

United Kingdom Woodland Assurance Standard

UKWAS Revision 2009-2011

Consultation Paper on Pre-approval Draft

**UKWAS Steering Group
29th April 2011**

www.ukwas.org.uk

1. Introduction

This final Consultation Paper seeks views on proposed changes to the UKWAS standard.

Our review of the certification standard began in 2009 with an evidence-gathering phase which included an Initial Stakeholder Consultation. The findings were published as an Issues Paper early in 2010 following which the UKWAS Steering Group put forward proposed changes to the certification standard in a Consultation Draft issued in December 2010 for 60 days' consultation.

The Steering Group has now considered all the responses received and prepared an amended draft of the certification standard known as a Pre-approval Draft. This Consultation Paper summarises the main changes proposed but you should refer to the following documents for fuller information:

- Consultation Report & Steering Group Responses on UKWAS Consultation Draft (April 2011)
- Consultation Report Annex 1: Consolidated Feedback (April 2011)
- UKWAS certification standard Pre-approval Draft (April 2011)

So that the Steering Group can conclude its work, it is vital that all stakeholders and other interested parties take this final opportunity to provide feedback on the changes made or, of course, on those that they still wish to be made. An electronic [Feedback Form](#) in MS Word format is provided as a separate document - please send your feedback to peter@wilsonapplied.com.

This is a 30-day consultation and your feedback is required by 31st May 2011.

Once the Steering Group has analysed your feedback it will consider whether further changes should be made to the standard before a final version of the 3rd edition of the UK Woodland Assurance Standard is agreed. The finalised certification standard will then be made available to FSC UK and PEFC UK for submission to their international parent bodies for approval. It is hoped that the necessary approvals will be received so that the 3rd edition of the UK Woodland Assurance Standard can be published on schedule in November 2011.

Key documents are available on www.ukwas.org.uk/standard/revision

To see the full Pre-approval Draft of UKWAS showing all the changes you need to download the [UKWAS Revision 2009-2011: Pre-approval Draft \(April 2011\)](#)

To see a summary of the responses to the previous Consultation Draft and the Steering Group's responses download the [Consultation Report & Steering Group Responses on UKWAS Consultation Draft \(April 2011\)](#)

To see all the responses to the previous Consultation Draft download the [Consultation Report Annex 1: Consolidated Feedback](#)

To submit your feedback please download the [UKWAS Pre-Approval Draft Feedback Form](#)

To learn more about the UKWAS revision process and timetable download [UKWAS Revision 2009-2011: Process and Timetable \(March 2009\)](#)

2. Format and design of the published standard

Points relating to the format and design of the standard are summarised below:

Steering Group response:

- The bespoke UKWAS format will be retained and the scope for extending text references will be explored.
- Additional 'how-to-use' and 'who-does-what' sections and, if practicable, interactive electronic links will be added within the existing format but will not form part of the auditable certification standard. In addition, a fuller explanation of the relationship between UKWAS and UKFS, FSC and PEFC is added to the Introduction (sub-section 1).
- The standard will be made available in pdf, html and MS Word electronic formats only. The Steering Group considers the cost of publishing a printed document is too great but is exploring low volume/ low cost print options using photocopying rather than printing so that hard copies may be made available at cost as required.

3. Revision of the Standard

Numerous changes are proposed throughout the certification standard and full details are given in the Steering Group responses incorporated in the Consultation Report. Points relating to the nine most significant issues identified in the previous Consultation Paper plus a list of additional issues are summarised below:

3.1 Definition of Woodland Management Unit (WMU)

Section: Introduction

Steering Group response: In light of a range of concerns on clarity and terminology, a simplified approach has been adopted. The existing text had been written with the intention of illustrating how the WMU definition might work in different scenarios. However, this approach seems to give rise to yet further need for clarification.

Therefore:

- The section entitled 'Area Specificity' has been re-titled 'Defining the Certification Area'. It notes that both wooded and non-wooded areas may be included in the WMU and refers the reader to the 'WMU' section for a definition and to Section 2.1 in relation to management planning documentation.
- The WMU section simply contains the WMU definition (which is intended to conform to FSC's current definition) and the text on management planning and illustrative scenarios has been deleted. Readers are advised to consult CBs/ group scheme managers for any further guidance they may need.
- The 'Scale of Application of the Requirements' section has been merged with the preceding section entitled 'Application of the certification standard to different scales of woodland management unit and intensities of operation'. The illustrative scenarios have been deleted. Instead readers are

advised that in achieving the UKWAS requirements they must adopt an approach that is best suited to the characteristics of the woodland and conforms to the spirit of the certification standard. This gives CBs the opportunity to prevent perverse interpretations of the requirements.

- Section 2.1.1:
 - Requirement – reference is now to ‘areas in the WMU’, rather than ‘woodlands’, to which management planning documentation shall apply
 - Guidance – additional bullet for what management planning documentation might include: ‘For a WMU consisting of multiple areas: an overarching plan’.

3.2 Definition of small and/ or low intensity managed (SLIM) woodland

Section: Introduction

Steering Group response: The case for a lower threshold is not made and would not deliver clear benefits. However, the FSC now classes GB (and NI once Felling Licences are introduced) as ‘low risk’ and this is regarded as new evidence to support an increased threshold.

A revised 500 ha threshold is proposed as, without compromising woodland management quality, it is likely to reduce costs for owners/ managers by cutting unnecessary audit visits. This can be expected to assist retention and expansion of woodlands in certification - it is anticipated that more owners of 100-500 ha would enter group schemes and so benefit from decreased auditing intensities.

3.3 Climate change adaptation and resilience

Sections: 2.2.2, 3.3.1, 6.3.3,

Steering Group response:

On planting stock from native seed zones/ provenance:

- Guidance in 3.3.1 amended to clarify that resilience of origins and provenances to climate change to be considered in species selection.

On provenance needing to be wider to ensure resilience to climate change and pests & diseases:

- Now covered by additional reference in 3.3.1 Guidance to origin and provenance and climate change as well as through existing reference to genotype.

On restocking taking into account climate change and pest & disease resilience:

- ‘Pest & disease resilience’ now added to 6.3.3 Guidance in addition to ‘climate change adaptation’.

3.4 Conversion to non-forested land

Sections: 2.1.1, 3.5.1, 6.1.3 and 1.1.5

Steering Group response:

On future management of non-forested areas and excision of part of WMU:

- Requirements 3.5.1 and 6.1.3 are for both wooded and non-wooded areas to be managed and this is expected to be on a long term basis in accordance with 2.1.1.

- Possible adjustment of the WMU area is a matter for certification scheme rules on excision and the advice note in 1.1.5 Guidance column refers readers to their CB or group scheme manager for further advice. Minor change made to Guidance advice note to refer to ‘any adjustment of the area’ rather than ‘the adjustment...’ to improve clarity.

On request for clarification of reference to ‘exceptional circumstances’ in 3.5.1:

- New wording adopted – ‘certain limited circumstances as set out in this requirement’.

On request for clarification of reference to ‘evidence of substantial dispute’ in 3.5.1:

- Reference is now to ‘unresolved substantial dispute’ in both Requirement and Guidance.

On whether the UKWAS standard should take any account of compensatory planting:

- The issue of compensatory planting is a planning issue and outwith the scope of the certification standard.

3.5 Pesticides, biological control agents and fertilizers

Sections: 5.2 (all sub-sections)

Steering Group response: Save for minor revisions in terminology, the proposals set out in the previous Consultation Draft have been retained.

3.6 Defining high conservation value (HCV) areas

Sections: 6.1.1 and consequential change in 3.5.1

Steering Group response: Save for minor revisions for clarification, the proposals set out in the previous Consultation Draft have been retained.

3.7 Deadwood, veteran trees and stumps

Sections: 6.2.2, 4.2.4

On suggestion to amend volumes to >20m³/ ha rather than ‘about 20m³’ and to increase proposed stem diameters in 6.2.2: In light of evidence relating to hole-nesting birds’ requirements ‘about 20m³’ retained but proposed change to 10cm stem diameters reversed back to original 20cm.

On stump removal can devastate underlying archaeological & historic sites: Additional bullet point added to cover damage to historical features and archaeological deposits.

3.8 Flexibility in management of plantations on ancient woodland sites (PAWS)

Sections: 6.3.2

Steering Group response: The proposals set out in the previous Consultation Draft have been retained.

3.9 Research plots

Sections: 2.1.1

In relation to the question of how to accommodate research plots for testing non-standard management techniques within a certified WMU:

Section 2.1.1 now includes a research policy as a document that can be referred to in the management planning documentation but a specific reference to research trials/ plots is considered to be helpful so that research trials/ plots which are consistent with the spirit of the objectives of the certification standard could be accepted e.g. tests to find alternatives to pesticide use, trials of new species/ provenances might be justified but not use of GMOs.

Additional guidance added to Section 3.4.1 on silvicultural systems: *The establishment of research trials or plots to assess the suitability of species, origins and provenances and/ or silvicultural systems including management and protection treatments should be undertaken in the context of a research policy and conform to the spirit of the certification standard.*

3.10 Other proposed revisions

Numerous other changes are proposed throughout the certification standard and details are given in the Steering Group responses incorporated in the Consultation Draft. The more significant of these revised sections is listed below but please also refer to the full text of the Pre-approval Draft to see all the changes proposed.

- **1.1.1:** – elaborated compliance requirements – changes to wording relating to ‘agreements and contracts’ as these are civil matters which may be subject to litigation
- **1.1.2:** elaborated conformance requirements – reference to ‘best practice guidelines’ rather than ‘guidelines’ for clarification
- **2.3.5:** change in monitoring intensity from ‘annual’ to ‘periodic’ in line with the assessed threat
- **5.1.1:** invasive plant and animal species added to list of risks that planting and restructuring plans shall be designed to minimise
- **5.1.2/ 5.1.x:** 5.1.2 now focuses on tree health monitoring and measures to prevent introduction and spread of pests and diseases. Grazing impacts is moved to new requirement 5.1.x with browsing also included
- **5.1.5:** clarification that a ‘vegetation fire management plan’ shall be developed as appropriate to the level of risk
- **5.1.6:** reference to ‘biosecurity protocols’ added to issues that staff/ contractors need to understand
- **5.5.2:** clarification that ‘lubricants’ refers to ‘cutting-chain lubricants’ only
- **6.1.1 (a):** ‘field survey’ changed to ‘assessment on the ground’ to allow a more flexible approach
- **6.1.3:** text to clarify that this section relates to ‘small scale habitats within a woodland’ matrix reinstated
- **7.1.1:** proposed requirement to consult stakeholders at every five-year re-certification deleted
- **7.3.2:** proposed reference to ‘reasonable provision’ changed to ‘equitable provision’
- **8.1.1:** elaboration in respect of systems and procedures relating to safe working practices previously covered in 8.1.2 which is now deleted
- **8.1.1:** updated guidance on relevant management roles
- **8.4.1:** insurance documents need to be ‘demonstrated’ rather than ‘displayed’.

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