

# **United Kingdom Woodland Assurance Standard**

**UKWAS Revision 2009-11 (Consultation Draft) (December 2010)**

**Consultation Report on Consultation Draft**

**Annex 1: Consolidated Feedback**

**29<sup>th</sup> April 2011**

This document contains the full comments received allocated to the appropriate section of the UKWAS.

Analysis of the feedback is in the main Consultation Report

**[www.ukwas.org.uk](http://www.ukwas.org.uk)**

## Full list of respondents (N.B. The Identifier Number is used to identify respondents' comments.)

Id #	Respondent	Organisation	Nature of interest	Location
<b>Woodland owners &amp; forestry practitioners</b>				
1	Jane Karthaus	ConFor	Trade association	UK-wide
2	Colin Palmer	Rural Services on behalf of ConFor	Trade association	UK-wide
3	Francis Fulford	ConFor (SW England)	Trade association/ woodland owner	Devon, England
4	Phil Tidey	Small Woods Association	Trade association	UK-wide
5	N/A	Englefield Trust Estate	Woodland Owner	Berkshire, England
6	Tim Shardlow	Nicholson Nurseries Limited	Forest nursery	Oxfordshire, England
7	John M Monaghan	Shiellow Wood Ltd	Woodland owner of ex-UKWAS certified woodland	Northumberland, England
8	John Martin	Sole trader	Coppice worker and woodman	Surrey, England
9	D J Williams	Individual	Woodland owner	Aberdeenshire, Scotland
10	Rob Gazzard	Individual	Chartered Forester and Surveyor, District Forester - Forestry Commission	England
11	John Jervoise	Herriard Estates	Traditional estate	Hampshire, England

<b>State forest enterprises</b>				
<b>12</b>	John Hair	Forestry Commission Scotland	Government department/ national forest service	Scotland
<b>13</b>	Moira Baptie	Forestry Commission Scotland	Government department/ national forest service	Scotland
<b>14</b>	Mariska van der Linden	Forestry Commission England	Government department/ national forest service	England
<b>Environmental and heritage organisations</b>				
<b>15</b>	Mike Wood	RSPB	Woodland owner/ environmental NGO	UK-wide
<b>16</b>	Gordon Pfetscher	Woodland Trust	Woodland owner/ environmental NGO	UK-wide
<b>17</b>	Jonathan Wordsworth	Archaeology Scotland	Environmental NGO	Scotland
<b>Wood processing industry</b>				
<b>18</b>	David Sulman	UK Forest Products Association	Trade association	UK-wide
<b>Certification bodies and group scheme managers</b>				
<b>19</b>	Meriel Robson	Soil Association Woodmark	Certification Body	UK-wide/ worldwide
<b>20</b>	Andrew Heald	UPM Tilhill	Forest management company/ group scheme manager	UK-wide
<b>21</b>	Rob Shaw	Scottish Woodlands Ltd	Forest management company/ group scheme manager	UK-wide
<b>22</b>	Name withheld on request	Name withheld on request	Certification manager	UK-wide

<b>Forestry standard setting and labelling bodies</b>				
<b>23</b>	Charles Thwaites	Forest Stewardship Council UK	Standard-setting body	UK-wide
<b>Other</b>				
<b>24</b>	Paul Hedley	England and Wales Wildfire Forum	Multi-stakeholder partnership	England and Wales
<b>25</b>	Trevor Johnson	Scottish Wildfire Forum	Multi-stakeholder partnership	Scotland
<b>26</b>	Roger Cooper	Individual	Chair of UKWAS Interpretation Panel	UK-wide
<b>27</b>	Stewart Snape	On behalf of the Forestry Commission/ Forestry Sector UK Biosecurity Programme Panel	Tree health and biosecurity	UK-wide

Introduction	
<i>Your proposed amendments</i>	<i>Justification for proposed amendments</i>
<b>1. Background and purpose</b>	
1. It would be helpful to have more explanation of the relationship between UKWAS and UKFS.	The UKFS and its status should be explained and therefore the UKWAS is UKFS and more. Perhaps it is worth noting that the differences between the two are reducing (if that is actually true).
27. 1. To reinforce the need for Site Owners/Agents and Contractors to be aware of new tree diseases, their identification and need to report their occurrence. 2. To reinforce the need for Site Owners/Agents and Contractors to be aware of the latest guidance on Biosecurity to prevent the spread of tree diseases. 3. To ensure that Site Owners/Agents and Contractors are implementing appropriate and best Biosecurity practice.	<p>We have seen in recent years an unprecedented increase in the rate and number of serious tree diseases entering/appearing within the UK – recent examples being Phytophthora ramorum, Acute Oak Decline and Oak processionary moth. In case of Phytophthora ramorum and Oak processionary moth these have had and will continue to have serious on-going costs and operational implications for the forestry sector as a whole.</p> <p>There is therefore a need, the Biosecurity Programme Panel feels, to ensure a high degree of awareness of the latest and/or potential serious tree diseases in the UK in order to ensure timely reporting and action. Alongside this there is a need to gain greater commitment and implementation of simple biosecurity measures to help prevent the importation/ movement of tree diseases around the UK. We feel that the UKWAS standard is one way to help achieve this and at the present time the draft UKWAS standard has limited reference to tree health and no reference to the issue of biosecurity.</p> <p>The Biosecurity Programme Panel feels that woodland owners and their agents and contractors are at the very forefront of any attempts to identify and prevent the establishment/spread of new tree diseases. As a sector and UK wide issue it is felt appropriate to request a strengthening of the UKWAS standard</p>

	on both these issues.
<b>2. Use of the certification standard</b>	
<p>10. Revised title proposed for Section 5 (Conservation &amp; enhancement of biodiversity).</p> <p>Additional section proposed as section 7: Adaptation and mitigation to climate change.</p> <ol style="list-style-type: none"> <li>1. Compliance with the law and conformance with the requirements of the certification standard</li> <li>2. Management planning</li> <li>3. Woodland design: creation, felling and replanting</li> <li>4. Operations</li> <li>5. Protection and maintenance</li> <li>6. Conservation enhancement <b>and adaptation</b> of biodiversity</li> <li>7. <b><u>Adaptation and mitigation to climate change</u></b></li> <li>8. The community</li> <li>9. Forestry workforce.</li> </ol>	<p>Section 6 focuses rightly on biodiversity protection and enhancement. But I would argue that Section 6 is now sub-servant to Climate Change, bring greatest challenges to woodland species over the next 50 years. Would strongly suggest that adaptation is included in Section 6</p> <p>Research by Forestry Commission<sup>1</sup>, Read report<sup>2</sup> have highlighted the importance of climate change and forestry's role in mitigation and adaptation. If it is appropriate to have sections on sustainable development assets (social, economic and environmental) in UKWAS then climate change should have a prominent position, despite the cross cutting nature of the topic.</p> <p>Adaptation and mitigation measures will be defined in the fore coming Climate Change Risk Assessment (Defra).</p> <p>The success of the 3<sup>rd</sup> Edition must be judged against how it meets up to the challenge and our evolving understand of climate change. This must be seen as the principle threat and opportunity to the UK woodlands.</p>
<b>3. Structure of the certification standard</b>	
<b>4. Procedures for use of the certification standard</b>	
1. Peer review	Is peer review working? Has anyone studied this part of the

<sup>1</sup> <http://www.forestry.gov.uk/fr/INFD-6XCFGA>

<sup>2</sup> <http://www.forestry.gov.uk/readreport>

	<p>process? There are several areas of potential problems, such as, who is willing to do it; vested interests.</p>
<p>10. Low intensity management</p> <p>I would strongly suggest that the term SLIM (Small and Low Intensity Woodland) is not used. I suggest the term 'Small Woodland' is used separately (to be used to reflect the differences and difficulties of small woodland to owners) from the term 'Low Intensity Management'.</p> <p>Where organisations wish to use Low Intensity Management for larger areas, such as the Woodland Trust and other environmental NGOs, there should be concern as whether this upholds the foundations of Sustainable Forest Management. The concerns listed below cover the risks posed by the practice of Low Intensity Management on increasing the risk of wildfire incidents, reducing carbon sequestration, Sustainable Forest Management and increasing pests &amp; diseases</p>	<p><b>Concerns about LIM (Small and Low Intensity Management) Woodlands and wildfires</b></p> <p>There is concern that 'Low Intensity Management' woodland provides an increased risk for wildfire incidents over woodlands that are managed. Active management ensures that vegetation fuel loading are reduced, thus reducing the severity and likelihood of wildfires. With reference to evidence in Annex A I recommend that due to climate change impacts Low Intensity Management of broadleaves and conifers reduces the potential of Sustainable Forest Management as well as reducing resilience. For woodlands with or adjacent to high wildfire risk areas, LIM should not be used.</p> <p><b>Concerns about LIM woodlands and carbon sequestration</b></p> <p>The Forestry Commission states that: “Young forests grow rapidly and soak up carbon more quickly than mature forests. In mature forests the carbon balance may reach a steady state as carbon storage is matched by decomposition. At this point the forest becomes a vast carbon reservoir. When mature trees die the carbon stored is released back into the atmosphere. By harvesting trees before they die we can ensure that the carbon is locked up for longer in recyclable wood products. We can ensure that the system will continue to provide environmental benefits for future generations by replacing the felled trees with new ones.”</p> <p>UK WAS is an important mechanism to ensure the carbon sequestration targets, required to achieve the UK legal and domestic needs, in both private and public woodlands, is achieved. Given that over 51% of England's woodlands are under 100 hectares, one of the key challenges is to increase the</p>

number of these woodland back into active woodland management that provides optimum carbon storage to reduce the impact of climate change.

With this in mind I would suggest that Interpretation Note 5 and SLIM woodlands managed for Low Intensity Management or non-intervention are now at odds with climate change adaptation requirements. The question posed is why is UKWAS certification should be awarded to woodlands that under-perform in terms of carbon sequestration? I would argue that both Interpretation Note 5 and LIM woodlands should now be reviewed to see if they comply with the significant research and the Read reports requirements.

**Concerns about LIM woodlands and Sustainable Forest Management.**

I note that the three definitions of Low Intervention Management (LIM):

*"Woodland management units are classed as being managed in a low intensity manner when:*

*a) the rate of timber harvesting is less than 20% of the mean annual increment (MAI) within the total production woodland area of the unit*

*AND / either*

*b) the annual harvest from the total production woodland area is less than 5,000 cubic metres*

*or*

*c) the average annual timber harvest from the total production woodland is less than 5,000 m<sup>3</sup> / year during the period of*

*validity of the certificate as verified by harvest reports and surveillance audits.*

*Note: where Woodland Management Unit-specific estimates of mean annual increment are unavailable or impractical regional estimates of growth rates for specific woodland types may be used."*

The impact of cutting below 20% of MAI (when the optimum for maximising volume production in most stands is 70% of MAI) is for increasingly dense canopy, a marked reduction in mean diameter, and the early onset of mortality in the stand (although less so in shade bearing species). So the wood you could have cut for public benefit dies on its feet, the stand produces less volume and natural competition in the stand results in the survival of wolf trees which out compete their weaker neighbours. In mixed stands, the most dominant species will tend to dominate over a single rotation.

In summary LIM achieves:

- Dark stands
- Lots of small, dead trees in the early to mid stages.
- Less harvestable material/small diameters
- The creation of large dominants
- Next to no ground flora and confined to the spaces where light hits the floor
- Probably low biodiversity overall but good for a few specialists

These outcomes seem at odds to climate change adaptation needs, carbon sequestration, biodiversity, access , recreation and Sustainable Forestry Management.

	<p><b>Concerns about LIM and the prevention and response to pests and diseases</b></p> <p>Putting plantations into LIM would tend to exacerbate the tree health issues we have. For example pines would be more prone to RBNB and Larch would be better able to pass on its poisonous <i>Phytophthora</i> spores - according to the latest research. Access would be very difficult in young to middle aged stands. Awarding UK WAS certification to woodlands by promoting Low Intervention Management have the potential to incubate and spread pests and diseases to more responsible small or non-SLIM woodlands.</p>
<p>25. Low intensity management</p>	<p>There is concern that 'Low Intensity Management' woodland provides an increased risk for wildfire incidents over woodlands that are managed. Active management ensures that vegetation fuel loading are reduced, thus reducing the severity and likelihood of wildfires. The forum recommends that due to climate change impacts Low Intensity Management of broadleaves and conifers reduces the potential of Sustainable Forest Management as well as reducing resilience.</p> <p>The Forum's requirements from UKWAS:</p> <ul style="list-style-type: none"> <li>• Ensure a risk based approach to vegetation fire is used across UKWAS woodlands to reflect the diversity and range of forestry owners' aims and objective.</li> <li>• That FRS are consulted only where there are significant issues that increase wildfire risk (e.g. creation of open habitats)</li> <li>• Ensure that climate change adaptation and mitigation is integrated into UKWAS, changes to forestry design and contingency planning are made to increase resilience to wildfires. This should be made within a risk based</li> </ul>

	<p>approach.</p> <ul style="list-style-type: none"> <li>The evidence base for vegetation fires is increased by more effective, standardised and coordinated reporting via UKWAS</li> </ul>
12. The woodland management unit	<p>1) The Woodland Management Unit (WMU) is defined as a "clearly defined woodland area". We use FDPs as the WMU, however some FDPs have a significant amount of open space (50%), most of which is above the tree line. I'm unclear on the status of such open hill land, as previously I had assumed the whole estate was certified.</p> <p>2) On p18, there is a statement "the holdings in the consolidated WMU are located in the same landscape unit" (when dealing with fragmented woodlands). Is there any guidance on what constitutes a landscape unit?</p>
<p>14. Definition of a Woodland Management Unit: keep first paragraph and consider putting the remainder in the annex. If it is simply an administrative unit, then it might be worth making this more explicit.</p> <p>Use either 'management sub-divisions' or 'discrete woodland areas' to ensure consistency. Perhaps a 'management sub-unit' would be more easily interpreted than 'management sub-division'.</p>	<p>This definition remains confusing.</p> <p>Ensure consistent and clear terminology.</p>
16. Definition of WMU	<p>We do not have the expertise to comment further on the proposed definition of WMU but would merely reiterate that it is of the utmost importance for UKWAS to make all possible efforts to ensure the definition of WMU is acceptable to all. The practical auditing/sampling intensity of the new definition could be significant for many certified owners/managers and therefore needs to be as unambiguous as possible.</p>
<p>19. Definition of WMU: Clarify WMU definition to avoid different interpretations by different Certification Bodies and</p>	<p>The definition of WMU is crucial for certification bodies as this is how the sampling for groups and multiple site organisations is</p>

to ensure clear for forest managers.

calculated and hence estimates of the cost of certification.

The first sentence under “The Woodland Management Unit” states that the WMU is the area to which management planning documentation relates. However the following paragraph refers to a WMU being the area covered by an overarching strategic plan and could cover several sub-divisions with several management plans. This appears to be a contradiction and could lead to different interpretations by different parties.

The FSC definition of FMU very closely follows the first sentence of the UKWAS definition, i.e. it is a clearly defined area covered by a management plan. FSC-Accredited Certification bodies are required to sample on the basis of FMUs.

For example, in a case with an organisation of, say, 600 sites and where there is a strategic plan for the organisation at national level (e.g. England) the UKWAS text could imply that a CB could sample one site only in England, which might jeopardise the integrity of the evaluation; FSC would not allow this level of sampling because CBs are required to base sampling at the management plan level.

Some FSC Accreditation audits (audits carried out of CBs by the FSC Accreditation Service) recently have focussed on how CBs have selected sampling and how FMUs have been defined. Also under FSC standards all of the requirements of the standards must be met at each FMU. If the definitions of FSC FMU and UKWAS WMU are different, this may cause confusion and inconsistencies of interpretation among forest managers and stakeholders - relating to the statement on page 18 of UKWAS which says that the requirements could be met across

	the “consolidated WMU”.
<b>Specific Questions: A ‘small woodland’ is currently defined as: ‘an individual woodland of 100 hectares or under in size’.</b>	
<b>1) Do you consider that the definition of ‘small woodland’ should be changed?</b>	
<p>1. ConFor has received numerous communications about the cost, complexity and burden of certification and SLIM currently appears to offer little respite. Everything possible should be done to make certification attractive for all woodland owners, especially of smaller woods. ConFor is aware of owners of woodlands significantly larger than 100ha abandoning certification because it is simply too expensive. Have these been studied? It is uncertain whether SLIM would attract any of these back, but it would help. See “further observations” below.</p>	
5. No	
<p>3. It is imperative that there is no reduction in the definition of the size of a ‘small’ Woodland management Unit from the present 100hct. Any reduction would be counterproductive – In fact a good case could be made for increasing the size as the profit/turnover on a 100 hct. WMU is far too small to justify the expense/paperwork of certification.</p> <p>It is doubtful if any WMU of less than 200 hct could make any economic or business case to be certified under UKWAS.</p>	
<p>4. 100 hectares is a very large woodland by UK standards. Our average member’s woodland is 10ha, and they have no incentive to certify their woodlands due to the cost and procedures as many obtain little or no income from their woodlands. A simpler, cheaper system for woodlands below 10-20 ha would provide an incentive for these owners to become certified so as to recognise their wise husbandry of their woodland.</p>	
8. Yes.	
<p>9. It would be more appropriate to define ‘small woodland’ by value rather than area. 100 hectares of top-quality mature trees might be worth £1M, whereas 100 hectares of restock, scrub or a failed planting might only be worth 1/10<sup>th</sup> of that. If UKWAS is modified to stop penalising small woodlands, the definition becomes unnecessary anyway.</p>	
<p>10. The United Kingdom Vegetation Fire Standard categories up to 100 hectare as being a large wildfire incident. Up to 1 hectare is considered a small wildfire, the most commonly attended category for Fire and Rescue Services.</p> <p>The definition of small woodland should be changed. With reference to the National Inventory of Woodlands and Trees (NIWT) over 51% of England's woodland</p>	

comes under this category.
14. There is no evidence available on whether putting the level at 100ha is helping to increase rates of certification. In the absence of funding to further investigate the relationship between woodland size and certification, changing the level and monitoring impact could help shed light on this issue.
15. No, 100ha and below should be retained as the definition of a 'small' woodland, as well as the related existing definition of 'low intensity management' and the guidance and definition of 'Very Small' woodlands.
16. No we do not. The evidence on size of forest holdings for the UK does not provide any supporting justification for an increase to the 100ha threshold. In fact, whichever way one approaches this, a 100ha woodland is not a true small woodland in the UK context. The average size of a UK woodland we understand to be much less than even 50 hectares. On this basis we would see an increase to the current 100 ha threshold to be disingenuous and to the detriment to what are genuinely small woodlands for which simplified certification requirements and/or auditing standards could be developed in future.
20. Yes, small woodland definition should be consistent with other countries i.e. 1,000ha.
21. No
22. Yes. 1000ha is a fairly realistic definition. It is the intensity of woodland management that is the real question. You can have 1000ha well managed at a low intensity or 10ha poorly managed at a high intensity. UK has a sound regulatory foundation and is assessed as Low Risk in Controlled Wood terminology.
23. FSC UK is neutral on the subject of the threshold size for small woods. However, the Board of FSC UK have to recommend any change to the current status quo to FSC IC, and will be looking for strong justification of any proposed increase, particularly wishing to balance the possible loss of rigour suggested by SLIMF with the likelihood of more woodland area coming into certification.
26. No. I assume that if it were reduced say to 10ha it would lead to a greater burden on woodlands between 1 and 100ha.

<b>2) If so, what new area threshold should be applied?</b>
4. As stated above currently certification offers little to small woodland owners. Reducing the SLIM limit, or introducing a smaller tier (perhaps under 20ha) with cheaper and simpler procedures would make certification more attractive to owners of smaller woodlands.
8. Small woodland should be under 25 hectares.
9. It would be more appropriate to define 'small woodland' by value rather than area. 100 hectares of top-quality mature trees might be worth £1M, whereas 100 hectares of restock, scrub or a failed planting might only be worth 1/10 <sup>th</sup> of that. If UKWAS is modified to stop penalising small woodlands, the definition becomes unnecessary anyway.
10. It is suggested that the new threshold should be <10 hectares. This would account for some 17% of England's woodlands, greater than 41,000 sites or 179,000 hectares.
16. We are content to leave the threshold at 100 ha for the definition of "small woodland". We would support work on developing certification requirements and / or auditing standards for a new category of "very small woodlands" in future. We accept that the opportunity for this is unlikely as part of this version of UKWAS.
20. Small woodland definition should be consistent with other countries i.e. 1,000ha. The UK is recognised by FSC as low risk in the controlled wood risk assessment. The UK is very heavily regulated with almost no recent history or evidence of forestry exploitation.
22. The threshold should include management intensity and size. 1000ha is a fairly realistic definition.
<b>3) How do you believe your proposal would benefit smaller owners?</b>
8. They should get more recognition by government bodies/agencies. <i>(In support of &lt;25 ha.)</i>
10. This would improve the focus of government agencies and Environmental Non-Government Bodies to ensure that small woodlands can be appropriately considered at the landscape scale where the scope and scale of economies is less effective. The majority of woodlands under 10 hectares are under managed and under performing in terms of carbon storage, biodiversity, recreation and other objectives. <i>(In support of &lt;10 ha.)</i>
16. A separate category of "very small woodlands" (say 30ha or smaller) could present significant scope to amend certification requirements and / or auditing

intensities as the genuinely small scale of these woodlands generally equates to lower levels of risk than for a 100 ha woodland. <i>(In support of 100 ha.)</i>				
20. This change in definition would lower auditing costs and will encourage more owners to use certification. <i>(In support of 1,000 ha.)</i>				
22. I am not of the opinion that there are lots of small owners urgently seeking certification, nor do they actually need it.				
<b>4) How do you believe your proposal would affect the total area of woodland under certification in the UK?</b>				
8. It should improve it.				
10. No, although this would remove some 34% of woodland currently categorised as small, it would ensure that woodland >10 but <100 hectares perform more effectively in terms of sustainable forestry management. More importantly it would promote active management to be more cost effective and build resilience to government funding.				
16. The “very small woodland” category would be a medium-term introduction so would not increase the total area of woodland under certification in the UK in the short term (i.e. as part of this UKWAS version 3) but could have definite scope to increase the total area of woodland under certification in the UK if such a new category and its associated low risk status was to be reflected by certification requirements, auditing intensities and the status of such a category was recognised by the certification schemes themselves.				
20. This change in definition would lower auditing costs and will encourage more owners to use certification.				
22. It would ease the process for the latecomers.				
<b>5. Interpretation and revision of the certification standard</b>				
<b>Certification Standard</b>				
<b>1. Compliance with the law and conformance with the requirements of the certification standard</b>				
<b>1.1 Compliance and conformance</b>				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
1.1.1	27. Add: Compliance with			

	<i>Statutory Plant Health Notices.</i>			
	5. Remove proposed new wording about agreements and contracts.			<p>The new wording implies that there must be compliance with agreements and contracts. Contract law is a complex area which often needs specialist lawyers to resolve. Parties often make accusations against other parties when contracts go wrong. Parties are often entitled to end a contract but the other party may dispute this.</p> <p>How does UKWAS propose to sensibly account for this area when the best legal minds in the country often fail? This is far too complex an area to be done justice and opening it up will only cause problems. Contractual disputes are best left to the contract parties to resolve.</p>
	14. Take out 'agreements' or include a more specific term.			The term 'agreements' is somewhat confusing. This could span a variety of agreements, from legal to verbal ones and beyond. This could make it difficult to determine which agreements need to be considered as part of certification processes and which do not.
1.1.2	1. Ref: 'guidelines'.			Is it clear what is meant by "guidelines"? Anyone can publish a booklet called guidelines on anything.
1.1.3				
1.1.4				
1.1.5			20 & 22. Remove new advice to owners/managers.	<p>20. This takes up space and does not add value – this is a standard not a guide to the standard.</p> <p>22. Useless clutter that fills up the page and adds next to nothing</p>
				26. If the certifying body recommends excising an area of woodland would this then comply with this Requirement? See points raised under 3.5.1.
<b>1.2 Protection from illegal activities</b>				

Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
1.2.1				23. We feel that our original suggestion has been overlooked and we would like to re-open discussion on this point. We originally noted that FSC's actual requirements for non-SLIM woodlands are for: documented policies and procedures and records of any illegal activities within the FMU and of relevant consultations with local communities. Our suggested additional wording was as follows: Add extra bullet to non-SLIM woodlands: <i>maintain records of illegal and unauthorised activities and follow-up action</i> . We would like further discussion on whether some new wording can be inserted into this section that meets FSC's requirements better than at present.

## 2. Management planning

### 2.1 Documentation

Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
2.1.1	10, 24 & 25. Additional point (l):  <i>Contingency Planning for incidents and emergencies</i>		10, 24 & 25. Adopt bullet list format and use the term 'vegetation fire management plan' instead of 'fire management plan':  <i>The management planning documentation should cover all elements of the requirement but may refer to other documents as appropriate; these might</i>	See respondent's references to wildfire in government policy, strategies and action plans under 'Any other observations' at end of this document.  For Requirement note: Operation Guidance Booklet 17 – Planning for the Unexpected (OGB17). Forestry Commission. 2009.

			<p>include:</p> <ul style="list-style-type: none"> <li>• <b><u>A vegetation fire management plan,</u></b></li> <li>• <i>a deer management plan,</i></li> <li>• <i>an integrated pest management strategy,</i></li> <li>• <i>a research policy,</i></li> <li>• <i>project plans and necessary permissions from applicable regulatory and licensing authorities.</i></li> </ul>	
			<p>Ref: Red Data List species and BAP, HAP, SAPs</p>	<p>14. It would be useful if UKWAS had a link to up to date lists of red data book species or a complete list and if the glossary defined what is meant by red data book species, as I think there has been some change in terminology in recent years, which could lead to confusion. From memory red data book species are assessed to get BAP priority species, but I could be wrong, which does lead to a bit of overlap. So in summary we need to be very clear what the definitions and intentions are of including red data book species and what the expectations are.</p> <p>I also wonder if they need to review the references on BAP HAPs and SAPs, as SAPs are becoming linked to HAPs. Gordon Patterson would be a good person to comment on this.</p>

<b>Specific question: How can research plots for testing non-standard management techniques be best accommodated within a certified WMU?</b>				
9. Should be a matter for the woodland manager. This whole section of UKWAS is unnecessarily prescriptive.				
16. We believe that on-going forest research across a range of disciplines is important in furthering our understanding and knowledge of the effects of different treatments on tree growth. Where research involves controversial or non-standard management techniques it may be possible for parts of these WMUs to be excised from the rest of a certified WMU but only where the research is not dependent on the interaction with or has the potential to threaten other woodland in the UK, whether that other woodland is certified or not.				
20 & 22. In the same way as Minor Components are dealt with for Chain of Custody, see FSC-STD-40-004 v2.0 page24. The principle is already established by FSC and managed by the CBs. One could apply the <1% and 1-5% rule in the same way but applied to area.				
23. The broad nature of the term 'non-standard' is worrying. We appreciate that research plots are necessary, but caution suggests that they cannot be accommodated within the certified part of a WMU. I have never seen a research plot, but I imagine that they can be the testing ground for such experiments as new and different pest and foliage controls, increased densities of planting etc, etc and thereby differ considerably from the management regime of the remainder of the woodland. I am not sure that one could easily rationalise scale and intensity of each research plots to make them 'managerially acceptable'. At first sight, I do not believe that FSC will accept research plots as being part of the certified WMU.				
26. By identifying these areas in the management plan and by defining the types of operation to be undertaken over the next 5 years. The areas could be excised but with an adequate explanation in the MP this should be unnecessary.				
2.1.2				
2.1.3				
<b>2.2 Productive potential</b>				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
2.2.1				
2.2.2	5. Add in or create new section: <i>Lack of management &amp;</i>			5. There should be something about justifying a lack of management i.e. where the woodland is not being managed and is not yielding timber this should be justified e.g. on enviro-

	<i>timber production should not jeopardise the productive potential of the woodland unless there is sound justification for not managing the woodland.</i>			<p>protection grounds. If there isn't good justification then it should be a requirement of the standard to manage &amp; produce timber.</p> <p>The focus is too much on regulating active management and needs to be balanced to regulate lack of management (particularly where large landowners fail to manage), which is a greater problem in the UK than management. All major countryside bodies agree that woodland management is the best option in UK conditions in most woodlands – gov policy also underpins this – so let's see it reflected in the standard.</p> <p>Failing to manage woodlands can affect their productive potential too - because utilisable timber is not taken and under-managed woodland tends to produce low quality timber with greater waste.</p>
				<p>10. Whilst this section has been in for some time, the wider woodland management context with respect to active management of private land (for woodfuel etc) suggests that this section should have a change of emphasis to embrace under-management. The clear thrust is to combat over-cutting but under-cutting can be just as harmful to the productive potential.</p>
			<p>14. Add: <i>'it is recognised that under-management can be as harmful to productive potential as over-harvesting'</i></p>	<p>14. This section should emphasise that under-cutting (un/under management) can be just as harmful as over-cutting to productive potential.</p>
2.2.3				
2.2.4		14. Say that chain of custody certifications		<p>14. Presumably a chain of custody certification is more relevant for processors than for woodland owners/managers. As such, it</p>

		may be taken into account by inspection bodies.		might be worth changing the language to reflect that a chain of custody certificate would be considered as part of a woodland certification process, but is not a requirement.
			20 & 22. Remove new advice to owners/managers	20. This takes up space and does not add value – this is a standard not a guide to the standard. 22. Useless clutter that fills up the page and adds next to nothing

### 2.3 Implementation and revision of the plan

Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
2.3.1				
2.3.2				
2.3.3				
2.3.4				
2.3.5				
2.3.6				

### 3. Woodland design: creation, felling and replanting

#### 3.1 Assessment of environmental impacts

Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
3.1.1				
3.1.2				
3.1.3				

3.2 Location and design				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
3.2.1			14. Emphasize that provenance may need to be wider to ensure resilience to climate change and pests & diseases.	Please see section on provenance in the new Ancient Woodland Practice Guide (p.31-32) <a href="http://www.forestry.gov.uk/pdf/FCPG201.pdf/\$file/FCPG201.pdf">http://www.forestry.gov.uk/pdf/FCPG201.pdf/\$file/FCPG201.pdf</a>
			26. Revise: <i>Where appropriate and possible, use <b>should be made of</b> natural regeneration or planting stock from parental material growing in the local native seed zone (native species) or region of provenance (non-native species).</i> 	Style
3.2.2			10 & 25. Add additional bullet: <ul style="list-style-type: none"><li><i>Prevention of wildfire incidents</i></li></ul>	See respondent 10's references to wildfire in government policy, strategies and action plans under 'Any other observations' at end of this document.
3.2.3				
3.2.4				
3.3 Species selection				

Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
3.3.1			Ref: <i>Where appropriate and possible use natural regeneration or planting stock from parental material growing in the local native seed zone (native species) or region of provenance (non-native species).</i>	1. Is this still best practice, in light of climate change? Are references up to date? ConFor would support Rob Gazzard's comments on this. All requirements must be based on sound evidence.
			5. Add:  <i>Certain near natives (Sweet chestnut, Sycamore, Scots pine (in England)) can be treated as natives where, regionally, they have been accepted as such.</i>	5. These species have been with use for over a thousand years and there is little to be gained from giving them a lower status than natives. Good woodland design and management is far more important.
	10. Delete text:  <b><u>b) For new woodlands, native species shall be preferred to non-native.</u></b> <i>If non-native species are used it shall be shown that they will clearly outperform native species in meeting the objectives.</i>			10. <b>The long-term role of 'native woodlands' in a changing climate</b> I note the Woodland Trust ( <i>Our Landscape Scale Principles</i> ) and other Environmental Non-Government Organisation position statements are at odds the findings of the Forestry Commission research and the Read Report. Based on evidence native and non-native conifers will play a significant role in future woodland composition and an important role in carbon sequestration. I believe the dogmatic approach of focusing just on native species is flawed and not in the wider interests of the public, the economy or the environment but also in our response to a changing climate.

				With reference to 3.3.1 b) in some cases in the UK this may not be appropriate for the benefit of long term management planning. There are strong arguments made that present non-native species will be more appropriate in the future and many 'native species' will not. I would strongly recommend that the text in 3.3.1 a) is used given it more dynamic and flexible approach to the evolution of species over the next 50 to 100 years. Please see Read Report Box 9.3.
			14. Emphasize that provenance may need to be wider to ensure resilience to climate change and pests & diseases.	14. Please see section on provenance in the new Ancient Woodland Practice Guide (p.31-32) <a href="http://www.forestry.gov.uk/pdf/FCPG201.pdf/\$file/FCPG201.pdf">http://www.forestry.gov.uk/pdf/FCPG201.pdf/\$file/FCPG201.pdf</a>
			26. see 3.2.1	see 3.2.1 style – use 'should'.
3.3.2				1. The maximum percentages of primary species is considered to run contrary to some facets of SFM, in particular, the sustainable production of industrial raw material. The maximum percentages contained in UKWAS appear to be out of step with the provisions of UKFS and may act as a deterrent to the achievement of planting targets. The wording of the requirement should be relaxed to allow a greater percentage of primary species where this can be justified.
			26. see 3.2.1	see 3.2.1 style – use 'should'.
3.3.3				
3.3.4				10. With reference to comments made in 3.1.1 b, 3.3.4 a needs to reflect the need for non-native species as part of climate change adaptation. Therefore non-natives can bring considerable environmental, social , economic and climate change benefits.
<b>3.4 Silvicultural systems</b>				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>

	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
3.4.1				
3.4.2				
3.4.3				
<b>3.5 Conversion to non-forested land</b>				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>
	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
3.5.1	1. Ref: <i>Conversion to non-forested land shall take place only in exceptional circumstances.</i>  Ref: <i>There is no evidence of substantial dispute.</i>			1. If compensatory planting is like-for-like, this first sentence (exceptional circumstances) is not necessary. The following sentence explains the circumstances.  With windfarms, there is always substantial dispute. If this sentence is necessary, it requires qualification.
			10. With reference to:  <i>Planning consent or an approved Environmental Statement can provide sufficient evidence that there is no substantial dispute.</i>	See: Forestry Commission England: When to convert woods and forests to open habitat in England: Government policy (Open Habitats Policy) 2010 as noted in respondent's references to wildfire in government policy, strategies and action plans under 'Any other observations' at end of this document.
				12. I see that timber from windfarm infrastructure cannot be sold as certified - will the same apply to hydro infrastructure?
				15. We welcome the proposed revising wording of the 'Requirement', 'Means of Verification' and 'Guidance' columns of Requirement 3.5.1, and to the 'Guidance' column of

				Requirement 6.1.3.
	17. Use 'Appropriate circumstances' rather than 'exceptional circumstances'  Ref: <i>'more significant in terms of its biodiversity, landscape or historic environment importance than any achievable woodland cover'</i>			17. 'exceptional circumstances' is more restrictive than the existing requirement and implies woodland should only very rarely be removed. For biodiversity, landscape or historic environment reasons. This is not always the case and less pejorative language should be used here. We do not see why this should be 'exceptional' rather than appropriate.  'more valuable than any type of practicably achievable' is clumsy phrasing and also suggests a monetary value.
	Ref: <i>Exceptional circumstances</i>	20. Unclear as to what represents exceptional circumstances		20. Remove all reference to exceptional circumstances – without defining exceptional circumstances this is just creating additional areas for argument and debate.  Remove the additional "test" clause, regarding "any woodland cover". Prior to consideration for certification - any proposed deforestation or significant development will have either required full planning permission and/or FC consultation, and in turn formal determination as to whether an EIA is required. The EIA will consider a range of alternative land uses, including other forms of woodland cover. The proposed deforestation will have been subject to a significant investigation by a range of formal authorities – if consent has been granted for the deforestation, the application of additional hurdles within UKWAS will not deliver any additional value.
	22. Addition of a definition of scale and or proportion of holding allowed to be cleared.	22. Unclear as to what represents exceptional circumstances		22. Is it acceptable, working to a forest management standard, to have a certified area with few if any trees left standing? I tend to the view that it is not desirable.

	Ref: <i>Exceptional circumstances</i>			<p>At the end of the 5 year certification term the property exits certification having had the benefits of certification (price, access to market) without necessarily delivering the promised benefits.</p> <p>Is there any research into the outcome of forest clearances for windfarms? Have the promised gains been realised?</p>
				<p>26. I do not have any specific amendments to suggest. The earlier questions about whether timber can be sold as certified are now clarified, but I think there is a case for more positive guidance in the standard about the continued certification of the WMU.</p> <p>The Guidance note advises owners/managers to seek guidance from the certification body who will presumably refer to FSC/PEFC rules on for example excision. This vagueness may cloud the issue for third parties e.g. local stakeholders and lead to their objecting to the granting of certified status when more specific guidelines might avoid this. If excision is the way to clarify this could the guidance column refer to the relevant FSC and PEFC policies?</p>
<p><b>Specific question:</b>  <b>Should 'compensatory planting' be acceptable to mitigate conversion to non-forested land?</b></p>				
<p>1. ConFor has identified loss of productive forestry from a variety of sources as being a major concern for the forest industries. Ideally, compensatory planting would be on a like-for-like basis to prevent further loss. Compensatory planting should be acceptable to UKWAS.</p>				
<p>3. Compensatory planting should be obligatory – not just as an area of planting but be species specific –i.e. when an area of commercial woodland is felled and not replanted you are reducing the area of commercial woodland and there is a danger that in certain parts of the country this will mean that there is no longer enough commercial woodland to support a viable forest industry.</p>				
<p>4. Yes, it should always be required, but should not be used to help justify the removal of woodland with biodiversity, economic or social value.</p>				
<p>5. Yes, I think the industry could have gained a lot over the past few years had this policy been implemented. The likelihood is that the new land will be more</p>				

productive than that reverted to other habitats (or at least in south England where the main issues surrounds heathland).

9. Some form of compensation is required for deforestation! Compensatory planting is better than nothing.

10. Compensatory planting to mitigate conversion to non-forested land should only be permitted where it is fully established before the conversion takes place. That would ensure that establishment of the compensatory land would be done properly. Agreements etc will not ensure that that takes place. It must be a condition prior to clearance.

14. Yes, increased flexibility could increase uptake of the standard and a dynamic attitude to land-use could help increase woodland creation. However, some protection would need to be put into place.

For certain woodlands and under certain circumstances woodland removal could be acceptable if offset by planting elsewhere (e.g. this would not apply to ancient woodland, old-growth woodlands, locally valued woods and woods that are highly valued for their heritage, landscape or recreational use).

Setting the right criteria could prevent such flexibility from being abused. For instance, UKWAS could stipulate that in order for forest products to be certified:

- It must be demonstrated that the new land use must have significantly higher social and/or environmental benefits than the woodland
- Compensatory planting and successful establishment must have taken place before clearance work can begin (this in order to address concerns that offsetting would be regarded as a simple tick box approach resulting in low quality)
- Where local people express strong concerns about loss of woodland, the new woodland should be established in the same landscape or locality.
- To make up for loss of ecosystem products in the period between clearance work of one woodland and maturity of the new woodland, (1) the area of new woodland must exceed the area lost and (2) the productivity of the mature new woodland must exceed that of the felled woodland to make up for the loss of ecosystem products. Were a high production crop was being replaced by one of lower productivity, a larger area will be required to sustain the overall productivity. ( A reasonable benchmark here would need to be set.)

This approach needs more work, in particular on how to enforce it. Forestry Commission England would be happy to be involved.

15. No – changes to the standard should be limited to the current proposed revised text of the standard Requirements 3.5.1 and 6.1.3 in *UKWAS Revision 2009-2011: Consultation Draft December 2010*.

The RSPB considers that ‘compensatory planting’ should not, and must not be required by UKWAS for the restoration of priority open ground habitats, sites for priority species and designated wildlife sites under Requirements 3.5.1 and 6.1.3. Compensatory planting is a country forestry policy consideration, not an UKWAS matter. In addition to not requiring compensatory planting for priority biodiversity restoration and management within UKWAS, the UK Forestry Standard and country forestry strategies, we recommend that any consideration of compensatory planting must be at a country, not a site level.

The RSPB considers that 'compensatory planting' should not be required, and is not required, by the UK Forestry Standard and associated Biodiversity Guidelines for the restoration of priority open ground habitats, sites for priority species and designated wildlife sites. Restoring and managing these important wildlife habitats and sites is fully consistent with sustainable forest management, as is not afforesting or replanting them. Requiring the 'compensation' of the loss of biodiversity damaging plantation forestry on restorable priority open ground habitats that meet UKWAS Requirement 6.1.1. would be an unacceptable and perverse interpretation of the principles, practice and concept of sustainable forest management. The RSPB is fully supportive of the requirement not to remove High Conservation Value Forests that consist of priority woodland habitats and species and designated woodland sites.

We consider that for country forestry policy makers, compensatory planting should not be a requirement for the restoration of priority open ground habitats, sites for priority open ground species and designated open ground wildlife sites. The proposed inclusion of site-level 'compensatory' planting into UKWAS is an inappropriate and unhelpful confusion of country forestry policy objectives with a voluntary sustainable forest management standard.

It is worth noting that Forestry Commission England, Scotland and Wales, and Forest Service Northern Ireland currently approve the restoration of priority open ground habitats through their respective forestry Environmental Impact Assessment processes and Felling Licensing (currently GB only, but NI are to introduce this) to meet the biodiversity commitments in country forestry and biodiversity strategies.

16. The Woodland Trust does not believe that you can compensate for the loss of high nature conservation value woodland by planting new woodland. Ancient woodland is a unique and irreplaceable habitat, there should be no further loss of ancient woodland.

If the conversion to non-forested land results in the loss of woodland not of high conservation value and the resulting land use is reverted to valuable semi-natural habitat then it may not be necessary to use compensatory planting as a mitigation measure against forest loss. In such cases the Environmental Impact Assessment regulations should be the mechanism used to determine whether or not compensatory planting is acceptable.

If the conversion to non-forested land results in the loss of woodland not of high conservation value and the resulting land use is reverted to low grade vegetation or lost to another land use (eg development) entirely then not only is compensatory planting acceptable but must be a pre-requisite as a mitigation measure against forest loss.

17. Compensatory planting may be appropriate but should not be a standard requirement as it could put undue pressure on a woodland owner to acquire new land for planting outwith an existing woodland. A distinction should be made between woodland removed for development purposes and woodland removed for environmental benefit (whether biodiversity, landscape or historic environment'. Owners should not be discouraged from removing woodland where it is appropriate to do so for fear of punitive new planting costs.

20. Compensatory planting is fundamentally a planning issue. Any forestry clearance should only be certified on its own merit. It is impractical to tie potentially 2

separate pieces of land together, for the purpose of certification. It is an unnecessary complication to certification and forest management.

21. As long as the compensatory event can be clearly defined in an acceptable UK legal framework and linked explicitly to the development being undertaken. Also the planting should have a degree of “additionally” to it, so that developers are not just “buying” compensation events that would have happened anyway.

23. Under FSC’s current principles & criteria, conversion in the first place is only allowed when it entails a very limited portion of the WMU, does not occur in HCVEs and has to show clear, substantial, additional, long-term conservation benefits across the WMU. At moment, we do not know how the revised principles and criteria will address this issue, but it is likely that the relevant criterion will be rewritten in some way – at the very least to remove the measure of interpretation required for the term ‘very limited’, but there may be more fundamental changes than that.

Hence my first reaction to this proposition is that, first and foremost, the existing criterion must remain as a cornerstone of Section 3.5.1. If forest managers wishing to convert follow the criterion to the letter, then, of course, compensatory planting would be a bonus.

However, we could not accept that compensatory planting be used as an excuse to justify conversion that does not meet the aforementioned criterion.

26. Yes, but there must be clearly defined conditions. Relevant questions include: (i) like for like areas/species/localities? (ii) timing of CO2 emissions / capture (iii) monitoring of new compensatory woodlands (iv) ownership of compensatory woodland.

Is the implication of the question that the restrictions of 3.5.1 would be set aside if there were compensatory planting?

3.5.2				
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**4. Operations**

**4.1 General**

Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
4.1.1				
4.1.2				

**4.2 Harvest operations**

Section	Your proposed amendments			Comments and justification for proposed amendments
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	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
4.2.1				
4.2.2				
4.2.3			10, 24 & 25. Add:  <i>Sites at high risk from wildfire incidents must have an agreed Vegetation Fire Management Plan before burning operations commence.</i>	See respondent 10's references to wildfire in government policy, strategies and action plans under 'Any other observations' at end of this document.
4.2.X	10, 24 & 25. Proposed new criterion:  <i>Where prescribed burning operations are considered a site must have a Vegetation Fire Management Plan with the risk of wildfire is high.</i>	<b>All woodlands:</b> <ul style="list-style-type: none"> <li>• <i>Management planning documentation</i></li> <li>• <i>Discussions with the owner/manager/neighbours</i></li> <li>• <i>Maps</i></li> <li>• <i>Vegetation Fire Management Plan</i></li> </ul> <b>SLIM woodlands:</b> <ul style="list-style-type: none"> <li>• <i>Discussion with the owner/manager demonstrates awareness that impacts have been considered</i></li> </ul>	See 5.1.5	See respondent 10's references to wildfire in government policy, strategies and action plans under 'Any other observations' at end of this document.

		<ul style="list-style-type: none"> <li>Evidence of registration of exempt activity.</li> </ul> <p><b>Non-SLIM woodlands:</b></p> <ul style="list-style-type: none"> <li>Documented appraisal</li> <li>Evidence of registration of exempt activity.</li> </ul>		
4.2.4			<p>Additional bullet:</p> <ul style="list-style-type: none"> <li>Damaging archaeological &amp; historic monuments and deposits</li> </ul>	17. Tree stump removal and the associated ground disturbance can devastate underlying archaeological & historic sites that may survive in existing woodland
<b>4.3 Forest roads</b>				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>
	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
4.3.1				
4.3.2				
<b>5. Protection and maintenance</b>				
<b>5.1 Planning</b>				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>
	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
5.1.1		<p>10, 24 &amp; 25. Amend bullet point:</p> <ul style="list-style-type: none"> <li>Discussion with the owner/ manager/ <b><u>neighbours</u></b></li> </ul>	<p>10, 24 &amp; 25. Insert additional bullet point:</p> <ul style="list-style-type: none"> <li>Vegetation fire management plan</li> </ul>	See respondent 10's references to wildfire in government policy, strategies and action plans under 'Any other observations' at end of this document.

5.1.X	<p>10, 24 &amp; 25. Proposed new criterion:</p> <p><i>Contingency Planning for incidents and emergencies</i></p>	<p><b>All woodlands:</b></p> <ul style="list-style-type: none"> <li>• <i>Management planning documentation, with the risks reducing in the following:</i></li> <li>• <i>Woodland design</i></li> <li>• <i>Management Planning</i></li> <li>• <i>Operations</i></li> <li>• <i>Protection and maintenance</i></li> <li>• <i>Conservation and enhancement of biodiversity</i></li> <li>• <i>The community</i></li> <li>• <i>Discussions with the owner/manager/neighbours</i></li> <li>• <i>Appropriate agencies and services</i></li> </ul>	<p><i>Evaluation should consider the risks caused by management and the impact of climate change, including:</i></p> <ul style="list-style-type: none"> <li>• <i>Flooding</i></li> <li>• <i>Wildfire</i></li> <li>• <i>Pests and disease</i></li> <li>• <i>Land erosion and subsidence</i></li> <li>• <i>Windblow/snap</i></li> </ul> <p><i>The aim is to use risk based approach that focuses on preparedness and prevention phases of contingency planning. This is achieved by addressing the emergency and incident in management and design. This has significant cost saving as well as improving the effectiveness and efficiency of response and recovery phases.</i></p>	<p>See respondent 10's references to wildfire in government policy, strategies and action plans under 'Any other observations' at end of this document: see Civil Contingency's Act 2004.</p>
5.1.2	<p>14. Include a reference to pests and diseases.</p>	<p><i>Amended text proposed:</i></p> <ul style="list-style-type: none"> <li>• <i>Evidence of unhealthy trees <b>and significant tree pest and disease</b></i></li> </ul>		<p>14. Recent years have seen an increase in the rate and number of serious tree diseases entering/appearing within the UK. Therefore we suggest including a specific reference to tree pest and diseases alongside plant health as requiring monitoring.</p>

		<i>is noted and appropriate action taken</i>		
			<p>Ref new text proposed by respondent 27:</p> <p><i>For serious tree pest and diseases, statutory notices must be complied with, in the absence of statutory notices any guidance from the statutory authorities to prevent the introduction and/or onward spread <u>should be considered against any other relevant UKWAS requirement</u></i></p>	<p>16. We support the draft amendments we have seen put forward by the UK Biosecurity Programme Panel (respondent 27) but would ask that particular emphasis is placed on the phrase in Guidance “should be considered against any other relevant UKWAS Requirement”.</p> <p>This is so that biosecurity Requirements (unless legally enforced) do not prejudice other UKWAS Requirements as we believe they should not do so.</p>
	<p>27. Proposes:</p> <p>1. To make the section specific to Tree Health/Disease by removing to another section reference to grazing impacts. So wording changed to “Tree <b>Health and pest/diseases</b>”</p>	<p>1. Suggested change to wording below</p> <p><b>All woodlands:</b></p> <ul style="list-style-type: none"> <li>• <i>Owner/manager is aware of potential <b>significant tree pest and disease</b> risks</i></li> <li>• <i>Evidence of unhealthy trees and <b>significant tree pest and disease</b></i></li> </ul>	<p>1. Suggested change to wording below:</p> <p><i>Plans and actions related to plant health ecology <b>and pest/disease</b> should be appropriate to the scale and composition of the woodland and to plant health/<b>pest/disease</b></i></p>	<p>1. To have a section that is dedicated to Tree Health and Diseases only by removing reference to grazing impacts to a separate section. This being done to strengthen the impact of the UKWAS standard with regard to the present situation regarding tree diseases.</p> <p>2. To include specific reference to tree pest and diseases alongside plant health as requiring monitoring.</p> <p>3. It is felt important that there is reference to both the onward reporting of significant tree pests and diseases to ensure that any monitoring of outbreaks is assisted and new diseases reported early.</p>

	<p>impacts shall be monitored”</p> <p>2. Change wording of section too:</p> <p><i>Tree health <b><u>and pest/diseases signs/</u></b> impacts shall be monitored <b><u>for.</u></b> Results shall be incorporated into management planning together with guidance arising from national monitoring / <b><u>advice</u></b> on plant health <b><u>and tree pest/diseases.</u></b> <b><u>Significant or new tree pest / disease are reported to relevant body.</u></b> <b><u>Measures to prevent the introduction and onward spread of tree pest / diseases are implemented according to national guidance.</u></b></i></p>	<p><i>is noted and appropriate action taken</i></p> <p><b>Non-SLIM woodlands:</b></p> <ul style="list-style-type: none"> <li>• Documented systems for assessing tree health</li> </ul> <p><i>Notes or records of monitoring and responses to problems</i></p>	<p><i>hazards.</i></p> <p><b><u>For serious tree pest and diseases, statutory notices must be complied with, in the absence of statutory notices any guidance from the statutory authorities to prevent the introduction and/or onward spread should be considered against any other relevant UKWAS requirement</u></b></p> <p></p> <p><b>MP</b></p>	<p>4. It is felt important that there should be reference to taking recommended steps to prevent the introduction and onward spread of pest and diseases.</p>
5.1.3				
5.1.4				

5.1.5	<p>10, 24 &amp; 25. Proposed rewording:</p> <p><i>A vegetation fire management plan shall be developed where there is an appropriate level of risk.</i></p>	<p>Proposed rewording:</p> <p><b>All woodlands:</b></p> <ul style="list-style-type: none"> <li>• <i>Discussions with the owner/manager/neighbours</i></li> <li>• <i>Vegetation fire management plan</i></li> <li>• <i>In sites with high risk of fire, such as those with young conifers or within or adjunct to open habitats or open space, must provide evidence of contact with the fire and rescue service and that their advice has been heeded.</i></li> <li>• <i>Woodlands that are converted to open habitats will require consideration of wildfire risk as part of an Environmental Statement.</i></li> </ul>	<p>Proposed rewording:</p> <p><i>Vegetation fire management plan should include:</i></p> <ul style="list-style-type: none"> <li>• <i>Wildfire risk assessment</i></li> <li>• <i>Appropriate control measures to bring the wildfire risk level to low</i></li> <li>• <i>Fire map</i></li> <li>• <i>Wildfire reporting system</i></li> <li>• <i>Responsibilities for action</i></li> <li>• <i>Contact details</i></li> <li>• <i>Contingency planning for emergency procedures.</i></li> </ul> <p><i>In addition where prescribed burning is used as a management technique the follow is required:</i></p> <ul style="list-style-type: none"> <li>• <i>Prescribed fire management plan</i></li> <li>• <i>Prescribed fire operations plan</i></li> </ul>	<p>Requirement - clarification that 'appropriate' is in reference to the level of risk is defined in Vegetation Fire Risk Management</p> <p>See respondent 10's references to wildfire in government policy, strategies and action plans under 'Any other observations' at end of this document.</p> <p>Ref MoV: Forestry Commission England: When to convert woods and forests to open habitat in England: Government policy (Open Habitats Policy). 2010</p> <p>Ref Guidance: Vegetation Fire Risk Assessment: Guidance for Land Managers and Advisor's (2011 in draft)</p>
5.1.6	27. Suggested change to		See comments	The Biosecurity Programme Panel are of the opinion that in

	wording below:  <i>Staff and contractors shall clearly understand and implement safety precautions, environmental protection plans, <b>biosecurity protocols</b> and emergency procedures.</i>			these times of unprecedented increase in tree disease there is a need to ensure that suitable biosecurity measures are adopted by the sector to prevent the introduction and movement of significant pest and diseases and that all land owners, staff and contractors need to aware of and implementing such measures. The panel is presently working to produce some industry wide biosecurity protocols which hopefully could be available as guidance when the new UKWAS standard is issued.
<b>5.2 Pesticides, biological control agents and fertilizers</b>				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
Over-arching	1. Please refer to Colin Palmer’s submission on this section, which ConFor endorses.			
	6. We concur with Colin Palmer’s comments regarding the revisions.			
Back-ground	<p>2. Overall, I believe that the revised section strikes the right balance between encouraging growers to avoid or minimise the use of pesticides without the downsides associated with an overly prescriptive framework.</p> <p>I agree with the separation of pesticides, fertilisers and BCA’s.</p> <p>Definitions: Pesticides are, by definition, chemicals which control undesirable flora &amp; fauna. Reference to “chemical pesticides” does therefore have a rather quaint feel about it which tends to detract from the otherwise highly professional information. I suggest that the prefix “chemical” is therefore removed.</p> <p>Similarly “.... the use of pesticides”. There is no need to qualify pesticides as “including herbicides and rodenticides” as they are internationally accepted to do so. If it is felt necessary to add a list of types of pesticides then insecticides, fungicides, growth regulators, molluscicides, acaricides should also be noted - but on balance best not to list any.</p> <p>“.... may require the use of a limited range of pesticides” - I feel that “limited” is conveying the wrong message, and would suggest a more targeted sentence such as: “.... may require the use of pesticides carefully selected and applied to minimise or eliminate adverse effects on the environment or operator.”</p>			

5.2				
5.2.1	2. Ref 5.2.1(a):  I think that “Integrated Pest Management strategy” may be better defined as “Integrated Crop Management Strategy”.			2. This concept allows for anticipating and remedying many problems including weeds and insects which may otherwise require pesticide applications.
				27. The Biosecurity Programme panel support the proposed change to in requirement to an integrated pest management strategy approach and suggest that one of the key guidance document for this could be International Standards for Phytosanitary Measures (ISPM) No 14 – “The use of integrated measures in a systems approach for pest management” – see <a href="http://www.ippc.int">www.ippc.int</a> .
5.2.2				2. The COSHH assessment will aid the protection of the operator - should an environmental risk assessment also be required before a new pesticide is applied?
5.2.3				2. Reference should be made to best practice provided in “Pesticides: Code of Practice for using plant protection products (Defra / HSE PB11090) or “Pesticides: Code of Practice for using plant protection products in Scotland (Scottish Executive / HSE).  Should reference be made for operators to be trained and competent, and hold pesticide operator certification? This may become mandatory for all towards the end of 2011.
5.2.4			Ref: <i>Certificate holders may be subject to additional requirements...</i>	1. What about those applying for certification for the first time?

	5.2.4(a): add “forest” - statement should be modified to: “they are approved for forest use by the UK regulatory authorities”.			2. I believe the changes here strike the right balance to cover both FSC and PEFC requirements.  2. The current statement would permit use of non-forestry approvals.
			20 & 22. Remove new advice to owners/managers	20. This takes up space and does not add value – this is a standard not a guide to the standard. 22. Useless clutter that fills up the page and adds next to nothing.
5.2.5		Ref: <b>Non-SLIM woodlands:</b>		1. In other sections, the distinction is for woodlands under or over 100ha.
<b>5.3 Genetically modified organisms</b>				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
5.3.1	5. Why is this a requirement?			5. What evidence is there to suggest GMO (trees, if there are any) are a problem?
<b>5.4 Fencing</b>				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
5.4.1				
5.4.2				
<b>5.5 Pollution</b>				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
5.5.1				
5.5.2				

5.5.3				
<b>6. Conservation and enhancement of biodiversity</b>				
<b>6.1 Protection of rare species, habitats and natural resources</b>				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
6.1.1				10. The definition of woodlands of High Conservation Value should really exclude a lot of PAWS. Once they have been managed to a low level of non-native species, then it's fine for them to become HCV woods. I would add that including areas that support priority habitats and species listed in the UK BAP as HCV woods would include all of ours, including conifer stands on heathy soils (Bats, Firecrest, Red squirrel etc..) Remember, there are over 1100 BAP species. It's not a very differentiating criterion.
	14. Replace 'field survey' by 'assessment on the ground'			A field survey is a specific method of assessment, making this requirement potentially onerous to comply with. Requiring an 'assessment on the ground' will allow for more flexibility, both to adapt methods to the characteristics of the woodland and to the skills set of the woodland owner.
			14. Proposed text to include 'can':  <i>These areas and features of high conservation value <b>can</b> include:</i> <ul style="list-style-type: none"> <li>• <i>Areas supporting priority habitats and species listed in the UK Biodiversity Action Plan.</i></li> </ul>	This section, in combination with section 6.3 ('Woodland identified in section 6.1.1 shall not be converted to plantation or non-forested land') seems to suggest that any woodland with a UK BAP species cannot be converted. But while section 6.3 focuses on ancient and semi-natural woodland, woods with UK BAP species may be entirely conifer, e.g. in the case of red squirrels and certain types of bats. We therefore suggest teasing apart ancient and native woodlands from woods with UK BAP species.

				15. We agree with the proposed definition of HCVF as meeting Requirement 6.1.1a, and related text changes to 6.1.1c on ongoing stakeholder consultation.
				26. It might be useful to include a definition of HCV in the glossary
6.1.2				
6.1.3				1. By removing the guidance about scale, this appears to have the potential to be expensive and lead to further deforestation and loss of timber resource.
			10. I have some concerns with <i>"Woodland removal to facilitate infrastructure or built development which is not integral to the management of the rest of the woodland cannot meet this requirement"</i>	10. This could make Recreational development, for example, a bit difficult and outside of UKWAS, although it could be argued that recreation development supports management, although I can see some bodies not seeing it like that. Similarly, does this then support, a traditional and integral part of management of the forest in some locations?
				14. See comment to question on compensatory planting.
				15. We welcome the proposed revising wording of the 'Requirement', 'Means of Verification' and 'Guidance' columns of Requirement 3.5.1, and to the 'Guidance' column of Requirement 6.1.3.
			24. Insert additional text at end:  <i>Where habitats (such as grassland, heath and moor) are at higher risk</i>	24. Note: there should be consideration when the creation or restoration of habitats from woodland has an impact on the social and infrastructure needs. For example the removal of woodlands can alter the watershed and flood plains of new communities/settlements and other national infrastructure leading to increase potential for flooding. Similarly examples

			<i>of wildfire incidents a vegetation fire management plan will be required and the approval of the local Fire and Rescue Authority.</i>	can be found for wildfire, windblow etc. The relationship between the restored habitats and the present local needs must be determined and resolved.  Reference: Forestry Commission England: When to convert woods and forests to open habitat in England: Government policy (Open Habitats Policy). 2010
				26. ditto comments about referral to certification body in 3.5.1
<b>6.2 Maintenance of biodiversity and ecological functions</b>				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
6.2				
6.2.1				10. There are lots of minimum thresholds set throughout the UKWAS to ensure that woodland owners take account of things, but no maximums. Here, for example, would it be a good thing (for woodlands, users, neighbours etc) for an owner to put all of their woodland into Natural Reserves. Throughout the Standard, maximum thresholds, both percentages and absolute area figures, should be set to ensure that what would seem to be reasonable minimum requirements are not taken to excess.
6.2.2				1. Ref explanatory note on changes proposed: <i>Guidance - since stumps no longer contribute to deadwood volume targets in guidance, text added that at least some stumps should be retained.</i>  This does not make sense.
			14. Proposed text:  <i>The amount of deadwood across the</i>	14. We recommend rephrasing this section so that it says deadwood can be built up over time rather than provided with immediate effect. This will provide further flexibility to woodland owners.

			<p><i>WMU must be increased over time. While deadwood must be provided across the whole WMU, uniform distribution should be avoided and the greatest volumes should be concentrated in areas of high higher ecological value</i></p>	<p>We also believe the deadwood target is flawed since measuring the amount of deadwood accurately is extremely difficult. We suggest UKWAS considers taking a similar line to the advice on deadwood as set out in the Ancient Woodland Practice Guide (p.21):</p> <p>“Setting specific targets, or maximum levels is not necessary because it is quite simple: the amount of fallen deadwood in every wood should be steadily increased at every opportunity. If you stop and look around you in any wood and cannot see a sizeable piece of deadwood, then increasing the amount should be a high priority. In most situations naturally fallen deadwood should be left, but with two exceptions: where there is extensive windblow and where valuable sections of the stem can still be recovered. Large dimension hardwood is particularly valuable, but the deadwood retained should include a variety of species and sizes. It should be naturally scattered through the wood, but a few low piles or concentrations of deadwood can be particularly valuable habitat (e.g. off-cuts and part loads left near timber stacking areas are ideal). Deadwood should be left in large sections and not cut up, and generally is best left roughly where it falls. Deadwood within the soil is equally valuable and stump removal should not be undertaken on ancient woodland sites.”</p> <p><a href="http://www.forestry.gov.uk/pdf/FCPG201.pdf/\$file/FCPG201.pdf">http://www.forestry.gov.uk/pdf/FCPG201.pdf/\$file/FCPG201.pdf</a></p>
			<p>16. Amend volumes to &gt;20m<sup>3</sup> rather than ‘about 20m<sup>3</sup>’:</p> <p><b><i>Volumes greater than 20 m<sup>3</sup>/ha, excluding tree</i></b></p>	<p>16. See evidence from Nordic states in Appendix 1.</p> <p>This indicates that there is a significance in having deadwood of a greater diameter than 10cms dbh and clearly greater than 20cms dbh. For woodpeckers there is evidence that the minimum should be increased to 30cms dbh.</p>

			<i>stumps, should be provided across the whole WMU...etc</i>	In referring to "those species important to the site", UKWAS could easily add that if those species include populations of hole-nesting birds, for example, which are likely to be fairly obvious beneficiaries for most woodland managers, then larger diameters generally over 20cms are what is required - otherwise they will be disappointed.
			20. Remove "avoid uniform distribution"	20. The guidance already talks about the importance of concentrating deadwood in the most suitable areas.
				26. There might be a case for defining deadwood in the glossary. Is it just stem wood and branches or does it include brash (presumably not)? This becomes relevant to the 20m3/ha guideline
<b>6.3 Conservation of semi-natural woodlands and plantations on ancient woodland sites</b>				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
6.3.1				10. If all of our woods fall within 6.1.1 (including AW) because they contain BAP species, then none shall be converted to plantation or non-forested land. Can this be right, if so I'm signing up now! This section (6.3), which appears to be only about conservation of SN woodlands and PAWS, includes (in 6.1.1) woods with BAP species which may be entirely conifer - red squirrel, bats etc?! This needs some further clarification.
6.3.2				10. This section in particular is completely over the top now. It's so detailed and prescriptive about process yet it applies to only 8% of the total woodland area in England and many of these ancient woods' owners are not interested in the UKWAS. However, I accept that it does allow us some flexibility of action but it could refer to the latest FC guidance and save a lot of space.
				26. It might be useful to define the precautionary approach in

				the glossary
6.3.3	14. Specify that restocking can take into account climate change and pest & disease resilience. Therefore provenance can be wider.			Please see section on provenance in the new Ancient Woodland Practice Guide (p.31-32) <a href="http://www.forestry.gov.uk/pdf/FCPG201.pdf/\$file/FCPG201.pdf">http://www.forestry.gov.uk/pdf/FCPG201.pdf/\$file/FCPG201.pdf</a>
<b>6.4 Game management</b>				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>
	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
6.4.1				
6.4.2				
6.4.3				
<b>7. The community</b>				
<b>7.1 Consultation</b>				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>
	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
7.1.1			Ref to 'the certifier'.	26. New definition? Queries whether should be 'certification body'.
	20 & 22. Remove "and subsequent recertifications"			20 & 22. It should be discretionary as to whether it would be useful to re-contact all stakeholders at recertification. Where management is unchanging, no disputes, and evidence of ongoing consultation with stakeholders then there is little purpose served for another cost.
<b>7.2 Woodland access and recreation including traditional and permissive use rights</b>				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>
	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
7.2.1				

7.2.2				10. I had not noticed before but there seem to be a lot of exemptions where public access can be denied in this section. Given the current political debate, would it be a good thing if private owners who excluded public access (under one or many of these exemptions) could still claim compliance with the Standard?
7.2.3				
<b>7.3 Rural economy</b>				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
7.3.1			Ref: <i>The woodland's potential products include non-timber forest products and recreational activities.</i>	1. The UN now uses the term “non-wood forest products”, which is better.
			14. Delete reference to regional forestry frameworks	The future of regional forestry frameworks is uncertain and it is unlikely that these will be kept up to date.
7.3.2	1 & 20 & 22. Delete proposed new requirement.			1. This was adequately covered previously. 20. Ill defined. Challenging and time consuming to prove. 7.3.1 is adequate. 22. Ill defined. Challenging and time consuming to prove.
<b>7.4 Minimising adverse impacts</b>				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
7.4.1				
7.4.2	10, 24 & 25. Insert ‘and		Revised list and deletion	See respondent’s references to wildfire in government policy,

	<p>emergency services’:</p> <p><i>The owner/manager shall mitigate the risks to public <b><u>and emergency services</u></b> health and safety and the wider impacts of woodland operations on local people.</i></p>		<p>of ‘smoke’ proposed:</p> <p><i>Examples of impacts include:</i></p> <ul style="list-style-type: none"> <li>• <b><u>Major infrastructure (i.e. transport, wayleaves and property)</u></b></li> <li>• <b><u>Environmental assets</u></b></li> <li>• <b><u>Social assets</u></b></li> <li>• <b><u>Economic assets</u></b><sup>3</sup></li> <li>• <b><u>Carbon sinks</u></b></li> <li>• <i>Timber traffic, particularly in and around the woodland</i></li> <li>• <i>Natural hazards to operators and public, e.g. unsafe trees.</i></li> </ul>	<p>strategies and action plans under ‘Any other observations’ at end of this document especially:</p> <p>IRMP Steering Group Policy Guidance - Wildfire.</p>
7.4.3		<p>1, 20 &amp; 22. Delete proposed additional MoV:</p> <p><b><u>Non-SLIM woodlands:</u></b></p> <ul style="list-style-type: none"> <li>• <i><u>A complaints process and public contact point.</u></i></li> </ul>		<p>1. This addition is off-putting to the woodland owner in the 100-200+ ha bracket. In some peri-urban situations, this could unjustifiably onerous.</p> <p>20. Overly bureaucratic, and of doubtful worth. No evidence of necessity over the past 10 years.</p> <p>22. Overly bureaucratic, and of doubtful worth. No evidence of any necessity over the past 10 years.</p>

8. Forestry workforce				
8.1 Health and safety				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
8.1.1			20 & 22. Simplify guidance to focus the manager's attention on his responsibility for H&S at all levels for all operations within the certified area.	20 & 22. New Guidance will only serve to reinforce the misconception that certification requirements equate to standard HSE practice, this is not the case. For example with a standing sale under certification there is still a requirement for the manager to be able to demonstrate that the purchasers labour is competent/trained/insured.  20. This requirement is identified in 8.1.2.
			Ref: <b>Advice to owners/managers</b>  <i>With respect to health and safety, it is important for owners/managers to be aware of their legal responsibilities in regard to fulfilling the functional roles of, for example:</i>  a) Woodland owner b) Forestry works manager c) Forestry contractor.	1. Is this the most current terminology/guidance? Under revision?
8.1.2			20 & 22. Add specific guidance - that for low risk ops at least one trained in 1 <sup>st</sup> aid, if high	20 & 22. 1 <sup>st</sup> Aid requirements are still not spelt out and regularly cause confusion. High risk includes all chainsaw ops Low risk includes fully mechanised harvesting operation.

			risk op then at least 2 trained in 1 <sup>st</sup> aid on site.	20. Reference should be made to the new FC policy and guide on First Aid training and the new names for the levels of first aid training. <a href="http://www.forestry.gov.uk/pdf/fcgb-user-guide-corp1.pdf/\$FILE/fcgb-user-guide-corp1.pdf">http://www.forestry.gov.uk/pdf/fcgb-user-guide-corp1.pdf/\$FILE/fcgb-user-guide-corp1.pdf</a>
	27. Proposes additional wording below:  <i>The owner/manager shall meet all applicable requirements of health and safety legislation, ensuring that workers have had relevant instruction in safe working practice <b>and</b> <u>biosecurity protocols</u> and training in first aid.</i>	Proposes additional bullet:  <b>All woodlands:</b> <b><u>System to ensure that anyone working in the woodland is briefed on appropriate biosecurity protocol and there are procedures in place to monitor compliance.</u></b>		The Biosecurity Programme Panel are of the opinion that in these times of unprecedented increase in tree disease there is a need to ensure that suitable biosecurity measures are adopted by the sector to prevent the introduction and movement of significant pest and diseases and that all land owners, staff and contractors need to aware of and implementing such measures.  The panel is presently working to produce some industry wide biosecurity protocols which hopefully could be available as guidance when the new UKWAS standard is issued. If it was felt that including Biosecurity in with H&S was not appropriate then the Biosecurity Programme Panel would request that consideration be given to have a separate section for Biosecurity within the workforce chapter.
<b>8.2 Training and continuing development</b>				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
8.2.1				
8.2.2				
<b>8.3 Workers' rights</b>				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
8.3.1				

8.3.2				
<b>8.4 Insurance</b>				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>
	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
8.4.1	Ref: <i>Owners/managers, employers and contractors shall hold <b>and display adequate</b> public liability and employer's liability insurance.</i>			1. This seems unnecessary. It is the law to display EL, but not PL. Anyone can ask to see PL.
	20. Remove "display" replace with "demonstrate"			20. Display is an unhelpful concept in this scenario, demonstrate is adequate. 22. Display is a ridiculous concept in this scenario
<b>Glossary of Terms</b>				
<i>Term</i>	<i>Your proposed deletions, insertions or amendments</i>			<i>Comments and justification</i>
BCA	1. Its use can....			
FMU	1. synonymous with....			
Historic environment	1. 1 <sup>st</sup> sentence, have?			
SRF	1. Would it be helpful to expand this a little, adding, eg, fast-growing species, often non-native?			
WMU	1. A WMU is a clearly defined woodland area, or areas, with mapped boundaries, managed by a single managerial body to a set of explicit objectives which are expressed in a self-contained woodland management plan. (or sets of)? You might have different objectives for different woods.			

Red Data Species	13. It would be useful if UKWAS had a link to up to date lists of red data book species or a complete list and if the glossary defined what is meant by red data book species, as I think there has been some change in terminology in recent years, which could lead to confusion. From memory red data book species are assessed to get BAP priority species, but I could be wrong, which does lead to a bit of overlap. So in summary we need to be very clear what the definitions and intentions are of including red data book species and what the expectations are.	
BAP, HAP, SAP	13. I also wonder if they need to review the references on BAP HAPs and SAPs, as SAPs are becoming linked to HAPs. Gordon Patterson would be a good person to comment on this.	
HCV	26. New definition required.	To clarify meaning
Deadwood	26. New definition required.	To clarify meaning
Precautionary approach	26. New definition required. (Ref use in 6.2.2)	To clarify meaning
ISPM	27. International Standards for Phytosanitary Measures – adopted for use worldwide. ISPM’s can be viewed or downloaded from <a href="http://www.ippc.int">www.ippc.int</a>	Key documents regarding tree pest and diseases control and movement and suggested as a reference point for section 5.2.1
CoC cert	20 & 22. Amend to include “ from a well-managed and or controlled source”	Proposed definition does not reflect the use of controlled wood which is not necessarily from a well managed source.
Contingency Planning	10 & 24. A pre-established plan to mitigate an unusual situation which has the potential for harm, which incorporates the best use of local as well as remote facilities and resources (Glossary of HSE terms, Health and Safety Executive. 1999)	
Prescribed burning	10 & 24. Controlled application of fire to vegetation in either their natural or modified state, under specified environmental conditions which allow the fire to be confined to a predetermined area and at the same time to produce the intensity of heat and rate of spread required to attain planned resource management objectives (prescribed fire). Note: This term has replaced "Controlled Burning" (Food and Agriculture Organisation, 2005).	
Vegetation fire	10 & 24. Fires that use vegetation as the main fuel sources. Includes wildfire incidents and prescribed burning, also suppression fires (UK Vegetation Fire Standard, 2008).	

Wildfire	10 & 24. Any unplanned and uncontrolled wildland fire which regardless of ignition source may require suppression response, or other action according to agency policy (Food and Agriculture Organisation, 2005).	
<b>Appendix</b>		
<i>Item</i>	<i>Your proposed amendments</i>	<i>Comments</i>
	1. FC Guidelines are under revision	
	1. Forest ops and badger setts – I think guidance in Scotland has changed and possibly England.	
	1. Do you need to mention General Binding Rules in Scotland?	
	1. I wasn't sure why you had deleted FSC chemicals publications on p111.	
	1. Under H&S, there is a new interpretation of the requirement for 1 <sup>st</sup> aid training on FC woodlands, which is generally thought to be applicable to all woodland.	
	1. English Nature is now Natural England	
	1. Pesticides Safety Directorate has a new name too.	
	13. It would be useful if UKWAS had a link to up to date lists of red data book species or a complete list and if the glossary defined what is meant by red data book species, as I think there has been some change in terminology in recent years, which could lead to confusion. From memory red data book species are assessed to get BAP priority species, but I could be wrong, which does lead to a bit of overlap. So in summary we need to be very clear what the definitions and intentions are of including red data book species and what the expectations are.	
	13. I also wonder if they need to review the references on BAP HAPs and SAPs, as SAPs are becoming linked to HAPs. Gordon Patterson would be a good person to comment on this.	
	14. Please see reference the new Ancient Woodland Practice Guide <a href="http://www.forestry.gov.uk/pdf/FCPG201.pdf/\$file/FCPG201.pdf">http://www.forestry.gov.uk/pdf/FCPG201.pdf/\$file/FCPG201.pdf</a>	
Key Legislation	27. Add references to the The Plant Health (Forestry) Order 2005 and The Plant Health (Forestry) ( <i>Phytophthora ramorum</i> ) (Great Britain) Order 2004	These are the key legislative mechanisms for enforcing Plant Health controls.

<b>Format and design of the published standard</b>		
<b>Question 1</b>		
<p>The Steering Group's initial conclusions are:</p> <ul style="list-style-type: none"> <li>To retain the current bespoke UKWAS format and section order</li> <li>To seek opportunities through improved design to better emphasise the importance of text references to additional information sources – Management Planning, Biodiversity Action plan, Forest Reproductive Material Regulations and References.</li> </ul> <p>Do you agree?</p>	<p>1. Yes</p> <p>4. Agreed</p> <p>9. No. UKWAS needs a complete rethink.</p> <p>14. Yes</p> <p>16. Yes we do. Most users of UKWAS are now familiar with the format and order of the UKWAS.</p> <p>17. We regret, as in previous iterations, that while there is specific reference to a Biodiversity Action plan, there are not equivalent requirements for landscape and the historic environment. We feel it would be appropriate if these were explicitly mentioned even if it is with reference to the appropriate guidelines.</p> <p>20. No. The bespoke format is an historic legacy of being first in the field. UKWAS IV should be converted to FSC P&amp;C without fail. The UKWAS format imposes significant additional cost on the production of CB assessments and surveillances. In addition it is not readily understood in other parts of the world and it makes it hard to equate P&amp;C to UKWAS.</p> <p>Adding in increasing numbers of references, hot links and notes</p>	

	<p>will increasingly bury the actual standard in additional verbiage. A stand-alone Standard would be preferred, and an additional guide or annotated Standard much like there was with UKWAS I where standard was green and guidance blue book.</p> <p>21. Yes</p> <p>22. No. The bespoke format is an amusing historic legacy of being first in the field. UKWAS IV should be converted to FSC P&amp;C without fail. The UKWAS format imposes significant additional cost on the production of CB assessments and surveillances. In addition it is not readily understood in other parts of the world and it makes it hard to equate P&amp;C to UKWAS.</p> <p>Adding in increasing numbers of references, hot links and notes will increasingly bury the actual standard in additional verbiage. I would rather see a slim stand-alone Standard, and an additional guide or annotated Standard much like there was with UKWAS I where standard was green and guidance blue book.</p> <p>23. Yes. FSC possibly has the strongest reasons to change the order, but we appreciate that a rewrite to meet our preferred order is unrealistic, and would do certification more harm than good. We would support improved design in the light of more than 4 years' experience.</p> <p>26. Yes</p>
Question 2	
<b>Would the following be helpful?</b>	
<ul style="list-style-type: none"> <li>Inclusion of a "How to use" section at the beginning of the certification standard</li> </ul>	1. Yes

<p>indicating different functionality, including how to use the different electronic and conventional formats.</p>	<p>4. Yes</p> <p>9. Probably not. It would only add further verbiage to what is already an excessively verbose document.</p> <p>14. Yes</p> <p>16. No, unless it was a separate document. Our feeling is that everything possible should be done to try and keep the physical size/length of the UKWAS as concise and user friendly as possible.</p> <p>20. In general it would be helpful in Guide to Standard. But the more complex it gets the less likely it is to remain up to date and usable.</p> <p>21. Yes</p> <p>22. In general it would be helpful in Guide to Standard. But the cleverer it all gets the less likely it is to remain up to date and usable.</p> <p>23. I think 'yes', assuming that the sections/ formats can be displayed succinctly.</p> <p>26. Yes</p>
<ul style="list-style-type: none"> <li>• Inclusion of a section/ table showing the division of responsibilities for different aspects of certification between the UKWAS Steering Group, certification bodies, certification schemes and accreditation services i.e. a "Who does what" section.</li> </ul>	<p>1. Yes</p> <p>4. Yes. A 'who does what' section would be very useful.</p> <p>9. Probably not. It would only add further verbiage to what is already an excessively verbose document.</p>

	<p>14. Yes</p> <p>16. Yes – it would be helpful if one table could summarise this.</p> <p>20. In general it would be helpful in Guide to Standard. But the more complex it gets the less likely it is to remain up to date and usable.</p> <p>21. Yes</p> <p>22. In general it would be helpful in Guide to Standard. But the cleverer it all gets the less likely it is to remain up to date and usable.</p> <p>23. I think ‘yes’, assuming that the sections/ formats can be displayed succinctly.</p> <p>26. Yes, very useful.</p>
<ul style="list-style-type: none"> <li>• Inclusion, in electronic formats, of interactive electronic links to information sources and documents listed in the Appendix references – this might draw on the approach adopted in the revised UK Forestry Standard and help to ensure that links are kept up to date.</li> </ul>	<p>1. Yes</p> <p>4. Yes</p> <p>9. Probably not. It would only add further verbiage to what is already an excessively verbose document.</p> <p>14. Yes</p> <p>16. Yes, very helpful if in electronic format.</p> <p>17. Happy to see hyperlinks to information sources and documents in an online version.</p>

	<p>20. In general it would be helpful in Guide to Standard. But the more complex it gets the less likely it is to remain up to date and usable.</p> <p>21. Yes</p> <p>22. In general it would be helpful in Guide to Standard. But the cleverer it all gets the less likely it is to remain up to date and usable.</p> <p>23. I think 'yes', assuming that the sections/ formats can be displayed succinctly.</p> <p>26. Yes</p>
<p><b>Question 3</b></p>	
<p><b>In relation to publication formats:</b></p>	
<ul style="list-style-type: none"> <li>Is publication as a paid-for paper document necessary and what would you be prepared to pay for a copy?</li> </ul>	<p>9. £0.00</p> <p>14. We would continue to print copies, as we currently do, even if a paid-for paper copy was available.</p> <p>16. No, this is not necessary from our perspective.</p> <p>20. A published hard copy is desirable – lasts longer and easier to use. £15.</p> <p>21. Yes. Printed on PEFC and/or FSC certified paper.</p> <p>22. 22. A published hard copy is desirable – lasts longer and easier to use. £15.</p> <p>23. I would buy a clean paper copy</p>

	26. Yes £15
<ul style="list-style-type: none"> <li>Which electronic formats, including any additional formats, would be most useful?</li> </ul>	<p>14. PDF (for printing) and HTML (for easy navigation)</p> <p>16. Downloadable pdf or MS Word format which can be edited to incorporate (for example) an internal audit checklist.</p> <p>20. pdf formatted.</p> <p>21. PDF would be best.....</p> <p>22. pdf formatted.</p> <p>23. If we are talking about pdf vs any other format, I prefer the former</p> <p>26. PDF</p>

**Please make any other observations here**

**1. ConFor**

The Confederation of Forest Industries (UK) Ltd (ConFor) is a members' organisation, funded by and accountable to businesses in the forest industries. ConFor's aim is to promote the market for wood, forest products and forest services, and to help improve the industry's competitiveness.

ConFor's remit covers all parts of the industry supply chain, from nurseries through to woodland owners, timber growers, contractors, harvesters, hauliers, sawmills and other processors. ConFor provides the industry with a strong voice in the marketplace and in all levels of government - European, UK and country.

Through its membership, ConFor represents over 75% of managed woodland in the UK in non-state hands (more than 1.5 million hectares) and businesses employing 40,000 people delivering £2 billion Gross Value Added per annum for the UK economy.

ConFor receives general complaints about various aspects of certification and UKWAS in general. While ConFor acknowledges that this consultation is for UKWAS only, it is an opportunity to pass on these comments, including some that relate to other bodies:

1. **Consultation time** too short. It was launched on 3rd December 2010, with deadline for end of January, but was proclaimed to be a "60-day consultation", despite the holidays.
2. **Loss of timber resource** – UKWAS (and UKFS) is contributing to the loss of productive forest area. Is there anything UKWAS can do to redress this balance? For example, is there opportunity to introduce some flexibility into re-structuring requirements for open ground and native broadleaves? There is a requirement in UKFS and UKWAS to protect the timber resource – does this receive adequate consideration?
3. **Low intensity management** - Rob Gazzard has copied his response to ConFor and he raises some valid points. ConFor would welcome discussion on whether LIM is really SFM.
4. **Wildfire** - Rob Gazzard is right to raise the subject, but ConFor would welcome further discussion on how best to pursue this without it becoming too onerous. Rob also raises a number of other points worthy of discussion, such as, maximum thresholds.
5. **Duplication** – A frequent complaint is about duplication between felling licence/grant scheme and UKWAS requirements. This can be minimised during the auditing process, but the relationship between the two should be clarified. There is also a call for certified woodlands to be treated more lightly by the

Forestry Commission, but this risks losing that relationship, which would ultimately lead to more costly certification auditing.

**6. Monitoring** – Many members believe that certification should require little effort beyond normal management, but increasingly UKWAS monitoring and recording of the obvious (and to some extent auditing) is an additional and intolerable burden. It is felt that almost the same standard is required through Forestry Commission schemes, but without the detailed monitoring and recording. Last year, one company changed auditors and was audited three times in less than 12 months.

**7. Cost** - Many woodland owners struggle to make their woodlands pay. Management is often for other purposes. A common complaint is: “UKWAS is a waste of money for most woodland owners and no tangible benefit”. It appears that SLIM has not yet delivered sufficient savings (time and money) for these people (or perhaps, they may not be sufficiently aware). In many cases, estate woodlands total less than 100ha, but even “commercial” plantations of 100-200ha are not immune from these problems.

Some people have suggested the threshold should be 500ha.

**8. Balance** – A number of people feel strongly that the environmental (and to some extent social) influences in UKWAS have become too dominant. Sustainable Forest Management must include economic sustainability, but other pressures increasingly encroach and threaten the economic viability.

**9. Cross-compliance** – Have checks been made on country-specific regulations, such as, general binding rules, in Scotland? Similarly, with Good Agricultural and Environmental Conditions required of farmers.

#### **4. Small Woods Association**

As mentioned above certification offers little or nothing to many small woodland owners because of its high cost and administrative burden to owners who make little or no commercial return from their woodlands. The current limit for SLIM woodlands is actually very high by UK standards, and many of the criteria in this document have little relevance to most of our members. What the small woodland sector needs is a cheap and simple means of recognising their wise management of their woodlands where their objectives are not commercial. We would like to see progress made in this direction as a priority, and we would be glad to take part in a working group to take this forward.

Otherwise the modifications are clear and reasonable when viewed as criteria for assessing a medium or large woodland with commercial objectives..

#### **7. John Monaghan (Shiellow Wood Ltd)**

Last year we had a visit from a representative of a certification body. The person involved came after informing our manager, (Tilhill) of his desire to see the

woodland. I was informed and expressed an interest in being present. It was clear to me that as the owner of a SLIM woodland I was not considered to be worthy of being involved in any discussion.

Many questions were asked of my involvement in the day to day management of the woodland. I happen to have an RFS certificate in arboriculture and take a keen interest in the day to day management of the woodland. The discussions were not conducted in a friendly manner which should have prepared me for the content of the report which was generated.

To say that my wife and I were surprised at the comments is an understatement. In fact she wondered whether the person who had written the report had confused our woodland with another. I then went through Tilhill and attempted to have a discussion about the content of this report. Tilhill were very helpful but I came up against a full stop with the auditors themselves.

In the end I was told that I was in the 'wrong scheme' and should change over to a much more expensive situation. I had also been informed that it was important to be in UKWAS as most woodlands were so certified. I did a straw pole among my many colleagues in the RFS with woodlands of varying sizes around the North East. Most of my enquiries were met with the interrogative of, "what is UKWAS"

I went further into this matter and found that I could write a FC management plan which covered all the requirements in the UKWAS certification and would not have to be insulted at the same time.

I made every effort to have a sensible conversation with UKWAS but was met with obstruction and failure to return calls at every turn. I strongly feel that well managed woodlands are essential for the future of our country but until UKWAS changes from being an arcane, obscure and inaccessible organisation SLIM woodland owners will feel that it is not for them particularly when the FC runs a system which is helpful and constructive and meets all the standards required.

I have taken this opportunity to write to you as I signally failed to find you last year when I was attempting to shed some light on this matter. If you are interested I have a large documentation of my genuine attempts to obtain some explanations.

#### **8. John Martin (coppice worker & woodman)**

As a coppice worker and log merchant I manage other peoples woodlands usually under EWGS, these owners are not certified and have no interest in it. As the person working them I would like the wood I cut certified but cannot as stated.

I would therefore look to see the person certified i.e. me who is doing the work to a high standard which can be witnessed by the local FC officers.

If I can sell my products as coming from certified woodlands, (as I believe eventually all products will need to be certified) this will put me in a better trading position.

#### **9. D Williams (woodland owner)**

Back in the 1990s, the development of forest certification schemes & the UKWAS looked like a good idea, to myself as to many others. However the implementation has been sadly disappointing. UKWAS has been over-influenced by a handful of NGOs with one-sided agendas, to the exclusion of concerns for the future security of our timber and biomass supplies, the viability of the forestry industry, & indeed the job prospects for foresters.

Whilst it would be wrong to blame UKWAS for all the problems of the forestry industry, there are 3 areas where it urgently needs reform:

- 1) Eliminating the bias against small woodlands. Over-verbose guidelines, extra bureaucratic red tape and additional overhead costs may be tolerable to large well-funded organisations (FC, RSPB etc), but not to a small woodland owner.
- 2) Reducing the barriers to afforestation – and indeed raising the barriers against deforestation, since some areas of the UK are now experiencing net deforestation. Percentage woodland cover in the UK remains only 1/3<sup>th</sup> of the European average; and probably only 1/6<sup>th</sup> of what it would be under natural conditions.
- 3) Treating forestry more equably with other land uses. Most obviously, the burdens imposed by the UKWAS on forestry should match those imposed on farming. Unfortunately, at the moment they are far more onerous.

The latest redraft does not effectively address any of the above, and can only be described as a wasted opportunity.

#### **10. Rob Gazzard**

I support the responses made by the England and Wales Wildfire Forum and Scottish Wildfire Forum as well as the Confederation of Forest Industries.

On balance UKWAS does not provide an appropriate balance between sustainable development criteria, and as Section 6 now demonstrates, is to biodiversity focus to ensure climate change adaptation and mitigation and/or encourage economic and active management of woodlands.

I note the short length of the consultation and believe this should be extend to cover 3 months as per government consultation, especially as the Christmas period has reduced the time to respond.

## References to wildfire in government policy, strategies and action plans

### **Defra: Climate Change Plan 2010**

Policy and Practical Response (p40-41) "wildfire - monitoring and contingency planning"

Forestry Actions (p42): "The Forestry Commission will work with the UK Fire and Rescue Services, Communities and Local Government (CLG), Natural England and stakeholders to establish improved fire monitoring for forest and heathland fires and develop a risk assessment approach."

Climate Change in National Parks and the boards (p133): Four key actions: "adaptation to climate change on a landscape scale, through, for example, expanding woodland habitat networks and wildfire risk management";

### **UK Climate Change Risk Assessment (CCRA) - Forestry Sector Phase 1 Report (2010)**

(p8) Effect on forest fires to the forest sector and need for appropriate infrastructure [i.e. resolved in forest design planning] and specialist training. The following evidence should also be considered:

#### **UK CCRA - Biodiversity Sector Workshop Record (2010)**

Climate effect, impact: medium, Consequence of wildfire incidents on biodiversity (p6) and forestry (p27) from open habitat species

#### **UK CCRA - Agriculture Sector Workshop Record (2010)**

Climate effect, impact: medium, Consequence of wildfire incidents on agricultural crops (p13 and 33)

Note: The Forestry Commission England and Forest Research are working with Defra on their Climate Change Risk Assessment (CCRA) on Biodiversity, Forestry and Agriculture.

### **Forestry Commission England: When to convert woods and forests to open habitat in England: Government policy (Open Habitats Policy). 2010**

(p22) "Evidence indicates that open habitats generally present greater wildfire risk than woodland. This is a particular issue for lowland heathland. We will routinely look at the impact of wildfire risk in the scoping exercise for all proposals for converting woodland to open habitat that are over thresholds for environmental impact assessment. Where we require an environmental statement, and wildfire risk is identified as an issue, the practitioner should liaise with the local fire authority to agree appropriate mitigation and control measures."

### **Forestry Commission Scotland: Scottish Climate Change Action Plan 2009-2011**

Adapting to Climate Change (p28):

Risk: Increased risk of forest fires, particularly in late summer

Likelihood and Impact: Medium

Response: Treat

Control: Maintenance of fit-for-purpose, integrated fire plans and standard operating procedures in the forestry sector.

Action: Review of forest fire preparedness, prevention, response, recovery and monitoring in Scotland – in partnership with Scottish Government Justice Directorate, Fire & Rescue Services, Scottish Wildfire Forum, private sector forestry interests, Forestry Commission Fire Forum, and the wider land management community.

Overarching Action: Review listed risks and, where necessary, develop detailed risk management plans.

**Community and Local Government: IRMP Steering Group Integrated Risk Management Planning: Policy Guidance - Wildfire (2008)**

(p9) Broad Habitat Classification Conifer Woodlands: High Risk, Suspectable Species at risk - Young: Pines (Pinus species), Spruce (Picea species), Firs (Abies species), Bioenergy plantations (Eucalyptus species) Old: Bioenergy plantations (Eucalyptus species)

**Vegetation Fire Risk Assessment: Guidance for Land Managers and Advisor's (2011 in draft)**

A risk based approach to assessing various habitats and species to reduce the likelihood and severity of wildfires. For use in management plans, grant applications and Environmental Statements.

**Operation Guidance Booklet 17 – Planning for the Unexpected (OGB17). Forestry Commission. 2009.**

The Forestry Commissions appropriate to contingency planning on the Public Forest Estate, including vegetation fires.

**Forest Research: UK Vegetation Fire Standard - Data Fields and Terminology for Wildfire Incidents and Prescribed Burning Operations within Great Britain and Northern Ireland. 2009.**

United Kingdom Vegetation Fire Standard (UKVFS) project is a multi-government agency and organisation approach to delivering vegetation fire (Outdoor fires) reporting.

**Forestry Commission: Combating Climate Change - A Role for UK Forests 2010**

Also known as the Read Report, it is an assessment of the potential of the UK's trees and woodlands to mitigate and adapt to climate change. Box 9.3 defines wildfire risks to broadleaves woodland given climate change impacts.

**11. John Jervoise (Herriard Estates)**

I understand there is a consultation out on this at the moment and I think it is important to realise that there are many people who believe the scheme is a complete waste of money. Most of the UK forestry practice has not changed as a result of this and the scheme is an unnecessary burden on the wood producers in the UK.

The requirement for certification is simply over regulation in the UK. The old Forestry commission arrangements ensured all forestry in the UK was sustainable.

We should move back to that system which was run by qualified and experienced foresters with real local knowledge who could actually help and advise. If those people approve a forest plan then that should be adequate, and in practice achieves most of what UKWAS does at a fraction of the cost and bureaucracy.

Why UKWAS a waste of money for most owners and a problem:

- Woodlands in the UK are in practice mainly non-profit making and there is no margin to spend additional money. Landowners like myself do work because we love the countryside and wish to preserve it for the future. If woods starts to cost us money we might as well abandon it.
- UKWAS is an additional cost with no tangible benefit to woodland owners
- It has been imposed by the retailers and environmentalists who bear little of the cost
- Some local authorities and government agencies require UKWAS sourced timber only now, restricting sales outlets
- Any additional admin work is a disincentive to woods owners, particularly at the smaller end to do things officially or indeed manage their woods at all
- Annual Management Grant for many woods currently require woods to be within certification and others may follow – but is vital for woods finances
- There is much anecdotal evidence that the regulations are evaded in other parts of the world. .

Currently the UK economy is failing and the Far East is growing – why?

Because they have flexible fast moving economies that are not wasting time on useless regulation.

It is hard enough to make money and evolve any business without swimming in the treacle of bureaucracy.

We condemn our children to lower living standards unless we start to abolish some of the many new regulations introduced in the last 20 years.

#### **14. Forestry Commission England**

- Overall it should be made easier to demonstrate compliance with UKWAS. This can be achieved through a combination of introducing flexibility and reducing the burden of proof. More emphasis on outcomes is needed, and less on auditable evidence. Down a similar line, further simplification is needed for small units and low impact operations.
- We recommend that UKWAS specifically mentions woody energy crops where appropriate given that certification is likely to play a big role in

biomass sustainability criteria.

When it comes to managing ancient woodlands in England, the Ancient Woodland Practice Guide should be followed [http://www.forestry.gov.uk/pdf/FCPG201.pdf/\\$file/FCPG201.pdf](http://www.forestry.gov.uk/pdf/FCPG201.pdf/$file/FCPG201.pdf)

## **15. RSPB**

The RSPB welcomes the chance to comment on the development of the 3rd Edition of the UK Woodland Assurance Standard (UKWAS). We will also comment in further detail through our work on the UKWAS Steering Group and the next and final public consultation.

We are supportive of voluntary certification of sustainable forest management in the UK, such as UKWAS, as long as it meets all of the following criteria:

- meets priority species, habitats and designated sites needs under country biodiversity strategies, UK Biodiversity Action Plan, EU Birds & Habitats Directives & the Ramsar Convention;
- includes environmental, economic and social stakeholders and issues in all processes;
- is independently third party audited; &
- has transparent governance, standard setting, audit and appeal processes and procedures.

We do recognise the need for stability and continuity in the content of the standard to allow woodland owners and managers to effectively formulate and run their management plans. This revision should aim to be more of a refinement. We hope that this review process will be effectively supported by the two global forest certification systems that UKWAS meets – Forest Stewardship Council (FSC) and Programme for the Endorsement of Forest Certification (PEFC) - through timely and accurate advice, from their UK and International headquarters.

**The RSPB has the following issues that this revision of UKWAS to needs to address:**

### **A. Small and/or Low Intensity Managed Woodland certification**

The RSPB would welcome further development of the UK Woodland Assurance Standard, and associated certification audit procedures to assist the uptake of UKWAS by owners of small and/or low intensity managed woodlands (SLIMW).

We recognise that some of the measures required to facilitate this, for example the setting up of SLIMW group schemes, may be beyond the scope of this revision of the standard and lie mostly with the FSC, PEFC and their certification bodies.

### **B. Restocking on priority open ground habitats**

The RSPB would like to see UKWAS make a clearer commitment to not permitting the restocking on important open ground habitats, such as lowland heathland, blanket and raised bogs and coastal dune systems. The existing requirements on woodland design, management planning and removal of woodland for habitat creation are helpful, but could be improved.

This highlights an anomaly with the UK Forestry Standard (which underpins UKWAS), that allows the restocking on priority open ground habitats which are restorable, but quite rightly does not permit the initial afforestation of such habitats. The current version of the draft revised standard does still not properly address this issue.

### **C. Revised Requirements 3.5.1. & 6.1.3 on open ground habitat restoration**

We welcome the proposed revising wording of the 'Requirement', 'Means of Verification' and 'Guidance' columns of Requirement 3.5.1, and to the 'Guidance' column of Requirement 6.1.3.

We are, however, concerned about the commentary within the consultation document – 'Revision Notes' for Requirement 3.5.1, and the consultation question that raise a new 'discussion point' on compensatory planting that was not part of the preparatory work to produce the current consultation draft text of the standard. Our biodiversity rationale is below.

### **E. Open Space**

We would welcome the opportunity to discuss the possibility of improving the biodiversity targeting of the 'open space' requirements of the standard, in terms of location, habitat type and condition. We would welcome this part of the standard driving the production of higher quality habitats, both in terms of initial opening up of forest areas through restructuring, but also the onward high quality management for wildlife.

We do recognise that the open space target area is used, and was negotiated into the standard, as a proxy for biodiversity, as well as for landscape and water quality reasons, and is derived from the UK Forestry Standard and associated Forest Guidelines.

### **F. Other issues**

The RSPB has concerns, outside the standard review process, that impact on the environmental credibility of UKWAS. We consider that the full and widespread compliance with UKWAS may be restricted by the effectiveness of audit protocols and their implementation.

We also have concerns about the certification of controlled wood and how this relates to actual woodland management that protects and enhances biodiversity.

### **18. UK Forest Products Association**

In view of the current consultation on the revision of UKWAS, I thought that it might be worthwhile to convey to you a generalised comment that I am hearing with increased regularity from contacts within the timber harvesting sector.

When UKWAS was introduced it was well received and has been generally well regarded for some time since, however, there do seem to be an increasing number of comments that for whatever reason the Standard is increasingly involving itself in what many in industry regard to be non-core activities within sustainable forest management. A commonly used expression which typifies such comments is “the tale is now wagging the dog”.

I am sure that you will be aware of such comments and I hope that they will be borne in mind during the current revision process. Perhaps it is the case that some of the more recent changes to the Standard have been required in order to secure FSC and or PEFC approval?

We have of course encouraged Members to respond to the current consultation.

### **23. FSC UK**

FSC UK has completed a mapping exercise of all the points we presented in July 2009 against the new wording of the current Consultation Draft. We are grateful to the Oversight group for the inclusion of all those (bar one, see 1.2.1) that we suggested, other than those few we agreed to withdraw in the light of discussion.

### **25. Scottish Wildfire Forum**

The Scottish Wildfire Forum supports the response of the England and Wales Wildfire Forum

The aim of the Forum is to create a focus to enhance joint working between Fire and Rescue Services, agencies and those with land management interest within Scotland that will be able to develop and communicate strategic wildfire protection and prevention initiatives to ministers, stakeholders and the wider community.

The Forum will work together to achieve the following objectives which will be delivered through the SWF Strategic Action Plan: -

- To actively promote the work of the Forum
- To encourage relevant interest groups to join the Forum
- To consult additional stakeholders as appropriate
- To promote the formation of Wildfire Groups
- Develop and promote a common understanding of wildfire related issues and procedures

- To minimise environmental damage from wildfire
- To advise on wildfire safety matters
- Develop a wildfire prevention programme which will include education, hazard and risk reduction and enforcement issues
- Identify suitable management systems for wildfire hazards and associated risks within Scotland
- Improve wildfire suppression activities including fire plans, tactical skills, incident command skills and liaison
- Identify specialist equipment availability, develop appropriate preparedness and mobilisation procedures, and other partnership arrangements
- To stimulate research and development of wildfire related issues
- To advise wildfire related national policy, strategy and action plans
- To communicate with Scottish Government, Ministers, other stakeholders and the media
- To promote key wildfire issues and priorities for partner agencies
- To assist with policy development within partner agencies

#### **27. The UK Biosecurity Programme Panel**

The UK Biosecurity Programme Panel is made up of a representative group of Trade, Government (to cover SG and Fera), NGO and professional bodies, and Forestry Commission staff with a specific remit to deliver a Plant Health Strategy for the Forestry Commission and to explore issues around tree health and the associated need for biosecurity measures within the UK Forestry Sector. The panel views UKWAS as an important means of establishing and reinforcing the need for greater awareness within the forestry sector with regard to tree health and biosecurity measures/protocols.

Given the Panel's remit its comments on the revision of the UKWAS standard in this response is limited to issues around tree health and biosecurity only.

The Biosecurity Programme Panel would welcome the opportunity to discuss further the best way of strengthening/clarifying UKWAS with regard to tree pest and diseases and how best to include biosecurity within the standard – and views these consultation comments as an initial step to raise these matters with the UKWAS steering group.

**Criterion 6.2.2 – evidence from Nordic states in support of proposed revision from Woodland Trust (respondent 16)**

**Swedish study:** de Jong, J. and Almstedt, M, (2005) *Död ved i levande skogar Hur mycket behövs och hur kan målet nås?* RAPPORT 5413 • OKTOBER 2005  
NATURVÅRDSVERKET

- 1) In Finland and Russia, Martikainen et al. (2000) studied saproxylic beetles compared a number of woodland types with different amounts of dead wood. The results showed a positive correlation between the number of species of saproxylic beetles and the amount of dead wood. The correlation may not be helpful, especially if it distracts, or provides a "false sense of security" to, the owner and means that he/she doesn't preserve the larger diameter material thinking that it is total volume rather than size of stem that is critical.

Evidence:

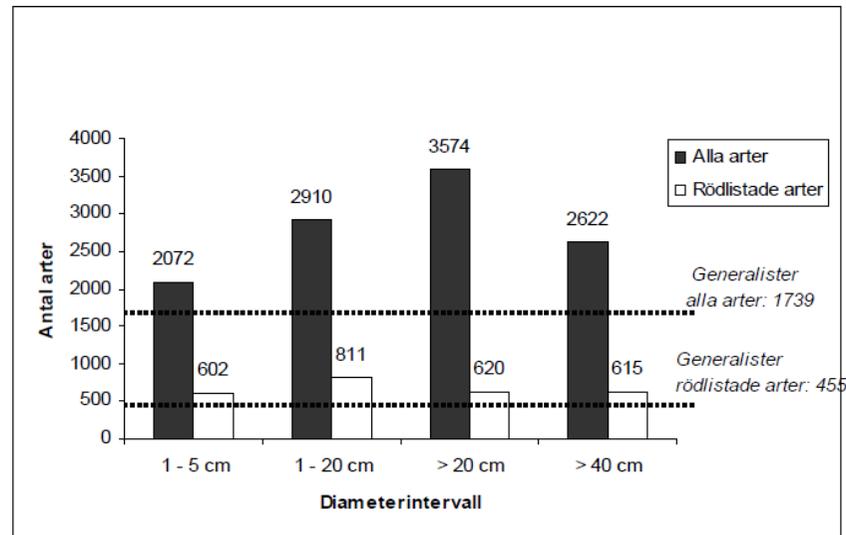
Research in Sweden has indicated size diameter of deadwood for different species: see Figure 4 below.

This indicates that there is a significance in having deadwood of a greater diameter than 10cms dbh and clearly greater than 20cms dbh. For woodpeckers there is evidence that the minimum should be increased to 30cms dbh.

In referring to "those species important to the site", UKWAS could easily add that if those species include populations of hole-nesting birds, for example, which are likely to be fairly obvious beneficiaries for most woodland managers, then larger diameters generally over 20cms are what is required - otherwise they will be disappointed.

Even the smallest of the woodpeckers, the Lesser Spotted Woodpecker (*Dendrocopos minor*), which is also the rarest and most threatened in the UK, requires nest holes in stems greater than 20cms dbh. Even though it feeds on small diameter branches these are in the canopy and not related to stem diameter. However, nest sites and a choice of many potential sites are critical to this species - suffering from predation losses as well as other factors - and so it needs a decent number of dead/decaying trees of the right diameter in an area over 40ha or so to stand any chance of nesting success. The evidence from a study in Norway suggests that Lesser Spotted chooses to nest in stems with median diameter between 27 - 31cm. For the other UK woodpecker species the diameters are bigger - e.g. 35 - 38cm for Great Spotted (Stenberg 1996: Nest Site selection in 6 woodpecker species. *Fauna Norvegica* (series C) 19 (1) 21 - 38.).

Other species like Nuthatch - also a small bird and likely to benefit from dead wood habitat diversity - require bigger stem diameters than 10cm. Even smaller hole-nesting species like Marsh Tit, which prefers natural holes in small trees (although it will use re-use woodpecker holes (but in these it is more easily predated)) was found in one study to require a minimum stem diameter of 11cm and an average of over 30cm (Wesolowski 1996. Ibis 144: 593 - 601. BOU). Many other species (e.g. other Tits and Redstarts, Pied Flycatchers etc) either require natural holes or woodpecker holes and so, similarly, need larger diameter trees.



**Figur 4.** Antal vedlevande arter som påträffats på olika dimensioner av ved. Med streckad linje visas antal arter som kan förekomma på alla dimensioner. Ännu är kunskapen för dålig för att kunna generalisera hur många arter som har sin huvudsakliga förekomst inom olika intervall. De prickade linjerna visar hur många arter som är generalister och kan förekomma inom flera diameterintervall (Efter Dahlberg & Stokland, 2004).

**Figure 4 – The number of saproxylic species found on different dimensions of wood. The upper dotted line shows the number of species which can be found on a range of wood dimensions. Our knowledge is still too poor to be able to say how many species have their primary distribution within different intervals. The lower dotted line shows how many endangered species are generalists and can be found on several different wood dimensions. Black columns: all species, white columns: endangered species.**