

United Kingdom Woodland Assurance Standard

UKWAS Revision 2009-11 (Pre-approval Draft) (April 2011)

Consultation Report & Steering Group Responses

21st June 2011

The Steering Group (SG) responses reflect discussions as follows:

- UKWAS Steering Group – 21.06.11

Key:

Steering Group responses to the consultation feedback received are shown in **red ink**.

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Annex 1: Consolidated Feedback

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1. Introduction

1.1 Background

A public consultation to generate feedback on the Pre-approval Draft of the UK Woodland Assurance Standard was carried out for 32 days between 29th April and 31st May 2011; at the request of some consultees, later submissions were also accepted.

An electronic on-line Consultation Feedback Form was provided on the UKWAS website.

The responses were analysed in June 2011.

The Draft Standard is broken down into Requirements as follows:

- 8 principal sections (e.g. 3: *Woodland design: creation, felling and replanting*)
- 30 sub-sections (e.g. 3.1: *Assessment of environmental impacts*)
- 87 clauses (e.g. 3.1.1)

The electronic feedback form invited feedback on:

- The Introduction
- Each of the 87 clauses
- The Glossary of Terms
- The Appendix (bibliography)
- Other observations of a general nature.

The specific comments received have been assigned to each section and are presented as consolidated feedback in Annex 1 to this report with the respondent's identity shown for each unless a respondent requested his/ her name to be withheld. The general comments made have either been assigned to the most relevant section of the standard or, if of a more general nature, are included as other observations.

Concise lists of key summary points have been prepared and included in Part 2 of the main body of the report by section and sub-section; they are categorised and grouped as matters for clarification, proposed additions or, if requiring deeper consideration, as issues. In addition, a short summary is provided of the main issues raised by respondents for each Section. This is intended as the working checklist to make it easy for the drafting team to consider each issue without recourse to the raw responses. However, the reader is recommended to refer to each respondent's full comments given in Annex 1 since these often contain important elaboration on the summary point.

1.2 Characteristics of respondents

Five organisations or individuals responded formally to the consultation with most using the on-line response form.

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

- Woodland owners and forestry practitioners (2)
- State forest enterprises (1)

- Environmental and heritage organisations (1)

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

A full list of respondents is given in Appendix 1.

2. Detailed comments

Introduction section

Sub-section 4: Procedures for use of the certification standard

Issues:

- Concern expressed over the adoption of Low Intensity Management (LIM) or non-intervention management practice on wildfire risk sites, such as those within or adjacent to open habitat sites, coniferous woodlands and key infrastructure.

Steering Group response: no change - the standard does not advocate the adoption of a low-intervention management regime and section 5.1.6 requires a fire plan to be developed as appropriate to the level of risk.

- Proposed that 'small woodland' definition should be consistent with other countries i.e. 1,000ha. Noted that UK is a low risk zone as evidenced by FSC risk assessment and that a higher threshold would lower auditing costs and so increase uptake.

Steering Group response: the decision to adopt a new 500 hectare threshold reconfirmed.

- Steering Group discussion on whether to reinstate list of examples of WMU scenarios from Consultation Draft.

Steering Group response: an amended list of WMU examples reinstated and advisory note referring users to their certification body or group manager deleted.

Sub-section 5: Interpretation and revision of the certification standard

Clarifications:

- Incorrect reference to small woods as 100ha.

Steering Group response: corrected to 500 hectares.

Section 1

Compliance with the law and conformance with the requirements of the certification standard

Sub-section 1.1: Compliance and conformance

Deletions proposed:

- 1.1.5 Guidance (advisory note): delete proposed advisory note to owners/ managers as unnecessary.

Steering Group response: text to be retained as previously agreed as considered to be helpful to users.

- 1.1.5 Requirement: Steering Group discussion on correction of text to match document style by changing 'shall be committed' to 'shall commit'.

Steering Group response: agreed.

Section 2

Management planning

Sub-section 2.1: Documentation

Clarifications sought:

- 2.1.2 Requirement: improved punctuation needed.

Steering Group response: correction made to read 'documentation'.

Deletions proposed:

- 2.1.1 Requirement (l): removal of new requirement for short summary of management planning documentation as it is an additional cost for no benefit.

Steering Group response: this is a requirement of the Forest Stewardship Council.

Additions proposed:

- 2.1.1 Requirement: add point (m) on summarising potential severe weather impacts.

Steering Group response: new bullet point in 3.4.1 Guidance on 'future resilience' included as a factor to be taken into account when identifying an appropriate silvicultural system.

Sub-section 2.2: Productive potential

Additions proposed:

- 2.2.1 Requirement: add point (c) on increasing resilience to severe weather incidents.

Steering Group response: new bullet point in 3.4.1 Guidance on 'future resilience' included as a factor to be taken into account when identifying an appropriate silvicultural system.

Deletions proposed:

- 2.2.4 Guidance (advisory note): delete proposed advisory note to owners/ managers as unnecessary.

Steering Group response: text to be retained as previously agreed as considered to be helpful to users.

Sub-section 2.3: Implementation and revision of the plan

Additions proposed:

- 2.3.2 Requirement/ Guidance/ MoV: add severe weather incidents to point (c) list of minimum monitoring requirements.

Steering Group response: rejected – too detailed.

Section 3

Woodland design: creation, felling and replanting

Sub-section 3.1: Assessment of environmental impacts

Clarification sought:

- 3.1.1: WMU definition can be improved to increase clarity on sampling frame appropriate for auditing.

Steering Group response: no change considered necessary.

Additions proposed:

3.1.1 Guidance: additional bullet point on resilience to severe weather.

Steering Group response: new bullet point in 3.4.1 Guidance on 'future resilience' included as a factor to be taken into account when identifying an appropriate silvicultural system.

3.1.1 Guidance: add BAP priority habitats and species.

Steering Group response: the last bullet point of guidance elaborated with specific reference to BAP priority habitats and species.

3.1.2 Guidance: additional bullet point on resilience to severe weather.

Steering Group response: new bullet point in 3.4.1 Guidance on 'future resilience' included as a factor to be taken into account when identifying an appropriate silvicultural system.

Sub-section 3.2: Location and design

Clarifications proposed:

- 3.2.1 Guidance: proposed new text to replace reference to 'endangered habitats'.

Steering Group response: agreed - specific reference made to 'BAP priority', rather than 'endangered', habitats and species.

Additions proposed:

3.2.1 Requirement: additional text proposed on resilience to severe weather.

Steering Group response: new bullet point in 3.4.1 Guidance on 'future resilience' included as a factor to be taken into account when identifying an appropriate silvicultural system.

3.2.5: additional requirement proposed to cover an integrated approach to severe weather resilience.

Steering Group response: new bullet point in 3.4.1 Guidance on 'future resilience' included as a factor to be taken into account when identifying an appropriate silvicultural system.

Sub-section 3.4: Silvicultural systems

Additions proposed:

- 3.4.1 Guidance: additional bullet point on resilience to severe weather.

Steering Group response: new bullet point on 'future resilience' included as a factor to be taken into account when identifying an appropriate silvicultural system.

Sub-section 3.5: Conversion to non-forested land

Issues:

- 3.5.1 Requirement: opportunities to deliver public and environmental benefits unnecessarily limited by the very narrow focus on the new land use delivering 'landscape, biodiversity or historic environment benefits'.

Steering Group response: rejected.

Additions proposed:

- 3.5.1 Requirement/ Guidance: proposed that the conversion must be carbon neutral with compensatory planting.

Steering Group response: rejected – beyond the scope of the standard.

- 3.5.1 Requirement: add '..provide a net benefit compared to other feasible woodland cover for that site' in place of 'the new land use shall be more valuable'.

Steering Group response: rejected – the currently proposed text is considered broadly equivalent.

- 3.5.1 Requirement (conditions (c) i – iii) –add deep peat/ carbon as current text takes no account of soil / deep peat and carbon implications. Removal of woodland for peatland isn't covered (other than for the restoration of the vegetation on top of the peat).

Steering Group response: rejected – this point is considered to be adequately covered by 3.5.1 c) i. which requires enhancement of biodiversity.

Deletions proposed:

- 3.5.1 Requirement: remove the additional "test" clause, regarding any woodland cover. The proposed deforestation will have been subject to a significant investigation by a range of formal authorities – additional hurdles within UKWAS will not deliver any additional value.

Steering Group response: rejected – the explicit reference to other woodland options is considered important.

Section 4 Operations

Sub-section 4.1: General

Additions proposed:

4.1.1 Guidance: add reference to designated sites (SSSI/ SAC) for checks to be made as consents may be required from statutory authorities.

Steering Group response: rejected – covered adequately under requirement a).

Sub-section 4.2: Harvest operations

Additions proposed:

- 4.2.3 Guidance: additional bullet point proposed to cover need for appropriate control measures when there is high risk of fire on nearby sites.

Steering Group response: rejected - adequately covered in 5.1.6 which requires a fire plan appropriate to the level of risk.

Sub-section 4.4: Prescribed fire operations (proposed new sub-section)

Additions proposed:

- Text proposed for completely new sub-section to cover prescribed fire operations: *'Prescribed fire burning shall only be undertaken to reduce fuel loading and achieve other benefits after full consideration of the impacts'* plus guidance and MoV.

Steering Group response: rejected.

Section 5 Protection and Maintenance

Sub-section 5.1: Planning

Additions proposed:

- 5.1.x (now 5.1.3) Guidance: add 'signs of undergrazing'.
Steering Group response: rejected – adequately covered.
- 5.1.3 (now 5.1.4) MoV/ Guidance: invasive species aspects needs to be reflected in MoV and guidance
Steering Group response: rejected – adequately covered.
- 5.1.5 (now 5.1.6) Requirement/ Guidance/ MoV: proposed rewording of criterion to provide a much more comprehensive treatment of vegetation fire management planning.
Steering Group response: rejected – adequately covered.

Deletions proposed:

- 5.1.5 (now 5.1.6): delete references to vegetation management as these serve no purpose.

Steering Group response: agreed – reference now to ‘fire plan’ throughout document as this is an understood term embracing the full range of fire scenarios not just vegetation fires.

Sub-section 5.2: Pesticides, biological control agents and fertilizers

Comments noted:

- 5.2 Background: A number of non-chemical control methods for pest and disease now exist and they should be evaluated when considering practicable.

The options to consider, in order of desirability are: management strategy; physical barrier; planting at a high density with a view compensatory thinning; chemical treatment on the nursery; a combination of the above; use of chemicals in the forest. Every effort should be made to reduce run-off.

The cheapest option is still being preferred (chemical use in the forest) without consideration to environmental factors, esp. when controlling *Hylobius*. Decision support tools, WeeNets and higher-density planting are all successfully used by some environmentally-conscious foresters and the increased use of these methods should be encouraged.

Steering Group response: rejected – 5.2 makes clear that pesticide use shall be minimised; the detailed options proposed are considered too specific.

Additions proposed:

- 5.2.5 Requirement: add that the impact of the use of fertilisers should be reduced where practicable

Steering Group response: rejected – adequately covered already.

- 5.2.5 Guidance: add that targeted application of fertiliser is preferred to broad-cast and that controlled release is preferred.

Steering Group response: rejected.

Sub-section 5.5: Pollution

Additions proposed:

5.5.4: proposed that new Requirement created: *Ensure that areas of high wildfire risk plan for the impact smoke particulates impacts on public health.*

Steering Group response: rejected.

Section 6

Conservation and enhancement of biodiversity

Sub-section 6.1: Protection of rare species and habitats

Clarifications sought:

- 6.1.1 Requirement (a): suggested to replace 'endangered mobile species' with 'Species / Habitats of Principal Importance' in line with established terminology.

Steering Group response: rejected – not considered that the change would be clearer.

Issues:

- 6.1.3: the proposed text does not include a clause on compensatory planting, claiming that this needs to be tackled through the planning system. However we still believe there is a role for UKWAS in promoting and encouraging compensatory planting as part of a flexible sustainable forest management approach.

Steering Group response: rejected – previously considered but considered to be beyond the scope of the standard.

Additions proposed:

- 6.1.3 Guidance: suggested additional bullet point on building resilience to severe weather impacts such as wildfire.

Steering Group response: new bullet point in 3.4.1 Guidance on 'future resilience' included as a factor to be taken into account when identifying an appropriate silvicultural system.

Sub-section 6.2: Maintenance of biodiversity and ecological functions

Comments noted:

- 6.2.2 Guidance: proposed change back to original stem diameter of 20cm supported.

Steering Group response: change to 20cm confirmed.

Deletions proposed:

- 6.2.2 Guidance: Remove "*avoid uniform distribution*" as is repetitive.

Steering Group response: agreed.

Section 7

The community

Sub-section 7.1: Consultation

Comments noted:

- 7.1.1 Requirement: deletion of '..and subsequent reassessments'.

Steering Group response: agreed.

Additions proposed:

- 7.1.1 Requirement: suggested insertion of “*on their specified area of interest and expertise*” in relation to consultees as current wording allows for any consultee to comment on issues outside their scope.

Steering Group response: rejected.

- 7.1.1 MoV: suggested addition of ‘Judgement of FC’ and ‘Decision making body’ as verifiers.

Steering Group response: rejected.

Sub-section 7.2: Woodland access and recreation including traditional and permissive use rights

Additions proposed:

- 7.2.2 Guidance/ MoV: additional bullet points in relation to fire proposed.

- **Steering Group response: rejected.**

Sub-section 7.4: Minimising adverse impacts

Additions proposed:

- 7.4.1 Guidance: additional bullet point in relation to severe weather.

Steering Group response: rejected.

- 7.4.2 Guidance: additional bullet point in relation to severe weather incidents.

- **Steering Group response: rejected.**

Deletions proposed:

- 7.4.3 MoV: delete new verifier – ‘*A complaints process and public contact point*’ - as unnecessary and overly bureaucratic.

Steering Group response: rejected.

Section 8

Forestry workforce

No comments received.

Glossary of terms - See detailed points in Annex 1.

Steering Group response: no changes made.

Appendix (Bibliography) - See detailed points in Annex 1.

Steering Group response: changes made as appropriate.

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Appendix 1

Full list of respondents

Id #	Respondent	Organisation	Nature of interest	Location
Woodland owners & forestry practitioners				
1	Grant Murray	Alba Trees plc	Tree Nursery	East Lothian, Scotland
2	Rob Gazzard	Individual	Chartered Forester and Surveyor, District Forester - Forestry Commission	England
State forest enterprises				
3	Mariska van der Linden	Forestry Commission England	Government department/ national forest service	England
Environmental and heritage organisations				
4	Hilary Miller	Countryside Council for Wales	Conservation agency	Wales
Certification bodies and group scheme managers				
5	Richard Peberdy	UPM Tilhill	Forest management company/ group scheme manager	UK-wide

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