

UKWAS

UK WOODLAND ASSURANCE STANDARD

UKWAS Review & Revision 2020-23: Issues Paper

November 2020

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Introduction

A. Purpose

This Issues Paper is a working document setting out the results of the initial evidence-gathering phase of the UKWAS review and revision process.

The evidence gathered is presented under six headings:

- Interpretation Review
- Technical Review
- Standard Users' Feedback Review
- Risk Review
- Certification Schemes' Requirements Review
- Initial Stakeholders' Evidence.

This evidence is to be considered by the appointed Working Group during the Stage 1 Review and to be carried forward to any subsequent Stage 2 Revision and Consultation drafting work.

B. Key process documents

A revised *UKWAS Standard-Setting Process (Version 3.0)* document was approved by the UKWAS Steering Group on 21st November 2019 and is aligned with FSC and PEFC requirements - <http://ukwas.org.uk/wp-content/uploads/2019/12/UKWAS-Standard-Setting-Process-Version-3.0-FINAL-22.11.19.pdf>.

The UKWAS review and revision plan is set out in the *UKWAS Review & Revision Plan & Timetable 2020-23* document approved by the UKWAS Steering Group on 21st May 2020 - <http://ukwas.org.uk/wp-content/uploads/2020/06/UKWAS-5-Review-Revision-Plan-Timetable-FINAL-21.05.20.pdf>.

FSC UK and PEFC UK were invited to participate in the review and revision process and both confirmed their participation.

C. Summary of the review and revision process

An independent Working Group has been appointed to undertake the review and revision.

The review and revision will be taken forward in two main stages:

- **Stage 1 – REVIEW (July-October 2020):** a review of the current standard, UKWAS 4, to determine whether a revision is necessary
- **Stage 2 – REVISION & CONSULTATION (November 2020 – June 2022):** if deemed necessary, a revision to develop an updated UKWAS 5 standard.

Stage 1

For Stage 1, the review process is taken forward in two phases:

- **Phase 1 Evidence gathering (July-September 2020):** this phase involved gathering and collating evidence to inform the review
- **Phase 2 Review of evidence (October 2020):** the Working Group shall review the evidence gathered and decide whether or not a revision is necessary; should the Working Group consider it necessary, it shall proceed with a revision. Should the Working Group consider that a revision is unnecessary, it shall recommend to the Steering Group that a revision is not needed.

The Steering Group shall publicly announce the decision on whether or not to undertake a revision of the standard.

Stage 2

For Stage 2, the revision process, should the Working Group consider it necessary, shall be taken forward in five main phases:

- **Phase 1 (December 2020 – February 2021):** prepare Initial Revision Draft
- **Phase 2 (March/April 2021):** stakeholder consultation 1 (60 days)
- **Phase 3 (May - September 2021):** analyse stakeholder feedback and prepare Second Revision Draft including synopsis of stakeholder comments and explanation of proposed changes
- **Phase 4 (October/November 2021):** stakeholder consultation 2 (60 days)
- **Phase 5 (Dec 2021 – May 2022):** analyse stakeholder feedback and prepare Pre-approval Draft including synopsis of stakeholder comments and explanation of proposed changes and remit to Steering Group.

Section 1:

Interpretation Review

Purpose

A consideration of any advice developed by the Interpretation Panel.

An Interpretation Panel is appointed by the Steering Group to provide advice on interpretation of the standard for standard-users.

One Interpretation Note has been issued for the fourth edition:

Interpretation Note 9 - Definition of “Priority Species” (November 2019) (see full text in **Appendix 1**).

In summary, the note addresses a request for interpretation of UKWAS requirements in relation to the definition of “priority species” provided in the UKWAS 4 glossary.

The respondent noted that the glossary definition *inter alia* includes species “categorised as Near Threatened, Vulnerable, Endangered or Critically Endangered in the IUCN Red List” and queried the status of those animal and tree species on the IUCN Red List which are present in the UK but are not native.

This relates to UKWAS sections 2.4.4, 2.13.2b, 3.1.2, 4.1.2, Glossary.

The panel reached the following conclusion:

- The definition of “priority species” includes species on the IUCN Red List of Threatened Species. This includes species present, but not native, in the UK such as Chinese water deer and a number of non-native conifer species relevant to UK forestry. The wording in the Standard implies a requirement for a degree of protection for such species which is neither intended nor justified.
- For the purpose of UKWAS, IUCN Red List species will qualify as priority species only if they are within or geographically close to their natural range as described by IUCN global or regional lists.

Additional note submitted by the Interpretation Panel chair, Graham Gill:

- When we were compiling that, Owen Davies mentioned that "While we're looking at the UKWAS priority species definition, I wonder whether it is also worth noting that priority species for Wales are now listed under Section 7 of the Environment (Wales) Act 2016, rather than under Section 42 of the Natural Environment and Rural Communities (NERC) Act 2006 as per the current definition."

I said we would note that for any revision.

- Another related reference to update is the IUCN Red List which is now "IUCN 2020. The IUCN Red List of Threatened Species. Version 2020-2. " This seems to be updated several times a year, so the reference will always be out of date!

Section 2:

Technical Review

Purpose

A consideration of any new scientific or technical knowledge.

Forest Research

Forest Research has provided a list of new or revised publications containing information that might inform the development of UKWAS 5. These are listed in **Appendix 2** and a list with a synopsis for each publication forms **Annex 1**.

Elaine Dick advises:

A number of Practice Guides (PGs) are in preparation which are significant and expected to be available by the time UKWAS goes to press:

- Managing riparian woodlands (at advanced stage)
- Designing and managing woodland to reduce flood risk (at country consultation)
- Update in prep on Managing hazards from trees (syncing with the NTSG ‘common sense’ publication) (at advanced stage)
- New PG on Managing wildlife damage to woodlands and trees (at an early draft stage).

UK Forestry Standard (UKFS)

The four UK administrations are preparing for the next 5-yearly review of the UKFS. The review is to ensure the UKFS remains relevant and reflects current sustainable forestry practices.

The UKFS and UKWAS revisions will be running broadly in parallel with the UKWAS revision work to be concluded in June 2022 and the UKFS a little later. Scottish Forestry is co-ordinating that work and Bob Frost will be a member of the UKWAS working group as the UKFS representative and will provide the Working Group with updates on the UKFS review.

Section 3:

Standard Users' Feedback Review

Purpose

- *A consideration of feedback made directly to the UKWAS Steering Group*
- *A consideration of feedback made to the certification schemes from certificate holders and accredited certification bodies. (To be provided by the certification schemes.)*

A. Feedback to UKWAS steering group

Anecdotal feedback on the content of the standard was broadly positive and no specific feedback was received prior to the initiation of this review process save for an interpretation request as noted in Section 1.

As part of the previous UKWAS revision process it was decided to change how the UKWAS standard was structured, laid out and presented. The aim was to make the standard more accessible and usable for forest managers through a more logical grouping and sequencing of requirements.

Anecdotal feedback on this restructuring was positive. However, in order to get a more detailed picture on whether standard-users found the new structure and layout helpful, the steering group initiated a short on-line survey in summer 2019 to provide feedback and recommendations to be considered at the time of the next revision.

65 responses were received and the results of the UKWAS 4 Usability Survey can be seen here: [UKWAS 4 survey results](#).

Aspects that were less liked were the fact that UKWAS V4 is still a lengthy document, which some felt is still too 'wordy' and sub-divided (with some topics covered in greater depth than others). Some respondents disliked some of the design and layout features of the PDF/printed copy – citing the small typeface and double-column as difficult to follow.

Preferences for the next edition included:

- continued streamlining, simplification and fewer words
- an index as well as a glossary.

Some respondents submitted ideas for additional supporting information, such as a list of permitted chemicals on the UKWAS website, visual tutorials, examples of best practice and 'how you can demonstrate this' in guidance notes.

The steering group has requested that prior to initiating any revision of the standard, the working group reviews the survey results so that these can be taken into account during the drafting phases. The steering group requests that the working group provides specific recommendations on publication formats and layouts.

B. Feedback to PEFC UK

PEFC UK report that no specific feedback has been received beyond a generally positive response to the new structure of the UKWAS 4 standard.

C. Feedback to FSC UK

Standard Users' Feedback Review

Dr Owen Davies, Forest Standards Manager, FSC UK (August 2020)

1. Executive summary

FSC UK has received relatively little unsolicited feedback on UKWAS 4, but general feedback from certificate holders and certification bodies has been positive, and the revised standard structure is felt to be good. Certification body staff have raised some specific concerns about flexibility in meeting requirements being achieved at the expense of clarity. They have suggested that some clarification or additional guidance may be necessary in relation to plantations on ancient woodland sites, deadwood, watershed management and erosion control, monitoring, and appropriate means of verification. A specific issue has been raised regarding operator exposure to chemicals when handling pre-treated trees. Engagement with other stakeholders suggests that it may be beneficial to clarify the scope of the standard in relation to coppice systems and products, and to extend the scope to specific non-timber forest products.

2. Brief and approach

The UKWAS Standard-setting Process version 3.0 calls for 'A Standard Users' Feedback Review

- a consideration of feedback made directly to the UKWAS Steering Group
- a consideration of feedback made to the certification schemes from certificate holders and accredited certification bodies. (To be provided by the certification schemes.)'

In an e-mail dated 7 July 2020, it was clarified that accredited certification bodies were 'to be asked by schemes for feedback to be provided directly to UKWAS'. Accordingly, an e-mail was sent to representatives of Control Union, SGS and the Soil Association, the three certification bodies currently providing FSC Forest Management certification in the UK, encouraging their participation in the standard users' feedback review.

This document represents FSC UK's input to the UKWAS Standard Users' Feedback Review. It is based on feedback from certificate holders received between April 2018, when UKWAS 4 came into effect, and July 2020. It also includes feedback received from certification bodies prior to July 2020, primarily from discussions held in April and May 2019 to consider lessons learned from the first year of implementation of UKWAS 4. Finally, it includes relevant feedback from other stakeholders, such as potential certificate holders; while this is not strictly feedback from current standard users, it does seem pertinent to the future development of UKWAS.

3. Feedback from certificate holders

What little solicited and unsolicited feedback FSC UK has received from current Forest

Management certificate holders has been positive; while the major changes to the structure of the standard between versions 3.1 and 4.0 are noted, the outcome is considered to be good. No specific issues with the content of the standard have been raised.

4. Feedback from certification bodies

Overall, feedback from certification bodies has been positive, and apart from the initial disruption caused by the re-ordering of the standard, no particular issues were found to arise during the transition to UKWAS 4.

There are some concerns among auditors that the (intended) flexibility granted to certificate holders in meeting UKWAS 4 requirements leads to very different interpretations of the standard; indicators still need to be clear.

Specific areas where certification bodies have suggested that there may be a need for clarification or further guidance are plantations on ancient woodland sites (PAWS, UKWAS 4.3.1) and deadwood (UKWAS 4.6.4). (There may be scope to provide greater clarity on PAWS through a revised National High Conservation Value Framework; see the separate FSC UK Risk Review.) The adequacy of certificate holder approaches to watershed management and erosion control (UKWAS 4.5.1) can be difficult to assess in the absence of feedback from statutory stakeholders. There is a feeling that some certificate holders are not making the link between monitoring and objectives (UKWAS 2.2.1(g), (n) and guidance, and 2.15.1(c) and guidance).

There are also some concerns regarding verification and reliance on verbal communication; while it is accepted that verification should be appropriate to the scale and intensity of management, it may be necessary to state explicitly (in 'Using the certification standard') that conveying information verbally might not be sufficient to demonstrate compliance in some cases. A specific point has been raised by one certification body about the recording of operator exposure to chemicals such as acetamiprid when handling pre-treated trees. While recording in general terms is addressed in UKWAS 3.4.2(d) and 3.4.3, an explicit reference to pre-treated trees may help to ensure that this exposure pathway is given due consideration when assessing potential health impacts.

5. Feedback from other stakeholders

A number of enquiries received by FSC UK between April 2018 and July 2020 have related to certification of willow production or other coppice products. These have referred variously to hazel coppice, 'willow coppice on a 3-4 year rotation', 'willow rods' harvested 'every year for around 60 years' and 'willow plantations', and have come from a coppice worker, two landowners/businesses, a basket maker and a major retailer.

While UKWAS already refers to coppice, it may be beneficial to specify under what circumstances coppice areas, in particular those managed on very short rotations, can be included in a woodland management unit; this would be analogous to the clarification of scope in relation to Christmas trees in UKWAS 2.13.3. Although the enquiries received recently have been in relation to craft uses of coppice products, a clarification of scope might also be relevant to biomass production.

This should be considered in the context of FSC interpretation INT-STD-01-001_16 on the application of certification to 'other vegetation types'; see the separate *FSC Requirements Review*. An early UKWAS interpretation (*UKWAS Interpretation Note 1 – Species diversity in poplar plantations*, dated 28 February 2000) addressed the relationship between management objectives and reliance on a single species, but did not address intensity of management/shortness of rotation. The existing

UKWAS definition of 'Short rotation coppice' is not referenced in the body of the standard, and is only referred to in the definition of 'Coppice'.

Finally, FSC UK is represented on the steering group of Dewis Gwyllt, a project which aims to develop new supply chains for sustainably harvested wild produce in Wales. The project team believes that FSC certification could provide crucial assurance that non-timber forest products are sustainably sourced, if such products are included in the scope of UKWAS. FSC's requirements around including non-timber forest products in the scope of National Forest Stewardship Standards have been clarified since UKWAS 4 was produced, and it is now necessary to list the products in scope and to consider the need for product-specific requirements in various parts of the standard; see the separate *FSC Requirements Review*.

Section 4:

Risk Review

Purpose

- *A consideration of the impact and applicability of the standard for different scales and intensities of operation*
- *A consideration of potential impacts on areas and features of high conservation value.*

A. FSC UK input

FSC UK Risk Review

Dr Owen Davies, Forest Standards Manager, FSC UK (August 2020)

*The executive summary of the review is given below. The full report is provided as **Annex 2**.*

Executive summary

Based on a review of changes to the FSC normative framework, the current situation in the UK, and lessons from National Forest Stewardship Standards with a similar scope, FSC UK recommends that, in considering whether UKWAS 4 adequately addresses scale, intensity and risk (SIR) and High Conservation Values (HCVs), the UKWAS Working Group should:

- be aware that, while standard requirements are by no means the only factor, uptake of certification among smaller woods remains low in the UK;
- be aware that the concept of scale, intensity and risk is one of the key tools for tailoring certification requirements to different types of forest ownership and management;
- take into account the clarification of the concept of scale, intensity and risk and the examples of its application in FSC-GUI-60-002 V1-0 EN *Guideline for Standard Developers for addressing risk of unacceptable activities in regard to scale and intensity*;
- take into account the potential application of FSC-PRO-60-010 V1-0 EN *Incorporating a risk-based approach in National Forest Stewardship Standards*, and FSC-GUI-60-010 V1-0 EN *Guideline for Standard Developers on incorporating a risk-based approach in NFSS*;
- consider the draft FSC UK Low Intensity Management Standard (Annex 1 to this review) as a starting point for an SIR-adjusted version of UKWAS;
- consider the UK country profile produced during the FSC UK Small Woods project as a basis for discussion of SIR issues;
- be aware of the current and potential status of and risks to High Conservation Values in the UK;
- consider whether current UK HCV definitions are adequate, taking into account the full range of guidance provided by FSC and the definitions used in other national contexts;
- consider the implications for HCV requirements, particularly in terms of engagement with affected rights holders, of the review of the applicability of Criterion 4.2 recommended in the separate *FSC Requirements Review*;
- consider whether the existing National High Conservation Value Framework (Annex 2 to this review) is fit for purpose, taking into account the latest FSC guidance;

- consider whether the current voluntary use of the National HCV Framework is appropriate, or whether mandatory use might result in better protection of HCVs in the UK; and, at the very least, consider updating references, links etc. in the National HCV Framework.

B. PEFC UK input

UKWAS 4 was documented as being size neutral as was the PEFC ST 1003:2018 Sustainable Forest Management standard. However, PEFC has always tried to ensure that small woodland owners are able to participate in certification. One of the main risks preventing this happening is cost and while UKWAS can do very little to drive down costs, the schemes can try to assist by developing tools such as PEFC UK's on-line tool. This will help small woodland owners and group scheme managers manage their certification and hopefully make things easier, therefore less time consuming for the certification bodies.

That said a couple of areas that may assist are being considered by PEFC Ireland in their current scheme review by differentiating between woodlands above and below 100 hectares. These include:

Less formal monitoring for FMUs below 100 hectares by outlining stricter verifiers for larger FMUs
'Forests larger than 100 ha.

- *A documented monitoring plan*
- *Baseline information from studies in similar woods*
- *An analysis of data collected*
- *Summary of results*

Similar for Tree Health monitoring **'Forests over 100 ha. in size**

- *Documented systems for assessing tree health*
- *Notes or records of monitoring and responses to problems*

PEFC ST 1003:2018 Sustainable Forest Management standard has a new definition for 'Ecologically important forest areas'. The UKWAS WG should therefore consider that the definition below is encapsulated within the HCV definition and requirements of the standard.

Forest areas

- a) Containing protected, rare, sensitive or representative forest ecosystems;*
- b) Containing significant concentrations of endemic species and habitats of threatened species, as defined in recognised reference lists;*
- c) Containing endangered or protected genetic in situ resources;*
- d) Contributing to globally, regionally and nationally significant large landscapes with natural distribution and abundance of naturally occurring species.*

Section 5:

Certification Schemes' Requirements Review

Purpose

A consideration of advice (to be provided by the certification schemes based on a gap analysis) on any new or revised policies, procedures or guidance that is relevant to the revision and any learnings from equivalent accredited standards of a similar geographical or ecological scope of application and similar forest conditions. National certification schemes should seek advice and guidance from their international body when compiling their advice.

A. PEFC UK

PEFC UK gap analysis of potential gaps in compliance by UKWAS 4 against PEFC ST 1003:2018 – Sustainable Forest Management - Requirements

PEFC UK have conducted a gap analysis between UKWAS 4 and the current PEFC Sustainable Forest Management Standard PEFC ST 1003:2018. Discussions with other National Governing Bodies, in-particular with PEFC Ireland also assisted with reaching the conclusions below. Some areas are highlighted in yellow to specifically show the text that the analysis is referring to.

1. PEFC ST 1003 4.1 General
Sales claims made by certified forest owners have changed to include 100% PEFC Origin as well as x% PEFC Certified. This element will be covered in the PEFC UK scheme documents.
2. PEFC ST 1003 4.3.2, 5.1 to 5.3 Leadership
The standard requires that the organisation shall provide a publicly available commitment to continuously improve the sustainable forest management system and ensure that responsibilities for sustainable forest management are clearly defined and assigned. There are several mentions of 'continual improvement' which are not currently reflected in UKWAS 4 although the requirement may already be met by Group Scheme documentation.
3. PEFC ST 1003 6.2.3 Management Plans
The standard requires that management plans shall include at least a description of the current forest management unit, long-term objectives, and the average annual allowable cut, including its justification.

Inferred at UKWAS 2.4.2 but not explicit.
4. PEFC ST 1003 7.1.1
The standard requires that the organisation shall determine and provide the resources needed for the establishment, implementation, maintenance and continual improvement of the sustainable forest management system.

UKWAS 2.1.3 close but not as broad

5. PEFC ST 1003 8.1.2

The standard requires that the quantity and quality of the forest resources and the capacity of the forest to store and sequester carbon shall be safeguarded in the medium and long term by balancing harvesting and growth rates, using appropriate silvicultural measures and preferring techniques that minimise adverse impacts on forest resources.

UKWAS 2.4.2a talks about maintaining timber stocks. Carbon stores not explicitly identified

6. PEFC ST 1003: 8.1.3

The standard requires that climate positive practises in management operations, such as greenhouse gas emission reductions and efficient use of resources shall be encouraged.

Not currently explicit in UKWAS 4

7. PEFC ST 1003 8.1.4

The standard requires that forest conversion shall not occur unless in justified circumstances where the conversion:

- a) is in compliance with national and regional policy and legislation applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority including consultation with affected stakeholders; and
- b) entails a small proportion (**no greater than 5 %**) of forest type within the certified area; and
- c) does not have negative impacts on ecologically important forest areas, culturally and socially significant areas, or other protected areas; and
- d) **does not destroy areas of significantly high carbon stock**; and
- e) makes a contribution to long-term conservation, economic, and social benefits.

The two areas highlighted in yellow will need to be discussed as they do not appear in the UKWAS text shown below.

UKWAS 2.13.1

- a) Woodland identified in sections 4.1–4.3 shall not be converted to plantation or non-forested land.
- b) Areas converted from ancient semi-natural and other semi-natural woodlands after 1994 shall not normally qualify for certification.

UKWAS 2.13.2

b) 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 all of the following conditions shall be met:

- The woodland is not identified as of high conservation value in sections 4.1–4.3 and 4.5, nor identified as contributing to the cultural and historical values in section 4.8
- There is no evidence of unresolved substantial dispute

- The conversion and subsequent site management protect and substantially enhance at least one of the following:
 - The status and condition of priority habitats and species
 - Important landscape features and character
 - Important historic environment features and character
 - Important carbon stores
- The subsequent management of the converted area shall be integrated with the rest of the WMU.

8. PEFC ST 8.1.5

The standard requires that afforestation of ecologically important non-forest ecosystems shall not occur unless in justified circumstances

Section 4.1 of UKWAS 4 may touch on this but no specific mention of non-forest ecosystems.

9. PEFC ST 1003 8.4.9

The standard requires that traditional management practices that create valuable ecosystems on appropriate sites shall be supported, where appropriate.

Not explicit in UKWAS 4

10. PEFC ST 1003 8.5.2

The standard requires that areas that fulfil specific and recognised protective functions for society shall be mapped, and forest management plans and operations shall ensure the maintenance or enhancement of these functions.

Not explicit in UKWAS 4

11. PEFC ST 8.5.3

The standard requires that special care shall be given to forestry operations on sensitive soils and erosion-prone areas as well as in areas where operations might lead to excessive erosion of soil into watercourses. Techniques applied and the machinery used shall be suitable for such areas. Special measures shall be taken to minimise the pressure of animal populations on these areas.

Not explicit in UKWAS 4

12. PEFC ST 1003 8.6.7

The standard requires that forest management shall contribute to research activities and data collection needed for sustainable forest management or support relevant research activities carried out by other organisations, as appropriate.

Not explicit in UKWAS 4

13. PEFC ST 1003 9.2.1

The standard requires that an internal audit programme at planned intervals shall provide information on conformity of the management system

Will be covered by CB standards for group schemes and by the PEFC UK scheme, but not under the UKWAS standard.

14. PEFC ST 1003 9.2.2 – audit programme.

Not in UKWAS but covered by CB requirements and PEFC UK scheme

Not in UKWAS

15. PEFC ST 1003 10.1 Improvement

Dealing with non-conformity and corrective actions

Not in UKWAS but covered by CB requirements and PEFC UK scheme

16. PEFC ST 1003 10.2

The standard requires that the suitability, adequacy and effectiveness of the SFM system and the sustainable management of the forest shall be continuously improved.

Not in UKWAS

17. May need to add the UN Universal Declaration on Human Rights to the legislation and reference register.

B. FSC UK

FSC Requirements Review

Dr Owen Davies, Forest Standards Manager, FSC UK (August 2020)

*The executive summary of the review is given below. The full report is provided as **Annex 3**.*

1. Executive summary

A review was carried out of changes to the FSC normative framework since UKWAS 4 was produced, along with advice from FSC International and lessons from National Forest Stewardship Standards with a similar scope. There have been a number of developments in the FSC normative framework, some of them quite significant. FSC UK has made recommendations to the UKWAS Working Group based on the various elements of the review, the most significant of which are that the Working Group should:

- consider the need to bring Integrated Pest Management and pesticide requirements in line with the environmental and social risk assessment (ESRA) framework requirements for certificate holders in the *FSC Pesticides Policy*;
- consider whether the standard gives sufficient emphasis to maintaining basic ecosystem services (carbon sequestration and storage, biodiversity conservation, watershed services, soil conservation, and recreational services) as a minimum requirement of responsible forest management;
- consider whether the standard adequately addresses workers' rights;
- consider whether the standard adequately addresses gender equality;
- consider whether the standard adequately addresses soil protection;
- consider whether the standard provides an adequate steer on sustainable harvesting levels;
- consider the need to evaluate the applicability of various FSC requirements, particularly under Principle 4 (community relations);

- consider the need to clarify the scope of the standard, in terms of both vegetation types and non-timber forest products, and to develop specific requirements as appropriate; and,
- consider the need to change the form of standard requirements from 'shall' to statements in the present indicative.

As a general principle, FSC UK believes that the UKWAS Working Group should aspire to challenge foresters and explore new elements of responsible forest management.

Section 6

Initial Stakeholders' Evidence

Purpose

A consideration of initial input from stakeholders.

There was no formal consultation stage at the outset. However, when the review was publicly announced on 1st July 2020, a call for evidence was made for standard-users and stakeholders from across the UK forestry community to submit comments to the working group by 31st August.

Respondents were invited to raise any issues they considered important but were particularly requested to consider four questions:

1. *Do you think the UKWAS 4 standard needs updating and revision?*
 - *It would be helpful if you could tell us your reasons why you came to your view.*
2. *Do you think the structure and organisation of the standard needs to be changed?*
 - *And if so, please summarise why you think that.*
3. *Do you think the content of the standard needs updating e.g. to include new issues, to elaborate or revise existing requirements, or to remove existing requirements?*
 - *Again, it would be helpful if you could tell us your reasons why you came to your view.*
4. *Do you think the supporting Appendix of References needs updating and why?*

Evidence was submitted in nineteen responses and these are provided in full in **Appendix 3**.

The following individuals and organisations submitted evidence:

Working Group members or their organisations

Stuart Housden* (RSPB)
Angus Mackie* (Forestry & Land Scotland)
Paul Nolan (Mersey Forest)
Andrew Sharkey* (Woodland Trust)
Jonathan Spencer (Soil Association)
Maria Wilding (Llais y Goedwig)
Stuart Wilkie* (Scottish Woodlands)

Pool of Experts

Martin Edwards* (BASC) (Deer & shooting)
David Jam (Forestry Commission) (Deer)
John Gorman (SEPA) / Ross Johnston* (NatureScot) (Environmental protection / Natural heritage)

Bill Mason (Continuous Cover Forestry Group - CCFG) (Silviculture)

Stakeholder Forum

Gillian Clark (Forest Industry Safety Accord - FISA)

Timothy Hill (Ancient Tree Forum)

Ted Wilson (Silviculture Research International)

Other stakeholders

Graham Gill (UKWAS Interpretation Panel)

Simon Hart* (RTS Forestry)

James Bruhn (Historic Environment Scotland)

Roland Stiven (Timber Transport Forum)

Liz Albert (Scottish Wildlife Trust Stirling and Clackmannanshire Local Group)

*N.B. * denotes UKWAS Steering Group members*

Appendices

1. UKWAS Interpretation Note 9: Definition of “Priority Species” (p.24)

2. UKWAS Technical Review: Publications list compiled by Forest Research (p.26)

3. UKWAS Initial Stakeholders’ Evidence (pp.28-54)

- **Angus Mackie (FLS)** (p.28)
- **Ancient Tree Forum (ATF)** (Timothy Hill) (p.28)
- **British Association for Shooting and Conservation (BASC)** (Martin Edwards, Head of Deer Management) (p.29)
- **Continuous Cover Forestry Group** (Bill Mason) (p.30)
- **Forestry Commission** (David Jam, Deer Advisor – Natural Environment, Forest Services, Ludlow) (p.32)
- **Forest Industry Safety Accord (FISA)** (Gillian Clark) (p.33)
- **Graham Gill OBE** (Chair, UKWAS Interpretation Panel) (p.33)
- **Historic Environment Scotland** (Dr James Bruhn, Deputy Head of Casework, Heritage Directorate) (p.33)
- **Llais y Goedwig** (Maria Wilding, Programme Manager) (p.35)
- **The Mersey Forest** (Paul Nolan, Director) (p.36)
- **RSPB** (p.37)
- **RTS Forestry** (Simon Hart, Business Development Manager) (p.41)
- **NatureScot & SEPA** (Joint response - Ross Johnston NatureScot (biodiversity) and John Gorman SEPA (environmental protection)) (p.41)
- **Soil Association** (Clive Thomas) (p.42)
- **Scottish Woodlands** (Stuart Wilkie Certification & Environment Manager) (p.45)
- **Scottish Wildlife Trust Stirling and Clackmannanshire Local Group** (Liz Albert on behalf of the Planning Volunteers Team) (p.45)
- **Professor Edward Wilson MSIF FRSB, Silviculturist** (p.49)
- **Timber Transport Forum** (Roland Stiven) (p.51)
- **Woodland Trust** (p.52)

4. Initial Stakeholders’ evidence: Scottish Woodlands (p.55)

UKWAS Interpretation Note 9: Definition of “Priority Species”

PLEASE NOTE: THIS INFORMATION NOTE RELATES TO THE FOURTH EDITION OF THE UK WOODLAND ASSURANCE STANDARD (VERSION 4.0)

Key words: Priority species, IUCN Red List

Relevant requirement references:

- 2.4.4 Priority species shall not be harvested or controlled without the consent of the relevant statutory nature conservation and countryside agency
- 2.13.2b ... The conversion and subsequent site management (of land converted to non-forested land shall) protect and substantially enhance at least one of the following: the status and condition of priority habitats and species; important landscape features and character; important historic environment features and character; important carbon stores
- 3.1.2 The planning of woodland operations shall include: taking measures to protect.... and prevent disturbance of and damage to priority species....
- 4.1.2 Appropriate measures shall be taken to protect identified priority habitats and species in accordance with plans agreed with nature conservation agencies. In planning and implementing measures within the WMU, the owner/manager shall take into account the geographic range and ecological requirements of priority species beyond the boundary of the WMU.

Date: This Information Note was discussed by the Panel in email correspondence between July and August 2019 and submitted to the UKWAS Steering Group for provisional approval in November 2019.

Interpretation request:

A Steering Group member pointed out that the UKWAS 4 definition of “priority species” includes species categorised as Near Threatened (NT), Vulnerable (VU), Endangered (ED) or Critically Endangered (CR) in the IUCN Red List.

The Red List includes species which are present but not native in the UK and threatened in their native range. Such species include Chinese water deer (*Hydropotes inermis*) (VU) and a number of conifer species of interest to UK forestry including Fraser’s fir (*Abies fraseri*) (EN), Korean fir (*Abies koreana*) (EN), monkey puzzle (*Araucaria araucana*) (EN), Serbian spruce (*Picea omorika*) (EN), Brewer’s spruce (*Picea breweriana*) (VU), western white pine (*Pinus monticola*) (NT), Monterey pine (*Pinus radiata*) (EN), eastern hemlock (*Tsuga canadensis*) (NT).

Discussion:

The IUCN Red List Guidelines (version 13 (March 2017))

<https://www.iucnredlist.org/resources/redlistguidelines> include the following guidance:

2.1.3 Introduced taxa and subpopulations

In addition to wild subpopulations (see section 2.1.4) inside the natural range of a taxon, the

categorization process should also be applied to wild subpopulations resulting from introductions outside the natural range, if all of the following conditions are met:

(a) The known or likely intent of the introduction was to reduce the extinction risk of the taxon being introduced. In cases where the intent is unclear, the assessors should weigh the available evidence to determine the most likely intent.

(b) The introduced subpopulation is geographically close to the natural range of the taxon. What is considered to be geographically close enough should be determined by the assessor, considering factors such as the area of the natural range, the nature of the landscape separating the natural and the introduced range, and whether the taxon could have dispersed to the introduced range without the effects of human impacts such as habitat loss and fragmentation. For example, an introduced subpopulation in a continent distant from the natural range would not qualify. On the other hand, most introduced subpopulations within the same ecoregion as the natural range would qualify.

(c) The introduced subpopulation has produced viable offspring.

(d) At least five years have passed since the introduction.

From the above, it is clear that the UK populations of Chinese water deer or of the conifer species listed have no effect on the classification of the species as IUCN Red List species.

Conclusion:

The definition of “priority species” includes species on the IUCN Red List of Threatened Species. This includes species present, but not native, in the UK such as Chinese water deer and a number of non-native conifer species relevant to UK forestry. The wording in the Standard implies a requirement for a degree of protection for such species which is neither intended nor justified.

For the purpose of UKWAS, IUCN Red List species will qualify as priority species only if they are within or geographically close to their natural range as described by IUCN global or regional lists.

UKWAS Technical Review: Publications list compiled by Forest Research

N.B. A full synopsis for each publication is provided in **Annex 1**.

A. Guidance series

Guidance:

- The UK Forestry Standard (July 2017)

Guidance Checklist:

- The UK Forestry Standard - summary checklist (July 2017)

Practice Guides:

- Managing forest operations to protect the water environment (May 2019)

Technical Notes:

- Assessing the stem straightness of trees (July 2017)
- Controlling grey squirrels in forests and woodlands in UK (December 2019)

B. Research series

Handbooks:

- Forest Yield: A handbook on forest growth and yield tables for British forestry (April 2016)

FC Software:

- Forest Yield (software) (April 2016)

Research Notes:

- Biodiversity and rotation length: economic models and ecological evidence (April 2016)
- Understanding the provision of conifer seed for woodland species (July 2016)
- Converting planted non-native conifer to native woodland (September 2016)
- The implications of upland conifer management for breeding birds (November 2016)
- Timber properties of Noble fir, Norway spruce, Western red cedar and Western hemlock grown in Great Britain (December 2016)
- Valuing the social and environmental contribution of woodlands and trees in England, Scotland and Wales (March 2017)
- Implications of lowland broadleaved woodland management for the conservation of target bird species (June 2017)
- Ecological implications of ash dieback and mitigation methods (July 2017)
- Choice of Silver birch planting stock for productive woodlands (August 2017)
- Assessing the investment returns from timber and carbon on woodland creation projects (August 2017)
- Using DNA barcoding and metabarcoding to detect species and improve forest biodiversity monitoring (May 2018)
- Encouraging biodiversity at multiple scales in support of resilient woodlands (August 2018)
- Conservation of black poplar: insights from a DNA fingerprinting approach (September 2018)

- Niches for species, a multi-species model to guide woodland management (September 2018)
- Woodland managers' understanding of resilience and their future information needs (January 2019)
- The role of urban trees and greenspaces in reducing urban air temperatures (January 2019)
- Comparing the cost-effectiveness of forestry options for climate change mitigation (January 2019)
- Understanding the role of urban tree management on ecosystem services (June 2019)
- Outdoor learning: closing the attainment gap in primary schoolchildren in Scotland August 2018).

Research Reports:

- Sustainable construction timber (June 2016)
- Delivery of ecosystem services by urban forests (February 2017)
- Valuing the social and environmental contribution of woodlands and trees in England, Scotland and Wales (2017)
- Timber, carbon and wind risk: towards an integrated model of optimal rotation length (December 2017)
- Wood properties and uses of Scots pine in Britain (April 2019)
- Genetic considerations for provenance choice of native trees under climate change in England (April 2019)
- Ecosystem services delivery by large stature urban trees (June 2019)
- Ecosystem services delivery by small and medium stature urban trees (June 2019).

UKWAS Initial Stakeholders' Evidence (submitted 1st July – 31st August 2020)

Respondents' Comments
<p>Angus Mackie (FLS)</p> <p>The points for consideration are as follows.</p> <p>UKWAS Version 4 was the product of a fairly comprehensive review and so on the basis of that, I think that the intensity of the current review would be to look to improve quality where appropriate, for specific aspects of the standard. I know that FLS would not be advocating a major revision at present.</p> <p>Having just been through our first surveillance audit from the Soil Association, there are a few aspects which might be worthy of consideration.</p> <p>Section 3.4 – Pesticides is probably high on the list with the introduction of ESRAs and the debate around highly hazardous chemicals. It would be useful to ensure that any potential revision on this was applicable and workable within the Requirements of the Standard.</p> <p>Section 2.15 – Monitoring is a large section, held within Section 2 of the Standard. One of the positive benefits of the UKWAS 4 revision was that it started to rationalise and group a number of the Requirements in a very logical fashion. However, there is a question whether the monitoring aspects might be interpreted under Management planning at the expense of Woodland operations where monitoring is equally valid and valuable. It may well be that it's a question of interpretation by the certificate holders but perhaps one worthy of considering.</p> <p>Soils and flooding is an area that could be considered and it seems from our discussion that there are perhaps others in the group who hold similar views.</p> <p>Carbon and carbon sequestration with potential links to carbon accounting might be worthy of consideration.</p> <p>As we discussed, we're awaiting the Soil Association view on our management of wild boar. This was a positive aspect of the recent audit and it appears (to me at least) that there might be a potential move to look at inclusion of wild boar into chain of custody. That then raises the question of the potential for inclusion of the management of feral pigs / wild boar within the Standard. I think this really has to wait until there is a definitive response from the Soil Association before introducing this to the table.</p> <p>We discussed natural capital and the links to the FSC Ecosystem Services Certification. This may however be out of scope for the working group.</p>
<p>Ancient Tree Forum (ATF) (Timothy Hill)</p> <p>Introduction to the Ancient Tree Forum</p> <p>The Ancient Tree Forum (ATF) is a small charity specialising in the conservation of ancient and other veteran trees (AoVT). These trees are most frequently found in wood pasture, parkland, hedgerows and other historic landscapes and may also be present in ancient and secondary woodland.</p> <p>We are the leading authority on the care & sustainability of AoVTs, working to increase the recognition of their value and to secure the future of their ecosystems. We do this by promoting good management and conservation practice, lobbying governments over their protection, encouraging research, and increasing people's enjoyment of ancient trees.</p> <p>We produce guidance and training to arborists, tree owners, landowners, farmers, land managers and other professionals (e.g. books, guides and events). We have 11 ATF regional groups across the UK, and our partnership projects with Woodland Trust, National Trust, English Heritage, Gardens Trust, Arboricultural Association, Natural England and Forestry Commission have a national impact. Our VETree scheme for veteran tree management</p>

professionals, and the [VETcert](#) scheme (the industry standard qualification for professionals in veteran tree management) funded by the EU Erasmus+ programme, both run throughout Europe.

Why a Revision is desirable

- **Legislative and Policy context:** this has changed significantly since the last UKWAS review, particularly an increasing recognition of the need for protection of AoVTs. Planning Policy (England NPPF 2018) specifically protects AoVTs as irreplaceable habitat from loss or deterioration, also ancient woodland. FC/NE Standing Advice (2019) and Planning Policy Guidance (2019) identifies ancient wood pastures and historic parkland as a form of ancient woodland, and irreplaceable habitat. England Tree Strategy (June 2020 Consultation and supporting Technical Annex) refers in 'Protecting & Improving pillar' - [ancient & veteran trees are heritage features of great ecological value, which is irreplaceable.... the value of these woodlands & trees is recognised in the 25 Year Environment Plan](#)".

Later, in the 'Managing our woodlands & trees' section, there is a significant paragraph recognising the importance of trees in the wider landscape: [Outside woodland - in fields, hedges, wood pasture, orchards and parkland - trees are key features of the landscape and natural environment. However, they are at risk. Research shows the number of hedgerow trees is falling, with losses increasing due to the impact of pests and disease while ancient and veteran trees are also at high risk from climate change and neglect. We need to retain and expand this resource ensuring they are resilient to our future climate, pests and diseases; and make sure that management of land around them does not result in damage – taking action in the short term to protect a future generation of ancient trees.](#)"

- **Terms Used in the Standard.** There are omissions and/or uncertainties in definitions and status of 'Wood Pasture', 'Parkland', 'Ancient Trees', 'Old Trees' which now require clarification both in the body of the standard and in the Glossary. This uncertainty could lead to failure in properly identifying e.g. important landscape elements or trees of great ecological and other values. Ancient Woodland and PAWS restoration is covered in detail whereas the connection, relationship, ecotones with wood pasture and historic parkland is not. There is also no mention of 'tree roots', 'root protection areas (RPA)' or 'rhizosphere', any or all of which could be seriously damaged during woodland operations (including use of pesticides and fertilisers) and this needs a more detailed examination.

- **Section 4: Natural, Historical & Cultural Environment.** Whilst ATF is delighted that Veteran trees are mentioned throughout this section, there is confusion between the values of and relationship between ASNW, PAWS, Wood pasture & Parkland and where Veteran trees (occasionally referred to as 'Old Trees') feature in the mix. Whilst this requires more detailed work at the consultation stage (and ATF would certainly be happy to help with refining and clarifying terms), there are currently gaps that suggest a revision to UKWAS 4 is essential. Additional areas of concern relate to veteran tree and deadwood management. The minimum requirements and guidance are generally accepted and in keeping with ATF guidance (see below) but the statements: [Veteran tree management should not conflict with safety of the public or workers](#) and- [Deadwood management should not conflict with safety of the public or workers or the health of the woodland](#) should be removed. Such 'conflict' can be resolved as part of a wider tree safety strategy e.g. by 'moving the target, not the risk'

- **Resources.** We were unable to access main reference documents via the website so couldn't confirm content. From ATF perspective, we consider the bare minimum to be the following: link to [Ancient Tree Inventory](#), reference to [Magic](#) website and link to Wood Pasture & Historic Parkland overlay, checking surrounding historic landscapes through 1st edition OS maps at 1:1250 scale. Strongly recommended: books and leaflets can be sourced (openly or for a nominal amount) via [ATF website](#), particularly the invaluable [Ancient & other Veteran Trees: further advice on management](#), which provides current & expert advice on several scenarios set out in the 'Guidance' sections of UKWAS 4. The VETree & VETcert videos referenced in the introduction above are easily-digested and widely-recognised practical guides to good practice. More general advice on wood pasture and historic parkland can be found on the [UK Wood Pasture & Parkland Network](#).

- Assuming the Working Group approves the revision of UKWAS 4, ATF has a number of detailed comments, which would follow in full consultation process.

British Association for Shooting and Conservation (BASC) (Martin Edwards, Head of Deer Management)

1. Just looking at the references document and noticed you still refer to the Deer Commission for Scotland this organisation is now extinct and their latest incarnation is within NatureScot who publish a Code of Practice on Deer Management (<https://www.nature.scot/code-practice-deer-management>) and Best Practice Guidance on the Management of Wild Deer in Scotland (<https://www.bestpracticeguides.org.uk/>).

Relevant UKWAS section: Appendix of References

2. Suggested amendment to the standard:

4.9 Game and fisheries management

4.9.1 REQUIREMENT

Game rearing and release, shooting and fishing shall be carried out in accordance with the spirit of codes of practice produced by relevant organisations **such as the Code of Good Shooting Practice.**

Continuous Cover Forestry Group (Bill Mason)

Commentary on UKWAS 4.0

1. Does the UKWAS 4 standard need updating and revision?

Yes, for the reasons outlined below.

2. Does the structure and organization of the standard need to be changed?

Some minor adjustments may be needed to reflect the changes suggested below.

3. Do you think the content of the standard needs updating?

a. Difficulties caused by the use of the term LISS.

My major criticism is the lack of clarity about silvicultural practices induced by the use of the term 'lower impact silvicultural systems (LISS)'. This is defined on p 70 as:

'Silvicultural systems including group selection, shelterwood or under-planting, small coupe felling, coppice or coppice with standards, minimum intervention and single tree selection systems which are suitable for windfirm conifer woodlands and most broadleaved woodlands.'

The problem is that the basic concept implicit in the term LISS relates more to management intensity (e.g. degree of site management, chemical inputs, harvest intensity, etc.) than to silvicultural systems as such. The definition also includes measures that are not silvicultural systems but are regeneration techniques ('underplanting') and others that are approaches to management ('minimum intervention'). We should remember that standard definitions of a silvicultural system emphasise that a system integrates various phases of stand development such as regeneration, stand tending and harvesting to produce different structures that meet management objectives.

To try to resolve this issue, I think it is worth looking at the attached typology prepared a few years ago in an EU project which distinguishes five broad categories of Forest Management Approaches (FMAs): unmanaged, close-to-nature, combined objective, intensive even-aged, and short rotation (see Duncker et al., 2012) (*N.B. This paper forms Annex 5 to this Issues Paper*). As a study of the paper will indicate, silvicultural systems are the means used to deliver the chosen FMA. By using LISS, the present UKWAS standard confounds management approach with means of delivery.

My suggestion is that the standard abandons LISS and instead makes explicit reference to FMAs using a term like 'lower impact forest management approaches'. This could be defined along the following lines:

'Lower impact forest management approaches are characterised by less intensive silvicultural practices such as the extent of site manipulation and harvesting. Examples of such approaches are minimum intervention, continuous cover forestry, and traditional coppice regimes. These approaches can be delivered by a variety of silvicultural systems including shelterwood and selection systems as well as coppice and coppice with standards. These systems can be applied in windfirm conifer woodlands and many broadleaved woods.'

If accepted, this would require some alteration to the text and to other definitions. For example, it is striking that the references relating to silvicultural systems mention three of the FC Information Notes dealing with CCF (nos 29, 40 and 45), but continuous cover is never mentioned in the text.

b. Other points.

- I. p2. I was confused by the phrase 'only in the context of a research policy' and I am not sure that this adds anything to the sentence – suggest deletion.
- II. P10. I wondered if the distinction between 'shall', 'should' and 'may' could be strengthened by having these words and their definitions in a box rather than scattered through the text.
- III. P14. I have no idea what a 'toolbox talk' is. It either needs to be defined or rephrased.
- IV. P14. I think the sentence under guidance stating '[...] long-term forest resilience will underpin environmental, [...]' should be rephrased as '[...] long-term forest resilience will underpin *the achievement of environmental, [...]*'. Inserted text is in italics.
- V. P15. The phrase under Guidance '[...] tree densities and other woodland management [...]' should have the word 'measures' inserted after 'management'.
- VI. P19. Section 2.4.1. I wondered if the desirability of having a 'soils map' should be mentioned under Guidance. This would seem to link with a number of the guidance measures outlined on p 20.
- VII. P 22. Section 2.5.3. Under Guidance the phrase 'Diversity of species, ages and distribution of open ground' should have the word 'structure' inserted after species. This reflects the findings that greater use of CCF will promote mixed stands and enhance the ability to withstand wind and limit the impacts of pests and diseases.
- VIII. P24. 2.7.1. Requirement. It must be very difficult to determine what is 'an appropriately diverse mosaic of species [...]'? I think a better phrase might be 'a site-adapted mosaic of species, structure, sizes, [...]'.
IX. P24. 2.7.1. Guidance. This section appears to assume that clearfelling is the only way to 'restructure' even-aged plantations. I suggest that the use of CCF should be mentioned as one option for increasing diversity, assuming that the wind risk is acceptable.
- X. P25. I had some difficulty with the use of 'shall' here, particularly in relation to 'natural conditions'. The latter seemed to be defined in relation to native species, whereas achieving greater resilience could involve 'non-native species' and future natural conditions. I was also missing a reference to 'species mixtures', and this could be inserted in the penultimate paragraph of the guidance.
- XI. P26. Section 2.10. In line with recommendations above, the references to LISS should be removed, and replaced by CCF – the text suggests that this section applies particularly to planted conifer forests so a reference to coppice systems is not needed here.
- XII. P26. Section 2.10. Guidance. Site access and infrastructure is one factor missing from the list of factors to be considered when choosing a silvicultural system. I also think that the phrase 'silvicultural characteristics of the species' would better read 'ecological characteristics [...]'.
XIII. Pp 28 and 29. Section 2.12 –Protection. It seemed strange to have one specific section on 'Deer' immediately followed by a much more general one covering a range of biotic and abiotic disturbances. I wondered if the various factors should be separated out a bit more e.g. protection against squirrels, mention of wind risk forecasting tools. Perhaps there could be one section on pests and another on climatic factors? The link with section 3.4.2 on 'pest management' also could be made clearer?
- XIV. P44. I was surprised by the suggestion that no fertilisers should be applied round 'veteran trees'. I could envisage careful applications being a means of restoring tree vitality and wondered if this was based on good evidence?
- XV. General. I may have missed it, but I was unable to find reference to 'soil carbon' other than in relation to whole tree harvesting. There is also no reference to cultivation. I would have thought that Section 3 should include a mention of the need to avoid long-term disruption to soil carbon by limiting the use of intensive cultivation.

4. Does the supporting Appendix of References need updating?

- a. I imagine that the list of documents must be updated to refer to current legislation setting up devolved organisations such as Forestry and Land Scotland.
- b. It is striking that nearly all supporting documents refer to official organisation publications (e.g. FC Bulletins, practice guides etc.). I wonder whether this accurately reflects contemporary reality where increasingly journal articles are available with Open Access to download online. Another problem is that some of the material is quite dated e.g. forest fertilisation bulletin dating from 1991. I wonder whether there ought to be a decision to strictly limit supporting references to material published in the last 20 years?
- c. There are a number of Operational Guidance Booklets (OGBs) and similar documents that have been published by the FC/FR in the last 15 years or so – see for example Gary Kerr and Jens Haufe’s booklet on underplanting – see https://www.forestresearch.gov.uk/documents/1512/UnderplantingGuideVersion10_11October2016.pdf. These should feature in a revised list of supporting documents.
- d. Personal bias, but it is disappointing to see the FC publication on ‘Managing Native Broadleaved Woodland’ referenced, but not its sister publication on ‘Managing the Pinewoods of Scotland’?
- e. A horrible suggestion in terms of workload, but I wonder if every cited reference should have a web address linked to it to ensure quick cross referencing. Readers are (mostly) going to read this Appendix on screen and having the links will make accessing the relevant documents much easier?

Forestry Commission (David Jam, Deer Advisor – Natural Environment, Forest Services, Ludlow)

1. Do you think the UKWAS 4 standard needs updating and revision?

- Based on national levels of risk and recorded impacts such as the National Forest Inventory, <https://www.forestresearch.gov.uk/tools-and-resources/national-forest-inventory/what-our-woodlands-and-tree-cover-outside-woodlands-are-like-today-8211-nfi-inventory-reports-and-woodland-map-reports/nfi-woodland-ecological-condition/> there is a need for the deer management requirements within the standard to be revised and reinforced.
- Having been involved in audits within Forest Enterprise and private sector it is clear that deer management is often overlooked and no provision made to develop clear objectives for planning for control or mitigation of deer impacts and the reinforcement for this need within the standard would provide an additional driver for owners/managers to do so.

2. Do you think the structure and organisation of the standard need to be changed?

- No

3. Do you think the content of the standard needs updating e.g. to include new issues, to elaborate or revise existing requirements, or to remove existing requirements?

- The requirement for deer management and deer management planning is often overlooked and the risks underestimated and there needs to be a greater emphasis on the role of woodland owners and managers to ensure effective mitigation of deer impacts is considered, planned and outputs such as survey results, cull effort and number of deer culled are recorded and included as part of ongoing management planning much the same as conventional silvicultural management.
- Lack of clearly stated deer management objectives and effective control strategies across much of the woodland/forestry sector with too much reliance placed on recreation deer stalking which can often have conflicting objectives of maintaining a harvestable surplus of deer for “sporting purposes” or reliance upon gamekeepers to undertake deer management/population regulation during winter months when they are unable to do so by the game shooting season.

4. Do you think the supporting Appendix of References needs updating and why?

- Yes, potentially some more supporting evidence of the scale of impacts in the UK and also some more decision support tools and links to useful data.

Forest Industry Safety Accord (FISA) (Gillian Clark)

FISA appreciate that the purpose of UKWAS is to set a standard for woodland management that can be met in myriad ways. With broad objectives to ensure they can be met through a wide range of management approaches, and the references are similarly broad to ensure a coverage of appropriate guidance for whatever approach is used. The focus being on 'intelligent management' responding to the forest delivery on the ground.

UKWAS already requests compliance with legal standards and should also meet the FISA guidance in this tone, specifying safe working.

UKWAS could encourage greater adherence to Safety with the following:

- 5.2 could include contractors within a complaints procedure perhaps, not just employees.
- A new section 5.6.2 under worker's rights to include contractors and bring in the Safety before Price principles – contractor payment, itemised costs, equitable tendering, incorporating change, renegotiations, etc. It could be a minefield initially, but it would help keep the principles broad and all certified bodies could then find their own way of meeting them. UKWAS would then be the means for these principles to be audited too. It wouldn't reach the full audience of course but it would help establish the principles in the main player's approaches which is where the initial change may be needed most.
- 5.4 H&S:
 1. Recommend a link in the advice to owners/ managers section and in the Appendix of References to the FISA website to ensure up to date documentation can be followed
 2. There is a requirement to follow FISA Guidance and the Guides in the Annexes/Key Publications are listed, but the lists are out of date and need updating – can this be done by a link better?
 3. In the 'Example Verifiers' it would be helpful if they make reference to 'Welfare provision is made available', please see FISA 806 Welfare – show as a link to the website
Suggest in the 'Example Verifiers' for 5.4.1, Bullet 2 could read – "Discussion with workers demonstrates that they are aware of relevant requirements, and have access to appropriate FISA guidance, codes of practice and welfare provisions"
 4. Example Verifiers....Under 'Contracts ref H&S requirements we add 'for example FISA GMHSF 2019'
Suggest in the 'Example Verifiers' for 5.4.1, Bullet 3 could read – "Contract documents specifying health and safety requirements for example, by reference to FISA GMHSF 2019 and other guidance.

Graham Gill OBE (Chair, UKWAS Interpretation Panel)

Appendix of References:

I guess there will be a lot of references to update with the state sector name changes, and no more forestry.gov.uk.

Following on from ICF's member hour with Rob Gazzard, you may wish to include a reference to Forestry Commission Practice Guide 022 (2014) "Building wildfire resilience into forest management planning".

Historic Environment Scotland (Dr James Bruhn, Deputy Head of Casework, Heritage Directorate)

As the lead public body responsible for investigating, caring for and promoting Scotland's historic environment, we are regularly consulted by auditors working on behalf of certification bodies, such as SGS Qualifor and the Soil Association, seeking to ensure that owners/managers of certified forests are operating in compliance with the UK Woodland Assurance Standard. In this context Historic Environment Scotland's remit is to comment on forest management in

relation to the site and/or setting of nationally important designated historic features, such as Scheduled Monuments, A Listed Buildings and Sites on the Inventories of Gardens and Designed Landscapes and Historic Battlefields.

We are therefore supportive of the continued inclusion of cultural heritage in the UKWAS document and, if a revised version of the standard is to be drawn up, would be keen to see aspects of cultural heritage site management further highlighted. In this regard, appended below are our recommendations for some minor changes to the text of UKWAS 4.

If the initial review process leads to a full revision of the standard, we would be happy to participate in further consultation opportunities and request that we be included in the stakeholder forum. Our contact details for this would be: james.bruhn@hes.scot

We hope this response is helpful and, should the UKWAS review progress further, we look forward to hearing from you.

Suggested changes to UKWAS version 4:

Section **2.2.1e** is particularly valuable for our interests and we recommend that a historic environment site management plan is added to the list of documents cited in the last section of the guidance.

At **2.2.3** we recommend that management planning documentation should be reviewed timeously following results of monitoring and stakeholder engagement. We have in mind windblow and the control of woody vegetation on historic environment sites and suggest that this flagged as an example in the guidance.

At **2.5.3** we recommend that the guidance includes evaluation of potential for impact of windthrow on designated/sensitive areas.

At **2.8.1a** we recommend inclusion in the requirements of species selection for the conservation and enhancement of designed landscapes.

At **2.10.1** we recommend that choice of silvicultural system should also take into account the sensitivities of the historic environment and that impact on historic environment sites is added to the guidance.

At **3.1.2** we recommend the inclusion of consultation with relevant national agencies/local authority archaeology services where woodland operations are in the vicinity of historic environment features.

At **3.5.2** we recommend that the guidance is expanded to include prior consultation with relevant national agencies/local authority archaeology services where historic environment features may be affected. Statutory consent may be required on designated sites.

At **4.1** we recommend that consideration is given to re-titling the section 'Statutory nature conservation sites and protected species', since it does not cover all statutory designations, such as scheduled monuments.

At **4.8** we suggest the following changes/additions (shown in red):

4.8 Protection of cultural and historic environment

4.8.1 REQUIREMENT

Through engagement with the relevant national statutory historic environment agencies, **local authority archaeology services**, local people and other interested parties, and using other relevant sources of information, the owner/manager shall:

- Identify sites and features of special cultural, historical **and archaeological** significance **and mark their locations and extents on maps**
- Assess their condition
- **Identify potential threats, such as regeneration and windthrow**, and
- Adopting a precautionary approach, devise and implement targeted measures to **protect, maintain** and/or enhance them.
- **There shall be ongoing communication and/or consultation with statutory bodies, local authority archaeology services, and other relevant organisations.**
- **Apply for statutory consent for management work on scheduled monuments where required.**

EXAMPLE VERIFIERS

- Any known features mapped and documented
- Discussion with the owner/manager demonstrates rationale for management of relevant sites
- Records of consultation with statutory bodies, local authorities and interest groups to identify features and record and monitor their condition
- Condition reports from statutory agencies, where applicable.
- Documented woodland/forest management plans with cultural and historic environment features/sites mapped.
- For all potentially damaging operations, awareness demonstrated of how areas shall be protected/safeguarded.
- Workers are aware of such sites and of plans for their management

GUIDANCE

Examples of relevant sources of information include:

- Maps
- Databases
- Relevant websites
- Field observations, by owners/managers and relevant historic environment agencies / services.

Typical examples include:

- Prominent viewing points
- Landscape features
- Veteran and other notable trees
- Historical features and archaeological sites
- Woodlands which feature in literature or which are of artistic significance
- Historic and designed landscapes and woodlands which are still managed under traditional systems

Where relevant, a professional archaeological walkover survey may be required to inform decisions and provide baseline evidence.

Sites of potential historical/archaeological importance discovered during the course of forest management should be reported to the relevant statutory historic environment agencies and local authority archaeology services.

Statutory consent from the relevant national archaeological agencies is routinely required for woodland/forest management work undertaken on legally protected scheduled monuments. Consultation with the relevant statutory agency should be undertaken in advance of works such as planting, felling, drainage and fencing affecting scheduled monuments.

See also section 2.3.1 in relation to consultation.

At 5.1.2 we recommend expanding the first paragraph of the guidance to highlight that the maintenance of access for the required monitoring and management of historic environment features will provide opportunities for public access, education and recreation.

In the **References** we recommend the inclusion of *Forestry and Land Management (Scotland) Act 2018* in the list of Key Legislation.

Llais y Goedwig (Maria Wilding, Programme Manager)

The comments below are based solely on experience in Wales and represent the views of Llais y Goedwig (Wales community Woodland Network) members, staff and board of directors. Unsurprisingly they centre around communities and people managing and accessing woodland and their inclusion in the forestry sector as a whole. I have not gone into detail on individual elements that might be changed, as I expect that to be part of the role I have signed up to as a member of the UKWAS review working group.

1. Do you think the UKWAS 4 standard needs updating and revision?

Community and small woodland management is a growing trend in Wales, with an attendant growing interest in certification as the groups and individuals are interested in:

- Utilising a broad range of their woodlands resources to make an income NTFPs as well as timber– selling into local and niche markets and developing new supply chains
- Ensuring quality management receives recognition – especially important in convincing land owners in the public sector that community or socially oriented management is a valid route for high quality, multi-purpose woodland management.

UKWAS four is comprehensive and detailed set of criteria that does allow for flexibility in dealing with different types and levels of ownership, but it is still off-putting for the smaller woodland manager or group who with aims that might not fall into categories well recognised or understood by the traditional timber industry.

A simplified standard for small and/or low intensity managed woodlands would go a long way to recognising these changes and opening up the possibilities and relevance of certification to a wider audience.

2. Do you think the structure and organisation of the standard need to be changed?

See comments above as pertains to a simplified standard for woodlands that fall into appropriate criteria regarding size and management systems.

3. Do you think the content of the standard needs updating e.g. to include new issues, to elaborate or revise existing requirements, or to remove existing requirements?

Yes, possibly. The main standard could benefit from a broader community and people focus although this would be something that wouldn't be relevant to all owners in much the same way as some of the existing criteria aren't that relevant to social or community managers of woodland.

4. Do you think the supporting Appendix of References needs updating and why?

Yes, in as much as it needs to refer to the latest information and contain references to any new material or guidance that is included in the revision

The Mersey Forest (Paul Nolan, Director)

1. Do you think the UKWAS 4 standard needs updating and revision?

I think that UKWAS 4 is a sound document overall, that requires some updating and revision to recognise new approaches and legislation that may impact on woodland management.

2. Do you think the structure and organisation of the standard need to be changed?

No, I think that the document is well laid out and well structured.

3. Do you think the content of the standard needs updating e.g. to include new issues, to elaborate or revise existing requirements, or to remove existing requirements?

There are a few comments on the content.

- In general, it may be useful to make a link to Land Management Plans and their role in future regulation of trees, woodland and forests. UKWAS should ask for evidence of compliance with LMPs when they are initiated.
- I may be wrong, but it feels (locally) that there has been a reduction in the area of smaller woodlands being certificated. This is unfortunate and UKWAS should recognise the importance that these woodlands play in delivery a wide range of public services and attempt to find a way to re-engage with these owners, including Local Authorities as part of a action on the Climate Emergency.
- Is there a need to have a specific section on sanitary felling? It would be good to think that we had hit a peak in number of tree diseases, but that may not be the case. Large scale sanitary felling and management of restock, future silviculture etc, are important.

- A final general comment is that that the standard should make reference to the increasing availability of remote sensing and include that as a potential verifier for some elements of certification.
- 2.3.1 - no change - but good to see consultation is appropriate to size.
- 2.9.1 - Some work to do here to encourage appropriate non-natives for resilience? Use of ESC?
- 4.7 - include specific mention of Natural Flood Management and emerging guidance.
- 5.2.1/5.4.1 - specific mention of CDM regulations appropriate for forestry operations.
- 5.3 - there is also an urban economy context for many woodlands. Does there have to be a specific rural focus here or can "economy" in general be the focus of this section?

4. Do you think the supporting Appendix of References needs updating and why?

Yes, in line with accepted comments and to reflect new science and publications.

RSPB

Introduction

The RSPB considers this is an opportune time to take stock of UKWAS, allowing new information, developing experience, and new and anticipated policy developments to be factored in, allowing a refresh and an update to occur.

With both a biodiversity/nature and a climate emergency facing the world, and the UK, it is essential that land use, including forestry, optimise their contribution to solving these twin challenges. If done well, a win-win can occur. If done badly nature, species and even the climate could suffer. If done well multi-purpose benefits can accrue.

We consider it is important that stakeholders consider the duties across the devolved nations to ‘further the conservation of biodiversity’ that are a requirement on the statutory players. Furthermore with the Scottish Government committed to keep pace with EU Environmental legislation, the adoption of the new [EU Biodiversity Strategy 2030](#) by the Commission, sets new challenges.

The [25 Year Environment Plan](#) in England is also relevant and the duties placed upon Ministers will also impact on land use plans moving forward.

The strength of biodiversity monitoring across the UK has been much enhanced by the [State of Nature](#) reports so we know more about the pressures driving biodiversity loss, which include forestry and forest management. Lastly the delayed CBD summit is likely to [refresh the 'Aichi' targets](#) with consequential commitments that will require consideration by FSC, Government agencies and UKWAS.

We consider it essential to harness the collective power of the UKWAS partnership to resolve and provide leadership to prevent disputes and disagreements over new afforestation proposals as forests expand-which should not be at the expense of priority species, habitats or sites for nature/biodiversity. The RSPB has reviewed many of the issues covered by the UKWAS standard here in its report: ['Woodlands for Climate and Nature'](#).

The following areas should be considered and developed, and the RSPB stands ready to assist:

1. Carbon related issues

Releases of carbon exacerbate the climate crisis, even if over time they are mitigated by the net capture of, and storage of carbon in forest soils, forests and forest ecosystems. Accordingly, the establishment and management of forests and plantations should use techniques that minimise carbon loss to the atmosphere or water courses, and optimise carbon sequestration through efficient management and wherever possible by producing durable, long life timber products. Avoiding the loss of carbon from soils in the short to medium term is essential if the binding climate targets are to be met, as moving to a positive carbon balance during the second rotation, will challenge the timetabled reductions required <https://www.climatechange.org.uk/media/3137/afforestation-and-restocking-on-peaty-soils.pdf>

[Additional references: Tree planting in organic soils does not result in net carbon sequestration on decadal timescales <https://onlinelibrary.wiley.com/doi/full/10.1111/gcb.15229> Not seeing the carbon for the trees? Why area-based

targets for establishing new woodlands can limit or underplay their climate change mitigation benefits
<https://www.hutton.ac.uk/news/not-seeing-carbon-trees-mapping-net-change-carbon-forestation-scotland>

Below we list some areas to be considered:

- i) Ensure that soil carbon is protected over the long term, by retaining appropriate levels of brash and other by products on site, and minimising soil disruption. However avoid brash accumulating on or near to peatland areas, or wetlands
- ii) Minimise soil disturbance eg through ploughing, cutting drains, during establishment or harvesting operations
- iii) Avoid removing stumps, or standing dead timber unless absolutely essential for tree health reasons
- iv) Avoid planting and ground works, or roads cut through peat pockets, wetland areas or wet organic soils and flushes
- v) When undertaking restocks and second rotations look for opportunities to restore deeper peatland, especially where neighbouring areas are now SSSI/Ramsar etc and are relatively intact. A positive example is Flanders Moss. [Scottish Forestry policy](#) on restocking of deep peat on designated sites should be followed. A current disputed area on a SAC /SSSI site in the south Scotland¹ is an example of proposed restocking which appears inconsistent with policy and best practice.
- vi) Adopt a continuous improvement model to learn from best practise in other temperate zones eg. Finland.
- vii) Perhaps beyond immediate scope is the need to reduce demand for forest products, and recycle material recovered from business processes wherever possible as part of a circular economy drive.

Overall a move to produce more valuable higher grade forest products that are used in long life situations, e.g. in buildings/construction, will be more beneficial as carbon is locked away for significant periods. The industry should concentrate more on this, and less on pallet wood or other more ephemeral uses, taking a whole life cycle approach to carbon (and nature) when considering forest establishment and management.

2. Management of existing forests for biodiversity/nature.

The opportunity should be taken under the standard to exceed the statutory requirements, and ensure UKWAS certification adds value for nature and biodiversity. Good examples exist of course but the focus should increasingly be on addressing the needs of declining priority species, and those of EU significance (under the Nature Directives). In some cases, specialist knowledge or partnerships with local experts or NGO's may benefit forest companies and or owners.

The opportunities include:

- i) Selection felling during the forests life to introduce a more diverse age structure
- ii) Safeguarding dead, including standing dead timber
- iii) Providing more open space, especially around wet features, herb rich flushes, streams, rocky outcrops etc.
- iv) Feathering the edges of plantations especially conifer/pine in upland situations, to favour hunting raptors, woodland grouse and some passerine species e.g. tree pipit and whinchat

¹ Site in southern Scotland where restocking is being proposed on a SAC/ SSSI. The SAC is designated for blanket bog and has a management plan which highlights the need for peatland restoration. Restocking is proposed on areas of peat (over 0.5m), which would conflict with the management objectives of the SAC/SSSI. It would also potentially impact the adjacent SPA (designated for breeding birds) through re-seeding and also increase in predation due to edge effect (discussed further below). Negotiations to limit impacts through this plan is ongoing.

- v) Keeping some trees beyond normal felling cycles, allowing more light into the forest establishing a shrub layer
- vi) Introduce native shrubs and trees into thinned areas (often by natural regeneration), create wider rides, and more open space
- vii) Major interventions e.g. clear-fells should avoid the peak of the bird nesting season April-end July.
- viii) Consider restoring sites once harvested (especially those established on ASNW sites) to native woodland. Indeed we would not support non-native planting as restocks on former ASNW sites.
- ix) Pockets of deep peat, or wetlands should be given as much space around them as possible-a minimum of 30M, and this should be maintained during the cycle of forest establishment and subsequent management (native shrub layer e.g. willow is usually OK - self-sown forest trees e.g. spruce to be avoided).

3. New afforestation proposals on open ground

New afforestation can, if done insensitively, have an adverse impact on some priority protected species and EU habitats. The impacts include the direct loss on the site in question, fragmentation so large open areas become subdivided by plantations, and edge effects where the negative impact of the forestry extends well beyond the site planted-as has happened on some peatland areas, for example. See the following research papers on these topics: [Upland land use predicts population decline in a globally near-threatened wader](#) [Modelling edge effects of mature forest plantations on peatland waders informs landscape-scale conservation](#) [Do moorland breeding waders avoid plantation edges?](#)

Hydrological effects on wetlands and peatlands can also occur.

- i) A particularly at risk group of species found on open, particularly upland sites are ground nesting wading birds e.g. Curlew, lapwing, redshank, dunlin, snipe and golden plover. The UK is of international significance for these species, for example some 25% of the [global Eurasian curlew](#) population breeds in GB, but many are declining rapidly², and afforestation is one of the key drivers of this. These species require extensive, often seasonally grazed semi-natural grassland, and wet areas including peatland. In Scotland in particular many of the best areas for waders are not notified as SSSI, or other protected areas, and so screening may fail to recognise they are an issue. UKWAS must reference this matter urgently. The curlew is a [Biodiversity Route Map](#) priority species for the Scottish Government. A number of current cases are of concern to the RSPB³.
- ii) Birds of prey found in large areas of open ground can also be impacted by inappropriate afforestation, for example golden eagles, hen harriers and short-eared owls. A joint guidance note by the then FCS, SNH and RSPB provides advice on how to avoid or mitigate this problem, and we would recommend a similar approach in Scotland for waders would be a valuable way of better informing this issue. That said there have been recent cases of new afforestation which are likely to damage golden eagle interests. Scammadale⁴ in Argyll and Bute is one example. Two woodland creation schemes have also recently been brought forward in a hen harrier SPA in north Scotland⁵
- iii) Black grouse is a species which is in sharp decline in southern Scotland with less than 150 males recorded in 2018. Afforestation can have a direct impact to populations through loss of lekking and nesting habitat

² [https://www.bto.org/our-science/projects/bbs/latest-results/maps-population-density-and-trends_\(type_curlew_into_the_search_bar_or_other_wader_species\)](https://www.bto.org/our-science/projects/bbs/latest-results/maps-population-density-and-trends_(type_curlew_into_the_search_bar_or_other_wader_species))

³ RSPB are currently engaged in a number of large afforestation proposals where high densities of curlew are potentially impacted. An example of a previously consented afforestation scheme impacting on curlew is Pitreadie, Aberdeenshire where at least 5 pairs of breeding curlew were predicted to be lost from the site.

⁴ Scammadale woodland creation scheme in Kilninver, Argyll and Bute as now been consented. The scheme resulted in substantial new areas of sitka spruce planting within a core golden eagle territory. The territory was already highly constrained due to existing forestry and neighbouring eagle territories in the surrounding area.

⁵ Two afforestation proposals have recently been brought forward in the Strath Carnaig and Strath Fleet Moors SPA designated for hen harriers. One proposal has recently been consented and although some revisions were made to the scheme to avoid hen harrier nest sites, the management proposals designed to prevent the loss of further open group are only for the 25 year period of the grant, and not over the long term.

and additional pressure is caused through fragmentation of populations and increased pressure from predators. Cumulative pressures from new forestry and other developments is already an issue across is range in southern Scotland and therefore, we require a more strategic approach to targeting new woodland/forestry. Scottish Forestry in liaison with Scottish Borders Council is piloting a project to try and address this issue. Benefits of new woodland can be achieved through both sympathetic management of existing and new forestry through the provision of small-leaved native broadleaf species in particular. The UKWAS standard needs to be strengthened to ensure that duties under the CBD are not forgotten, and afforestation does not fragment priority habitats, or cause problems for rapidly declining species. The UK Government has obligations under the CBD (and in the Country biodiversity strategies) to restore habitats, and thus there is a need to better consider the impacts of land use change at a site and regional level to achieve this.

- iv) We would recommend that the UKWAS advice is specifically strengthened by the mention of at risk groups like breeding wading birds, and the need to consider habitat fragmentation at a district or regional scale-where incremental afforestation may be tipping the balance against biodiversity interests, where important biodiversity/nature interests are found. See for example, RSPB's [guidance on curlew](#).

4. Peatland soils and afforestation

The Harmonized World Soils Database (HWSD) provides detailed information on the soil organic carbon in the topsoil (0-30cm), and subsoil (30-100cm). The planting of forests in peat depths of greater than 50cm is no longer permitted in Britain, but some current restock proposals on peat greater than 50cm depth are still occurring (and in some cases, on natura sites designated for peatland habitats as highlighted by south west Scotland example in Section 2 above). There is growing interest in protecting carbon in soils, particularly wet soils, due to the releases that can occur to the atmosphere. These losses may take many years to mitigate. [Restoring peat and organic rich wet soils would enable 6-7 million tonnes of extra sequestration](#) to occur and would in addition avoid significant annual emissions from degrading bogs.

Such areas tend to also support semi-natural vegetation and thus are often of high nature conservation and biodiversity value; this is where wading birds are often found. We advise that great care should be taken to evaluate this prior to afforestation being approved, in order to avoid driving carbon emissions, and overlooking the benefits of restoration of the peatland, and enhancing biodiversity. More detailed advice should be provided to potential applicants to better quantify the risks and prevent schemes that will damage climate and biodiversity interests.

5. Improving new plantation forests for biodiversity/nature

It goes without saying that the most important step is to avoid damaging existing biodiversity assets found on a site, or adjacent to the site. Protecting these is of paramount importance, and often any 'replacement' is either impossible, or takes decades to become of value-see earlier text.

That said the existing standard offers opportunities for forests to contribute towards amenity and biodiversity, especially if semi-natural habitats and important features are retained onsite, and links to nearby open ground, or native woodland refugia are kept. There is [scope to further enhance such opportunities](#) by using the 'space' within the plantation site as effectively as possible by prioritising key species, such as Black Grouse, most in need of help.

The following can be considered:

- i) Consider the tree species mix, and include a range of native species typical to the region-link such planting to offer corridors across the site to neighbouring native woodlands
- ii) Planting density-allow areas of lower density to be planted, thus allowing more light to support establishing a field layer that is important for invertebrates and some birds
- iii) Protect wet flushes, areas that are floristically rich, and other areas of existing interest such as crags steep banks, remnant native trees, dead wood etc
- iv) Encourage a shrub layer, eg vaccinium, juniper or other locally typical species wherever possible, and establish sheltered glades, uneven edges to planting lines, wide rides, protect any water features by allowing at least a 25m margin of unplanted land etc
- v) Consider the impact of windblown self-seeding (of say) sitka spruce onto neighbouring peatlands, dune systems or other open ground habitats, and seek to avoid wherever possible, especially if that open ground is SSSI/SPA/SAC.
- vi) If fencing to exclude deer is to be used, mark the fences where woodland grouse may be present

- vii) Avoid ploughing, and drainage ditches if at all possible, and plan any tracks with care to avoid soil disturbance and the loss of habitat features
- viii) Take advice from local NGO's, experts and consult datasets like the NBN to explore the opportunities and ensure survey work is undertaken to a high standard by experienced field staff.

RTS Forestry (Simon Hart, Business Development Manager)

We run a Group certification scheme with some 40 members and 18,000ha.

We do not think the UKWAS standard is in need of revision. The existing standard is robust and fit for purpose. Constant revision makes life difficult for forest managers and auditors who need to keep adapting to often relatively minor changes.

Guidance does change, but there is no need to change the Standard as adherence to latest guidance is mandated in the Standard.

NatureScot & SEPA (Joint response - Ross Johnston NatureScot (biodiversity) and John Gorman SEPA (environmental protection))

This joint response also incorporates feedback received from the statutory nature conservation agencies from the rest of the UK, plus the Scottish Environment Protection Agency.

Using the helpful structure from UKWAS, we have the following answers and comments:

1. Do you think the UKWAS 4 standard needs updating and revision?

Yes.

In summary, the standard needs revision because the context for forestry has changed markedly due to:

- a) escalating understanding and concern over climate change and biodiversity loss, and
- b) increasing focus on payments for environmental services (PES) - this review is an opportunity for UKWAS to position itself better as an accreditation mechanism for future support for environmental excellence.

2. Do you think the structure and organisation of the standard need to be changed?

Yes.

a) Standard setting. Given the diversity of woodlands in the UK the standard has a necessary balance of clear mandatory obligations and more generic and loosely defined requirements e.g. the expectation that certain issues will 'inform management' of woodlands. We believe that this balance does need to be reviewed to achieve a greater proportion of measurable unambiguous requirements - in order to provide greater confidence that the standard does deliver the expected sustainable management

b) Hierarchy of issues. The standard reflects the different elements of sustainable forest management including economic, environmental and social factors. However, we consider that the standard should give a greater proportional emphasis to environmental factors given the increasing requirements for woodlands to address climate change and issues such as natural capital and carbon accounting, soils, water, peat and biodiversity.

3. Do you think the content of the standard needs updating e.g. to include new issues, to elaborate or revise existing requirements, or to remove existing requirements?

Yes.

Within the wider concerns around climate change and biodiversity declines we believe the Standard needs to modify or develop requirements in the following areas:

1. Grazing - in our view, sustainable woodland management requires a commitment to grazing control to provide permanently low levels of grazing impacts. Such impacts should be set to allow tree and shrub regeneration and the development of woodland ground flora. The importance of this issue should not be relegated to the current 'Potential adverse impacts may include: Browsing by rabbits, deer and other animals'

and needs to be developed into a major theme within the Standard. The directly related issue of natural regeneration similarly needs to be given a higher profile especially in relation to biosecurity, soil disturbance, resilience and biodiversity.

2. Soils - our knowledge of the function of soils as a reservoir of carbon, and our concern at the implications of damage to this reservoir have substantially advanced in recent years, and the Standard needs to be amended to clarify appropriate soil management. This needs to cover issues like planting and ground preparation on organic and semi-organic soils, restoration of forest to peatland.

3. Water - further development of the standard is needed around water issues. This includes reducing the risk of offsite flooding, the provision of riparian woodland and protection of public and private drinking water supplies, water scarcity, GWDTE's, oil storage and waste arisings.

4. Biosecurity - the recent rise in tree health concerns as well as long-standing invasive species issues need to be strengthened, especially in terms of forest level risk reduction, surveillance/reporting, and management to reduce invasive species. The choice of planting stock as potential biosecurity risks needs to be clarified.

5. Carbon emissions - further development of the standard is needed around overall and avoidable carbon emissions as part of a wider response to the climate emergency. This might include developing the standards for the building and use of forest roads and fences and the use of less invasive ground preparation techniques.

6. Resilience - the long-term influence of key forest management decisions within a rapidly changing environment (especially in terms of climate and tree health) requires a re-evaluation of sustainable forest management to take account of those changes and their accompanying uncertainty. This includes new resilience approaches - for example, diversity in species and silviculture - to reduce the risk of large scale damage.

7. Plastic - concerns about large-scale plastic pollution suggest that the use of plastic in forest management needs to be addressed, in particular the use of treeshelters and treeguards that are left to 'break down in the environment'.

8. Area for conservation - the current standard requires 'a minimum of 15% of the WMU where management for conservation and enhancement of biodiversity is the primary objective'. We consider that this needs to be raised to 30% in line with the EU 2030 Biodiversity strategy and the evidence supporting it. We also believe that this can be achieved by better integration with production objectives, especially taken as a whole with our other suggestions around grazing management and wider species diversity.

9. Deadwood - the current coverage in the standard of the management of deadwood in woodlands may need to be enhanced in light of its critical importance for woodland biodiversity

4. Do you think the supporting Appendix of References needs updating and why?

Yes.

This appendix needs to reflect the new UK policy contexts for land use and climate change and biodiversity.

Soil Association (Clive Thomas)

The Soil Association supports the proposed UKWAS review and we welcome our involvement with the UKWAS review working group.

We have these initial comments and suggestions for the working group to consider.

In section A, we propose issues that we believe are relevant to responsible forest management in the UK, but which do not yet have clear UKWAS requirements and we would welcome some consideration by the working group.

In Section B, we identify a number of current UKWAS requirements that are most relevant to our priorities, with some possibilities for change/improvement listed and highlighted.

Section A

Issues that the Soil Association considers are relevant to responsible forest management in the UK, but which do not yet have clear UKWAS requirements. The UKWAS review working group is encouraged to engage and discuss these issues.

1. **Long-term carbon storage in the forest ecosystem – biomass and soil** – currently there is no requirement to consider the forest carbon stock. Should this be put alongside sustainable yield, with a requirement that forest management demonstrates long-term increases in forest carbon stock in long-term native species retentions and soil?
2. **Long-term land use and soil fragility considerations** – currently there is little requirement for long-term planning to change forest composition so that the risk to fragile soils, especially peaty soil complexes, is removed by cessation of high-impact forestry on these sites.
3. **Long-term abundance and diversity of nature across the whole forest ecosystem** – linked to the suggestion for requirement 2.11.1 in Section B, currently there is no requirement to ensure that biodiversity is enhanced across the whole forest ecosystem. We believe biodiversity should be an objective for the whole forest ecosystem.
4. **Use of plastic** – although there is a requirement for waste disposal (**REQUIREMENT 3.6.1** - *Waste disposal shall be in accordance with current waste management legislation and regulations*), there is currently no requirement to minimise the use of plastic or consider alternatives in routine forest management.
5. **Scale of silvicultural management/clearfelling** – there is currently no requirement to limit either size of individual clearfell or proportion of the WMU managed through a clearfell system. We believe this needs further consideration by the working group, in respect of a lay understanding of responsible forest management.

Section B – current UKWAS requirements that the Soil Association believes need working group discussion.

UKWAS SECTION 2 - MANAGEMENT PLANNING

REQUIREMENT

UKWAS 2.4.1

FSC 5.2.1

The owner/manager shall plan and implement measures to maintain and/or enhance long-term soil and hydrological functions.

This requirement could be strengthened to specifically cite soil carbon storage and the hydrology of peaty soils?

REQUIREMENT

UKWAS 2.7.1

FSC 6.8.2

Even-aged woodlands shall **be gradually** restructured to achieve an appropriately diverse mosaic of species, sizes, ages, spatial scales, and regeneration cycles. This structural diversity shall be maintained or enhanced.

Replacement of 'gradually' with 'systematically' or 'through a timebound plan' or similar would be a welcome improvement.

REQUIREMENT

UKWAS 2.8.1

FSC 10.1.1

FSC 10.2.1

FSC 10.2.2

a) The range of species selected for new woodlands, and natural or artificial regeneration of existing woodlands shall be suited to the site and shall take into consideration:

- Improvement of long-term forest resilience

- Management objectives
- Requirements for conservation and enhancement of biodiversity (see section 4)
- Requirements for enhancement and restoration of habitats (see section 4)
- Landscape character.

b) Regeneration (natural or planted) shall restore stand composition in a timely manner to pre-harvesting or more natural conditions.

c) Native species shall be preferred to non-native. If non-native species are used it shall be shown that they will clearly out-perform native species in meeting the owner's objectives or in achieving long-term forest resilience.

REQUIREMENT

UKWAS 2.10.1

FSC 10.5.1

FSC 10.5.2

a) Appropriate silvicultural systems shall be adopted which are suited to species, sites, wind risk, tree health risks and management objectives and which stipulate soundly-based planting, establishment, thinning, felling and regeneration plans.

b) Where species, sites, wind risk, tree health risk and management objectives allow, a range of silvicultural approaches, and in particular lower-impact silvicultural systems, shall be adopted with the aim of diversifying ages, species and stand structures.

A requirement that means that only species and sites that can be silviculturally thinned or managed as lower impact systems are permitted would be more compatible with a lay understanding of responsible forest management? Would mean that high elevation sites, on fragile wet soils are not planted with species in future rotations where the management objectives mean that high-impact forest operations (clearfelling) will be required.

REQUIREMENT

UKWAS 2.11.1

FSC 6.5.1

a) Management planning shall identify a minimum of 15% of the WMU where management for conservation and enhancement of biodiversity is the primary objective.

As well as the 15% requirement, we should be aiming for biodiversity to be a (not the) primary objective, alongside other primary objectives, for the whole WMU

UKWAS SECTION 3 – WOODLAND OPERATIONS

REQUIREMENT

UKWAS 3.1.2

FSC 6.7.1

The planning of woodland operations shall include:

- Obtaining any relevant permission and giving any formal notification required
- Assessing and taking into account on and off-site impacts
- Taking measures to protect water resources and soils, and prevent disturbance of and damage to priority species, habitats, eco-systems and landscape values, including adapting standard prescriptions where required. Any disturbance or damage which does occur shall be mitigated and/or repaired, and steps shall be taken to avoid recurrence
- Measures to maintain and, where appropriate, enhance the value of identified services and resources such as watersheds and fisheries.

Linked to thoughts under 2.10.1. Aim for a long-term planning requirement linked to this implementation requirement that means progressively measures will not be required to protect soil, water and biodiversity, as intensive high-impact forestry will no longer be practiced where these risks are apparent

REQUIREMENT

UKWAS 3.2.1

FSC 10.11.2

b) Timber harvesting shall particularly seek to avoid:

- Damage to soil and water courses during felling, extraction and burning

SECTION 4 – NATURAL, HISTORICAL & CULTURAL ENVIRONMENT

REQUIREMENT

UKWAS 4.6.2

FSC 6.6.1

FSC 6.6.2

Long-term retentions and/or areas managed under lower-impact silvicultural systems

(LISS) shall constitute a minimum of 1% of the WMU. Where this is impracticable,

an additional minimum 1% of natural reserve shall be identified.

Remove the 'impracticable' caveat and require that long-term retentions or LISS are practicable e.g. native species. Also consider increasing the 1% area requirement.

Scottish Woodlands (Stuart Wilkie Certification & Environment Manager)

See **Appendix 4** for detailed comments.

Scottish Wildlife Trust Stirling and Clackmannanshire Local Group (Liz Albert on behalf of the Planning Volunteers Team)

UKWAS Consultation Response

1. Do you think the UKWAS 4 standard needs updating and revision?

Yes, see suggestions on revisions below.

2. Do you think the structure and organisation of the standard needs to be changed?

The standard is generally well set out, but it could benefit from additional detail and annexes or supporting documents to give more detailed guidance on certain areas, e.g. wildlife legislation and deadwood management. Examples of good practice may also be useful.

3. Do you think the content of the standard needs updating e.g. to include new issues, to elaborate or revise existing requirements, or to remove existing requirements?

Yes, please see suggestions below. Issues such as use of lead shot have become more prominent in recent years.

4. Do you think the supporting Appendix of References needs updating and why?

Yes, all requirements should make reference to best practice guidelines where they exist. Some documents and schemes referred to are out of date.

This response is based on issues encountered by SWT Stirling and Clackmannanshire Local Group Planning Volunteers. Our team regularly monitors and responds to FPAs and FGS proposals on Scottish Forestry Public Registers, and also offers free advice on wildlife and biodiversity to Forest Agents / Designers when at early stage of considering FGS proposals/ or consulting on management plans.

At the grant application stage we do not receive information about whether a woodland is being managed to meet UKWAS requirements, but we feel it would be useful for this information to be readily available to local communities and not just consumers.

Our general observation is that many requirements included in the current standard have the potential to improve the sustainability of forestry practice. However, our key concern is that proper assessment of the ecological impacts of new

planting and other operations are often not made and there is often little proactive effort to gather sufficient information to make informed decisions.

We feel there is little evidence of some requirements being met e.g.

“2.6.1 New woodlands shall be located and designed in ways that will:

- Deliver economic goods and/or [ecosystem services](#),
- Maintain or enhance the visual, cultural and ecological [value](#) and character of the wider landscape, and...”

In our experience there typically appears to be little proper assessment of how new planting will affect existing habitats where land is not already well known for its conservation value.

We therefore suggest that either auditing needs to be improved to ensure the stated requirements are being met and / or the requirements need to be set out in greater detail so there is less scope for a range of interpretations. More links to best practice guidance and legislation may also improve compliance with the standard.

Suggested changes are set out below, italicised sections are passages of text from the standard:

1 Legal compliance and UKWAS conformance

1.1 Compliance and conformance

1.1.1 In our experience there is a low level of awareness of the law protecting some species (particularly reptiles, which are protected under the Wildlife and Countryside Act 1981 (as amended), against intentional or reckless killing and injury. To our knowledge, steps are very rarely taken in forestry planning and operations to comply with this legislation and new planting has the potential to cause local extinctions to already very fragmented and vulnerable reptile populations). Similar issues also exist for protected plant species. Key wildlife legislation including the Wildlife and Countryside Act is not included in the current UKWAS references in this section, but is in the main references. Understanding and compliance may be improved by including the key wildlife legislation in this section and by providing a summary of the species protected under these acts in an annex or separate document. Providing links within the main document to best practice guidance documents may also be helpful.

2 Management planning

Dead wood plans (and monitoring) should be included in management planning, since this is a complex issue requiring long term planning to ensure a continuous supply of veteran trees and diverse deadwood types are available.

Although there is still poor ecological understanding of carrion ecology, it is now accepted as an important aspect of terrestrial ecosystems, particularly for specialist invertebrate species. Deer management should include plans to provide a supply of carrion to support carrion feeding communities.

Management plans should be made freely publicly available, not just on request, as this may be a barrier to the local community and wider society viewing plans, particularly if a charge is involved.

2.3 Consultation and co-operation

2.3.1 a) [Local people](#), relevant organisations and [interested parties](#) shall be identified and made aware that:

- *New or revised management planning documentation, as specified under section 2.2.1, is being produced*
- *High impact operations are planned*
- *The woodland is being evaluated for certification.*

b) *The owner/manager shall ensure that there is full co-operation with the relevant [forestry authority's](#) consultation processes.*

c) The owner/manager shall consult appropriately with local people, relevant organisations and other interested parties, and provide opportunities for their engagement in planning and monitoring processes.

Even though our team has been operating in our area regarding forestry for 6 years, in our experience this rarely happens, perhaps UKWAS could provide an online platform to facilitate this?

2.5.1 a) The impacts of new planting and other woodland plans on [environmental values](#) shall be assessed before operations are implemented, in a manner appropriate to the scale of the operations and the sensitivity of the site.

Should state that a minimum of an ecological desk study shall be undertaken to assess the extent of ecological impact on sensitive species and habitats. If the desk study finds that current data is insufficient to assess impacts, then surveys to provide adequate data shall be undertaken.

An assessment of the impacts of planting on peat soils of less than 0.5m should be made based on the quality of the habitat present and where there is the possibility of the planting area being hydrologically connected to deep peat habitats. Hydrologists should be consulted where appropriate.

2.9 Non-native species

2.9.1 Non-native tree species shall only be introduced to the WMU when evidence or experience shows that any [invasive](#) impacts can be controlled effectively.

Natural regeneration of non-native species to other areas of the WMU or surrounding landscape should be controlled through ongoing management e.g. removal of Sitka spruce spreading from planting areas through natural regeneration.

2.11 Conservation

2.11.1 a) Management planning shall identify a minimum of 15% of the WMU where management for conservation and enhancement of [biodiversity](#) is the primary objective.

b) This shall include conservation areas and features identified in the following sections:

- *Statutory designated sites (section 4.1)*
- *[Ancient semi-natural woodland](#) (section 4.2)*
- *[Plantations on ancient woodland sites](#) (section 4.3)*
- *Other valuable semi-natural habitats (section 4.4)*
- *Areas and features of critical importance for watershed management or erosion control (section 4.5)*
- *[Natural reserves](#) (section 4.6.1)*

Local Nature Conservation Sites (LNCS) or equivalent (under other names in different parts of UK) should be added to this list.

2.12 Protection

2.12.1 Management of wild deer shall be based on a strategy that identifies the management objectives, and aims to regulate the impact of deer.

Add:

The use of lead shot will be avoided in all deer management operations.

The strategy should aim to allow native tree species and native plant communities within the WMU to regenerate naturally without suffering severe negative impacts from deer browsing.

Alternatives to culling brown hares (an SBL species) should be pursued where possible.

2.15 Monitoring

2.15.1 c) In addition to monitoring environmental impacts and changes in environmental condition impacts, the monitoring of biodiversity aims should be carried out to ensure they are being met.

3 Woodland Operations

3.1 General

At least some rides shall be 1.5-2 x highest expected trees to allow light to penetrate to the ground vegetation layer. This will allow a more natural vegetation structure to develop and will benefit invertebrate and reptiles species and in consequence will benefit other aspects of ecosystems reliant on these habitats and species.

Thinning operations should be carried out where it is practical to do so, to allow light to penetrate the forest floor and natural vegetation to develop.

4. Natural, historical and cultural environment

4.1 Statutory designated sites and protected species

4.1.1 a) Areas and features of [high conservation value](#) having particular significance for [biodiversity](#) shall be identified by reference to statutory designations at national or regional level and/or through assessment on the ground.

Change to:

Areas and features of [high conservation value](#) having particular significance for [biodiversity](#) shall be identified by reference to statutory and non-statutory designations (e.g. Local Nature Conservation Sites) at national or regional level and/or through assessment on the ground (by ecologists with suitable expertise where appropriate).

This should include consideration of proposed LNCS given the lack of action by many councils in designating proposed sites that have been surveyed and are of demonstrable conservation value.

4.1.2 *Appropriate measures shall be taken to protect identified [priority habitats and species](#) in accordance with plans agreed with nature conservation agencies. In planning and implementing measures within the WMU, the owner/manager shall take into account the geographic range and ecological requirements of priority species beyond the boundary of the WMU.*

“[Priority habitats and species](#)” should specifically refer here to Scottish Biodiversity List (SBL) habitats and species (and the equivalents in other UK countries). Local Biodiversity Action Plans could also be mentioned, but these lists tend to be less comprehensive and are often derived from SBL. In our experience there is a low level of awareness of SBL species and habitats within the forestry sector. Input from ecologists with suitable knowledge is likely to be required to achieve this requirement.

4.6 Maintenance of biodiversity and ecological functions

Reference to the control of Non-native Invasive Species (NNIS) should be made in this section also, given the extent that NNIS such as rhododendron can reduce biodiversity and impair ecological functions. NNIS should be eradicated or if re-infection is ongoing, controlled to a level where they are unable to continue to spread across and out of the woodland owner/manager’s land.

4.6.4 *The owner/manager shall plan and take action to accumulate a diversity of both standing and fallen [deadwood](#) over time in all wooded parts of the WMU, including felled areas.*

Given the lack of deadwood in managed forestry systems (typically 90% lower than natural woodland) and the lack of certainty regarding the volumes of deadwood required to support saproxylic communities, the 20 m³/ha average deadwood volume should be changed to 20-30 m³/ha. Monitoring should be undertaken to ensure sufficient accumulation is being achieved. Reference should be made to the guidance provided in:

Kortland, K. 2016. *Deadwood summary guidance for FES staff*. Forestry Commission Scotland.

4.9 Game and fisheries management

4.9.1 [Game](#) rearing and release, shooting and fishing shall be carried out in accordance with the [spirit](#) of codes of practice produced by relevant organisations.

Change to:

[Game](#) rearing and release, shooting and fishing shall be carried out in accordance with 2.9.1 (“Other non-native plant and animal species shall only be introduced if they are non-invasive and bring environmental benefits”), and the [spirit](#) of codes of practice produced by relevant organisations. Game shooting shall not involve the use of lead shot, and lead weights shall not be used for fishing.

Professor Edward Wilson MSIF FRSB, Silviculturist

Thank you for this opportunity to provide initial input. I only have limited time to provide comments, but hope these are of some use to the expert panel/review panel. I have mostly concentrated on areas where I feel qualified to comment.

I have responded to each of your questions in turn, highlighting my submission in **green**.

1. Do you think the UKWAS 4 standard needs updating and revision?

RESPONSE: Yes, the UKWAS 4 requires updating and revision.

REASONS:

- Resilience – there is not enough clarity associated with this key issue. Economic resilience and ecological resilience appear to be interchangeable in the current document. There needs to be a more robust series of definitions and greater separation of the various management functions with respect to ecological and economic resilience. Also, other related terms, such as robustness, requires insertion and clarification with respect to the development of the forest estate. There needs to be far greater linkage between sustainable management practices and resilience, and this requires greater reference to associated science and practice from elsewhere. Climate mitigation and adaptation could, similarly, be more fully developed.
- LISS - this is an outmoded term that does not adequately describe silvicultural alternatives to clear-felling. In fact, LISS might in a very broad definition justify and incorporate patch felling (i.e. small clear-fells). There needs to be a complete overhaul and clarification of silvicultural systems and where/how they might be applied in an appropriate manner. Increasing forest diversity, one of the key strategies for increasing ecological resilience, requires greater use of a range of silvicultural systems. Separately, there also needs to be recognition of the distinction between specific silvicultural systems and continuous cover forestry, which is an alternative management approach. It takes time to transform stands with or towards one silvicultural system or another. Special attention needs to be given to this area so that verifiers can make objective assessments of performance at the stand and forest planning levels.
- Continuous Cover Forestry (CCF) – this is one of the most important and significant developments in UK forestry in recent decades. There has been a steady increase in adopters, especially on private estates and in the public forest estate, and there is a growing evidence base for its effectiveness in delivering multiple benefits, economic, ecological, environmental and social. At present there is no mention of continuous cover forestry in UKWAS4; no definition is provided. CCF does not equal LISS. The distinction needs to be clarified and there needs to be far greater acknowledgement of the potential and opportunities for CCF, on the right site and in terms of delivering owner objectives. Stand transformation, and essential pathway to CCF, needs to be defined and also benchmarked so that reporting can be properly assessed. Guidelines elsewhere in UKWAS regarding growth and yield forecasting may require revision to account for a different approach in CCF.
- Thinning – we require a more modern view of thinning. It is not simply crop improvement, there are various types of thinning, each with specific purposes and effects. This requires linkage with long-term management plans. Low thinning is effective for even-aged stands with rotational management; crown, variable density and graduated density might apply where there is transformation to continuous cover forestry, or where conservation objectives might be the primary management objective, especially in native/conservation woodlands. Managers need to report these details as part of planning and management activities. Verifiers will need to be conversant with the distinctions and have objective criteria for assessment.

- Planting stock – one of the greatest threats to our forests is the risk of pest and disease importation in planting stock and associated soil sourced from outside the UK. There needs to be a greater push to eradicate plant imports, and a system of traceability and accountability in terms of planting stock biosecurity. Currently UKWAS4 does not provide adequate protections against the importation of pests and diseases, and it does not provide enough incentive for forest owners to specify only UK sourced and grown planting material.
- Pests and Diseases – there is a lack of detail on basic tree health management and care. For example, stump treatment on harvesting sites and measures to minimise the risk of transporting pests and infections from one site to another. Overall, the standard needs to review the area of pest and diseases. This is an issue that is only becoming more serious and it is incumbent on all woodland owners and managers to have appropriate plans, working practices and mitigation strategies in place. UKWAS provides an opportunity for improvements in best practice.
- Training and CPD – more detail is required, with direct reference to professional practice/accreditation. For example, practitioners of CCF should have training and be able to present evidence of skills development. Professional bodies and educational institutions should be engaged to provide appropriate registration so that evidence of CPD can be presented in UKWAS reporting.
- Protection – currently this only mentions wild deer. There needs to be similar reference to other damaging wildlife, especially grey squirrel in broadleaf plantations. Humane management and control measures must be strongly emphasised.

2. Do you think the structure and organisation of the standard need to be changed?

RESPONSE: Limited revision of the structure and organisation of the standard might be helpful to users and assessors.

REASONS:

- Woodland creation is addressed under SECTION 2 MANAGEMENT PLANNING section of the standard. In my view there needs to be reference to woodland creation and also woodland restocking in the SECTION 3 WOODLAND OPERATIONS. Harvesting methods and operations are not an end point but an integral element of a re-stocking plan for any woodland. We need to see greater integration of harvesting with re-stocking to safeguard environmental quality and minimise costs, chemical inputs and division of responsibility among departments within organisations. The standard should seek evidence of joint working and collaboration between harvesting and re-stocking departments and functions. Re-stocking plans should consider planting and natural regeneration methods, and benchmarks appropriate for woodland types, species and management objectives.

3. Do you think the content of the standard needs updating e.g. to include new issues, to elaborate or revise existing requirements, or to remove existing requirements?

RESPONSE: Yes, there could be update and revision in a number of areas.

REASONS:

- Silviculture – see comments above – generally this requires greater development, role of CCF, mixtures and other silvicultural strategies aimed at enhancing ecological resilience.
- Biosecurity and phytosanitary measures – this needs modernising, updating and expanding
- Public use of woodlands – greater recognition of well-being and measures to improve access for a range of permitted uses. This area could be given greater clarity, update to reference recent events and realities, and generally be more forward looking. Forest owners should be given credit for supporting access and safe use of woodlands for mental and physical well-being. A strong evidence base, mostly initiated and reported by Forest Research, would support the development of this area in the standard.

4. Do you think the supporting Appendix of References needs updating and why?

RESPONSE: Yes, the reference list requires revision and updating.

REASONS: There has been a steady increase and advance on many of the publications listed. There should be a comprehensive review to ensure the most up to date and relevant material is included. There should be clearer linkages between documents listed in the reference section and measures in the standard.

Also, there could be greater reference to peer-reviewed publications and research, not necessarily all produced by Forest Research/Forestry Commission. This might be especially relevant in relation to climate adaptation and mitigation measures. An example might be the series of papers written and curated by the late Peter Savill in *Quarterly Journal of Forestry* on alternative tree species for adoption in British forestry; and the latest edition of Peter Savill's text "*The silviculture of trees used in British Forestry*" (2018). There is a significant body of other literature, especially with respect to forest health, silviculture, woodland establishment and public health/well-being that could (should?) be cited and incorporated into this document.

I hope the expert group is able to demonstrate the clear links between pure/applied research and specific best management practices for sustainable forestry. At present, the references appear as an extended list, not necessarily supporting individual measures within the standard. For example, the evidence base underlying the areas set aside for conservation (2.11.1a) and the amount of deadwood (4.6.4) is not clear; targets sometimes appear arbitrary in the absence of a direct link to scientific/technical evidence. A traffic light system might be helpful in giving users and assessors greater clarity about the strength/quality of the evidence underlying specific measures in the standard. In general, the *science of forestry* could be more evident in these documents.

I hope these comments are of some assistance in making the initial decisions about how best to progress this important project.

I would be pleased to provide greater clarification on any points.

Many thanks for this opportunity to contribute to the revision process. I wish you and your colleagues best wishes with this project.

Timber Transport Forum (Roland Stiven)

N.B. The new 5th edition of the Road Haulage of Round Timber Code of Practice is now published:

<https://timbertransportforum.org.uk/work/good-practice>

The Timber Transport Forum proposes the following changes to the text of the UKWAS Standard and Appendix:

Changes to the Standard

REQUIREMENT

2.3.1

Guidance

Add

For transport issues, owners/managers should seek to identify and consult local timber transport groups, local authority roads or highways authorities and appropriate community groups.

3.3.2

GUIDANCE Where new roads are planned, a documented evaluation should be made to achieve a balance between timber extraction distances and road density, which takes into account the impact on the environment and the impact on the public road infrastructure to which the forest roads will connect. Nontimber activities also need to be taken into account, e.g. access for sporting.

Changes to the Appendix

Section 2.3 Consultation and co-operation

Forestry Commission:

2017: The UK Forestry Standard guidelines:

- Forests and People

Forestry Commission Practice Guide:

Timber Transport Forum

2019: Transporting Timber on Public Roads: Consultation and Engagement Guidance (Scotland)

1996: No. 10: Involving Communities in Forestry The UK Woodland Assurance Standard (Fourth Edition) Appendix: References (Version 1.0 April 2018)

Etc.

Section 3.2 I am not sure if the text of this section of the standard requires that the timber transport guidance is referenced in this section of the appendix. If it does then the following changes should be made:

Timber Transport Forum

~~2012~~2020: Road Haulage of Round Timber: Code of Practice. ~~4th~~5th Edition

~~2012: Managing Timber Transport: Good Practice Guide~~

2019: Transporting Timber on Public Roads: Consultation and Engagement Guidance (Scotland)

2014: Tread Softly: Lower impact vehicles for timber haulage

2016: Loading Timber from Roadside Forests: Good Practice

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Timber Transport Forum

~~2012~~2020: Road Haulage of Round Timber: Code of Practice. ~~4th~~5th Edition

2019: Transporting Timber on Public Roads: Consultation and Engagement Guidance (Scotland)

~~2012: Managing Timber Transport: Good Practice Guide~~

2014: Tread Softly: Lower impact vehicles for timber haulage

2016: Loading Timber from Roadside Forests: Good Practice

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Timber Transport Forum:

Agreed Routes Maps for Timber Transport. See timbertransportforum.org.uk

~~2012~~2020: Road Haulage of Round Timber: Code of Practice. ~~4th~~5th Edition

2019: Transporting Timber on Public Roads: Consultation and Engagement Guidance (Scotland)

~~2012: Managing Timber Transport: Good Practice Guide~~

2014: Tread Softly: Lower impact vehicles for timber haulage

2016: Loading Timber from Roadside Forests: Good Practice

Woodland Trust

The Woodland Trust welcomes the opportunity to feed into the consultation for the UKWAS 4 review. As both an UKWAS steering group member and a landowner with a UK-wide estate continually FSC certified for over 22 years, the Woodland Trust can testify to the strength and value of UKWAS 4 as a suitable auditable standard for FSC and PEFC requirements. It also recognises the significant revisions, and associated consultations, that led to the present UKWAS 4.

As such our comments below are very much restricted to those where we feel the evidence base associated with the requirement has changed, where our experience of UKWAS 4 suggest greater clarification within the standard would be helpful and only in one case where we feel the existing requirements fall short in terms of protecting the conservation value of sites audited under UKWAS.

Given the length of the possible review period the Woodland Trust reserves the right to raise further potential consultation points at a later date.

1. Need for a new requirement with regard to the protection and enhancement of permanent and temporary open space within woodlands

Permanent and temporary open space – such as rides, glades, and other more open-canopy and transitional woodland/scrub zones - within both HCV and non-HCV sites play a major role in the biodiversity value of both types of sites. These often provide the key conditions for specific species to occur within a woodland, as well as providing a key

and important structural element, such as woodland edge or more open grown trees, that enhance the habitat value of woodland itself. Rides and glades are also often of historic and cultural merit. The value of such open space/ground is clearly referenced in publications such as:

- Managing ancient and native woodland in England – Chapter 6
<https://www.gov.uk/government/publications/managing-ancient-and-native-woodland-in-england>
- UK Forestry Standard
<https://www.gov.uk/government/publications/the-uk-forestry-standard>

Within the UK Forestry Standard there are numerous references to the value of open space and include reference to minimum amounts of open space provision.

“Maintain or establish a diverse composition within the forest management unit; where only one species is suited to a site and management objectives, a maximum of 75% may be allocated to a single species (see notes below). In all cases, incorporate a minimum of:

- *10% open ground or ground managed for the conservation and enhancement of biodiversity as the primary objective;”*

Most available woodland condition assessments include the presence of temporary and permanent open ground element as a key requirement for woodlands to achieve a “good” woodland condition assessment rating.

While UKWAS includes reference in various requirements throughout the standard such as 2.5.3, 2.6.1 and 2.8.1 (which includes reference to UKFS), 3.4.2 and 4.4.2 there is no single requirement that pulls together and reflects the value of open space within woodland or seeks to set minimum requirements.

The Woodland Trust would therefore welcome the opportunity for the discussion on the potential for a specific requirement to cover this important biodiversity, structural and cultural component of woodlands.

It should be noted that the Woodland Trust views open space/ground in this context as being an integral part of the woodland habitat itself. This is in line with UKWAS on approach and definition although it is noted while both terms, open space and open ground habitats, are used in UKWAS 4, only open space has a glossary entry. It is therefore also suggested that consideration be given to the inclusion of a glossary entry for open ground habitat.

2. Need to reflect latest evidence of impact on lichens from ammonia pollution from pheasant pens.

A recent study by NRW has demonstrated that ammonia pollution from pheasant pens can impact lichen communities on trees. At the moment the UKWAS requirement **4.9.1 includes the following guidance:**

GUIDANCE

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

It is suggested that this guidance should be expanded to include “*and ammonia-sensitive lichen communities*” to better reflect present evidence of impacts from pheasant rearing pens.

Reference: *NRW Evidence Report 295 - Lichens and N pollution at Allt-y-gest SSSI – implication for pheasant rearing.*

3. The promotion of a new/next generation of veteran trees as a suitable action to meet future deadwood requirements

UKWAS requirement 4.6.4 provides a clear statement/requirement in support of the value of deadwood both standing and fallen within all woodlands. Evidence of the value of veteran trees in both providing a range and ever changing volumes of deadwood over significant time periods and such trees’ wider biodiversity and cultural value within woods is

overwhelming. Quite rightly the actions listed within the guidance suitable to meet this requirement focus on the protection of the existing deadwood element or the “creation” of new deadwood during thinning and felling operations.

The Woodland Trust suggest that this requirement could be enhanced by including the **identification, recruitment and protection of “future” veteran trees** within the existing bulleted potential actions within the guidance section of this requirement.

4. The minimum level and distribution of deadwood

The evidence base around the amount and distribution of deadwood required to maintain functional connectivity for associated deadwood biodiversity especially within native and ancient woodland is building. We are presently reviewing this evidence with a mind to the UKFS consultation process. We would welcome the opportunity to feed in the result of this evidence review and for UKWAS to be open to review the minimum requirement for deadwood outlined in 4.6.4 as part of the UKWAS 4 review.

5. Clearer reference to PAWS remnant features within guidance section of 4.3.1

It is felt the guidance section in 4.3.1 would be strengthened if the remnant feature description provided in the glossary was placed in full in section 4.3.1. The importance of the identification, protection and enhancement of remnant features is one of the key and fundamental principles underlying the restoration of PAWS. As such it is felt the list of remnants should therefore be reflected and embedded directly in the guidance section.

6. Mapping and identification of PAWS remnant features as an example verifier within 4.3.1

Requirement 4.3.1 (b) states that

“The owner/manager shall:

- *Identify and evaluate remnant features*
- *Implement targeted actions”*

Given the above requirements are clearly spatial in nature and require monitoring over time the Woodland Trust feels that an element of mapping and monitoring of identified remnants should be included in the example verification. As many of the remnants are very sensitive and easily damaged to the extent of full loss it seems that field observations, often after operations have been undertaken, and discussions with owner/manager are not sufficient verifiers that the requirement to maintain and enhance or restore identified features within PAWS is being met.

Scottish Woodlands (Stuart Wilkie) comments

UKWAS Ref	Issue
Overarching Issues	Carbon and productive renewable resource management issues need more clearly addressed.
Introduction	How do we cover devolution etc
Introduction Example Verifiers	Although example verifiers are not normative could we give some indication that the use of example verifiers is strong evidence of compliance. I have had an auditor express the opinion that it is entirely up to him to decide what verifiers he will accept.
Scale, Intensity and Risk	<p>I don't think this came over clearly in the last iteration in that people are still talking about a small woods standard which effectively means a lower less onerous standard. Applied properly it was intended that UKWAS 4 should allow small woods to become certified with little documentation but more on a show and tell basis at audit.</p> <p>This does not always come out at audit. Some auditors are fixated with paperwork. E.g. 46ha woodland receives CAR because a possible (Canmore – Possible camp site but may be a deer dyke... no trace of any camp) archaeology site is not mapped. The only reason that the auditor knew about the site was because the manager told him about it. In this example the manager by demonstrating a knowledge of his woodland generated a corrective action when he was demonstrating compliance.</p>
1.1.7 There shall be compliance with legislation relating to the transportation and trade of forest products, including, where relevant, the EU Timber Regulation (EUTR) and phytosanitary requirements.	Plant Passporting may apply if owner/manager commissions timber haulage
2.1.2 Woodland management planning shall take fully into account the long-term positive and negative economic, environmental and social impacts of proposed operations, including potential impacts outside the WMU.	We should say something about carbon here
2.1.3 a) Woodland management planning shall demonstrate a commitment to long-term economic viability. b) The owner/manager shall aim to secure the necessary investment to implement the management plan in order to meet this standard and to ensure long-term economic viability.	Carbon could also contribute to long-term economic viability. Also, Ecosystem Services.
2.2.3 The management planning documentation shall be reviewed periodically (at least every ten years), taking into account: Monitoring results Results of certification audits Results of stakeholder engagement New research and technical information, and Changed environmental, social, or economic circumstances.	I think we need to clarify that this means that management documentation should be reviewed following major changes not just every 10 years. Potential to condense with 2.14.1

<p>2.4.4 Priority species shall not be harvested or controlled without the consent of the relevant statutory nature conservation and countryside agency.</p>	<p>Include Hares in Scotland as guidance. Confirm open seasons count as consent.</p>
<p>2.7.1 Even-aged woodlands shall be gradually restructured to achieve an appropriately diverse mosaic of species, sizes, ages, spatial scales, and regeneration cycles. This structural diversity shall be maintained or enhanced.</p>	<p>Historically this applied to most woodlands, but should we now give some guidance on how we expect fully restructured woodlands to be managed.</p>
<p>2.12.1 Management of wild deer shall be based on a strategy that identifies the management objectives, and aims to regulate the impact of deer.</p>	<p>Perhaps we need to say something about fencing and tree-shelters here. It is not always possible for a woodland owner to regulate deer numbers to a sustainable level of 3 to 3 per 100ha.</p>
<p>2.13.2 Conversion to non-forested land shall take place only in certain limited circumstances as set out in this requirement.</p>	<p>This should not become a get out clause for developers.</p>
<p>2.15.1 a) The owner/manager shall devise and implement a monitoring programme appropriate to the scale and intensity of management.</p> <p>b) The monitoring programme shall be: Part of the management planning documentation Consistent and replicable over time to allow comparison of results and assessment of change Kept in a form that ensures that results are of use over the long-term.</p> <p>c) The owner/manager shall where applicable monitor and record:</p> <p>The implementation of policies and objectives and the achievement of verifiable targets Implementation of woodland operations Harvesting yields Social impacts Environmental impacts Changes in environmental condition Usage of <u>pesticides</u>, <u>biological control agents</u> and fertilisers and any adverse impacts Environmentally appropriate disposal of waste materials.</p> <p>d) Monitoring targets shall fully consider any special features of the WMU.</p>	<p>Some guidance on the implementation of policies and objectives and the achievement of verifiable targets</p> <p>Under d – clarification that special features would mean a protected habitat or species, cultural site etc. Not just the most interesting part of the site.</p>
<p>3.1.2 The planning of woodland operations shall include:</p> <p>Obtaining any relevant permission and giving any formal notification required</p> <p>Assessing and taking into account on and off-site impacts</p> <p>Taking measures to protect water resources and soils, and prevent disturbance of and damage to <u>priority species</u>, habitats, <u>eco-systems</u> and landscape <u>values</u>, including adapting standard prescriptions where required. Any disturbance or damage which does occur shall be mitigated and/or repaired, and steps shall be taken to avoid recurrence</p>	<p>Perhaps include diffuse pollution control plan as a verifier.</p>

Measures to maintain and, where appropriate, enhance the value of identified services and resources such as watersheds and fisheries.	
3.4 Pesticides	We left this section last time around, but it does need a review. Remove reference to FEPA records. FEPA not relevant now
3.4.5 a) Fertilisers (inorganic and organic) shall only be used where they are necessary to secure establishment or to correct subsequent nutrient deficiencies. b) Where fertilisers are to be used the owner/ manager and <u>workers</u> shall be aware of and shall be implementing legal requirements and best practice guidance for their use in forestry. c) No fertilisers shall be applied: in <u>priority habitats</u> around priority plant species, or around <u>veteran trees</u> . d) In addition, bio-solids shall only be used following an assessment of environmental impacts in accordance with section 2.5. e) The owner/manager shall keep a record of fertiliser usage, including types, rates, frequencies and sites of application.	There is some confusion as to how this related to micro root zone fertilisers applied to the planting hole as opposed to higher dose broadcast fertilisers. i.e. 12.5kg per ha as opposed to 350kg per ha.
3.5.1 Where appropriate, wildlife management and control shall be used in preference to fencing.	Should we also include tree shelters as these are worse than fencing for the environment due to plastic waste? What is the balance between using tree shelters and fencing? What about biodegradable shelters over those that disintegrate to microplastics? What we need is a considered approach to tree protection taking account of all the issues. See also 2.4.4 control of priority species and 2.12.1 Deer
3.5.2 Where fences are used, alignment shall be designed to minimise impacts on <u>access</u> (particularly <u>public rights of way</u>), landscape, wildlife and <u>historic environment</u> sites.	Do we need something similar for tree shelters spirals etc. Where plastic tree protection measures are used potential impacts on wildlife and the landscape should be considered and consideration of how tree protection might eventually be removed
3.6.2 The owner/manager shall prepare and implement a prioritised plan to manage and progressively remove redundant materials.	I think we were ahead of the game when we included this last time, but should we be more specific about plastics over timber stakes and fence posts. There has been some criticism (SEPA) that waste is waste and should be removed immediately not via priorities plan and that redundant materials is just fancy wording for waste.
4.1.1 and 4.1.2 Designated sites and priority species	Focus 4.1.1 more on sites and 4.1.2 on mobile species would aid clarification
4.2.1 and 4.3.1 ASNW and PAWS	There is a bit of inconsistency between these two requirements and while they should remain separate there should be a commonality of approach. Some of 4.3.1 b should be guidance
4.2.1, 4.2.1, 4.3.1 and 4.4.1	Could we somehow emphasis the hierarchical approach that should be applied across these requirements, based on biodiversity quality. So, while generally the greatest emphasis is on 4.2.1 down to 4.4.1 a really well developed

	4.3.1 could take priority over a degraded PAWS. A lot of work done on one requirement could mean less was required elsewhere.
4.5.1 Areas and features of critical importance for watershed management or erosion control shall be identified in consultation with relevant <u>statutory bodies</u> . b) Where critically important areas or features are identified, their management shall be agreed with the relevant statutory bodies.	I have yet to come across a woodland where this applies
4.6.4 Deadwood	Revisit guidance
4.9.1 <u>Game</u> rearing and release, shooting and fishing shall be carried out in accordance with the <u>spirit</u> of codes of practice produced by relevant organisations.	BASC and others have now signed a commitment to remove lead shot by 2025 and UKWAS should reflect this. What about lead bullets for deer control? Possible
5.2.1 The owner/manager shall mitigate the risks to public health and safety and other negative impacts of woodland operations on local people.	Do we need guidance to include roadside trees especially ash

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