United Kingdom Woodland Assurance Standard

UKWAS Revision 2009-2011

Summary Revision Report

December 2011

www.ukwas.org.uk

1. Introduction

This Summary Report sets out:

- How the revision process was undertaken
- A summary of changes made in the UKWAS Third Edition.

Appendix 1 is a separate document providing a Final Draft of the revised certification standard showing all the deletions and insertions made to the Second Edition.

Appendix 2 lists the dates of relevant meetings.

Appendix 3 lists the key documents produced during the revision process with links to the documents which may be downloaded from www.ukwas.org.uk.

2. The revision and consultation process

A detailed document setting out the arrangements for the 2009-11 revision was agreed in March 2009: *UKWAS Revision 2009-2011: Process and Timetable*.

The work was undertaken by the UKWAS Steering Group supported by a Drafting Group which took forward issues between meetings. In addition, the Board reviewed progress and ensured Steering Group decisions were implemented correctly.

The revision and consultation processes were taken forward in three main phases which incorporated 150 days of stakeholder consultation:

- **Phase 1 (2009):** this was the **evidence gathering** phase including a 60-day initial stakeholder consultation in May-June 2009. There were seven elements in this phase:
 - Certification Schemes' Requirements Review
 - International Benchmarking Review
 - Interpretation Review
 - Small and Low Intensity Managed Woodlands Review
 - Technical Review
 - Standard Users' Feedback Review
 - Review of the Initial Stakeholders' Consultation.

This phase identified the key issues that would need to be considered during the main revision drafting phase and these were published in an Issues Paper in February 2010: *UKWAS Revision* 2009-2011: Issues Paper.

- Phase 2 (2010): this was the main revision drafting phase when all the issues identified in the Issues Paper were considered by the Steering Group with the support of a drafting sub-group which met seven times. This phase was concluded with the publication of a Consultation Draft for 60 days' consultation during December 2010 and January 2011: UKWAS Revision 2009-2011: Consultation Draft.
- Phase 3 (2011): this was the conclusion phase and included analysis by the Steering Group of the consultees' comments and suggestions and further revision of the draft certification standard. The Steering Group was assisted by a drafting sub-group which met once.

A Pre-approval Draft was issued for a further 30 days' consultation at the end of April 2011 and the Steering Group met and agreed further amendments on 21st June 2011.

The Final Draft of the certification standard was prepared and made available to FSC UK and PEFC UK at the end of July 2011 so that they could submit it for approval through their international scheme processes. A small number of text clarifications to avoid ambiguity or deliver greater clarity was subsequently incorporated in August at the request of the FSC UK Trustees.

PEFC Council endorsement was confirmed on 14th November 2011 and a decision on FSC approval is anticipated early in 2012.

3. Format and content of the published standard

3.1 Publication formats

Decisions relating to the format and content of the standard are summarised below:

- The bespoke UKWAS format is retained.
- The standard is available in electronic versions only using pdf, html and (on request) MS Word formats; there is no printed document but the pdf is a fully-designed document which can be printed by the user. The html version is designed for on-line working.

Information is provided on the differently formatted versions of the standard within the pdf document and on the website.

3.2 Additional information on woodland certification in the UK

In response to a common confusion about the roles of different bodies in the certification process, a fuller explanation of the relationship between UKWAS and UKFS, FSC and PEFC is included in Section 1 of the Introduction. An additional section entitled 'Woodland certification in the UK' is included in the pdf document and in the 'About the Standard' section of the website; it provides a visual who-does-what explanation of these relationships.

3.3 Advisory notes

New advisory notes are included as a new editorial device in the guidance column of the certification standard; they provide advice for owners/managers on related matters which are outwith the direct scope of a forest management certification standard. Advisory notes have been introduced in the following sections on these topics:

- 1.1.5 adjustment of area within woodland management unit
- 2.2.4 chain-of-custody certification requirements
- 3.5.1 certification of timber from woodland converted to non-forested land
- 5.2.4 additional certification scheme requirements relating to the use of pesticides
- 6.1.3 certification of timber from woodland converted to non-forested land
- 8.1.1 fulfilling health and safety functional roles.

Their status is clarified in the Introduction (Section 3): 'Such information is provided as an advisory note only and shall not be considered by certification bodies when assessing conformance with the certification standard'.

4. Revision of the Standard

4.1 Terminology

To reflect common usage the following changes in terminology are adopted throughout the certification standard:

- 'Accreditation service' in place of 'accreditation authority'
- 'Certification body' in place of 'certification authority'
- 'Certification scheme' in place of 'certification programme'
- 'Historic environment' in place of 'archaeology' where context permits because it is a broader concept and better reflects the intent of the certification standard.
- As short hand for the UK Woodland Assurance Standard, the term 'certification standard' is adopted in preference to 'standard' for consistency throughout the document and to avoid any confusion with the governmental UK Forestry Standard.

• The term 'forestry workforce' is adopted in sections 1.1.5, 4.1.1 and 4.2.1 for consistency with the title of Section 8 (Forestry workforce) and because it is a broader term covering employees and contractors.

4.2 Major revisions

The changes made in relation to the nine most significant issues raised during the revision process are summarised below:

4.2.1 Definition of Woodland Management Unit (WMU)

In light of a range of concerns on clarity and terminology, the text in Section 4 of the Introduction now includes revised information and simplified illustrative scenarios under three headings:

- Defining the certification area
- The woodland management unit
- Application of the certification standard to different scales of woodland management unit and intensities of operation.

In Section 2.1.1 (Management Planning) the requirement now refers to 'areas in the WMU', rather than 'woodlands', to which management planning documentation shall apply. The guidance now includes an additional bullet for what management planning documentation might include: 'For a WMU consisting of multiple areas: an overarching plan'.

Glossary definition of woodland management unit added.

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

In light of concerns that certification is too complex and costly for smaller owners/managers, the text in Section 4 of the Introduction and in the glossary is revised.

A new 500 ha upper size threshold is introduced for Small Woods 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.

The case for a higher threshold is supported by the FSC's risk assessment which now classes Great Britain (and Northern Ireland once Felling Licences are introduced) as 'low risk' and this is regarded as new evidence to support an increased threshold.

Glossary definition of small woodland revised.

4.2.3 Climate change adaptation and resilience

The increasing importance of adapting to climate change and increasing woodland resilience is recognised in Sections 2.2.2, 3.3.1, 3.4.1, 5.1.1 and 6.3.3; these are amended to clarify that resilience of origins and provenances to climate change and pests and diseases is to be considered in species selection, in restocking plans and in designing silvicultural systems.

4.2.4 Conversion to non-forested land

A number of concerns and queries were raised regarding the restoration of substantial tracts of woodland to 'more ecologically valuable' open habitats (frequently in association with windfarm developments). In consequence, Sections 2.1.1, 3.5.1, 6.1.3 and 1.1.5 have been revised.

In 3.5.1, new wording is adopted to limit further the circumstances in which conversion to a non-woodland habitat is acceptable – 'Conversion to non-forested land shall take place in certain limited circumstances as set out in this requirement' and 'The new land use shall be more valuable than any type of practicably achievable woodland cover in terms of its biodiversity, landscape or historic environment benefits' and meet the four conditions which are set out in the Requirement.

The guidance sets out that a transition plan should set out the justification for conversion and a strategy for implementation, subsequent management and monitoring of the converted area.

In relation to future management of non-forested areas, Requirement 3.5.1 stipulates that both wooded and non-wooded areas are to be managed; this is expected to be on a long term basis in accordance with the revised Section 2.1.1 which clarifies that management planning documentation shall cover all areas in the WMU not just woodlands.

Any adjustment of the WMU area is considered to be a matter for certification scheme rules on excision so an advice note in 1.1.5 refers readers to their certification body or group scheme manager for further advice.

Clarification of the reference to 'evidence of substantial dispute' in 3.5.1 was requested and the reference is now to 'unresolved substantial dispute'. The guidance now clarifies that planning consent or an approved Environmental Statement can provide evidence that there is no unresolved substantial dispute.

In relation to certification of timber harvested during conversion to non-forested land, the guidance in 3.5.1 and 6.1.3 further clarifies that deforestation to facilitate infrastructure or built development which is not integral to the management of the rest of the woodland cannot meet the requirement and therefore any timber felled cannot be certified.

4.2.5 Pesticides, biological control agents and fertilizers

Section 5.2.4 was no longer competent due to changes to the derogation process for FSC's 'Highly Hazardous Chemicals' policy. In addition, it was necessary to incorporate updates and ensure that the text was consistent with the requirements of both FSC and PEFC schemes.

An overarching requirement has been introduced at Section 5.2 which requires owners/managers to minimise their use of pesticides and fertilizers and avoid their use where practicable – this replaces the similarly-worded principle previously in the introductory background section.

Section 5.2.1 now requires an Integrated Pest Management Strategy with primary reliance to be placed on prevention and biological control agents as alternative non-chemical control methods where practicable.

Section 5.2.2 includes an elaborated requirement on the justification to be provided for use of pesticides and biological control agents.

Section 5.2.3 includes additional MoV on training and certification of pesticide operators.

A fully revised Section 5.2.4 sets out clearly a set of criteria to determine whether or not pesticides or biological control agents can be used. These take fully into account national regulations, restrictions under international agreements and certification scheme requirements. In addition, the circumstances in which pesticides categorised as Type 1A and 1B by the World Health Organization or which are restricted by the certificate holder's certification scheme are also set out.

Section 5.2.5 includes an additional requirement relating to keeping a record of fertilizer usage and an elaborated requirement on the use of bio-solids as fertilizers.

Glossary definition of biological control agent added.

4.2.6 Defining high conservation value (HCV) areas

In response to concerns on clarity and terminology, the definition of HCV areas is set out explicitly in Section 6.1.1 with a consequential change in Section 3.5.1.

4.2.7 Deadwood, veteran trees and stumps

Section 6.2.2 has been revised to take account of revised guidance in the UK Forestry Standard guidelines. The requirement stresses the importance of planning and taking action over time to accumulate deadwood volumes and maintain veteran trees. The previous Interim Guidance has been revised stressing the value of accumulation over time to provide continuity of habitat types and ecological connectivity and the importance of retaining some stumps and larger dimension native timber.

In addition to whole tree harvesting, Section 4.2.4 now also limits stump removal where it is likely to have a significant negative effect.

Glossary definition of *deadwood* added.

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

The layout of Section 6.3.2 has been made clearer for the reader through use of corresponding sub-headings in the requirement, guidance and MoV sections. The guidance has been revised to provide greater clarity and to offer more flexibility for determining silvicultural management options.

4.2.9 Research plots

In order to accommodate research plots for testing non-standard management techniques within a certified WMU, Section 2.1.1 has been revised. The guidance now refers to a research policy as a document that can be referred to in the management planning documentation.

Additional guidance is 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.

This specific reference to research trials/plots is considered to be helpful so that trials consistent with the spirit of the objectives of the certification standard could be acceptable e.g. tests to find alternatives to pesticide use or trials of new species/provenances might be justified but not the use of GMOs which is explicitly restricted.

Glossary definition of *Spirit*, conformance to added.

5. Other revisions

Numerous other changes are proposed throughout the certification standard and the more significant of these revised sections is listed below.

This is not an exhaustive list and the reader is referred to Appendix 1, a separate document providing a Final Draft of the revised certification standard showing all the deletions and insertions made to the Second Edition.

- 1.1.1: elaborated compliance guidance references to 'agreements' are moved to 1.1.1 from
 1.1.2 as these are civil matters which may be subject to litigation.
- 1.1.2: elaborated conformance requirements reference to 'good practice guidelines' rather than 'guidelines' for clarification.

- 1.1.5: elaborated requirement to commit to conformance with the certification standard and to declare 'an intention to protect and maintain the WMU and its ecological integrity in the long term'.
- 1.1.5: additional guidance/MoV on informing the forestry workforce of the requirements of the certification standard and practical implications for them in carrying out their work.
- 2.1.1: additional requirement for management planning documentation to include a short summary of the primary elements – previously referred to in 2.1.2.
- 2.1.1: in relation to management planning documentation, additional guidance that documentation might include an overarching plan for a WMU consisting of multiple areas.
- 2.1.1: additional guidance that management planning documentation may reference other appropriate documents – examples are listed.
- 2.1.1: additional guidance that Red List species be taken into account when assessing and mapping the woodland resource.
- 2.3.5: change in monitoring intensity from 'annual' to 'periodic' in line with the assessed threat.
- 4.2.1: in relation to whole tree harvesting, additional guidance that negative effects to be considered includes damage to historical features and archaeological deposits.
- 5.1.1: invasive plant and animal species added to list of risks that planting and restructuring plans shall be designed to minimise.
- 5.1.2-5.1.3: 5.1.2 now focuses on tree health monitoring and measures to prevent introduction and spread of pests and diseases. Grazing impacts is moved from 5.1.2 to new requirement 5.1.3 with browsing also included.
- 5.1.4-5.1.7: consequent on insertion of a new section 5.1.3, the sections previously numbered
 5.1.3 to 5.1.6 are renumbered as 5.1.4 to 5.1.7.
- 5.1.4: scope of requirement extended so that management of invasive plants shall also be undertaken in co-ordination with neighbours.
- 5.1.6: clarification that a 'fire management plan' shall be developed as appropriate to the level
 of risk
- 5.1.7: reference to 'biosecurity protocols' added to issues that staff and contractors need to understand.
- **5.5.2:** clarification that 'lubricants' refers to 'cutting-chain lubricants' only.
- 6.1.1 (a): requirement for a 'field survey' changed to 'assessment on the ground' to allow a
 more flexible approach.
- 7.1.1: requirement explicitly includes identification of local people and relevant organisations and interest groups and guidance is elaborated so that justification should be given for the frequency of consultation.
- **7.3.1:** scope of requirement extended to include woodland services with additional guidance.
- 7.3.1/7.3.2: guidance and MoV in 7.3.1 relating to 'making reasonable provision for local employment' is deleted and a new section 7.3.2 inserted with a broadly equivalent requirement that communities within or adjacent to the woodlands shall have equitable opportunities for employment and to provide supplies and services.
- 7.4.3: additional MoV for Non-SLIM woodlands a complaints process and public contact point.
- 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 cover needs to be 'adequate' and documents need to be 'demonstrated' rather than 'displayed'.
- Glossary of terms: additional terms included:
 - Biological control agent
 - Certification scheme
 - Chain-of-custody certification
 - Deadwood
 - Historic environment
 - International agreement
 - Ramsar sites
 - Red List species
 - Short rotation coppice (SRC)
 - Short rotation forestry (SRF)
 - Spirit, conformance to
 - Woodland management plan
 - Woodland management unit (WMU).

Appendix 1

Final Draft with all deletions and insertions showing changes from UKWAS Second Edition

This document is available for download from the UKWAS website:

http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Revision-2009-11-Summary-Report-Appendix-1-Third-Edition-showing-changes-from-UKWAS-2nd-Edition.pdf

UKWAS Revision 2009-11: Relevant meetings

Steering Group meetings

The Steering Group was responsible for taking forward the revision and for all final decision-making.

2009: 24th March; 3rd September; 24th November.

2010: 9th February; 13th July; 2nd November.

2011: 15th March; 12th April; 21st June; 15th November.

Drafting Group meetings

The Drafting Group took forward issues between Steering Group meetings and reported back to the next Steering Group meeting.

2010: 12th March; 21st April; 10th May; 18th June; 7th September; 12th October; 12th November.

2011: 31st March.

Board meetings

The Board reviewed progress and ensured Steering Group decisions were implemented correctly.

2009: 13th January; 7th April; 31st July; 5th November; 15th December.

2010: 6th May; 13th July; 17th September; 25th November.

2011: 24th February; 20th April; 18th July; 28th September.

UKWAS Revision 2009-11: Key documents

Process document:

UKWAS Revision Process 2009-2011 (March 2009):

http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Revision-Process-2009-2011-Standard-Setting-Process-March-2009.pdf

Phase 1 documents (evidence gathering including initial stakeholder consultation):

Initial Stakeholder Consultation Paper (May 2009):

http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Revision-Initial-Stakeholder-Consultation-Paper-May-2009.pdf

Issues Paper (February 2010):

http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Revision-2009-11-Issues-Paper-February-2010.pdf

Phase 2 documents (main revision drafting leading to a consultation draft):

UKWAS: Consultation Draft (December 2010):

http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Third-Edition-Consultation-Draft-December-2010.pdf

Consultation Paper (December 2010):

http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Revision-2009-11-Consultation-Paper-December-2010.pdf

Consultation Report on Consultation Draft - Annex 1: Consolidated Feedback (April 2011):

http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Consultation-Report-on-Consultation-Draft-Annex-1-Consolidated-Feedback-April-2011.pdf

Consultation Report on Consultation Draft & Steering Group Responses (April 2011):

http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Consultation-Report-on-Consultation-Draft-Steering-Group-responses-April-2011.pdf

Phase 3 documents (further revision and preparation of a pre-approval draft for a final consultation):

UKWAS: Pre-approval Draft (April 2011):

http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Third-Edition-Pre-approval-Draft-April-2011.pdf

Consultation Paper on Pre-approval Draft (April 2011):

http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Revision-2009-11-Consultation-Paper-on-Pre-approval-Draft-April-2011.pdf

Consultation Report on Pre-approval Draft Annex 1: Consolidated Feedback (June 2011):

http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Revision-Consultation-Report-on-Preapproval-Draft-Annex-1-Consolidated-Feedback-June-2011.pdf

Consultation Report on Pre-approval Draft & Steering Group Responses (June 2011):

http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Consultation-Report-on-Pre-approval-Draft-Steering-Group-Responses-June-2011.pdf

Final Documents:

UKWAS Third Edition (2011):

http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Third-Edition-Interim-Publication-Format-December-2011.pdf

UKWAS Third Edition Appendix – References (Version 1):

http://ukwas.org.uk/wp-content/uploads/2011/11/UKWAS-Appendix-Version-1-December-20111.pdf

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