

Consultation Paper Sections:

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1. Introduction

The first edition of the UK Woodland Assurance Standard (UKWAS) was published in January 2000 and there have been three revisions. The current version is UKWAS 4.

The UKWAS standard is designed to reflect the governmental UK Forestry Standard and the requirements of the two leading global certification schemes, the Forest Stewardship Council (FSC) and the Programme for Endorsement of Forest Certification schemes (PEFC).

Forestry knowledge and practice is constantly evolving as is society's interpretation of the economic, environmental and social context within which woodland managers must work. It is important, therefore, that the certification standard is regularly reviewed and updated using a process that is thorough and open.

2. The review, revision and consultation process

The UKWAS standard-setting process was revised prior to the commencement of the UKWAS review and revision to take account of best practice and to ensure continued alignment with the latest FSC and PEFC requirements. The revised process is set out in the document: *UKWAS Standard-setting Process (Version 3.0)*.

The review-and-revision process is based on evidence-gathering and thorough consultation with stakeholders. A detailed document sets out the plan and timetable for this revision: *UKWAS Review & Revision Plan & Timetable 2020-23*. The aim is for UKWAS 5 to be effective from 1st April 2023.

An independent working group comprising an independent chair and a balance of economic, environmental and social stakeholders was appointed by the UKWAS steering Group to review and, if considered necessary, revise the standard. Based on an initial evidence-gathering exercise, an Issues Paper was prepared in November 2020 and reviewed by the working group which concluded that a revision was necessary.

The revision and consultation processes are being taken forward in five phases:

- **Phase 1** (December 2020 – February 2021): working group to prepare Initial Revision Draft
- **Phase 2** (March/April 2021): stakeholder consultation 1 (60 days)
- **Phase 3** (May - September 2021): working group to analyse stakeholder feedback and prepare Second Revision Draft

- **Phase 4** (October/November 2021): stakeholder consultation 2 (60 days)
- **Phase 5** (Dec 2021 – May 2022): working group to analyse stakeholder feedback and prepare Pre-approval Draft and remit to steering group.

Key documents

- UKWAS Standard-setting process (Version 3.0): <http://ukwas.org.uk/wp-content/uploads/2019/12/UKWAS-Standard-Setting-Process-Version-3.0-FINAL-22.11.19.pdf>
- UKWAS Revision 2020-23: Review & Revision Plan & Timetable: <http://ukwas.org.uk/wp-content/uploads/2020/06/UKWAS-5-Review-Revision-Plan-Timetable-FINAL-21.05.20.pdf>

3. Summary of the issues

The findings of the initial evidence-gathering exercise are presented in an Issues Paper and Annexes available on the UKWAS website:

- Issues Paper: <http://ukwas.org.uk/wp-content/uploads/2020/11/UKWAS-Revision-2020-23-Issues-Paper-Final.pdf>
- Annexes: <http://ukwas.org.uk/library/> and go to Consultations / UKWAS Revision Process (2020-23) / Phase 1 documents - Initial Revision Draft preparation

4. Revision of the Standard

The Initial Revision Draft of UKWAS 5 represents over two months of intensive discussion and work by the revision working group; the working group is now seeking stakeholder's views on their draft.

The UKWAS 4 standard was published in 2018 following the most comprehensive revision in the history of UKWAS. It was more succinct, logical and user-friendly and included major structural changes and was well received by users.

For this current revision, the emphasis has therefore been on updating text, looking for gaps and, where necessary, providing more detail.

Two versions of the Initial Revision Draft standard are available:

- The **full version** includes the full text with requirements, guidance and example verifiers.
- The **short version** includes only requirements so making it easy to understand the overall shape of the draft.
- Both versions show deleted and additional text so you can see what has changed.

Both drafts can be downloaded from: <http://ukwas.org.uk/consultation/>

Highlights include:

- **Structure of the standard** is unchanged and retains the five main sections introduced in UKWAS 4:
 - 1. Legal compliance and UKWAS conformance
 - 2. Management planning
 - 3. Forestry operations
 - 4. Natural and historic environment
 - 5. People, communities and workforce.

- **Expression of requirements** - in recent editions of UKWAS, requirements were stated as ‘shall’. To improve clarity, this edition reverts to the simpler form of wording used in the first edition of UKWAS; this does not imply any change in the status of requirements, and these remain mandatory.
- **General approach** - the requirements have been updated and adapted where thought appropriate. In particular, the working group has sought to adapt the standard to reflect the global challenges of climate change, biodiversity loss and the need to embed forest resilience, enhance the natural capital value of woodlands and safeguard the provision of valuable ecosystem services. For example, additional wording on practices that enhance carbon storage in trees and soils and reduce greenhouse gas emissions from woodland operations has been woven into the text. There have also been updates to reflect relevant post-Brexit changes.

The more significant changes are indicated below.

- **In Section 1, Legal compliance and UKWAS conformance:**

1.1 Compliance and conformance

- **1.1.5 Requirement and guidance:** updated post-Brexit to include ‘relevant timber regulations’.
- **1.1.5 Guidance added:** preference for using UK-grown planting stock and sourcing from nurseries with accredited biosecurity practices; quarantining of imported planting stock; plant passporting.

- **In Section 2, Management planning:**

2.1 Long-term policy and objectives

- **2.1 section title amended to *Policy and objectives***
- **2.1.1 Requirement:** updated to include need to embed forest resilience in policy and objectives.
- **2.1.1 & 2.1.3 Guidance added:** inclusion of impacts on carbon balance.
- **2.1.3 Guidance added:** inclusion of indication that sufficient resources are available to implement woodland management plan.

2.2 Documentation

- **2.2.3 Requirement:** clarification on review and updating of management plan.

2.3 Consultation and co-operation

- **2.3.2 & 2.3.3 Requirements, guidance and example verifiers:** existing **2.3.2** split to form new **2.3.3** so that **2.3.2** focuses on engagement with neighbours to prevent compromising the management of adjoining woodlands and **2.3.3** on seeking opportunities to co-operate on conservation initiatives, and wild mammal and invasive species control.

2.4 Productive potential of the woodland management unit (WMU)

- **2.4.1 Requirement:** specific inclusion of soil carbon.
- **2.4.2 Requirement and guidance:** additional requirement (b) relating to ‘average annual allowable cut’.
- **2.4.3 Requirement & guidance:** revised nomenclature introduced: *Non-wood Forest Products (NWFP)* and guidance on which NWFPs are explicitly included within scope of the standard.
- **2.4.4 Requirement, guidance and example verifiers:** updated to improve clarity on necessary consents for harvesting or controlling priority species.

2.5 Assessment of environmental impacts

- **2.5 section title amended to *Assessment of environmental impacts in existing woodland.***
- **2.5.1 a) Requirement:** now solely focussed on potential impacts in existing woodlands.

2.6 Woodland creation

- **2.6.1 a)** Requirement & guidance: new sub-section modelled on 2.5.1 a) but solely focussed on new woodland establishment.
- **2.6.1 b)** Requirement & guidance: expanded requirement on mitigation of risk of damage from natural hazards.
- **2.6.2** Requirement: new sub-section focussed on minimising negative impacts of ground preparation and drainage.

2.7 Woodland restructuring

- **2.7.1** Requirement & guidance: revised text on diversity of restructured woodlands.

2.10 Silvicultural systems

- **2.10.1** Guidance: specific text on carbon and historic environment-related points.

2.12 Protection

- **2.12.1 b)** Requirement & guidance: new requirement that non-toxic (i.e. non-lead) ammunition is used in managing wild deer.
- **2.12.3** Requirement: new sub-section on choice of tree protection methods and products to minimise environmental impacts and associated guidance.

2.13 Conversion

- **2.13.2** Requirement: in relation to conversion of woodland to non-forested land, additional elements that the conversion entails <5% of the WMU and does not destroy areas of high carbon stock.
- **2.13.3** Requirement: existing clause a) amended to embrace conversion of woodland to short rotation coppice as well as to Christmas trees and deletion of clause b) relating solely to Christmas trees.

- In Section 3, Woodland operations:

3.1 General

- **3.1.2** Requirement: carbon-related text added to listed elements of planned woodland operations plus associated guidance.
- **3.1.3** Requirement: in relation to communication to workers, prescriptions for management of cultural and historic sites added.
- **3.1.5** Requirement: new requirement added to cover operational biosecurity.

3.2 Harvest operations

- **3.2** section title amended to *Harvesting and restocking*.
- **3.2.1 b)** Requirement: in relation to list of outcomes to be avoided, loss of soil carbon added.
- **3.2.3** Requirement & guidance: current reference to stump removal deleted, new requirement added that there is no stump harvesting. Guidance provided on situations where stump removal may be required.
- **3.2.4** Guidance: enhanced guidance on reducing negative impacts if burning lop and top.
- **3.2.5** Requirement: new requirement added to cover reduction of potential for soil carbon losses during ground preparation and restocking.

3.3 Forest roads and associated infrastructure

- **3.3** section title amended to *Forest infrastructure*.
- **3.3.1** Requirement & guidance: elaboration of 'other infrastructure' to 'Management, access and other infrastructure' and associated guidance.
- **3.3.2** Guidance: enhanced guidance on minimising environmental impact of infrastructure.

3.4 Pesticides, biological control agents and fertilisers

- **3.4.1 c)** Requirement: in relation to avoidance or mitigation of use, fertilisers added to existing text which relates to pesticides and biological control agents.

- **3.4.2** Requirement: revised text on justification of pesticide use and risk assessment.
 - **3.4.4** Requirement: additional and amended circumstances in which certain pesticides may be used.
- 3.5 Fencing**
- **3.5.2** Requirement: elaboration of existing text on fence alignment to minimise adverse impacts to include their specification and maintenance plus additional guidance.
- 3.6 Waste**
- **3.6.2 a)** Requirement: additional requirement for selection of materials to be chosen with regard to minimisation of waste and reduction of materials used.
- **In Section 4, Natural, historical and cultural environment:**
- 4.1 Statutory designated sites and protected species**
- **4.1** section title amended to *Statutory nature conservation sites*.
 - **4.1.1** Guidance: additional text on Priority species.
- 4.2 Conservation of ancient semi-natural woodlands (ASNW)**
- **4.2.1** Requirement & guidance: enhanced text on conserving ASNWs.
- 4.3 Management of plantations on ancient woodland sites (PAWS)**
- **4.3.1** Requirement & guidance: enhanced text on managing PAWS.
- 4.4 Protection of conservation values in other woodlands and semi-natural habitats**
- **4.4.1** Guidance: enhanced text on positive management of semi-natural woodlands.
 - **4.4.3** Requirement and guidance: required minimum area of WMU to comprise semi-natural habitat increased from 5% to 10% . Additional guidance provided.
- 4.7 Maintenance of local native seed sources**
- **4.7.1 b)** Requirement: in ASNW and other semi-natural woodlands, preference is given to natural regeneration.
- 4.8 Cultural and historical features/sites**
- **4.8** section title amended to *Protection of cultural and historic environment sites*.
 - **4.8.1** Requirement: enhanced text on maintaining historic environment sites.
- 4.9 Game and fisheries management**
- **4.9** section title amended to *Game, shooting and fisheries management*.
 - **4.9.1:** section disaggregated so that **4.9.1** covers shooting sustainably, **4.9.2** covers game rearing and release (including a requirement that release pens are located outside areas of high conservation value), **4.9.3** covers fishing sustainably, and **4.9.4** requires use of non-toxic ammunition in all shooting activities.
- **In Section 5, People, communities and workers:**
- 5.1 Woodland access and recreation including traditional and permissive use rights**
- **5.1** section title amended to *Public access rights, permissive uses, traditional rights, and the health and wellbeing of local people and communities*.
 - **5.1:** section disaggregated and re-ordered so that a new **5.1.1** covers public access legislation, **5.1.2** (ex 5.1.1) covers permissive uses, and **5.1.3** (ex 5.1.2) covers other provision for public access or community use. Existing guidance is placed in the most relevant sub-section and there are significant additions of guidance especially in **5.1.3**.
- 5.2 Minimising adverse impacts**
- **5.2.1** Guidance: specific reference to Ash dieback added.

5.3 Rural economy

- 5.3 section title amended to *Local economy*.

5.4 Health and safety

- 5.4 Please note that the working group is giving further thought to this sub-section and only minor changes to guidance have been made to date.

5.5 Training and continuing development

- 5.5.1 Requirement: specific reference to volunteers added as extra clarification that they are a sub-set of workers.
- 5.5.2 Guidance: additional guidance on how training may be promoted and new recruits to the industry encouraged.

5.6 Workers' rights

- 5.6 Please note that the working group is giving further thought to this sub-section.
- 5.6.1 Additional elements added to requirement to explicitly cover child labour and modern slavery plus additional guidance on equality legislation.

– Glossary - items added, deleted or revised:

- **Carbon balance** (*new*) (*text not fully defined - expert opinion to be sought*)
- **Endemic species** (*new*)
- **Environmental and social risk assessment** (*new*) (*text not defined*)
- **General Licences** (*new*)
- **Greenhouse gases** (*new*)
- **Lower-impact silvicultural systems (LISS)** (*amended text*)
- **Non-toxic ammunition** (*new*)
- **Non-timber woodland products (NTWP)** (*deleted as term no longer used in the standard*)
- **Non-wood forest products (NWFP)** (*new*)
- **Peatland** (*new*) (*text not fully defined - expert opinion to be sought*)
- **Priority habitats** (*updated text*)
- **Priority species** (*text not yet fully defined and remains under review to reflect Brexit-related changes and new guidance in UKWAS 4.1.1 etc.*)
- **Remnant** (*amended text*)
- **Short rotation coppice (SRC)** (*amended text*)
- **Short rotation forestry (SRF)** (*deleted as term no longer used in the standard*)
- **Statutory bodies** (*updated text*)
- **Traditional** (in relation to Christmas trees) (*deleted as term no longer used in the standard*)
- **UK Red Lists** (*new*)
- **Whole tree harvesting** (*amended text*)
- **Workers** (*amended text*).

5. Questions for stakeholders

This Consultation Draft is just that: it presents the revision working group's initial ideas on how to improve the standard. The working group now welcomes further comments from stakeholders and standard-users on all aspects of the draft standard.

In particular, the working group seeks specific feedback on the issues set out below:

1. **Sub-section 2.12.1 b)** – draft requirement proposes that only non-toxic (i.e. non-lead) ammunition is used in the management of wild deer. What are your views on the practicability of this proposal?

2. **Sub-section 2.4.3** – draft guidance specifies which Non-wood Forest Products (NWFPs) are explicitly included within scope of the standard. Is this a complete list?
3. **Sub-section 5.4 Health and safety** - the working group is giving further thought to this sub-section and only minor changes to guidance have been made to date. Do you have suggestions?
4. **Sub-section 5.6 Workers' rights** - the working group is giving further thought to this sub-section. Do you have suggestions?

6. How should I respond and what is the deadline for making my input?

6.1 What do I need to read?

This Consultation Paper reviews the revision process and summarises the changes proposed.

You will also need to refer to the following documents available on <http://ukwas.org.uk/consultation>:

UKWAS Consultation Drafts:

- Full version
- Short version (requirements-only).

6.2 How do I respond?

Please use the **Consultation Template** available on <http://ukwas.org.uk/consultation>.

The template is the full text of the draft standard which also allows you to make comments throughout the document in the green-shaded free text boxes provided for each section of the document.

This is a 60-day consultation. Your feedback is required by 30th April 2021.

Please send all your responses to ukwas@ukwas.org.uk.