PAWS).

This proposed section is a strong dilution of the current standard. This changes the emphasis from progressive improvement of the ecological condition of PAWS to something far weaker. The RSPB would support the retention of the current UKWAS Requirements in UKWAS 3.1 in the revised standard.

4.4.2 Valuable Semi-natural Habitats

Suggested change in italics below, to ensure that important non-woodland habitats are not under threat for example using continuous cover forestry (CCF) systems on important lowland heathland habitats. Moving to CCF would mean that the seed bank could not renew like it would in plantation high forest clearfell. Also could be used to stop shifting to broadleaves on a potential open habitats which would change soil type and remove potential for future ecological restoration.

*"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*".*

4.6.4 Deadwood

The proposed deadwood wording is much weaker than the current standard. The draft UKWAS 4 removes an important driver to produce, protect, maintain and enhance high quality deadwood habitats in a targeted manner across the Woodland Management Unit. The draft UKWAS 4 misses out on the importance of different types of deadwood and leaving wind-blow.

It important that high quality deadwood habitats are produced, protected and managed appropriately for high quality biodiversity benefits.

Note that the existing practice guidance on deadwood habitats was produced on behalf of UKWAS for an earlier revision and contains detailed advice. The requirement on deadwood should better articulate how to better meet the content and intent of this guidance, along with means of verification of evidence, rather than remove any meaningful deadwood requirement.

There may be audit and interpretation issues with how the current standard, and the underlying UK Forestry Standard Forests & Biodiversity Guidelines and deadwood practice guidance, are being met in UKWAS certified woodlands. It is important not to dilute the UKWAS requirements for deadwood and their application but to improve their targeting for priority species and priority habitats at a suitable scale and locations. Better environmental quality deadwood needs to be created, managed and protected in key locations across WMUs.

Major changes to UKWAS on deadwood, for example relating to scale and application at the Woodland Management Unit could mean loss of deadwood in existing UKWAS certified woodlands.

4. Missing Requirements

a. 15% of woodland area to be managed for biodiversity. This needs to be reinstated. This may also be required to meet UK Forestry Standard requirements as FSC Principles & Criteria for sustainable forest management.

b. Open space provision in new woodlands section. This needs to be reinstated as this is critical for biodiversity.

This may also be required to meet UK Forestry Standard requirements as FSC Principles & Criteria for sustainable forest management.

It would also be helpful to have a reference to appropriate tree stocking density should be made in the guidance to avoid stocking at such high density that biodiversity value is reduced.

c. Minimum size ride widths. It would be useful to include this as a practical habitat enhancement measure to benefit woodland birds. Need to refer to appropriate detailed biodiversity guidance (1.5 x height of mature canopy can be beneficial).

d. Flood risk management. Further elements of the UK Forestry Standard Forests & Water Guidelines could be brought into UKWAS.

e. Climate change adaptation & mitigation. Further elements of the UK Forestry Standard Climate Change Guidelines could be brought into UKWAS to ensure biodiversity adaptation in relation to climate change for woodland and non-woodland priority habitats, priority species and designated wildlife sites.

It would be important, however, not to use the 'climate change' mitigation as a reason to promote environmentally damaging forestry practices through UKWAS requirement. All climate change

mitigation and adaptation works under UKWAS need to be planned and carried out in an environmentally sustainable manner.

f. Landscape-scale wildlife conservation. There may be further scope to consider wider-scale habitat management, restoration and enhancement within UKWAS requirements. This could be part of the objectives, species selection and management planning, as well as encouraging collaborative and co-operative approaches to woodland management.

There may also be audit protocols and group scheme aspects to this beyond the standard, but that standard setting, including evidence and guidance requirements, could support.

5. Requirements/evidence for small and/or low intensity managed woodlands

The RSPB is 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.

It is important that the standard requirements ensure biodiversity protection and enhancement and the means of verification for audit purposes are appropriate to assessing the compliance with the requirement, as well as the scale and intensity of the woodland management. Changing the means of verification and guidance in the standard is a major step, it is important this maintains the integrity, content and purpose of the standard and its application, rather than being used to reduce the scope and effectiveness of requirements in practice.

The RSPB notes 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 RSPB sees certification of small and/or low intensity managed (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.

In UKWAS Version 3.1 the RSPB was concerned that the 'small' woodland category within UKWAS 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. Data on influence of the previous development of UKWAS requirements for SLIM woods, and subsequent SLIM certification, would be helpful and should be sought from the proposed SLIM Woodlands Review, which should also scope out UKWAS uptake and woodland management barriers for SLIM woods.

We have concerns about the uptake of UKWAS, particularly by owners/managers of small and/or low intensity managed native woodlands. We recognise the limitations of the standard setting role of UKWAS Steering Group which may restrict its ability to effectively address uptake for SLIM woods, as well as the limits of what can be approved by FSC. We recognise that the UKWAS Steering Group wants to increase SLIM uptake, as well as FSC's previous request for refinements to assist SLIM certification. We also recognise that certification may not be considered relevant or pressing for

small woods, particularly if there is insufficient local market pull or issues of under/lapsed management.

We 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.

The RSPB would also welcome further discussion by the UKWAS Steering Group on barriers to certification, and wider management issues related to the restoration and management of small and/or low intensity managed native woodlands. This should form part of the proposed SLIM Woodlands Review for this revision, as well as ongoing work for the Steering Group or its members.

6. Reduction in environmental content & no continuous environmental improvement

The RSPB is concerned 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. For example on species diversity, deadwood, biodiversity protection as well as enhancement, and the management of small and or low intensity managed forests.

The RSPB is concerned that UKWAS is moving even closer to being a certification standard for large-scale timber production with reduced environmental content and lessened applicability to the full range of environmental, social and economic aspects of management for all of the woodland types in the UK.

The RSPB is 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.

7. Revised structure of standard.

Changing the means of verification and guidance in the standard is a major step, it is important this maintains the integrity, content and purpose of the standard and its application, rather than being used to reduce the scope and effectiveness of requirements in practice.

There is a continued need for guidance and definitions parts of the standard, and detailed means of verification evidence, alongside detailed and robust environmental requirements. These need to be supported by the references section.

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.

We would like 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.

8. Historic environment requirements

The RSPB welcomes the proposed introduction in the draft UKWAS 4 of clearly stated requirements on historic environment protection and conservation for both features and designated sites.

Historic environment protection and conservation is part of UK Forestry Standard and its associated Forest Guidelines on Historic Environment, and hence part of UKWAS. It is part of management planning, design, operation and connect with veteran trees, deadwood biodiversity, access and social aspects of UKWAS.

9. Priority Species & Priority Habitats wording.

The guidance and definitions section of UKWAS 4 may need to make clear what ‘priority habitats’ and ‘priority species’ are in devolved country contexts.

This could be defined as country nature conservation priorities: listed on Natural Environmental and Rural Communities Act 2006 - Section 41 (for England), Natural Environmental and Rural Communities Act 2006 Section 42 (for Wales), the Northern Ireland Biodiversity List and the Scottish Biodiversity List. These country biodiversity priorities embody the original UK Biodiversity Action plan priority species and priority habitats approach and lists.

It would also be helpful in guidance to mention the need to consider other important species that may be present, for example Red Data list species and Birds of Conservation Concern, as well as noting there may also be legal obligations for country, UK and EU protected species.

Alex McAuley, Institute of Chartered Foresters [7], received 30/10/15

1. The Institute of Chartered Foresters is the Royal Chartered body for forestry and arboricultural professionals in the UK. Our members practice in every branch of forestry and arboriculture and so are engaged in a wide range of activities relating to forests, woodlands and trees. We provide services to members including support for, and promotion of, the work of foresters and arboriculturists; information and guidance to the public and industry; and training and educational advice to students and professionals looking to build upon their experience. We also regulate the standards of entry to the profession and offer examinations for professional qualifications. We are regulated by our Royal Charter and maintain a Code of Conduct for all members.
2. ICF welcomes the opportunity to comment of the revisions to the UKWAS. We are pleased that the views of the Institute will also continue to be communicated via our representatives on both the Drafting Committee and Steering Group.
3. In general, ICF members welcome the changes that are being proposed. The alteration to a smaller number of sections gives the Standard a more logical flow and is particularly welcomed.
4. ICF would welcome clearer definitions. For instance, page 8 refers to Small as in SLIM. However, the glossary only refers to Low Intensity and not SLIM. We suggest that the document shouldn't use SLIM on page 8, as this could confuse owners, particularly as size was more explicitly relevant in the previous version of the Standard.
5. We believe that some advice on expected level of checks against BAPS, in 2.5.1 would be particularly useful.

6. ICF considers 2.5.4 as too broad. The use of the word 'minimise' provides a situation for individual interpretation. For example, many would argue that 75% of one species would meet the requirement but for others it would not. We suggest that an alternative word to minimise is used and that a clearer link to management objectives is made.

7. We believe that the revised wording of 4.6.4 will lead to even less standing deadwood than the current low levels already seen in certified woods and needs to be changed. The Standard should give a clear guide on how much (numbers, volume, dimension) is expected in a typical conifer clear fell. This is the one part of a rotation where a manager can make a big impact on levels of deadwood. The current Forestry Commission guidance is limited for plantations (i.e. what we are certifying) and most managers won't be aware of it. Putting a simple guidance in the Standard would, in our opinion, be an advantage.

8. While it is good that all the monitoring requirements have been drawn together under one section the text of the various requirements under section 14.2 is now lengthy and confusing. This section needs to be reworked to make it clearer and to emphasise the "where applicable" part of the requirement. Monitoring should primarily be relevant to the manager and inform management decisions. There is still a sense of monitoring for monitoring's sake in the long list of things which are given in 2.14.2. The intention is good but the wording needs refining.

Stuart Wilkie, Scottish Woodlands [10]*, received 30/10/15

Please see the attached Scottish Woodlands Response attached and below. The attached document is more of some comments I have in terms of 'proof reading' rather than to do with the main substance. Generally Scottish Woodlands welcome the proposed revision with one particular concern outlined below.

Section 2.14.2

While it is good that all the monitoring requirements have been drawn together under one section the text of the various requirements under section 2.14.2 is now lengthy and confusing. This section needs to be reworked to make it clearer and to emphasise the "where applicable" part of the requirement. Monitoring should primarily be relevant to the manager and inform management decisions. There is still a sense of monitoring for monitoring's sake in the long list of things which are given in 2.14.2. The intention is good but the wording clumsy.

Gordon Pfetscher, Woodland Trust, and Beatrix Richards, World Wide Fund for Nature [19], received 30/10/15

Principles

We support the new structure of UKWAS and overall simplification of text and applaud all stakeholders for the time and effort dedicated to this comprehensive review to date. Simplification of text however 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.

The overriding principle stands that we 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.

As currently drafted, there are still some Requirements which cause us particular concern and these areas of the draft Standard are highlighted below so that they can be addressed in time for the next consultation draft.

Ancient Woodland

One unintended consequence of the restructure of UKWAS 4 is that the previous Requirement (6.3.1.) that ancient semi-natural woodland shall not be converted to plantation or non-forested land is currently not covered by the new Requirement (4.2.1) sub-section c) of this Requirement.

Proposal

In Requirement 2.12.1. to insert the existing wording “Woodland identified in sections 4.1 – 4.3 shall not be converted to plantation or non-forested land” before the current draft text so that it is very clear what the Guidance attempts to say but doesn’t quite achieve.

Species diversity

The Government’s policy for broadleaved woodlands in Britain announced over 30 years ago clearly states as one of its aims the maintenance and greater use of broadleaves in the uplands, particularly where they will enhance the beauty of the landscape and the wildlife interest, including extensive conifer plantations. We strongly feel that the multiple benefits of (both broadleaf and conifer) species diversity is not recognised sufficiently within UKWAS 4. It is particularly disappointing that the very current lessons and obvious threats to our forests from increasing pest and disease threats, (never mind pressures from climate change) are still not fully recognised. This is especially the case in upland plantations which are often dominated by monocultures of a single species planted on a significant scale. In our opinion, Requirement 2.8.1 in particular still fails to fully acknowledge the vulnerability of perpetuating monoculture plantation forestry without recognising the associated risks and not taking the opportunity to pro-actively diversify species both at the stand and WMU level. There is much greater scope and opportunity at the end of a rotation to diversify plantations and plantation portfolios over time; opportunities we feel a sustainable standard like UKWAS should be encouraging more than the current wording does. These plantations may well be UKFS compliant but we feel that UKWAS, as a higher standard than the UKFS on a number of fronts, should maintain clear water between UKFS minimum compliant forestry practices and those of genuinely sustainable certified woodlands, of which greater species diversity over time is a fundamental component. There is a danger that the current wording could even result in the attrition / removal of existing species diversity going forward – a potentially very worrying development and one we cannot support.

Many plantations have already or are reaching the end of their first rotation. Restructuring these plantations for the second and subsequent rotations has been a requirement in UKWAS (previously 3.2.3. and 3.2.4.) and generally been implemented well arising in multiple benefits for owners (more phased production), the public (landscape) and the environment (habitat diversity). However, the scope and opportunities presented by restocking felled plantations with a greater diversity of tree and shrub species has not been fully grasped and UKWAS can and should encourage this to further the management of multi-purpose upland plantation forestry. The proposed text of the Guidance for Requirement 2.8.1. attempts to address this with the words “should seek to maintain or increase species diversity” but in our opinion this is not strong enough and compliance with the Requirement

only could still result in a reduction in species diversity at the coupe level. We also believe maintaining “pre-harvest or more natural conditions” to be a requirement of the FSC.

Proposal

We request the insertion of additional text within Requirement 2.8.1 which addresses a point of principle that “There should be no loss of species diversity. Species diversity should be maintained and where possible enhanced over time.”

In order to underline the principles of maintaining productive potential as per Requirements 2.4.1 and 2.4.2 we would also support consideration of plantations (perhaps restricted to upland plantations only) requiring greater tree species diversity in preference to a nominal and often token open ground percentage as required by the UKFS at the coupe level. We believe biodiversity in upland plantations in particular can benefit more from greater tree species diversity than open ground at the coupe level, largely because such plantations when viewed at a landscape level are often mere islands of forests in an ocean of open habitat and minimum percentages of open space required by UKFS could be met at the WMU level.

Deadwood

We support the inclusion of a specific Requirement on veteran trees and their management as this is a resource certified UK woodlands can play a lead role in, in both a European and indeed international context.

We welcome the important words “throughout the WMU” in Requirement 4.6.4 on the basis that, as per the points made on tree species diversity above, we would not wish to see (intended or unintended) a loss of existing deadwood, often created at considerable effort over the last 15 years, at the coupe level.

Small and Low Intensity Managed Woodlands

It was disappointing to note at the June 2015 Steering Group meeting that 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’ eg. those of 10 hectares or under in size.

Chris Nixon, Forest Enterprise Scotland [16]*, received 30/10/15

This covering note sets out Forest Enterprise Scotland’s overall views and comments on the Consultation draft of the UKWAS 4 Standard. These reflect the summarised views of a large number of our managers and staff with responsibilities spanning all aspects of our work. Comments on specific elements and requirements are provided separately in an annotated copy of the full standard.

1. We are pleased to see, and fully support, the primary objective of the review to make UKWAS more succinct, logical and more user-friendly. In this respect the restructuring of the Standard into 5 sections rather than 8 is certainly helpful and should make it easier for users

to understand and interpret. Whether or not this change has also made some elements of the standard more succinct is more questionable, an example being the requirements relating to monitoring (see 6 below).

2. The clearer distinction made between 'Guidance' and the 'Requirement' itself will also help clarify what the owner/manager actually needs to do or demonstrate (the 'normative' part), as distinct from the information that's provided to assist understanding. However, whilst this has largely been achieved, we feel there are still instances where the guidance could more accurately echo and flow directly from the requirement. Examples of this are noted in the relevant section.
3. We welcome the re-focussing and renaming of the 'Means of Verification' as 'Example Verifiers' to make it clear that they represent examples of how compliance might be demonstrated, and to avoid the possibility of them being considered necessary to meet the Standard.
To complement this approach, it would also be helpful in our view if verification was to include a greater focus on evidence of the outcomes delivered, as distinct from the process itself. In this respect the reference in the introduction to flexibility and local adaptation in meeting the requirements is helpful, although it inevitably places an even greater reliance on the interpretation and judgement of the certification body and their assessors.
4. The broadening of the scope of the Standard to include aspects such as the historic environment, and reference to climate change mitigation, adaptation and the delivery of ecosystem services is a positive development reflecting modern best practice. However, 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. We would urge this to be considered further as the new Standard is finalised.
5. Whilst the greater clarity provided in the introduction around the status and requirements of 3rd parties such as leaseholders is very helpful, we would like to see this incorporated and reflected more clearly in Section 1 of the finalised Standard.
6. We are concerned that, taken together, the suite of requirements relating to monitoring (2.14) are burdensome. Although it's useful to have them all in one place, and we acknowledge that they've not been extended per se in this draft, we would nevertheless like to see some further consideration given to how this aspect of the Standard can be made more succinct.
7. In addition to the above, there are a number of requirements in Section 2 of the draft Standard that would, in our view, prove very difficult for both the woodland owner/manager and the UKWAS assessor to interpret clearly as they stand and would benefit from further consideration/review. These include those around: 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. Other examples are flagged by requirement in our detailed comments.

We trust our comments above, and the more specific ones on the annotated copy of the consultation draft are helpful. Overall, we feel the direction that the review has taken is a very

positive one and the Drafting Group has done an excellent job in introducing some significant and beneficial changes. We look forward to continuing to work with the Steering Group in the coming months as the new UKWAS Standard is further refined prior to FSC/PEFC endorsement and publication.

Diana MacMullen, The Verderers [13], received 30/10/15

Please see the attached Background information on The Verderers (Certification) Group Certification Registration Code: SA-FM/COC-001140. Expires 26 March 2020.

I acknowledge that a substantive revision of UKWAS is overdue however the need to adopt the new Standard and incorporate it into existing Group documents is a daunting prospect due to the many and significant changes.

I welcome

- the changes to the consolidation of the 8 sections to 5
- the changes to the guidance, and means of verification
- the neutralisation of size so one standard fits all.
- the simplification of PAWS restoration requirements
- the removal of extraneous information to separate documents

However I am really disappointed that the decision has been made NOT to provide a 'track-changes document. At the very least I believe a detailed list of the following are required

- completely deleted sections giving the old UKWAS section numbers,
- newly added sections giving the new UKWAS section numbers
- in the new UKWAS – the numbers of the substantially changed section giving the numbers of old sections incorporated into the new sections.

But the 'proof of the pudding' really won't be revealed until UKWAS 4 is the audit standard and one can judge how positive an effect this will have on the information required of all Group Members in the audit, at which time one can make a comparison with the overburdensome current audit procedure.

Specific items I question are why UKWAS refers always to Fire Plans (2.11) when I believe it should talk about Incident Plans covering fire, electrical/gas/chemical/pesticide incidents and emergency accident information.

In BRIEF only, I am answering the following:

1. Does the new structure of the standard assist use and comprehension of the standard? YES
2. What might be done to further improve the new structure? Providing a clear indication of what's NEW and what has been deleted and Changes with reference to the OLD standard
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? The proof will be in the way the auditor applies the new 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? The proof will be in the way the auditor applies the new Standard in a mixed size Group.

b. What further guidance or tools might make using the standard easier? Cross referencing the old and new Standards.

6. Is the shorter Introduction comprehensive enough? Yes

a. Is anything now missing? Time will tell! Esp in how the Audit is handled.

b. Is further guidance needed? Hard to judge since I can't compare how my Audit is conducted against how other Groups' might be audited.

CLOSING COMMENTS:

I understand that my 2016 audit (Jan-March 2016) will be against the current Standard. Further I might manage one further audit to the current Standard if I'm lucky. This pleases me since I do NOT anticipate having to carry out a significant revision of my Group documents.

Frankly although I welcome a reduction in the length and intensity of UKWAS 4, I believe I will be considering closing the Group before this becomes THE only Standard and well ahead of the expiry of my Certificate in March 2020..

After so much time and energy expended in setting up The Verderers Certification Group; supporting the ethos behind UKWAS; supporting the FC using UKWAS to underpin AMG I am disappointed (incredulous) that the FC withdrew the requirement to underpin AMG or the new CS, and especially that there is no requirement to be UKWAS Certified to receive substantial capital grants for harvesting and burning woodfuel.

Background:

I have run and managed an independent UKWAS Certification Group for 15 years, audited by the Soil Association.

[The Verderers Group Certification Scheme was established in 2001 (initially as the Tinsley and MacMullen Group, latterly as the MacMullen, Pass and Associates Group, and from 2011 The Verderers Group) to provide members with a cost effective means of demonstrating independently audited compliance with the UK Woodland Assurance Standard (UKWAS), and of commitment to the FSC Principles and Criteria. The appointed auditors are the Soil Association, auditing to the Woodmark Standard]

The number of members and hectareage in covered by the Group has varied considerably over the years; initially the Group was established to service our directly managed estate-clients (in East Anglia) so that they could benefit from the Forestry Commission Annual Management Grant. The base-line area requirement underpinning AMG was raised so that eventually fewer clients needed to be certified to receive Management Grant. I expanded the Group (to sustain it economically for all Members) taking in new clients that I did not directly manage – they are managed by other independent Agents. The next milestone was that the FC dropped the requirement for UKWAS Certification to underpin receipt of any grant. All my managed clients then had no need and left the Group. I have committed myself to continue the Group for the independent clients until their need or wish to be UKWAS Certified expires. This year the Group is just below 3,000ha with 7 Members spread over a wide geographical area (Norfolk, S Yorkshire, Northants, Sussex, Kent and London fringes).

Due to the mix of estate sizes, the Group does not qualify for auditing as SLIMF.

We are audited annually both in the office and on 3 sites. This takes a minimum for 3 full days due to the geographical spread, plus many days of preparation by me and for each Member. This next audit may well take more as it will not be possible to audit two estates in one day, so I expect the audit will take 4 days.

To satisfy the particular proclivities of auditors and their interpretation of UKWAS (and Woodmark) over the years we developed a variety of documents and proforma to demonstrate Members' commitment to the theory and practice of UKWAS compliance. But c5 yrs ago the audits became (absurdly) more demanding and I re-wrote, expanded and aligned a suite of Group documents. We have successfully run and audited the Group like this for 5 yrs with two main documents (a Group Handbook – specifying the requirements of Group Members, the Resource Managers and the Group Managers, and signed by the Member as a commitment to abide by procedures of the Group and UKWAS.

The second document is The Verderers UKWAS Compliance Agreement listing all the requirements and information to verify that compliance with UKWAS and The Verderers Group Scheme. This document is closely linked to the Group Handbook.

Both documents are referenced directly to the sections of UKWAS. Both are annually updated (colour coded and cross referenced to UKWAS) to comply with changes recommended by the auditors.

Members are required annually to prepare a pre-audit check linked section by section to the UKWAS Standard. Members are also required to provide information on management carried out and planned. Both reports are in spreadsheet format with each year being added as a new Tab. Once again both are annually updated (colour coded and cross referenced to UKWAS) to comply with changes recommended by the auditors.

This therefore builds up a very comprehensive auditable record of works undertaken underpinned by UKWAS.

Since the very significant re-writing of our suite of Word and Spreadsheet documents were designed, generally a few small changes only have been recommended during the audit process. Whilst even these take a considerable time to comply with the auditors have consistently praised the comprehensive nature and format of the Group documentation. However, this does not defray the incredulity that I and the members feel that changes are made for the sake of change and that the revised documentation does not change the outcome of management operations.

Bill Mason, Continuous Cover Forestry Group [23], received 30/10/15

1. Since the early 1990s there has been increasing interest in the potential role of a range of silvicultural practices based on patch dynamics as alternatives to the clear-felling and replanting regimes traditionally used in the management of British forests. These alternative approaches have become widely known within the sector as Continuous Cover Forestry (CCF) and /or Low Impact Silviculture and cover a range of silvicultural systems such as selection systems and group/irregular shelterwoods which can increase species and structural diversity of forests.

2. These alternative silvicultural approaches have been widely supported in country policy and strategy documents (e.g. Scottish Forestry Strategy; Woodlands for Wales) as a means of adapting the regular and species poor stands characteristic of many British forests to more diverse structures capable of delivering a wider range of ecosystem services. The wording used in previous versions of UKWAS that:
 “Where there is a range of [silvicultural] options in windfirm conifer plantations, lower impact silvicultural systems **shall be increasingly favoured** where they are suited to the site and species.” (section 3.4.1) (emphasis added)
 was very helpful in encouraging managers to consider the potential use of a CCF/LISS approach in the future management of their forests and woodlands.
3. We are therefore concerned that the draft wording in section 2.9.1 of the consultation document represents a considerable weakening of the encouragement given to managers by the previous versions of UKWAS to actively consider the future role of CCF/LISS in the management of their forests. At present, the draft text reads:
 “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.” (emphasis added).
4. As drafted, this seems to seriously weaken the previous obligation to favour CCF/LISS and will probably have a negative impact on the uptake of these alternative systems within British forestry. It gives the impression that conventional patch clear felling regimes will be as effective as CCF/LISS in diversifying structure and species composition, for which we suggest there is very little supporting evidence.
 This is highly regrettable because there is increasing evidence becoming available to the sector both of the technical feasibility of adopting alternative silvicultural systems in British forests and of the wide ranging benefits that can accrue from so doing. Examples include information on the wider uptake of CCF (Wilson, 2013), on the potential use of CCF in Sitka spruce forests (Mason, 2015), on the experience of transformation to CCF in long-term demonstrations (Kerr et al., 2010), on the cost and revenue implications of managing forests using CCF (Davies and Kerr, 2015), on the potential benefits of CCF management for certain bird species (Calladine et al., 2015), and on public preference for the diverse structures provided by CCF (Edwards et al., 2012).
5. Given that it is recognised that transformation of the simple structures characteristic of many British forests to the more diverse and resilient stands envisaged by policy will take time (e.g. Kerr et al., 2010), we strongly recommend that the draft text in section 2.9.1 should be revised to read:
6. “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.”
7. We consider that this proposed revision preserves the integrity of the previous UKWAS commitment for CCF/LISS to be actively considered in preference to patch clear felling, while still allowing other silvicultural options to be pursued where site conditions and/or management objectives were serious constraints. We also note that the draft text also allows exemption from the use of CCF/LISS where clear-felling might be desirable to maintain priority habitats or species of conservation interest.

8. The CCFG will be happy to enter into further discussion on the wording of this section and any other relevant passages. Please do not hesitate to contact us if you would like clarification of any points raised in this submission.

References:

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Kerr, G.; Morgan, G.; Blyth, J.; Stokes, V. Transformation from even-aged plantations to an irregular forest: The world's longest running trial area at Glentress, Scotland. *Forestry* **2010**, *83*, 329–344.

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Wilson, S.M. Adoption of alternative silvicultural systems in Great Britain: A review. *Quart. J. For.* **2013**, *107*, 279–293.

Paul Sandys and Phil Webb, UK Forest Certification Group [12], received 01/11/15

UKFCG's Directors have reviewed the draft UKWAS V4 and are pleased to offer our support for endorsement of the revision. The realignment of requirements provides greater clarity and streamlining of UKWAS without detracting from the content.

We believe version 4 will enable forest managers and owners, both new entrants and those with many years certification experience, to benefit from a more systematic and understandable approach to achieving compliance with certification requirements.

The decision to make the standard 'size neutral' whilst redefining Means of Verification to Example Verifiers is expected to enable auditors to have greater flexibility by selecting verifiers that are proportionate to scale [of size, forest operations and features] for any forest or woodland.

We hope that wider industry feedback will concur with our view that amalgamating repetitive requirements that appear in UKWAS V3.1 and consolidating the standard into five Principles is to be welcomed.

Rob Green, Natural England [20], received 02/11/15

The one issue that stands out for me where I would like to comment concerns a weakening of the requirement on species selection (2.8.1). I understand that part of the argument for making this change is that there should be synergy between UKWAS and UKFS, and without this change the UKWAS would be stipulating a much more rigorous standard.

My reaction to this is twofold. Firstly, while broadly supportive that synergy between the two standards is an important goal, I'd point out the obvious that even so they are not the same. Secondly, and far more importantly in this instance, I take the view that the weakest element of UKFS concerns species composition/diversity. When the UKFS was last revised and the new climate change guidelines were introduced, it became apparent that the principles espoused in the new guidelines (which we supported) had not been applied consistently across the standard, specifically so in relation to species composition/diversity. Natural England commented on this in our response to the consultation but was unsuccessful in securing wider changes to the standard. I continued to raise this after the revised UKFS was launched and it was acknowledged that the principles outlined in the climate change guidelines and how these were applied across the standard was inconsistent, that it would be a difficult issue but would need addressing at the next revision to UKFS. In practical terms then, should UKWAS relax the requirement around species composition/diversity it will be aligning itself to one of the weakest elements of the UKFS and one that in all likelihood will be strengthened at the next revision of the UKFS. The timing of future reviews therefore raises the possibility that the UKFS could be setting out a higher standard than the UKWAS when surely UKWAS should be raising the game in its response to woodland resilience and the range of threats posed by climate change and pests and diseases.

Turning this on its head, any argument concerning species composition/diversity and consistency between UKWAS and UKFS should focus on UKWAS addressing (or exceeding, if the evidence base has improved) the principles outlined in the UKFS climate change guidelines, to adopt as strong an approach to sustainable woodland management as it can. Allowing for 75% of a single species is clearly a risky strategy or near monoculture and one that is at odds with the UKFS climate change guidelines.

Justin Cooke, The Ramblers' Association [22]*, received 04/11/15

The Ramblers is a charitable membership organisation representing walkers.

The Ramblers ensures that everything is in place so that everyone can enjoy the outdoors on foot and benefit from the experience.

We seek to improve the health and wellbeing of individuals regardless of their age, background, fitness or mobility by providing the support and resources everyone needs to enjoy and benefit from walking outdoors. We help put in place nationally and locally the policies and programmes that give individuals and communities the opportunity to go out and walk and educate them about how walking can improve their health and wellbeing.

We are a membership organisation with around 110,000 members and a network of around 500 local Groups across England, Scotland and Wales. We're committed to the principles of volunteering with around 25,000 active volunteers.

We warmly welcome the Forest Stewardship Council's inclusion of public access issues within the United Kingdom Woodland Assurance Standard.

We also welcome the inclusion of ecosystem goods and services as a factor within decision making and within guidance for landowners and managers working towards certification.

The Ramblers support strongly 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.

We believe the benefits from increasing and protecting access to woodland are considerable and doing so will build on the calculation made by the National Ecosystem Assessment of the social and environmental benefits provided by woodland being £1.2 billion per annum.

Currently 44% of all accessible woodlands in England are within the Public Forest Estate and the Ramblers wishes to work with others to achieve the Government's goal of giving as many people as possible ready access to trees and woodlands across both public and private woods.

We believe the United Kingdom Woodland Assurance Standard can help in achieving these shared goals.

1. Does the new structure of the standard assist use and comprehension of the standard?

The Ramblers has no specific comments to make in relation to question 1.

2. What might be done to further improve the new structure?

Additional information and guidance should be provided related to land manager and landowner responsibility in relation to public rights of way and open access under the Countryside and Rights of Way Act 2000 and the Land Reform (Scotland) Act 2003. This guidance should mirror that already provided such as:

Landowner responsibilities towards public rights of way

<https://www.gov.uk/guidance/public-rights-of-way-landowner-responsibilities>

Landowner responsibilities towards open access under Countryside and Rights of Way Act 2000

<https://www.gov.uk/guidance/open-access-land-management-rights-and-responsibilities>

Please also see our additional comments made to section 1.1.1 Legal compliance and UKWAS conformance for further detail in answer to question 7.

3. Are there further opportunities to amalgamate or simplify requirements?

The Ramblers has no specific comments to make in relation to question 3

4. From the perspective of medium-sized estates, do the changes made assist in the ease of applying the standard?

As a non-land-owning charitable organisation we have no comments to make in relation to question 4.

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?

As a non-land-owning charitable organisation we have no comments to make in relation to question 5.

6. Is the shorter Introduction comprehensive enough?

a. Is anything now missing?

b. Is further guidance needed?

The Ramblers has no specific comments to make in relation to question 6.

7. Please make any additional comments on the draft standard citing the relevant Section and Requirement numbers as appropriate.

The Ramblers has a number of additional comments related to the draft standard and make these comments as requested in the relevant sections column 4 on the following pages.

The relevant sections we wish to make additional comments on are:

1 Legal compliance and UKWAS conformance

1.1 Compliance and conformance

2 Management planning

2.3 Consultation and co-operation

2.6 Woodland Creation

3 Forestry operations

3.3 Forest roads

3.5 Fencing

5 People, communities and workforce

5.1 Woodland access and recreation including traditional and permissive use rights.

Susan Bowen and Doug Somerville [25], received 19/11/15

1. The Appendix states on the frontpiece that it is the 'Main legislation, regulations, guidelines and codes of practice referred to in the UKWAS.' This is also what is stated in the Contents. However, the EIA Forestry Regulations 1999 are not referred to in the UKWAS. The only reference to them is in the Appendix.
2. It is surprising that these regulations are not listed in the Appendix under Key Legislation. Charles Mynors in "The Law of Trees, Forests and Hedges" 2nd Edition devotes an entire chapter to the background and requirements of this important legislation. The four forestry projects involved are "projects that in any sensible system would require planning permission." These regulations are the only planning controls on public forestry activities.
3. Page 6 of the UKWAS is a diagram that purports to illustrate how the certification standard is produced. Under UK Governmental Requirements, only the UKFS and UKFS Guidelines are listed. The UKFS are not the Governmental Requirements. They are only a summary of regulations and guidelines by the Forestry Commission. What is more, the UKFS also fail to mention the EIA Forestry Regulations 1999. [...] What all of this indicates is that the EIA Forestry Regulations 1999 are not being given the attention such legislation would be expected to have with the consequence being that the regulations are not being adhered to.

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