# United Kingdom Woodland Assurance Standard

## Fourth edition (CONSOLIDATED FEEDBACK ON CONSULTATION DRAFT)

**Numbers in square brackets identify respondents. Other square brackets enclose editorial notes for clarification or transcriptions of proposed text edits.**

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# The UK Woodland Assurance Standard

## The Certification Standard

### Fourth Edition (WORKING DRAFT Version 4.1)

Approved by the Steering Group: 26th March 2012

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**Any further corrections or revisions necessarily made to the certification standard prior to its next full revision will be incorporated into the electronic versions available on the UKWAS website. A list of all the changes made since publication of this edition will be maintained on the UKWAS website and users are recommended to check this on a regular basis.**

**Further information is available at www.ukwas.org.uk.**

## Introduction

1. **Background and purpose** Primarily, the certification standard is designed to reflect the requirements set out in the governmental UK Forestry Standard and thereby the General Guidelines adopted by European Forestry Ministers at Helsinki in 1993, the Pan-European Operational Level Guidelines (PEOLG) subsequently adopted at Lisbon in 1998 and other relevant international agreements.

In response to the demand from the UK forestry and forest products sector, the certification standard is also designed to reflect the requirements of the two leading global forest certification schemes – the Forest Stewardship Council (FSC) and Programme for the Endorsement of Forest Certification schemes (PEFC). Products certified through these schemes are in much demand in the UK and global timber market as they provide a widely recognised way to inform customers that timber products come from responsibly managed sources.

The UK arms of FSC and PEFC take responsibility for submitting the UKWAS standard to their international parent bodies for assessment and provided the UKWAS standard is judged to be conformant with each scheme's requirements it will provide a certification standard for certification through each of these schemes. A list of certification schemes that currently use the UK Woodland Assurance Standard as the basis for certification in the UK can be found on www.ukwas.org.uk.

**Commented [OD1]:** [25] Page 6 of the UKWAS is a diagram that purports to illustrate how the certification standard is produced. Under UK Government Requirements, only the UKFS and UKFS Guidelines are listed. The UKFS are not the Governmental Requirements. They are only a summary of regulations and guidelines by the Forestry Commission. What is more, the UKFS also fail to mention the EIA Forestry Regulations 1999… What all of this indicates is that the EIA Forestry Regulations 1999 are not being given the attention such legislation would be expected to have with the consequence being that the regulations are not being adhered to.

## 2. Procedures for use of the certification standard

### Flexibility in meeting requirements

It is recognised that some woodland owners and managers may feel that certain requirements are not appropriate to their situation. Some flexibility to allow local adaptation may therefore be acceptable if either:

- It is not physically possible to achieve the requirement in the woodland, or
- The approach taken is an equally or more effective way of achieving the objectives intended by the certification standard.

In either case the impacts of the action shall be carefully monitored and recorded.

The certification body carrying out the audit shall make a professional judgement as to the acceptability of the flexibility, and may consult appropriate specialists or the UKWAS Steering Group (see section 3: Interpretation and revision of the certification standard).

**Commented [OD2]:** [14, 17] We very much welcome the opening statement on p.6 promoting the flexibility to allow local adaptation in situations where it is either not physically possible to achieve the requirement within a woodland or where a more effective way of achieving the objectives may have been identified.

**Commented [OD3]:** [14, 17] We also very much welcome the clear statement of intent on p. 6 that certification bodies may themselves make professional judgements about the acceptability of such flexibility in the interpretation of the Standard.

**Third party rights - Leases, burdens in title, ownership rights and legal restrictions on management**

In certain situations pre-existing leases, burdens in title and third party ownership rights may restrict management actions in such a way that the owner may not be able to fully meet all the requirements of the certification standard. For example:

- Forestry-only or long-term sporting leases where sporting or access rights may be restricted
- Timber leases under which the restocking obligation reverts to the landowner
- Wayleaves, and servitude rights
- Mineral extraction rights held by third parties
- Traditional rights (e.g. peat cutting).

In these circumstances compliance with the certification standard may still be achieved provided the owner/manager is able to demonstrate that:

- The holder of the third party rights has been made aware of those requirements of the standard which are relevant to the rights they hold and how they can assist with compliance. It is not however necessary for the third party to agree to comply with the requirements of the standard
- There is no evidence of complicity with illegal activity by the holder of the third party rights in respect of their exercising of these rights
- All reasonable measures have been taken to mitigate negative impacts caused by the holders of third party rights.
- The third party rights have not been created intentionally to avoid compliance

**Timing for full implementation of the requirements relating to woodland structure and layout**

A special feature of woodland management is its long-term nature. Decisions made in the past have a strong influence on the woodlands of today.

Therefore, when assessing conformance with the certification standard, certification bodies will not evaluate woodlands solely on the present structure and layout, but will consider the plans for management in the short, medium and long term.

Where present structure and layout fail to meet the requirements, woodland owners/managers will need to demonstrate through management planning documentation, design plans and on-going activities in the woodland that they are taking active measures to achieve conformance with the requirements. They will also need to demonstrate that there is a time frame for achieving full conformance based on sound management principles. Further guidance on how non-conformities are dealt with can be obtained from certification bodies or group scheme managers.

**Commented [OD4]:** [14, 17] We particularly welcome the clarity now given to the status of third party rights and the legal restrictions on management that might be imposed on those operating forestry only leases, or having to comply with other burdens in title, restrictions on action etc. generated by some pre-existing leases as outlined on p.7.

**Commented [OD5]:** [16] Proving negatives is very difficult. eg. issues relating to where there is evidence of the illegal activity, but proving it is difficult. A better wording might be possible?

**Commented [OD6]:** [17] We welcome the timing guidance on p.7 but are concerned about the reference to design plans as these no longer exist with NRW. Would suggest changing this to add the words 'or equivalent'. Have also update glossary to include forest resource plans in Wales.
[Proposed edit to: design plans or equivalent]

**The woodland management unit**

The woodland management unit (WMU) is the area to which the management planning documentation relates – see section 2.1 of the certification standard. A WMU is a clearly defined woodland area, or areas, with mapped boundaries, managed to a set of explicit long-term objectives.

For example, a WMU might be a single ownership incorporating several areas of woodland that are managed within a woodland management plan; several separate ownerships managed within a woodland management plan; a community-managed forest; a management subdivision of a national forest service such as a forest district covered by a woodland management plan.

Note: The terms 'woodland management unit' and 'forest management unit' are synonymous.

**Application of the certification standard to different scales of woodland management unit and intensities of operation**

Woodland management units vary in terms of the scale and intensity of management and the risk of negative impacts. While the principles remain the same regardless of woodland size and intensity of management, the level and complexity of management needed to meet the requirements of the certification standard, and the nature of the evidence to demonstrate conformance, may vary depending on the size and type of the woodland management unit. Certification schemes will have different sampling intensities depending on the scale and intensity of management and operations, e.g. for 'Small and/or Low Intensity Managed' (SLIM) woodland. In drafting this standard, every effort has been made to ensure that requirements are sufficiently flexible to apply to all scales and intensities of management.

## 3. Interpretation of the certification standard

The UKWAS Interpretation Panel provides the UKWAS Steering Group and users of the certification standard with advice on its interpretation. Further information is available on the UKWAS website including interpretation advice notes relevant to the current edition of the standard and how to submit a request for interpretation to the Interpretation Panel.

**Commented [OD7]:** [14] We welcome the identification of FEE Forest Districts as identifiable and functional Woodland management Units, though there are occasions when we consider the FEE estate as the most appropriate unit within which to address some requirements (for example the deployment of Natural Reserves or the documentation of some resource management). These occasional situations are identified in the detailed responses in the draft standard with comments submitted by FEE.
[17] We welcome the identification of Forest Districts as identifiable and functional Woodland management Units and would want to see region added as the term forest district no longer applies to the national forest service in Wales, though there are occasions when we consider the NRW estate as the most appropriate unit within which to address some requirements (for example the deployment of Natural Reserves or the documentation of some resource management).
[Proposed edit to: forest district or region]

**Commented [OD8]:** [6] Refers to Small as in SLIM. However, the glossary only refers to Low Intensity and not SLIM. I suggest we don't use SLIM on page 8 as this could confuse owners, particularly as size was more explicitly relevant in the previous version of the Standard.
[7] Page 8 refers to Small as in SLIM. However, the glossary only refers to Low Intensity and not SLIM. We suggest that the document shouldn't use SLIM on page 8,as this could confuse owners, particularly as size was more explicitly relevant in the previous version of the Standard.

**Commented [OD9]:** [24] I'm unclear of the status of IP [Interpretation Panel] notes with reference to this new edition. E.g. IP note 8 on wind farms which involved extensive discussion among the IP members seems equally relevant to the new edition as well as the current edition.

# Certification Standard
# Fourth Edition

## Using the certification standard

The certification standard is set out as follows:

**Requirements**

These are the compulsory elements of the certification standard and are stated as 'shall'. Woodland management must meet all relevant requirements and certification bodies will check that each requirement is being met.

**Example verifiers**

These are examples of objective evidence - documents, actions or discussions – that owners/managers may present to the certification body for their consideration in order to demonstrate that the requirement is being met. Certification bodies are required to undertake audits and owners/managers should be able to present sufficient evidence to allow the auditor to report compliance. The verifiers suggested are neither exclusive nor exhaustive. It will not always be necessary to use any or all of the verifiers suggested, and conformance to requirements may be demonstrated in other ways. The selected verifiers should be appropriate to the scale and intensity of management of the WMU and the risk of negative impacts.

**Guidance notes**

These aim to help both the woodland owner/manager and the certification body to understand how requirements should be applied in practice. More information is provided to elaborate some requirements, the meaning of certain terms or phrases is explained, and examples of appropriate action are given. Where guidance is stated as 'should' it indicates a recommendation. Where it is stated as 'may' it indicates an option or a list of options.

Note: the guidance note can include 'Advice to owners/managers' or 'Notes to certifiers' on related matters which are beyond the direct scope of a forest management certification standard e.g. owners/managers are advised to check the specific requirements of certification schemes in relation to chain-of-custody certification matters. Such information is clearly marked and is provided as an advisory note only: it shall not be considered by certification bodies when assessing conformance with the certification standard.



**Commented [OD10]:** [18] **Missing Requirements**
**a.** 15% of woodland area to be managed for biodiversity. This needs to be reinstated. This may also be required to meet UK Forestry Standard requirements as FSC Principles & Criteria for sustainable forest management.

**b.** Open space provision in new woodlands section. This needs to be reinstated as this is critical for biodiversity.
This may also be required to meet UK Forestry Standard requirements as FSC Principles & Criteria for sustainable forest management.
It would also be helpful to have a reference to appropriate tree stocking density should be made in the guidance to avoid stocking at such high density that biodiversity value is reduced. 5

**c.** Minimum size ride widths. It would be useful to include this as a practical habitat enhancement measure to benefit woodland birds. Need to refer to appropriate detailed biodiversity guidance (1.5 x height of mature canopy can be beneficial).

**d.** Flood risk management. Further elements of the UK Forestry Standard Forests & Water Guidelines could be brought into UKWAS.

e. Climate change adaptation & mitigation. Further elements of the UK Forestry Standard Climate Change Guidelines could be brought into UKWAS to ensure biodiversity adaptation in relation to climate change for woodland and non-woodland priority habitats, priority species and designated wildlife sites. It would be important, however, not to use the 'climate change' mitigation as a reason to promote environmentally damaging forestry practices through UKWAS requirement. All climate change mitigation and adaptation works under UKWAS need to be planned and carried out in an environmentally sustainable manner.

f. Landscape-scale wildlife conservation. There may be further scope to consider wider-scale habitat management, restoration and enhancement within UKWAS requirements. This could be part of the objectives, species selection and management planning, as well as encouraging collaborative and co-operative approaches to woodland management.

There may also be audit protocols and group scheme aspects to this beyond the standard, but that standard setting, including evidence and guidance requirements, could support.

## Key to icons

**References**

Check the Appendix for references providing further guidance.

## 1. Legal compliance and UKWAS conformance

| | REQUIREMENT | EXAMPLE VERIFIERS | GUIDANCE | MAKE CONSULTATION COMMENTS / NOTES HERE |
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| 1.1 | Compliance and conformance | | | [16] Whilst the greater clarity provided in the introduction around the status and requirements of 3rd parties such as leaseholders is very helpful, we would like to see this incorporated and reflected more clearly in Section 1 of the finalised Standard. |
| 1.1.1 | There shall be compliance with the law. There shall be no substantiated outstanding claims of non-compliance related to woodland management. | • No evidence of non-compliance from audit<br>• Evidence of correction of any previous non-compliance<br>• A system to be aware of and implement requirements of new legislation. | Certification bodies will be checking that there is no evidence of non-compliance with relevant legal requirements including that:<br>• Management and workers understand and comply with all legal requirements relevant to their responsibilities<br>• All documentation including procedures, work instructions, contracts and agreements meet legal requirements and are respected<br>• No issues of legal non-compliance are raised by regulatory authorities or other interested parties. | [2] First sentence is superfluous, pointless and should be deleted. We are all required to comply with the law, irrespective of whatever it says in UKWAS.<br><br>[14] FE England would like to see the sentence regarding 'a system to be aware of and implement requirements'… in verifiers removed. We think that evidence from audit and correction from previous non-compliance should be sufficient and as stated as a verifier, rather difficult to relate to the requirement and hence difficult for auditors to interpret.<br><br>[17] NRW has assumed that [A system to be aware of and implement requirements of new legislation] refers to being aware of new requirements and legislation outing the onus on the owner to keep up to date with this. In practice this may be difficult for some owners to achieve as it also depends on how widely the legislator publicises any new legislation, for example changes to employment law, and may in actually be picked up via evidence from audit and correction from previous non-compliance. |

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| | | | In the event of a perceived conflict between the requirements of the certification standard and legal requirements owners/managers should seek guidance from the UKWAS Interpretation Panel. | [22] Additional information and guidance should be provided related to land manager and landowner responsibility in relation to public rights of way and open access under the Countryside and Rights of Way Act 2000 and the Land Reform (Scotland) Act 2003. This guidance should mirror that already provided such as:<br><br>Landowner responsibilities towards public rights of way https://www.gov.uk/guidance/public-rights-of-way-landowner-responsibilities<br><br>Landowner responsibilities towards open access under Countryside and Rights of Way Act 2000 https://www.gov.uk/guidance/open-access-land-management-rights-and-responsibilities<br><br>Please also see our additional comments [below].<br><br>[22] To achieve certification landowners should comply fully with their obligations under rights of way law as is the case with payments made under the Basic Payment Scheme, Countryside Stewardship, Entry Level Stewardship, Higher Level Stewardship and English Woodland Grant Scheme via Cross Compliance rules as set out below:<br><br>GAEC 7b: Public Rights of Way (Previously GAEC 8)<br>Public rights of way (public footpaths, bridleways, restricted byways and byways open to all traffic) must be kept open and accessible because they are important landscape features. |

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| | | | | What you must do<br>You must:<br>• not obstruct public rights of way<br>• make good the surface of cross field footpaths and bridleways to not less than the minimum width within 14 days of the first disturbance if you are sowing a crop, or within 24 hours in all other circumstances. Minimum widths are 1 metre for footpaths and 2 metres for bridleways<br>• maintain stiles, gates and similar structures in a condition that makes them safe and reasonably easy to use<br>• indicate the route of a reinstated cross-field footpath or bridleway so that it's visible on the ground and is at least the minimum width of the recorded route.<br>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/397044/Cross_compliance_handbook_v2_web.pdf<br><br>They should also be aware and comply with the basic set of responsibilities any landowner has towards public rights of way, including:<br>• being aware of any public rights of way on their land<br>• avoid putting obstructions on or across the route, such as permanent or temporary fences, walls, hedgerows, padlocked gates or barbed wire<br>• make sure vegetation does not encroach onto the route from the sides or above |

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| | | | | • byways, restricted byways and unsurfaced public roads must not be cultivated (ploughed). The same applies to footpaths or bridleways that follow a field edge<br>• stiles or gates which are the landowners responsibility must be maintained so that they are safe and reasonably easy to use.<br>https://www.gov.uk/guidance/public-rights-of-way-landowner-responsibilities<br><br>[24] I accept the logic of referring perceived conflicts to the IP [Interpretation Panel]. However some conflicts could be highly technical and complex such that the IP might well need to call on external expert advice and possibly legal opinion. |
| 1.1.2 | There shall be conformance to the spirit of any relevant codes of practice or good practice guidelines. | • No evidence of non-conformance from audit<br>• Evidence of correction of any non-conformance<br>• A system to be aware of and conform to new codes of practice and good practice guidelines. | The Appendix provides further information on good practice guidelines and codes of practice.<br><br>Conformance to the spirit means that the owner/manager is aiming to achieve the principles set out in relevant codes of practice or good practice guidelines and that:<br><br>• Management and workers understand and comply with all legal | [10] Most of the guidance is a repetition of the guidance above. Is this correct?<br><br>[14] FE England would prefer to see the sentence regarding 'a system to be aware of and conform to new codes of practice guidelines'… in verifiers removed from the list of verifiers and suggest it is moved to guidance. We think that evidence from audit and correction from previous non-compliance should be sufficient.<br><br>Fe would welcome an amendment to the guidance to make it clear that staff and workers should "understand, to the degree that is appropriate fior their role and level within the organisation or the action being undertaken". This is mentioned more explicitly in Section 1.1.5 but |

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| | | | requirements relevant to their responsibilities<br>• All documentation including procedures, work instructions and contracts meet legal requirements<br>• No issues of legal non-conformance are raised by regulatory authorities or other interested parties.<br><br>In the event of a perceived conflict between the requirements of the certification standard and relevant codes and guidelines, owners/managers should seek guidance from the UKWAS Interpretation Panel.<br>**BAP** | could usefully be repeated here.<br><br>[17] See above [1.1.1] in relation to [A system to be aware of and conform to new codes of practice and good practice guidelines]. This may become more complicated with devolution due to the likelihood of country specific practice or implementation guidance (eg acid sensitive catchments)<br><br>NRW would welcome an amendment to the guidance to make it clear that staff and workers should "understand, to the degree that is appropriate for their role and level within the organisation or the action being undertaken". This is mentioned more explicitly in Section 1.1.5 but could usefully be repeated here.<br><br>[22] Landowners and land managers In Scotland should be aware of and show evidence of meeting the requirements set out in the Scottish Outdoor Access Code.<br><br>Landowners and land managers in England and Wales should be aware of and conform to the spirit of other non-statutory codes. |
| 1.1.3 | The identity of the owner/tenant and their legal ownership or tenure shall be proven. | • Long term unchallenged use<br>• Integrated Agriculture Control System (IACS) registration<br>• A signed declaration detailing nature and location of tenure | Long term unchallenged use might be demonstrated by the existence of previous grant scheme documentation or long-term certification to this | [3, 4] There is a need for clarity as to which tenants this applies to. Does it include all shooting and recreational tenants for example?<br><br>[9] What verifiers are proposed to prove the identity of the |

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| | | documentation<br>• Solicitor's letter<br>• Title deeds<br>• Land registry records. | standard. | owner? |
| 1.1.4 | Mechanisms shall be employed to resolve disputes over tenure claims and use rights. | • Use of dispute resolution mechanism. | Disputes of substantial magnitude involving a significant number of interests will normally disqualify an entity from being certified. | |
| 1.1.5 | The owner or forestry tenant, shall:<br>• Commit to conformance to this certification standard<br>• Have declared an intention to protect and maintain the woodland management unit and its ecological integrity in the long term.<br><br>A statement of these commitments shall be made publicly available upon request. | • Signed declaration of commitment<br>• Dissemination of the requirements of this certification standard to the forestry workforce<br>• Public statement of policy. | Examples of declarations of commitment are available from the UKWAS website.<br><br>The forestry tenant is the holder of a forest lease that gives control over the management of forestry operations.<br><br>The forestry workforce should be informed of the aim of the certification standard and, to the degree that is relevant, of the practical implications for them in carrying out their work functions. This might be done through, for example, meetings or | [14, 17] FE England/NRW would welcome amendment to the Requirement [Have declared an intention…] by following or replacing the last words "in the long term" with "throughout the term of ownership or lease (or until its surrender)" as the current wording implies an obligation not to sell or otherwise dispose of certified forest land, or to have it removed from the area of certified forest in the light of developments such as road stone quarries, forest cabins or other developments.<br><br>Staff workforce; We welcome the emphasis on the "degree of relevance" as appropriate to the role of staff concerned.<br><br>[16] Helpful to clarify whether or not "forestry tenant" has a wider meaning which includes all tenants within a WMU?<br><br>For a "statement of commitment" to be publicly available it will need to be in writing, but not all leases/options/agreements are registered and publically available. In fact some are commercially confidential. |

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| | | | briefings and the provision of appropriate written material.<br><br>If a substantial failure has led to withdrawal of a woodland certification to this standard in the past, then substantial changes in ownership, policy commitment and management regime should have been implemented or a two-year track record of conformance established.<br><br>**Advice to owners/managers**<br><br>Certificate holders may be subject to additional requirements from their certification scheme relating to any adjustment of the area in the woodland management unit. Owners/managers are advised to seek guidance from their certification body or group scheme | Hence clarity is needed on what form a statement of commitment, by any third party with an interest on the WMU, should take. |

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| | | | manager.<br><br>**MP** | |
| 1.2 | Protection from illegal activities | | | |
| 1.2.1 | The owner or manager shall take all reasonable measures to prevent or stop illegal or unauthorised uses of the woodland that could jeopardise fulfilment of the objectives of management. | • The owner/manager is aware of potential and actual problems<br>• Evidence of response to actual current problems<br>• Evidence of a pro-active approach to potential and actual problems including follow-up action<br>• Engagement with statutory bodies. | The phrase 'reasonable measures' means measures that are both within the law, within the terms of any forestry tenancyand within the jurisdiction of the owner/manager and that the measures are economically viable and environmentally and socially acceptable.<br><br>The scope of illegal activities which the owner/manager may encounter is so diverse that it is not possible to prescribe actions in every case. In specific cases a legal opinion may be required in order to prescribe 'reasonable measures'.<br><br>**MP** | [16] This req't to put in place reasonable measures to protect or stop illegal activities throws up the distinction between e.g. reckless disturbance and responsible access rights under different legislation. The guidance hints at how difficult it could be to be clear about the extent which owners/managers should 'be aware of potential illegal activities'. Worth reconsidering the inclusion of this aspect. |
| 1.3 | Genetically modified organisms | | | |
| 1.3.1 | Genetically modified organisms (GMOs) shall not be used. | • Plant supply records<br>• Discussions with the owner/manager. | GMOs are created through gene transfer under laboratory conditions and are not the product of tree breeding, vegetative propagation, cloning or tissue culture programmes. | [2] I am not aware of any proposals to introduce GMOs into UK forestry, so this requirement is currently superfluous.<br>It is conceivable that GM technology might in future be acceptable if there is no other way of resisting a disease, e.g. *Chalara*. |

## 2. Management planning

Commented [OD11]: [16] This is now a greatly expanded section and easier to use with the relevant requirements gathered into one place.

| | REQUIREMENT | EXAMPLE VERIFIERS | GUIDANCE | [16] [T]here are a number of requirements in Section 2 of the draft Standard that would, in our view, prove very difficult for both the woodland owner/manager and the UKWAS assessor to interpret clearly as they stand and would benefit from further consideration/review. These include those around: demonstrating that long-term environmental, economic and social impacts have been fully accounted for; maximising the productive potential of the tree crop and non-timber woodland products; demonstrating that the use of ecosystem services will not permanently exceed, or diminish, the long-term productive potential of the WMU. Other examples are flagged by requirement in our detailed comments. |
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| 2.1 | Long-term economic, environmental and social viability | | | |
| 2.1.1. | The planning of woodland management operations shall take fully into account the long-term economic, environmental and social impacts of proposed operations. | • Management planning documentation<br>• | MP<br>BAP | [16] This req't is useful as an overarching principle for the section – a similar over-arching principle could perhaps be identified for each section?<br><br>Suggest this section might refer instead to the "sustainable delivery of objectives". It would be difficult to demonstrate/prove recognition of long term economic impacts.<br><br>Consequently guidance is needed here and a focus that avoids too much detail which will simply not be available. |

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| 2.2 | Documentation | | | [14, 17] Throughout section 2.2 documentation there is a pressing need to be much clearer that only those things identified in point b) about resources and c) and d) about characteristics, needs and sensitivities should inform the objectives in e), **and that as such only these would require monitoring.** |
| 2.2.1 | All areas in the WMU shall be covered by management planning documentation which shall be retained for at least five years and shall incorporate:<br>a) A long-term policy for the woodland.<br>b) Assessment of relevant components of the woodland resource.<br>c) Identification of special characteristics and sensitivities of the woodland and appropriate treatments.<br>d) Identification of community and social needs and sensitivities.<br>e) Set and prioritise objectives, with targets.<br>f) Rationale for management | • Management planning documentation<br>• Appropriate maps and records<br>• Long-term management objectives will suffice to meet (a). | The subsequent sections of this standard provide additional guidance and information on how to meet this requirement.<br><br>Assessment and mapping of the woodland resource should include appropriate aspects of biological, physical and human environment.<br><br>The documentation and level of detail associated with the planning process should be appropriate to scale, intensity and risk.<br>The documentation might include:<br>• For low intensity managed woodlands: a brief statement of intent and an annotated map | [10] Sections C & M seem to have some overlap [Proposed edit to verifiers: For smaller WMUs, Long-term management objectives ~~will~~ may suffice to meet (a).]<br><br>[14, 17] FEE/NRW suggest that example verifiers should include 'long term management aims' rather than 'objectives' to distinguish between these and specific objectives with targets, which are to be monitored.<br>We would also recommend that 'and appropriate treatments' in c) is deleted, as this does not appear to differ from the requirements in points f) and m).<br><br>FEE/NRW would also welcome the addition of Operational Site Assessments to the bullet list of other documents in the list of verifiers.<br><br>Requiremt l) duplicates 2.14.2 and could be usefully deleted.<br><br>There a need to be much clearer that only those things identified in points b) about resources and c) and d) about characteristics, needs and sensitivities **should inform the objectives in e), and that therefore only these would require monitoring**.<br><br>We would also suggest that m) is deleted as it also |

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| | prescriptions.<br>g) Outline planned felling and regeneration over the next 20 years.<br>h) Where applicable annual allowable harvest of non-timber woodland products (NTWPs).<br>i) Rationale for the operational techniques to be used.<br>j) Plans for implementation, first five years in detail.<br>k) Appropriate maps.<br>l) Plans to monitor, at least those elements identified under section 2.14.2 against the objectives.<br>m) Specific measures to maintain or enhance those areas identified under sections 4.1-4.5 and 4.8, considering areas where either the extent of these areas or their sensitivity to operations may be | | • For other woodlands: a plan covering a 20 year period and incorporating an assessment at the landscape level<br>• For a WMU consisting of multiple areas: an overarching plan.<br>The management planning documentation should cover all elements of the requirement but may refer to other documents as appropriate; these may include:<br>• A fire plan<br>• A deer management plan<br>• An integrated pest management strategy<br>• A research policy<br>• Project plans<br>• Necessary permissions from applicable regulatory and licensing authorities.<br>**MP**<br>**BAP** | repeats section 2.14.2.<br><br>Suggest also that 'policy' under a) in requirements is changed to 'vision'.<br><br>[14] FEE would also suggest the following be added to the guidance column: 'Objectives should be specific and measurable, achievable within the foreseeable future, and relevant to the time period covered'<br><br>[16] h) NTWPs. Whilst acknowledging that harvesting of NTWPs must be done sustainably and this must be demonstrated by the woodland manager; prescribing an annual allowable harvest in the management plan would be very difficult or impossible in some cases,<br><br>Point d) is duplication of content in section 2.3 regarding consultation and cooperation.<br><br>It would be helpful to have an indication of the level of detail required in the guidance e.g. for d) and how management planning is expected to address this.<br><br>The introduction of the terms 'biological, physical and human environment' is not helpful terminology (also in 2.4.5)<br><br>m) would prefer to see these issues specified further in the planning section rather than just cross referenced to a section as they are a key aspect of our Land Management Plans. |

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| | unknown. | | | |
| | | • | | Requirement moved down to section 2.11 |
| | | • | | Requirement moved down to section 2.11 |
| 2.2.2 | While respecting the confidentiality of information, woodland managers shall, upon request, make publicly available either:<br>• Management planning documentation, or<br>• A summary of the management planning documentation. | • Evidence of fulfilling requests for management planning documentation or summaries<br>• A public contact point<br>• Summary management planning documentation. | MP | [3, 4] Simplify so that only a summary is required to be publicly available.<br><br>[17] Does it need to be clear in the guidance that a public contact point could be an organizational email address, rather than a named individual, the latter change? |
| 2.2.3 | The management planning documentation shall be reviewed every five years as a minimum. | • Management planning documentation. | The review should be conducted in order to assess whether any aspects of the management planning documentation require revision or updating taking into account, for example:<br>• The results of certification audits<br>• Monitoring data (see section 2.14.3)<br>• Advances in scientific | [10] [Proposed addition to list in guidance: Wind blow, pest or disease outbreaks] |

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| | | | research<br>• Improved technical and forestry practice guidance<br>• Results from stakeholder engagement, surveys, research and consultation relating to the woodland covered by the management planning documentation.<br>**MP** | |
| 2.3 | Consultation and co-operation | | | [16] Helpful having the consultation section here – note the inclusion of the word 'co-operation'. |
| 2.3.1 | a) Local people, relevant organisations and interest groups shall be identified and made aware that:<br>• New or revised management planning documentation, as specified under section 2.2.1, is being produced<br>• A new or revised forestry or woodland grant scheme application and associated documents are available for inspection<br>• High impact operations are planned | • Consultation with the relevant forestry authority<br>• Evidence that users of the woodland are informed about high impact operations (e.g. signs, letters or other appropriate means).<br>• A list of interested parties<br>• Established means of pro-active communication.<br>• A public contact point. | The owner should be able to justify the frequency and level of consultation and the certification body will look for corroborating evidence. Examples of methods for identifying and making local people and relevant organisations aware include:<br>• Statutory consultations by the relevant forestry authority or voluntary consultation with relevant bodies<br>• Letters to individuals or groups<br>• Temporary or permanent signs in or near the | [2] This provision is extremely burdensome for small woodlands in a well-populated area, and would not be tolerated by farmers.<br><br>[5] Remove the clause about consulting all and sundry each time you apply for a grant. This is not practical or useful. Grant bodies have their own consultation.<br><br>[14, 17] FEE/NRW regard the part of Requirement d) [and shall demonstrate how the results of the consultation including community and social impacts have been incorporated into management planning and operations] as very challenging and onerous especially in many situations where conflicting demands or unrealistic expectations are placed upon FE/NRW to accommodate the wishes of consultees. We would strongly recommend the text of d) be shortened by the removal of the text |

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| | • The woodland is being evaluated for certification.<br><br>b) The owner/manager shall ensure that there is full co-operation with the relevant forestry authority's consultation processes.<br><br>c)The owner/manager shall consult adequately with local people and relevant organisations and provide opportunities for their engagement in planning and monitoring processes.<br><br>d) The owner/manager shall respond to issues raised or requests for ongoing dialogue and engagement and shall demonstrate how the results of the consultation including community and social impacts have been incorporated into management planning and operations. At least 30 days shall be allowed for people to respond to notices, letters or meetings before certification. | | affected woodland<br><br>• Information in local newspapers or other publications<br><br>• Meetings and dialogue<br><br>• Internet<br><br>• Consultation with the relevant archaeology service.<br><br>Consultation and engagement with local people should be sufficient to identify:<br>• their permissive or traditional uses of the woodland<br>• sites or features of special cultural or historical significance.<br><br>*See also section 4.8.1 which covers sites and features of special cultural or historical significance and section 5.1.1 which covers permissive or traditional uses.*<br><br>**MP** | highlighted [above] thus making it a requirement to consult widely and take heed of responses but not be obliged by the demands of certification to accommodate all wishes of all participants in the consultation process.<br><br>A more minor point. The phrase ending "before certification" is very unclear and believed to be an error. We think it means "before consultation".<br><br>[16] d) Public register is 28 days. Not 30? Not a big issue but perhaps refer to 'min of 28days' as cleaner and easier to manage?<br><br>The definition of 'high impact operations', could apply to a whole range of works – fencing, ground prep, harvesting, vegetation control etc., depending on the view of stakeholders/ communities/ neighbours.<br><br>b) and c) = unclear whether the consultation requirement extends to non-forestry development by third parties?<br><br>[Proposed edits to requirement:<br><br>b) The owner/manager shall ensure that there is full co-operation with the relevant forestry authority's consultation processes for forest management proposals.<br><br>c) The owner/manager shall consult adequately with local people and relevant organisations and provide opportunities for their engagement in forest planning and monitoring processes.] |

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| | | | | [22] Owners of managers of woods with any form of public access, be it via statutory or others means including permissive or traditional access, should seek to identify and consult local representative groups or bodies which can represent users.<br><br>The statutory Local Access Forum for the area should also be included in any consultation process. |
| 2.3.2 | a) Where appropriate, contact shall be made with the owners of adjoining woodlands to try to ensure that restructuring of one woodland complements and does not unreasonably compromise the management of adjoining ones.<br><br>b) Management of invasive plants and of wild mammals shall be undertaken in co-ordination with neighbours where possible (see section 2.11.1 in relation to deer). | • Awareness of potential problems and verbal description of appropriate action<br>• Membership of a wildlife management group<br>• Where there is a significant problem caused by wildlife, a documented plan (which may take the form of a contract or licence) for control. | If management cannot maintain populations of wild mammals at a level that ensures they are not causing ecological damage, then sensitive areas - including regeneration sites, coppice coupes and areas with vulnerable flora - should be protected from browsing and other damage. | [10] [Proposed addition to verifiers: Felling Design Plan]<br><br>[11] "Membership of a wildlife management group". This might be better as "Membership of a wildlife group e.g. Wildlife Trust, RSPB, Raptor Study Group".<br><br>[14, 17] FEE/NRW has had considerable experience in working with partners and neighbours in addressing invasive plants and animals, particularly deer and grey squirrels. As a consequence we would strongly recommend that 2.3.2 b) be relegated from a requirement and moved to guidance, and that as such the wording be changed from "shall be" to "should" and from "possible" to "where possible and practicable". It is not seen as desirable to have as a requirement a set of actions that in practice can rarely be achieved or sustained.<br><br>[16] All areas can potentially have some vulnerable flora. Need to be clear whether this just refers to rare, palatable flora. |

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| | | | | Helpful if all the deer management requirements could be in one section? |
| 2.4 | Productive potential of the WMU | | | |
| 2.4.1 | The owner/manager shall seek to maximise the productive potential of the tree crop and non-timber woodland products, within the constraints of their objectives. | • Management planning documentation. | Productive potential relates to both qualitative and quantitative aspects of the tree crop and non-timber woodland products. | [2] I fully agree with these requirements [2.4.1, 2.4.2 and 2.4.3]: for sustainability we must ensure an equal harvest for future generations.<br><br>[16] This seems an odd requirement to maximize the productive potential of NTWP's. It suggests that an owner may be obliged to maximize harvest of eg. mushrooms within sustainable limits. The logic or intended focus of this isn't clear.<br><br>Not sure what this means in practice for tree crops – if we change SS for pine (assuming both will grow OK on the site) are we then not maximising the productive potential? Needs additional clarity over the term 'within the constraints of their objectives'. |
| 2.4.2 | Woodland management shall not diminish the long-term productive capacity of the site. | • Management planning documentation. | Long-term productive capacity relates to the ability of the site to sustain production over subsequent generations. | [2] I fully agree with these requirements [2.4.1, 2.4.2 and 2.4.3]: for sustainability we must ensure an equal harvest for future generations.<br><br>[5] Productive capacity declines in nearly all woodlands. Reword.<br><br>[9] This clause is not helpful, is not clear and cannot be audited. It is surely an outcome of implementing UKWAS. It is unnecessary waffle which undermines the credibility of UKWAS.<br><br>[14, 17] FEE/NRW would suggest that in the guidance the word 'production' should be replaced with 'productivity' to avoid inference that it **only** refers to sustained timber yield.<br><br>[16] 2.1.1 also covers sustainability aspects. There may |

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| | | | | be many reasons to "diminish" production levels whilst still sustaining a level of production. Note that 2.4.3 below also covers/replicates this point to some degree.<br><br>This requirement needs some qualification / additional guidance as it appears to rule out some of the lower input site choices eg. open habitat / peatland restoration. |
| 2.4.3 | Timber harvesting and restocking plans shall not jeopardise the long-term productive potential of the WMU and are consistent with management objectives. | • Compartment records<br>• Growth and yield estimates<br>• Production records or appropriate standing sale volume assessments and reconciliation with estimates<br>• Demonstrated control of thinning intensity<br>• Owner's/manager's knowledge<br>• Field observation. | The long-term productive potential in woodlands of planted origin should be considered primarily in terms of timber production.<br><br>Examples of growth and yield estimates include:<br>• Average growth rates or yield class for major species on different site types<br>• Predictions of thinning and felling yields for different crop types<br>• Forecasts of areas to be subject to harvesting operations in future years.<br>Accuracy of growth and yield estimates should be appropriate to the scale and intensity of the operation.<br>The resilience of the woodland and different species to climate change | [2] I fully agree with these requirements [2.4.1, 2.4.2 and 2.4.3]: for sustainability we must ensure an equal harvest for future generations.<br><br>Regrettably, the associated guideline includes the statement "*It is recognised that…replacing conifers with broadleaves or creating additional open space, will reduce the productive potential of the woodland*" suggesting it is acceptable to prejudice sustainability if political fashion so dictates.<br><br>[9] As per 2.4.3 This is not a readily auditable requirement. Again. If the rest of UKWAS is followed this should be an outcome. The only two scenarios I can think of would be adopting a practice which facilitates a Heterobasiduim infection or soil compaction / soil loss. All such actions are covered by other requirements.<br><br>[10] Should we just say Plantations<br><br>[14, 17] FEE/NRW welcomes the guidance items in section 2.4.3 referring to forest resilience, that in some circumstances the harvest will exceed annual increment of the FMU, and that in balancing objectives overall productive potential of woodlands and forests may be reduced.<br><br>[16] If there are to be sections like this in the standard then an explanation is required that that productivity is to |

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| | | | should be considered.<br>It is recognised that in some circumstances (e.g. during restructuring) the harvest level will exceed the increment.<br>It is recognised that achieving a balance of management objectives, e.g. replacing conifers with broadleaves or creating additional open space, will reduce the productive potential of the woodland.<br>In low intensity managed woodlands, or where timber production is not a primary objective, area rather than volume predictions are acceptable in planning and monitoring. | be considered in its widest sense .e.g. soil & nutrient conservation, ecosystem services not just timber. Perhaps more like in section 2.4.4<br><br>[17] [Proposed edit to guidance: It is recognised that in some circumstances (e.g. during restructuring), or in response to disease, the harvest level will exceed the increment.] |
| 2.4.4 | Authorised harvesting of non-timber woodland products and use of ecosystem services shall not permanently exceed, or diminish, the long-term productive potential of the WMU. | • Evidence from records and discussions with the owner/manager that quantities harvested are in line with sustainable growth rates and that there are no significant adverse environmental impacts. | Non-timber woodland products include foliage, moss, fungi, berries, seed, venison and other animal products.<br><br>Ecosystem services include include water supply and rights to grazing.<br><br>*See also sections 2.3.2 in relation to protection from* | [11] “Include” is repeated. Is rights to graze an ecosystem service?<br><br>[14] FEE welcome the clarification and support Requirement 2.4.4. We are though uncertain as to the link between the guidance [Ecosystem services include water supply and rights to grazing] and the requirement as stated and recommend it be deleted or revised to more clearly reflect the intention of the authors.<br><br>[16] This is better wording than h) in 2.2.1 |

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| | | | *wild mammals, and 4.9 in relation to game management.*<br>**MP** | Are "rights to grazing" really an ecosystem service? Need to define ecosystem service in Glossary.<br><br>Hard to demonstrate the sustainable harvest of some non-timber products e.g. mushrooms. The science/understanding to enable this is not available for some products. Not sure this requirement is practical to meet.<br><br>The term ecosystem service is being increasingly used in management planning by a range of stakeholders, and there is an inconsistent understanding of what it means and how it should be used. Needs to be better defined in the requirement, example verifiers & guidance.<br><br>Delivery of ES's is an important issue, and one that is likely to become more important with time. Perhaps it should be a separate requirement?. It also needs to be covered in the glossary to make sure that the current level of understanding is incorporated and it can be interpreted clearly & consistently.<br><br>[17] NRW has some concerns regarding the use of ecosystems services diminishing long term productive potential if the latter is just referring to timber and would welcome more clarity about what this means in this content. The examples given in the guidance are fine if this is what is meant. However ecosystems services also covers regulating services such as reducing flood risk and there are occasions where the increase in wetland habitat/peat restoration may be appropriate which would reduce timber productive capacity for wider public gain. |
| 2.4.5 | Protected and endangered plant and animal species shall not be exploited for commercial purposes. | • Discussion with owner/manager<br>• Monitoring records<br>• Species inventories. | In this context exploitation means the species is utilised to its proven detriment. | |

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| 2.5 | Assessment of environmental impacts | | | |
| 2.5.1 | 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. | • Management planning documentation<br>• Documented environmental impact assessment or 'Appropriate Assessment' where such has been requested by the appropriate forestry authority<br><br>• Design plans<br>• Documented environmental appraisals. | Environmental values relates to the biological, physical and human environment.<br><br>Depending on scale and sensitivity the assessment of environmental impacts may be:<br>• Brief environmental appraisals for planting or felling which might affect sites recognised for cultural, landscape, hydrological or ecological value<br>• Ecological assessments of ancient semi-natural woodland and projections of their response to management and natural processes<br>• Specific assessments for unusual and/or extensive operations<br>• Specialist advice on impacts of woodland operations on rare or vulnerable species or special sites<br>• Specialist advice on the impact of woodland operations on historic environment sites and landscapes<br>• Checks against relevant UK Biodiversity Action | [6] Guidance advice on expected level of checks against BAPS, etc would be useful.<br><br>[7] We believe that some advice on expected level of checks against BAPS, in 2.5.1 would be particularly useful.<br><br>[14] The inclusion of Design Plans in the list of Verifiers would appear to be superfluous as they are included in the term management plan documentation FEE would suggest that reference to 'design plans' as example verifiers throughout this section should be omitted. Plans as a whole are already covered by 'management planning documentation'.<br><br>[15] In the Guidance column, we would recommend the inclusion of a reference to flood risk 'specialist advice with regards to flood risk mitigation potential in accordance to local flood risk plans or strategies'.<br><br>[16] Refer here (and throughout) to 'Forest Management Plans' rather than 'Design Plans?<br><br>Helpful to include guidance on what, or who, would dictate whether a site has "recognised cultural, landscape, hydrological or ecological value" and what aspects might be included in a "brief environmental appraisal".<br><br>What is considered the threshold for an "extensive" operation?<br><br>[17] The inclusion of Design Plans in the list of Verifiers |

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| | | | Plan Habitat Action Plans (HAPs) and Species Action Plans (SAPs) paying particular attention to BAP priority habitats and species.<br>BAP<br>MP | would appear to be superfluous as they are included in the term management plan documentation and are specific to some organisations. NRW would suggest that if reference to 'design plans' as example verifiers throughout this section is retained the the words 'or equivalent' should be added. Plans as a whole are already covered by 'management planning documentation'.<br><br>[18] The guidance and definitions section of UKWAS 4 may need to make clear what 'priority habitats' and 'priority species' are in devolved country contexts.<br><br>This could be defined as country nature conservation priorities: listed on Natural Environmental and Rural Communities Act 2006 - Section 41 (for England), Natural Environmental and Rural Communities Act 2006 Section 42 (for Wales), the Northern Ireland Biodiversity List and the Scottish Biodiversity List. These country biodiversity priorities embody the original UK Biodiversity Action plan priority species and priority habitats approach and lists.<br><br>It would also be helpful in guidance to mention the need to consider other important species that may be present, for example Red Data list species and Birds of Conservation Concern, as well as noting there may also be legal obligations for country, UK and EU protected species. |
| 2.5.2 | The impacts of woodland plans shall be considered at a landscape level, taking due account of the interaction with adjoining land and other nearby habitats. | • Management planning documentation<br>• Maps<br>• Discussions with the owner/manager | In particular, planning including layout and design of woodland should take into account the following factors and action should be taken if required:<br>• The character of other | [5] Very vague – remove<br><br>[14, 17] FEE/NRW Comment: See above [2.5.1 re. Design plans]<br><br>FEE/NRW suggest a minor change to bullet point on |

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| | | • Design plans. | woodland in the area<br>• Needs or impacts of animals (both wild and domestic) which use both woodland and surrounding land<br>• Impacts on flora in the woodland and on surrounding land<br>• Scale and pattern of open land<br>• Habitats which are continuous from inside to outside the woodland (e.g. water courses)<br>• Buffering of water courses and water bodies, and connectivity of riparian habitats<br>• Woodland margins as transitional habitats<br>• Linking open space within the woodland with similar habitats outside<br>• The spread of invasive species into or out of the woodland<br>• Impacts on natural features (e.g. wetlands, rock exposures, drainage patterns)<br>• Catchment level impacts on water flows and flood risk<br>• Nature of historic landscapes and links with similar historic | historic landscapes because at present it implies that elements of the historic landscape have to be physically linked to features outside the woodland or forest. We suggest an amendment to “historic landscapes and the historic environment sites outside the woodland”. |

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| | | | environment sites outside the woodland<br>• Relevant UK Biodiversity Action Plan Habitat Action Plans (HAPs) and Species Action Plans (SAPs).<br>**BAP**<br>**MP** | |
| 2.5.3 | The results of the environmental assessments shall be incorporated into planning and implementation in order to avoid, minimise or repair adverse environmental impacts of management activities. | • Management planning documentation<br>• Discussions with owner/manager<br>• Field observations. | **MP** | [16] Not sure what 'the environmental assessments' refers to, and what the implications might be, particularly for "repair" of adverse environmental impacts. Helpful to be clearer here and include guidance. |
| 2.5.4 | Planting and restructuring plans shall be designed to minimise the risk of damage from wind, fire, invasive plant and animal species, and other pests and diseases. | • Management planning documentation<br>• Discussions with the owner/manager<br>• Design plan. | Evaluation should consider:<br>• Robust planting design<br>• Climate change adaptation<br>• Diversity of species, ages and distribution of open ground.<br>**MP** | [6] Is this too broad because of the use of word "minimise" and therefore open to interpretation? For example, would 75% one species meet the requirement (not in the eyes of some)? Use alternative word to minimise and/or perhaps make clearer link to management objectives.<br><br>[7] ICF considers 2.5.4 as too broad. The use of the word 'minimise' provides a situation for individual interpretation. For example, many would argue that 75% of one species would meet the requirement but for others it would not. We suggest that an alternative word to minimise is used and that a clearer link to management objectives is made.<br><br>[14, 17] FEE/NRW Comment: See above [2.5.1] comment on addition of Design plan to verifiers.<br><br>This Requirement is seen by FEE/NRW as being drafted as too absolute a measure as opposed to one requiring considerable flexibility to accommodate the range of issues that it purports to address. We are uncertain as to how to improve the wording of the requirement but the |

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| | | | | insertion of “as appropriate” may go some way to suggesting the need for flexibility in the interpretation of this particular requirement.<br><br>An alternative suggested by several Fe staff consulted would be to remove this as a requirement and to add the text as guidance within the Section addressing management Planning.<br><br>We welcome acknowledgement of the need to address the realities of climate change and to regard climate change adaptation as necessary in addressing future risks to forests and woodlands<br><br>[16] Minimising risk will not always be possible. Perhaps refer to eg. ‘Planting and restructuring should consider and balance the risks from wind etc… with other objectives, reducing risk to an acceptable level’.<br><br>Climate change adaptation is becoming an increasingly important aspect and should be referred to in the requirement rather than just the guidance. There is also a link here to long-term forest resilience which could be made more specific in the requirements. |
| 2.6 | Woodland Creation | | | |
| 2.6.1 | New woodlands shall be located and designed in ways that will:<br>• Maintain or enhance the visual, cultural and ecological value and character of the wider landscape<br>• Deliver ecosystem goods and services<br>• Ensure the creation of a diverse woodland over time. | • Management planning documentation<br>• Field surveys<br>• Discussions with the owner/manager<br>• Maps<br>• Field observation<br><br>• Design plan. | New woodlands should contribute to the conservation of neighbouring semi-natural woodland and other habitats.<br><br>BAP priority habitats and sites for BAP priority species as given in the UK and local Biodiversity Action Plans should be protected<br><br>Historic environment features should be identified and protected. | [5] Vague and meaningless statement. Suggest – “comply with current best practice and guidance”.<br><br>[11] Added “management” to “Water catchment management or soil protection”.<br><br>[14] FE England believe that new woodland should also be promoted with a strong emphasis on the future role of timber and woodfuel as part of the emerging low carbon landscape and hence we recommend a slight change to requirement 2.6.1 to stress the delivery of ecosystem and economic goods and services in the creation and expansion of woodland, as we believe the Standard as currently drafted overemphasises the biodiversity benefits of new woodland and underplays the other ecosystem |

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| | | | Examples of ecosystem goods and services include:<br>• Timber production<br>• Water catchment or soil protection<br>• Carbon sequestration.<br><br>A diverse woodland may be achieved through one or more of the following:<br>• Use of a diversity of species, clones and provenances<br>• Planting mixed stands<br>• Variation in site types and growth rates<br>• Management designed to avoid the need for felling over a very limited period<br>• Phased planting<br>• Retention of open ground<br>• Design and creation of wind firm edges.<br><br>The general aim should be to create a woodland that is sufficiently diverse to allow achievement of the felling rates given in section 3.4.2.<br><br>**FRM**<br>**BAP**<br>**MP** | services, and in particular their future provisioning role.<br><br>[14] FEE Comment: See above [2.5.1 re. Design plan]<br><br>See [general comment above]. FEE strongly recommend that the text of Requirement 2.6.1 be amended to include "Deliver ecosystem and economic goods and services" to address the current imbalance between sustainable goals of people and the environment and economic goods and benefits.<br><br>[14, 17] The meaning of [Management designed to avoid the need for felling over a very limited period] in the guidance column is unclear?<br><br>[16] This is the most important section in relation to identifying historic environment features and taking them into account during new woodland creation. Adding the two statements below would provide real assurance that UKWAS is serious about including the historic environment within sustainable forest and woodland management:<br><br>Suggest adding as an 'example verifier':<br><br>An archaeological survey has been undertaken in areas of high archaeological potential.<br><br>Suggest adding to the 'guidance' column:<br><br>Identifying and protecting historic environment features as part of the forest planning process before new woodland creation is very important. An archaeological walkover survey may be necessary. It will create the baseline record that will guide all future management in relation to UKWAS certification and in regards to the UKFS 'Forests and the Historic Environment' guidance note.<br><br>[17] NRW believe that new woodland should also be promoted with a strong emphasis on the future role of |

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| | | | | timber and woodfuel as part of the emerging low carbon landscape, as well as the regulating role of flood reduction, and hence we recommend a slight change to requirement 2.6.1 to stress the delivery of ecosystem and economic goods and services in the creation and expansion of woodland, as we believe the Standard as currently drafted overemphasises the biodiversity benefits of new woodland and underplays the other ecosystem services, and in particular their future provisioning and regulating roles, both of which have economic benefits.<br><br>[17] See [general comment above]. NRW strongly recommend that the text of Requirement 2.6.1 be amended to include “Deliver ecosystem and economic goods and services” to address the current imbalance between sustainable goals of people and the environment and economic goods and benefits. This includes the regulating services toward flood risk mitigation role which can have a significant economic impact.<br><br>[18] We note that this has been introduced to “Deliver ecosystem goods and services”<br><br>This does not introduce anything additional or helpful to standard in terms of biodiversity protection and enhancement, and could even be detrimental in its application to biodiversity. Some ‘ecosystem services’ could require degradation of habitats to maximise their production. It is important that ‘ecosystem services’ are planned, created and managed in environmentally sustainable manner.<br><br>Note that UKWAS 3.1 is already considering a range of ‘ecosystem services’ in the content and breadth of its existing requirements, and the underlying elements of the UK Forestry Standard and its integral Forest Guidelines that it draws upon.<br><br>[22] Recreational access should be added to the examples of ecosystem goods and services. |

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| | | | | Given the health and wellbeing benefits associated with public access to woodland the provision of recreational access should be incorporated in to new woods if possible, even if such access is permissive via forest tracks only. |
| 2.7 | Woodland restructuring | | | [16] Good to see the coupe size requirement has been removed allowing coupes suitable for the landscape to be the driver. |
| 2.7.1 | Even-aged woodlands shall be gradually restructured to diversify ages and habitats. | • Management planning documentation<br>• Discussions with the owner/manager<br>• Maps<br>• Field observation<br>• Design plan. | Restructuring should be planned and implemented in conformance with good forest design practice.<br><br>Design plans should ensure that in large even-aged plantations the woodland improves in age structure through:<br>• Phased felling<br>• Prescribing restocking, which will provide options for further diversification and reduction in coupe size at the end of the next rotation.<br><br>Site factors favouring larger coupe sizes might include:<br>• Windthrow risk<br>• Landscape scale<br>• Current plantation design<br>• Historic environment features<br>• Wildlife habitats. | [5] Restructuring can take place over 1 to 2 rotations.<br><br>[9] Large [in guidance] – presumably over 500ha?<br><br>[14, 17] Again, we suggest removing reference to ‘design plan” as it duplicates the message provided by “management planning and documentation” |

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| 2.8 | Tree species selection | | | |
| 2.8.1 | a) Species selected for new woodlands, natural regeneration and restocking shall be suited to the site and matched to the owner's objectives.<br><br>b) Species choice shall be informed by the need for long-term forest resilience.<br><br>c) Native species shall be preferred to non-native. If non-native species are used it shall be shown that they will clearly outperform native species in meeting the owner's objectives or in achieving long-term forest resilience.<br><br>d) New introductions of non-native species shall be made only when evidence or experience shows that any invasive impacts can be controlled effectively.<br><br>e) No more than 75% of the WMU shall be allocated to a single species in new planting or in regeneration plans for the next rotation of | • Discussions with the owner/manager demonstrate that consideration has been given to a range of species, including native species, in meeting management objectives.<br>• Management planning documentation<br>• Field verification. | The species proportions requirements set out in e) and f) reflect UK Forestry Standard guidelines. These guidelines also set out minimum proportions of open space; other species; or ground managed for environmental objectives; and native broadleaved trees or shrubs.<br><br>The single species limits in e) and f) need not apply at the level of an individual coupe provided that they are met at the WMU level. However, owners/managers should seek to maintain or increase species diversity at the coupe level where practicable and aligned with the owner's objectives. Practicability considerations include species suitability and long-term forest resilience with regard to, for example, climate change or pests and diseases.<br><br>In planning species composition, owners/managers should take account of requirements for conservation and | [3, 4] Is their opportunity for flexibility in the definition of a WMU, to include "off-site" areas to make better use of productive ground within the main WMU.<br><br>[5] Good<br><br>[14, 17] FEE/NRW consider that Requirement f) should be removed and replaced with text drawn from the UKFS which states that "Where more than one species is suited to the site and matches the management objectives, opportunities must be taken to further diversify the above species composition". It does not set the 65% requirement and FEE/NRW cannot establish any scientific basis for the use of this %.<br><br>It is however useful to have stated that these species proportions or ambitions to diversify species composition are in relation to the WMU rather than within specific sites.<br><br>[15] Under point c) 'native species shall be preferred to non-native species' we recommend the inclusion of reference (link) to 4.7.1.<br><br>We refer to points e) and f). In order to place the emphasis on increasing diversity in forestry, we would recommend merging the two points and placing the recommendation included in f) at the forefront as such 'Where site conditions allow and where more than one species is suited to the site, no more than 65% of the WMU shall be allocated to a single species. However, where site conditions are challenging, no more than 75% of the WMU shall be allocated to a single species in new planting or in regeneration plans for the next rotation of an existing woodland'. |

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| | an existing woodland.<br><br>f) Where management objectives and site conditions allow, and where more than one species is suited to the site, no more than 65% of the WMU shall be allocated to a single species in new planting or in regeneration plans for the next rotation of an existing woodland. | | enhancement of biodiversity and restoration of habitats in section 4.<br><br>Results of research into site suitability of different species origins and provenances and their resilience to climate change should be used to assist species choice. Because of the uncertain effects of climate change, selecting a range of genotypes may be prudent.<br><br>In woodland of high conservation value (see sections 4.1 – 4.3 & 4.5), use should be made of natural regeneration or planting stock from parental material growing in the local native seed zone where appropriate and possible.<br><br>Soil analyses and use of Forest Research's Ecological Site Classification (ESC) tool are useful when considering economic and ecological resilience to climate change.<br><br>*2 refs added to Appendix*<br><br>**FRM** | [16] Point C on native species seems unnecessarily constraining. Given the moving debate on Climate Change adaptation it would be very difficult to show that non-native species will outperform native species in terms of long term forest resilience. Unsure whether this reflects the UKFS or introduces a new policy direction?<br><br>It would be helpful to reconsider inclusion of the earlier req't: "Where only one species is suited to the site and matched to<br>the objectives:<br>< 75% primary species<br>> 10% open space<br>> 5% native broadleaf<br>> 10% other areas managed for biodiversity as a major objective.<br>The requirement in relation to open space does not apply to very small woodlands (i.e. 10 ha or under)."<br><br>Perhaps include reference to disease and mitigation measures regarding species choice?<br><br>Long-term forest resilience needs to be defined in the glossary<br><br>[18] The RSPB is concerned about the removal of the existing requirement (UKWAS Version 3.1, Requirement 3.3.2) to have a secondary species and a numeric maximum; i.e. 65% primary species where at least two species are suited to the objectives, the site and meet the other UKWAS requirements.<br><br>The proposal for UKWAS to reduce its species requirements to the UK Forestry Standard minima by increasing to a maximum of 75% primary species is ecologically unhelpful in both biodiversity conservation and plant health risk terms. This would reduce species diversity, particularly as this is across the whole of a Woodland Management Unit which can be a large area. |

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| | | | **MP** | This seems to be a retrograde step for a voluntary sustainable forest management standard that should be operating at a higher level beyond the UK's minimum mandatory standard requirements for all woodland owners.<br><br>Whenever the term "resilience" is used it should have a prefix of "ecological". NB 'resilience' does not have a formal definition. Economic resilience is often conflated with ecological resilience, and the actions taken can be heavily conflicting with potential threats to important wildlife values.<br><br>[19] Species diversity<br>The Government's policy for broadleaved woodlands in Britain announced over 30 years ago clearly states as one of its aims the maintenance and greater use of broadleaves in the uplands, particularly where they will enhance the beauty of the landscape and the wildlife interest, including extensive conifer plantations. We strongly feel that the multiple benefits of (both broadleaf and conifer) species diversity is not recognised sufficiently within UKWAS 4. It is particularly disappointing that the very current lessons and obvious threats to our forests from increasing pest and disease threats, (never mind pressures from climate change) are still not fully recognised. This is especially the case in upland plantations which are often dominated by monocultures of a single species planted on a significant scale. In our opinion, Requirement 2.8.1 in particular still fails to fully acknowledge the vulnerability of perpetuating monoculture plantation forestry without recognising the associated risks and not taking the opportunity to pro-actively diversify species both at the stand and WMU level. There is much greater scope and opportunity at the end of a rotation to diversify plantations and plantation portfolios over time; opportunities we feel a sustainable standard like UKWAS should be encouraging more than the current wording does. These plantations may well be UKFS compliant but we feel that UKWAS, as a higher |

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| | | | | standard than the UKFS on a number of fronts, should maintain clear water between UKFS minimum compliant forestry practices and those of genuinely sustainable certified woodlands, of which greater species diversity over time is a fundamental component. There is a danger that the current wording could even result in the attrition / removal of existing species diversity going forward – a potentially very worrying development and one we cannot support.<br><br>Many plantations have already or are reaching the end of their first rotation. Restructuring these plantations for the second and subsequent rotations has been a requirement in UKWAS (previously 3.2.3. and 3.2.4.) and generally been implemented well arising in multiple benefits for owners (more phased production), the public (landscape) and the environment (habitat diversity). However, the scope and opportunities presented by restocking felled plantations with a greater diversity of tree and shrub species has not been fully grasped and UKWAS can and should encourage this to further the management of multi-purpose upland plantation forestry. The proposed text of the Guidance for Requirement 2.8.1. attempts to address this with the words “should seek to maintain or increase species diversity” but in our opinion this is not strong enough and compliance with the Requirement only could still result in a reduction in species diversity at the coupe level. We also believe maintaining “pre-harvest or more natural conditions” to be a requirement of the FSC.<br><br>Proposal<br>We request the insertion of additional text within Requirement 2.8.1 which addresses a point of principle that “There should be no loss of species diversity. Species diversity should be maintained and where possible enhanced over time.”<br><br>In order to underline the principles of maintaining productive potential as per Requirements 2.4.1 and 2.4.2 we would also support consideration of plantations |

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| | | | | (perhaps restricted to upland plantations only) requiring greater tree species diversity in preference to a nominal and often token open ground percentage as required by the UKFS at the coupe level. We believe biodiversity in upland plantations in particular can benefit more from greater tree species diversity than open ground at the coupe level, largely because such plantations when viewed at a landscape level are often mere islands of forests in an ocean of open habitat and minimum percentages of open space required by UKFS could be met at the WMU level.<br><br>[20] The one issue that stands out for me where I would like to comment concerns a weakening of the requirement on species selection (2.8.1). I understand that part of the argument for making this change is that there should be synergy between UKWAS and UKFS, and without this change the UKWAS would be stipulating a much more rigorous standard.<br><br>My reaction to this is twofold. Firstly, while broadly supportive that synergy between the two standards is an important goal, I'd point out the obvious that even so they are not the same. Secondly, and far more importantly in this instance, I take the view that the weakest element of UKFS concerns species composition/diversity. When the UKFS was last revised and the new climate change guidelines were introduced, it became apparent that the principles espoused in the new guidelines (which we supported) had not been applied consistently across the standard, specifically so in relation to species composition/diversity. Natural England commented on this in our response to the consultation but was unsuccessful in securing wider changes to the standard. I continued to raise this after the revised UKFS was launched and it was acknowledged that the principles outlined in the climate change guidelines and how these were applied across the standard was inconsistent, that it would be a difficult issue but would need addressing at the next revision to UKFS. In practical terms then, should |

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| | | | | UKWAS relax the requirement around species composition/diversity it will be aligning itself to one of the weakest elements of the UKFS and one that in all likelihood will be strengthened at the next revision of the UKFS. The timing of future reviews therefore raises the possibility that the UKFS could be setting out a higher standard than the UKWAS when surely UKWAS should be raising the game in its response to woodland resilience and the range of threats posed by climate change and pests and diseases.<br><br>Turning this on its head, any argument concerning species composition/diversity and consistency between UKWAS and UKFS should focus on UKWAS addressing (or exceeding, if the evidence base has improved) the principles outlined in the UKFS climate change guidelines, to adopt as strong an approach to sustainable woodland management as it can. Allowing for 75% of a single species is clearly a risky strategy or near monoculture and one that is at odds with the UKFS climate change guidelines. |
| 2.8.2 | a) Non-native plant (non-tree) and animal species shall only be introduced if they are non-invasive and bring environmental benefits.<br>b) All introductions shall be carefully monitored. | • Documented impact assessment of any introductions made after the first certification<br>• Discussions with the owner/manager<br>• Field observation. | The requirement includes the re-introduction of once native animals not currently present within the United Kingdom.<br>Use of non-native biological control agents such as *Rhizophagus grandis* may be desirable to control non-native pests.<br>Game species may be introduced if managed in accordance with section 4.9.<br>**MP** | [16] The guidance should refer to plants and animals. Suggest 'includes the re-introduction of once native animals not currently present within the United Kingdom' is written along the lines of "Species that were once native, but are now absent should only be introduced with approval by the relevant statutory bodies and UK/Country Governments".<br><br>The monitoring requirement could helpfully specify how long monitoring should continue after re-introduction. |
| 2.9 | Silvicultural systems | | | |
| 2.9.1 | Appropriate silvicultural | • Management planning | The choice of silvicultural | [5] Remove second sentence which is potentially quite |

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| | 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.<br><br>Where species, sites, wind risk, tree health risk and management objectives allow, a range of silvicultural approaches including lower impact silvicultural systems shall be adopted with the aim of diversifying ages, species and stand structures. | documentation<br>• Discussions with the owner/manager<br>• Field observations. | system should take into account:<br>• Silvicultural characteristics of the species Management objectives<br>• Site limitations including potential growth rates and wind firmness<br>• Intended stem size and quality<br>• Current and future markets for timber products<br>• Impacts on the landscape and wildlife<br>• Age-structure and felling plan of nearby woodlands<br>• Ecological processes and natural disturbance regime for that woodland type<br>• Future resilience<br>• Historical management practices<br>• Views of local people.<br><br>The establishment of research trials or plots to assess the suitability of species, origins and provenances and/or silvicultural systems including management and protection treatments should be undertaken only in the context of a research policy and conform to the spirit of | restrictive.<br><br>[14, 17] FEE/NRW welcome and support the promotion of a range of silvicultural systems across the WMU and see this as an important element in the development of resilient woods and forests over time.<br><br>[16] This is an improvement on the earlier approach to choice of silvicultural system allowing the site conditions to lead.<br><br>[23] Since the early 1990s there has been increasing interest in the potential role of a range of silvicultural practices based on patch dynamics as alternatives to the clear-felling and replanting regimes traditionally used in the management of British forests. These alternative approaches have become widely known within the sector as Continuous Cover Forestry (CCF) and /or Low Impact Silviculture and cover a range of silvicultural systems such as selection systems and group/irregular shelterwoods which can increase species and structural diversity of forests.<br><br>These alternative silvicultural approaches have been widely supported in country policy and strategy documents (e.g. Scottish Forestry Strategy; Woodlands for Wales) as a means of adapting the regular and species poor stands characteristic of many British forests to more diverse structures capable of delivering a wider range of ecosystem services. The wording used in previous versions of UKWAS that:<br><br>"Where there is a range of [silvicultural] options in |

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| | | | the certification standard.<br><br>Use of lower impact silvicultural systems may not be appropriate where there is evidence that clearfelling is necessary for the conservation of priority habitats or species.<br><br>**BAP**<br>**MP** | windfirm conifer plantations, lower impact silvicultural systems **shall be increasingly favoured** where they are suited to the site and species." (section 3.4.1) (emphasis added)<br><br>was very helpful in encouraging managers to consider the potential use of a CCF/LISS approach in the future management of their forests and woodlands.<br><br>We are therefore concerned that the draft wording in section 2.9.1 of the consultation document represents a considerable weakening of the encouragement given to managers by the previous versions of UKWAS to actively consider the future role of CCF/LISS in the management of their forests. At present, the draft text reads:<br><br>"Where species, sites, wind risk, tree health risk and management objectives allow, **a range of silvicultural approaches including** lower impact silvicultural systems shall be adopted with the aim of diversifying ages, species and stand structures." (emphasis added).<br><br>As drafted, this seems to seriously weaken the previous obligation to favour CCF/LISS and will probably have a negative impact on the uptake of these alternative systems within British forestry. It gives the impression that conventional patch clear felling regimes will be as effective as CCF/LISS in diversifying structure and species composition, for which we suggest there is very little supporting evidence.<br><br>This is highly regrettable because there is increasing evidence becoming available to the sector both of the |

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| | | | | technical feasibility of adopting alternative silvicultural systems in British forests and of the wide ranging benefits that can accrue from so doing. Examples include information on the wider uptake of CCF (Wilson, 2013), on the potential use of CCF in Sitka spruce forests (Mason, 2015), on the experience of transformation to CCF in long-term demonstrations (Kerr et al., 2010), on the cost and revenue implications of managing forests using CCF (Davies and Kerr, 2015), on the potential benefits of CCF management for certain bird species (Calladine et al., 2015), and on public preference for the diverse structures provided by CCF (Edwards et al., 2012).<br><br>Given that it is recognised that transformation of the simple structures characteristic of many British forests to the more diverse and resilient stands envisaged by policy will take time (e.g. Kerr et al., 2010), we strongly recommend that the draft text in section 2.9.1 should be revised to read:<br><br>"Where species, sites, wind risk, tree health risk and management objectives allow, **a range of lower impact silvicultural systems** shall be adopted with the aim of diversifying ages, species and stand structures."<br><br>We consider that this proposed revision preserves the integrity of the previous UKWAS commitment for CCF/LISS to be actively considered in preference to patch clear felling, while still allowing other silvicultural options to be pursued where site conditions and/or management objectives were serious constraints. We also note that the draft text also allows exemption from the use of CCF/LISS where clear-felling might be desirable to maintain priority |

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| | | | | habitats or species of conservation interest.<br><br>The CCFG will be happy to enter into further discussion on the wording of this section and any other relevant passages. Please do not hesitate to contact us if you would like clarification of any points raised in this submission. |
| 2.9.2 | In semi-natural woodland lower impact silvicultural systems shall be adopted. All felling shall be in accordance with the specific guidance for that type of native woodland in the relevant Forestry Commission Practice Guide.<br><br>In semi-natural woodlands over 10 ha, no more than 10% shall be felled in any five-year period unless justified in terms of biodiversity enhancement or lower impact. | • Management planning documentation<br>• Discussions with the owner/manager<br>• Field observations. | For areas with UKBAP priority habitats and species, consider consulting with relevant species and habitat experts in statutory conservation agencies or NGOs.<br><br>**BAP**<br>**MP** | [5] Limiting felling of semi natural woodlands to 10% is very restrictive. This now encompasses many low value, regenerated birch woods where significant clear felling is desirable and not detrimental. Suggest a maximum of 75% for low value other semi – natural woodlands.<br><br>[15] We recommend amendment of the first sentence to read 'In semi-natural woodland lower impact silvicultural systems shall be adopted where they improve woodland condition. All felling shall be in accordance with the specific guidance for that type of native woodland in the relevant Forestry Commission Practice Guide. In semi-natural woodlands over 10 ha, no more than 10% shall be felled in any five-year period unless justified in terms of priority biodiversity enhancement or lower impact.'<br><br>[16] This should be more flexible in the way that it's worded as we sometimes have unavoidably to apply CF in semi-natural woodland eg. PAWS areas due to stability issues where the existing crop is unthinned. This can apply to extensive areas.<br><br>Linked to this, the req't that "In semi-natural woods over 10 ha, no more than 10 ha shall be felled in any 5 year period… "is unnecessarily restrictive.<br><br>Due to FC structure changes Practice Guides may have a limited lifespan and reference to any 'successor |

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| | | | | documents' would be prudent. |
| 2.10 | Conservation | | | |
| 2.10.1 | a) Management planning shall identify a minimum of 15% of the WMU managed with conservation and enhancement of biodiversity as a major objective.<br><br>b) This shall include conservation areas and features identified in the following sections:<br><br>• Statutory designated sites (section 4.1)<br>• Ancient semi-natural woodland (section 4.2)<br>• Plantations on ancient woodland sites (section 4.3)<br>• Other valuable semi-natural habitats (section 4.4)<br>• Areas and features of critical importance for watershed management or erosion control (section 4.5)<br>• Natural Reserves (4.6.1)<br>• Long-term retentions and/or areas managed under lower impact silvicultural systems | • Management planning documentation including maps<br>• Field observation | Where areas and features identified in b) and c) comprise less than 15% of the WMU additional areas should be identified.<br><br>The balance of areas managed with conservation and enhancement of biodiversity as a major objective may include:<br>• Existing open habitats integral to the WMU<br>• Natural reserves<br>• Long-term retentions<br>• Lower impact silvicultural systems<br>• Riparian zones integral to the WMU.<br><br>Larger and more widespread woodland estates may fulfill this requirement across the estate as a whole rather than reserving specified areas in each and every wood or woodland management unit.<br><br>Aim for a balance between the dispersal of sites across the WMU and a concentration of sites in important locations with benefits for conservation and/or enhancement of biodiversity. | [2] Farmers are not required to dedicate at least 15% of their farms primarily to conservation & biodiversity. Forestry should not be treated differently.<br><br>[5] Change 15% to 10%. Allow open space to contribute to the 10%<br><br>[10] There is no c<br><br>[14, 17] There appears to be no c) as referred to in the guidance column.<br><br>[16] There is no section "c)"<br><br>The inclusion in the guidance to 'Existing open habitats integral to the WMU' is a very useful addition assuming that open hill managed for conservation is recognised as being integral under this definition. |

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| | (LISS)(4.6.2). | | The conservation areas and features identified under b) may fall into more than one category but can only be counted once towards the 15% of the WMU managed with conservation and enhancement of biodiversity as a major objective. | |
| 2.11 | Protection | | | |
| 2.11.1 | Management of wild deer shall be based on a written strategy that identifies the management objectives, and aims to regulate the impact of deer. | • Awareness of potential problems<br>• Awareness of actual damage<br>• Description of appropriate action in the management planning documentation<br>• Membership of a deer management group<br>• Evidence of cull targets and achievements<br>• Where there is a significant problem caused by deer, a documented plan for control; this may take the form of a contract or licence. | This requirement may involve the setting of cull targets and should involve the membership of a Deer Management Group where appropriate.<br><br>[Add SNH *Best Practice Guides to Deer Management* to the Appendix]<br>**MP** | [9] This seems to simplify the requirement / verifiers and is commended.<br><br>[21] BASC agrees with the wording within this section. BASC recommends that in addition to the Appendix reference to SNH Best Practice Guides that the Deer Initiative Best Practice Guides are also referenced as follows: http://www.thedeerinitiative.co.uk/best_practice/deer_management.php |
| 2.11.2 | A fire plan shall be developed as appropriate to the level of risk. | • Discussions with the owner/manager<br>• Fire plan<br>• In sites with high risk of fire, evidence of contact with the | Fire plan should include:<br>• Responsibilities for action<br>• Contact details<br>• Emergency procedures. | [13] I question are why UKWAS refers always to Fire Plans (2.11) when I believe it should talk about Incident Plans covering fire, electrical/gas/chemical/pesticide incidents and emergency accident information. |

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| | | fire and rescue service and that their advice has been heeded. | MP | [14, 17] FEE/NRW recommend that the wording of last bullet point in the Means of verification be amended slightly and the words "and taken into consideration" added.<br><br>[Proposed edit to verifier: In sites with high risk of fire, evidence of contact with the fire and rescue service and that their advice has been ~~heeded~~ taken into consideration.] |
| 2.12 | Conversion | | | |
| 2.12.1 | Areas converted from ancient and other semi-natural woodlands after 1994 shall not normally qualify for certification. | • No evidence of conversion<br>• Field observations<br>• Discussions with owner/manager<br>• Management planning documentation. | Certification of converted ancient and other semi-natural woodlands may be allowed in circumstances where sufficient evidence is submitted to the certification body that the owner/manager is not responsible directly or indirectly for such conversion.<br><br>Woodland removal to facilitate infrastructure or built development which is not integral to the management of the rest of the woodland cannot meet this requirement. | [16] Needs explanation as to why the date has changed from 1985?<br><br>[19] Ancient Woodland<br>One unintended consequence of the restructure of UKWAS 4 is that the previous Requirement (6.3.1.) that ancient semi-natural woodland shall not be converted to plantation or non-forested land is currently not covered by the new Requirement (4.2.1) sub-section c) of this Requirement.<br><br>Proposal<br>In Requirement 2.12.1. to insert the existing wording "Woodland identified in sections 4.1 – 4.3 shall not be converted to plantation or non-forested land" before the current draft text so that it is very clear what the Guidance attempts to say but doesn't quite achieve. |
| 2.12.2 | Woodland areas shall be converted to areas used solely for Christmas tree production only where conversion is consistent with other requirements of this certification standard, including the need to leave open space, and in | • Field inspection<br>• Management records. | The requirement restricting conversion relates to use for growing Christmas trees of less than 4 metres in height.<br>The chemicals regime for Christmas trees must meet all the requirements of section 3.4.<br>Examples of Christmas trees | [16] The height guidance is welcome however this should be expanded to include an area threshold e.g. '75% of trees over the area are less than 4m in height' to gives a more realistic target. Height also needs defining further – ie. average, top or height of tallest tree? |

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| | accordance with any approved management plan from the relevant Forestry Authority, or when clearance is required for non-forestry reasons such as a wayleave agreement. Christmas trees shall be grown using traditional, non-intensive techniques. | | which may be covered by a certificate are:<br>* Trees (<4 m in height) grown on areas within the woodland matrix used solely for Christmas tree production<br>* Trees (<4 m in height) grown on areas used solely for Christmas tree production which, although outwith the woodland, form part of the woodland management unit<br>* Thinnings from forest tree crops<br>* Tops from harvested forest tree crops<br>* Trees grown by interplanting of forest tree crops<br>* Mature trees (>4 m height)<br>* Trees which have regenerated onto, and have been harvested from, adjacent open land in the interest of maintaining its biodiversity or landscape value, and provided that the adjacent area is managed as part of the woodland management unit.<br><br>Christmas trees grown as a | |

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| | | | horticultural or nursery crop cannot be covered by a certificate. | |
| 2.12.3 | Conversion to non-forested land shall take place only in certain limited circumstances as set out in this requirement.<br><br>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 conditions a, b, c and d shall be met:<br><br>a) The woodland is not identified as of high conservation value in sections 4.1 – 4.3 & 4.5, nor identified as contributing to the cultural and historical values in section 4.8.<br>b) There is no evidence of unresolved substantial dispute.<br>c) Conversion and subsequent site management protect and substantially | • Transition plan<br>• Management planning documentation for the converted area after felling<br>• Records of planning process and discussions<br>• Consultation with interested parties<br>• Monitoring records<br>• Environmental impact assessment process documentation. | Conversion to non-forested land should be planned and implemented in accordance with the UKFS Guidelines on biodiversity, landscape and historic environment.<br><br>A transition plan should set out as a minimum the justification for conversion and a strategy for implementation, subsequent management and monitoring.<br><br>Under current regulations an environmental impact assessment may be required before such conversions are implemented.<br><br>Planning consent or an approved Environmental Statement can provide sufficient evidence that there is no unresolved substantial dispute.<br><br>Deforestation to facilitate infrastructure or built development which is not integral to the management of the rest of the woodland cannot meet this requirement. | [2] Full compensatory planting should be required, before deforestation can be approved.<br><br>[16] The spirit of this should be that large scale deforestation (e.g. peatland restoration) can, in certain circumstances, be a positive environmental management decision. These would not be considered limited, at least in terms of the area of woodland conversion involved.<br><br>No reference in a) to climate change mitigation (carbon storage) which results in us not restocking some deep peat areas.<br><br>[24] There are only minor alterations to 3.5.1 in edition 3 most notably in para a)<br><br>I assume the reference to the “current standard” in the para on the IP [Interpretation Panel] on page 8 means the third edition rather than edition 4.<br><br>If this is correct then the IP’s note on forest conversion and wind farms seems relevant to this new edition/requirement. Might a reference to this in column 3 be appropriate? |

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| | enhance at least one of the following:<br><br>i. The status and condition of UK Biodiversity Action Plan priority species and habitats.<br>ii. Important landscape features and character.<br>iii. Important historic environment features and character.<br><br>d) The subsequent management of the converted area shall be integrated with the rest of theWMU. | | *See also section 4.4.2 in relation to restoration of small-scale habitats within a woodland matrix.*<br><br>**Advice to owners/managers**<br><br>Only timber felled in accordance with this requirement can be certified.<br><br>Owners/managers are advised to seek guidance from their certification body or group scheme manager.<br><br>**MP** | |
| 2.13 | Implementation, amendment and revision of the plan | | | |
| 2.13.1 | The implementation of the work programme shall be in close agreement with the details included in the management planning documentation. Any deviation from prescription or planned rate of progress shall be justified, overall objectives shall still be achieved and the ecological | • Cross-correlation between the management planning documentation, annual work programmes and operations seen on the ground<br>• Owner's/manager's familiarity with the management planning documentation and woodland | Changes in planned timing of operations should be such that they do not jeopardise the ecological integrity of the woodland in the long term.<br>Changes in planned timing may be justified on economic grounds if overall management practices continue to conform to the other requirements of this | |

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| | integrity of the woodland maintained. | • Documentation or owner's/manager's explanation of any deviation. | certification standard.<br>Catastrophic events such as wind damage or pest and disease outbreaks may necessitate amendment of the work programme and management planning documentation.<br>Refer to section 2.9.1 for information about thinning, felling and regeneration plans.<br>**MP** | |
| 2.14 | Monitoring | | | |
| 2.14.1 | The owner/manager shall devise and implement a monitoring programme appropriate to the scale and intensity of management. This shall be part of the management planning documentation. Monitoring procedures shall be consistent and replicable over time to allow comparison of results and assessment of change, and records shall be kept in a form that ensures that they are of use over the long term. | • A monitoring programme as part of management planning documentation<br>• Evidence of a consistent approach to recording site visits<br>• Discussions with owner/manager. | Monitoring is necessary to evaluate progress towards achieving management objectives, the impacts of management activities and the condition of the management unit. This information is vital to refining the management approach as part of adaptive management.<br><br>Monitoring may include:<br>• Supervision during operations<br>• Regular management visits and systematic collection of information<br>• Long-term studies, where appropriate, particularly on changes to the woodland ecosystem. Information from studies (particularly | [14] FEE suggest that it needs to be clearer that consideration of impacts and condition should be covered in the broad aims and specific objectives of the plan. If it's not a management objective it needn't be monitored - conversely if its impact can't be monitored it should not be an objective.<br><br>[14, 17] [Proposed edit to requirement: The owner/manager shall devise and implement a monitoring programme appropriate to the scale and intensity of management and clearly related to the management objectives identified within the plans.]<br><br>[16] Helpful to have the monitoring req'ts all in one place.<br><br>Note that the monitoring programme has to be a part of the management planning documentation but unclear about what this means in practice - monitoring over a wide range of topics will not be possible to include in one document. Helpful if further guidance could be given here.<br><br>The requirements of FES and other land managers will be different to that of a small woodland owner and clarity of what is required for the different scale of operator may be required |

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| | | | research programmes) carried out at one site can be extrapolated and the results used to assist management of other similar sites. For more complex long-term studies it is often more important for woodland owners/managers to be aware of the results and conclusions of such studies than to try to replicate them in their own woodland.<br><br>Owners/managers should be aware of the potential usefulness of information gathered for other purposes, for example to fulfil statutory requirements, which may meet or supplement monitoring needs. It may also be possible to make use of freely available information from sources such as statutory authorities or local interest groups.<br><br>Detail of information collected should be appropriate to the:<br>• Size of the enterprise<br>• Intensity of operations<br>• Objectives of management<br>• Sensitivity of the site. | [17] NRW suggest that it needs to be clearer that consideration of impacts and condition should be covered in the broad aims and specific objectives of the plan.<br><br>It needs to be clear that some management objectives are not possible to monitor objectively e.g. improve landscape value is a legitimate owner's objective of management but subjective and almost impossible to measure as it may relate to his view of what the woodland should look like. |

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| | | | Monitoring records should be appropriate to the same factors, as well as to the frequency with which monitoring is carried out. The owner/manager may consider:<br>• Formal written records<br>• A less formal site diary<br>• Photographic records<br>• Verbally communicated records.<br>Note that there may be legal requirements for record keeping in some cases, for example pesticide usage. | |
| 2.14.2 | The owner/manager shall where applicable monitor and record:<br>• Implementation of the management plan<br>• The achievement of objectives and verifiable targets<br>• Implementation of operational plans<br>• Economic viability<br>• Harvesting yields<br>• Environmental impacts of management, including:<br>  ○ Impacts of operations on priority habitats and species, landscape | • Monitoring records<br>• Discussions with owner/manager. | The purpose of monitoring should primarily be to help the owner/manager to implement and adapt the management of the WMU. Monitoring should be clearly linked to management objectives, operations and special features of the WMU. | [3, 4] This is an extensive list of requirements, however the key phrase is "where applicable" – is this list too long? Is more guidance needed ?<br><br>[5] Generally too prescriptive and needs trimming.<br>Remove - Implementation of operational plans<br>Remove – Economic viability<br><br>[7] While it is good that all the monitoring requirements have been drawn together under one section the text of the various requirements under section 14.2 is now lengthy and confusing. This section needs to be reworked to make it clearer and to emphasise the "where applicable" part of the requirement. Monitoring should primarily be relevant to the manager and inform management decisions. There is still a sense of monitoring for monitoring's sake in the long list of things which are given in 2.14.2. The intention is good but the wording needs refining. |

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| | values, water and soils<br>○ Impacts of non-native species, including invasiveness<br>○ Impacts of grazing and browsing<br>• Social impacts of management.<br>• Changes in environmental condition, including:<br>○ Tree health<br>○ Woodland composition and structure<br>○ Areas and features of conservation value<br>○ Ancient woodland features and remnants, including responses to management and any threats<br>○ Cultural heritage features<br>• Usage of pesticides, biological control agents and fertilisers and any adverse impacts<br>• Environmentally appropriate disposal of waste materials. | | | [10] While it is good that all the monitoring requirements have been drawn together under one section the text of the various requirements under section 2.14.2 is now lengthy and confusing. This section needs to be reworked to make it clearer and to emphasise the "where applicable" part of the requirement. Monitoring should primarily be relevant to the manager and inform management decisions. There is still a sense of monitoring for monitoring's sake in the long list of things which are given in 2.14.2. The intention is good but the wording clumsy.<br><br>[14] The Monitoring commitments identified in Version 4 are regarded as considerable and onerous, and while recognising that Version 4 has not added to such commitments, the brigading of requirements adopted in Version 4 has exposed the extent of the demand placed on certificate holders for ongoing monitoring of a very wide range of issues. FEE would welcome much clearer statement connecting the monitoring effort and resource only to the objectives of the Forest Plan.<br><br>[14, 17] NRW has considered the comments below from FEE and supports these. FEE has considered the monitoring section of version 4 in some depth. Having brought all the monitoring elements into one set of linked requirements it is clear that they collectively form a rather onerous burden of exiting certificate holders and are a barrier to potential forest manager's joining UKWAS as an accreditation scheme. Observations from staff are compiled below:<br><br>Monitoring should be linked to objectives. We suggest that the text should thus read:<br><br>"The owner/manager shall where applicable monitor and record the delivery of objectives set out in management planning documentation (2.2.1)" |

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| | | | | "Monitoring may include economic, social and environmental impacts such as:<br><br>• Harvesting yields.<br>• The impacts of non-native species, including invasiveness.<br>• Social impacts of management.<br>• Externally drive changes in relevant environmental condition, including:<br>  ○ Tree health<br>  ○ Woodland composition and structure<br>  ○ Impacts of grazing and browsing<br>• Usage of pesticides, biological control agents and fertilisers and any adverse impacts<br><br>The following should also be recorded [not monitored]:<br><br>• Environmentally appropriate disposal of waste materials"<br><br>There is a need to be clear about where and when these apply and we recommend that they apply only if they relate to the objectives stated and to features identified and documented under 2.2.1. in the absence of clarity there is perhaps a danger that many of the bullets will be perceived as additional demands, and that monitoring will therefore require huge resources.<br><br>Economic viability will be difficult to assess and should not be regarded as monitorable in the sense used here and may not be relevant to particular woods. We suggest it should be removed from the list of items required to be monitored.<br><br>[16] We are concerned that, taken together, the suite of requirements relating to monitoring (2.14) are burdensome. Although it's useful to have them all in one place, and we acknowledge that they've not been extended per se in this draft, we would nevertheless like to see some further consideration given to how this aspect |

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| | | | | of the Standard can be made more succinct.<br><br>[16] Some tree health aspects are grouped whilst others are dispersed through sections. Tree health seems to have lost its separate entry - given the importance of this subject perhaps it should be a separate requirement linking surveillance with appropriate actions.<br><br>[17] The Monitoring commitments identified in Version 4 are regarded as considerable and onerous, and while recognising that Version 4 has not added to such commitments, the brigading of requirements adopted in Version 4 has exposed the extent of the demand placed on certificate holders for ongoing monitoring of a very wide range of issues. NRW would welcome much clearer statement connecting the monitoring effort and resource only to the objectives of the Forest Plan. NRW also would wish to see recognition that objectives setting and monitoring is at different scales. |
| 2.14.3 | Owners/managers shall take monitoring findings into account, particularly during revision of the management planning documentation. | • Monitoring records<br>• Management planning documentation<br>• Discussions with owner/manager. | Expert advice should be sought where necessary and taken into account.<br>**MP** | |
| 2.14.4 | Monitoring findings, or summaries thereof, shall be made publicly available upon request. | • Written or verbal evidence of responses to requests.<br>• | The monitoring findings or summaries may exclude confidential information.<br><br>The means of sharing monitoring findings should be appropriate to the nature of the records and to the needs of the interested parties.<br><br>Owners/managers of smaller | |

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| | | | management units, relying more on informal monitoring methods and records, may find it more appropriate to communicate results verbally.<br><br>Owners/managers of larger management units, relying more on formal surveys and reports, may find it more appropriate to produce a written summary. | |

## 3. Forestry operations

| | REQUIREMENT | EXAMPLE VERIFIERS | GUIDANCE | |
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| 3.1 | General | | | |
| 3.1.1 | Forest operations shall conform to forestry best practice guidance. | • Field observations<br>• Discussions with the owner/manager and forestry workforce<br>• Monitoring and internal audit records. | | [16] 3.1.1 Says 'forest operations' 3.1.2 says 'woodland operations' – consistency? Or addition to glossary. The fact that 'operations' includes harvesting & non-harvesting operations should be stated clearly. |
| 3.1.2 | The planning of woodland operations shall include:<br>a) Obtaining any relevant permission and giving any formal notification required.<br>b) Assessing and taking into account on and off-site impacts.<br>c) Taking measures to protect special features, including adapting standard prescriptions where required.<br>d) Measures to maintain and, where appropriate, enhance the value of identified services and resources such as watersheds and fisheries. | • Documented permissions<br>• Contracts<br>• Discussions with owner/manager and workers<br>• Demonstration of awareness of impacts and measures taken<br>• Site-specific, documented assessment of impacts. | Particular attention should be given to ensuring that:<br>• the forestry workforce has been involved in the planning of operations<br>• local people potentially affected have been informed at the onset of operations.<br><br>Checks should be made against relevant UK Biodiversity Action Plan Habitat Action Plans (HAPs) and Species Action Plans (SAPs).<br>**BAP**<br>**MP** | [9] "the forestry workforce has been involved in the planning of operations".<br>They are not. They will not be. Why write it as a requirement. Is FC really going to issue a tender (and therefore not know who the workforce will be) before planning an operation? They requirement to include the workforce in H&S and RAMs is covered adequately elsewhere. |
| 3.1.3 | Operational plans shall be | • Discussions with staff and | Contracts can be in writing or | |

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| | clearly communicated to all workers so that they understand and implement safety precautions, environmental protection plans, biosecurity protocols, emergency procedures, and prescriptions for the management of features of high conservation value. | workers<br>• Records of pre-commencement meetings<br>• Field observation<br>• Biosecurity policy<br>• Relevant plans and procedures. | the forestry workforce may be given oral instructions where this is appropriate to the scale and sensitivity of the operation. | |
| 3.2 | Harvest operations | | | |
| 3.2.1 | Timber and non-timber woodland products (NTWPs) shall be harvested efficiently and with minimum loss or damage. | • Field observation. | Timber harvesting should particularly seek to avoid:<br>• Damage to soil and water courses during felling, extraction and burning<br>• Damage to standing trees during felling, extraction and burning<br>• Timber degrade.<br>Thinning/cutting trees to waste may be appropriate in some circumstances.<br>**MP** | [14, 17] FEE/NRW suggests the addition of compliance with the UKFS for soil management to the means of Verification.<br><br>[14] [Proposed addition to verifiers: Compliance with UKFS on soil management]<br><br>[15] We recommend the inclusion of brash management guidance in the Guidance column.<br><br>[16] Potential ambiguity here in that the Requirement states “with minimum loss or damage” whereas the Guidance states “seek to avoid”, the latter could be interpreted as an absolute, whereas the former recognises the practicality of harvesting operations. Similarly there is also a contradiction between ‘efficiently’ and ‘minimum of loss’ in some circumstances.<br><br>[17] [Proposed addition to verifiers: Compliance with industry standards on soil management] |
| 3.2.2 | Harvesting and sales documentation shall enable all timber and non-timber woodland products (NTWPs) that are to be sold | • Harvesting output records<br>• Contract documents<br>• Sales documentation. | The purpose of this requirement is to ensure that certified products can be traced back to the point of sale from the woodland (in | [3, 4] Add (words in bold) - …. that are to be sold **by the woodland owner/manager** as certified ….. |

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| | as certified to be traced back to the woodland of origin. | | the case of timber, for example, standing, at roadside or delivered). The responsibility of the owner/manager is limited to ensuring that certified products removed from the woodland can be traced forward along the supply chain from the first point of supply.<br><br>Where certified products from other sources are being stored in the same area, appropriate records should be maintained to demonstrate the source and quantity of produce obtained from other woodland areas.<br>**Advice to owners/managers**<br><br>Certification schemes may require certificate holders to provide additional information on sales documentation relating to:<br><br>• chain-of-custody certification, and<br>• the use of certification scheme trademarks<br>Owners/managers are advised to seek guidance from their certification body or group scheme manager. | |
| 3.2.3 | Lop and top shall be burnt | • Discussion with the | If lop and top is burned: | [5] Suggest – Lop and top can be burnt where it is legal |

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| | only where there is demonstrable management benefit, after full consideration of impacts. | owner/manager demonstrates awareness that impacts have been considered<br>• Evidence of registration of exempt activity<br>• Documented appraisal.<br>• | • The location and density of fire sites should be carefully planned.<br>• Some lop and top should be left unburned as habitat except where it will result in pest or disease problems.<br>• Statutory requirements required by relevant environment agencies.<br>Burning on site must be registered as an exempt activity with the statutory environment protection agencies in accordance with the Waste Management Regulations 1994 (plus amendments).<br><br>*Reference the latest legislation in the Appendix – NB info needed for Scotland and N Ireland*<br>**MP** | and appropriate. |
| 3.2.4 | Whole tree harvesting or stump removal shall not be practised where it is likely to have significant negative effects. | • Discussion with the owner/manager demonstrates awareness that impacts have been considered<br>• Documented appraisal. | Significant negative impacts to consider include:<br>• Leaching<br>• Soil compaction<br>• Soil erosion<br>• Soil carbon<br>• Nutrient loss<br>• Damage to historical features and archaeological deposits. | [11] Added “loss” to “Soil carbon”.<br><br>[14, 17] FEE/NRW observation: In some circumstances, such as the restoration of open habitats from existing plantations, the value of whole tree harvesting should be acknowledged. A note to this effect could be added to the guidance column. |

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| 3.3 | Forest roads | | | |
| 3.3.1 | For new roads, all necessary consents shall be obtained. | • Records of consents<br>• Environmental assessment where required. | 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. Non-timber activities also need to be taken into account, e.g. access for sporting.<br>MP | [9] "documented evaluation". The introduction (page 9) states this column is for guidance. The requirement is to "obtain consent". Carrying out a documented evaluation is an additional requirement – which, if required, should not be embedded in guidance. It seems this "requirement" is covered by section 3.3.2<br><br>[10] This guidance look more relevant to the next requirement This should refer to planning permission, CAR Licences EIA determination etc for new roads<br><br>[11] This refers to new roads requiring all necessary consents. Forest road upgrades may also require EIA Determination or Prior Notification to the planning authority. Add bullet point in column 3 stating: "Pre-consulation with Local Authority and EIA Determiantioon for new roads, upgrades and quarries".<br><br>[16] Note - Consent is also required for upgrades of roads<br><br>[22] Consideration should be given to what level of recreational access can be granted alongside and on any new roads and the provision of such access should form part of the planning and evaluation process. |
| 3.3.2 | Roads and timber extraction tracks and associated drainage shall be designed, created, used and maintained in a manner that minimises their environmental impact. | • Documented plans for the design and creation of permanent roads and tracks<br>• Control systems for the creation and use of temporary tracks and extraction routes | Particular attention should be paid to:<br>• Avoiding features of historic environment, biological, geological or cultural value<br>• Use of bridges, arches or culverts to cross water | [9] "Ensuring that verges and ditches are created and managed to promote their habitat value"<br><br>This is a new requirement – with quite significant implications. Not wholly unreasonable – but I look forward to the next audit to ensure FC have planted appropriate shrubs / grasses / heaths on the roadside verges and not just left an exposed batter. |

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| | | • Field observation<br>• Documented maintenance plans. | courses<br>• Ensuring that verges and ditches are created and managed to promote their habitat value<br>• Materials used, especially rock type, are in keeping with the ecology of the woodland<br>• Avoiding erosion and adverse impacts on water systems and wildlife habitats<br>• Careful landscaping of roads, both internally and externally<br>• Use of brash mats.<br>**MP** | It will not be difficult to find NCs here – will all managers continue to mow / control the verge vegetation. Will they all have a plan to cut back 25% of whins a year?<br><br>[11] In bullet point 2 it might be worth saying that in National Parks we have been asked for pre-consultation by the NPA for forwarder routes. |
| 3.4 | Pesticides, biological control agents and fertilizers | | | |
| 3.4.1 | Owners/managers shall minimise their use of pesticides, biological control agents and fertilizers and endeavour to avoid the use of pesticides and fertilizers where practicable. | • Discussion with manager<br>• Pesticide policy or position statement. | Where there is no practicable alternative, in terms of economic, social and environmental costs, owners/managers should provide justification for their use. | |
| 3.4.2 | a) The owner/manager shall prepare and implement an effective Integrated Pest Management Strategy that:<br>• Adopts management | • Written policy and strategy or statement. | Sites with special biodiversity attributes include:<br>• All ancient woodland on the inventory of ancient woodland, and other known sites which meet the same criteria, | [5] Too wordy and over the top. See section 5.4 which is a good example of how sections should be worded.<br>Suggest – Pest management will conform to best practice and legal requirements. The Forest Management plan will consider pest management.<br><br>[16] There is repetition between the references to use of |

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| | systems that shall promote the development and application of non-chemical methods of pest and crop management by placing primary reliance on prevention and, where this is not practicable, biological control methods<br>• Takes account of the importance of safeguarding the value of sites with special biodiversity attributes (see also sections 4.1 – 4.3 ) when considering methods of control<br>• Demonstrates knowledge of the latest published advice and its appropriate application.<br><br>b) The strategy shall include a description of all known use over the previous five years, or the duration of the current woodland ownership if that is less than five years.<br><br>c) The strategy shall | | distinguishing between the categories of the individual national inventories<br>• Semi-natural features in plantations on ancient woodland sites<br>• Valuable or diverse wildlife communities<br>• Rare and vulnerable species<br>• UK Biodiversity Action Plan Priority Habitats and Species<br>• Breeding sites, feeding areas and habitats of notable species<br>• Water courses, ponds and lakes<br>• Wetland habitats<br>• Lowland heath<br>• Peatlands covered by the policies of relevant forestry authorities.<br>• Rides and open ground<br>• Woodland margins and hedges<br>• Veteran trees<br>• Decaying deadwood habitat<br>• Any other valuable habitats or features.<br>Identification and mapping of areas and features may be carried out on an ongoing basis, provided that it has | non-chemical methods in Integrated Pest Management Strategies and Chemical Minimisation Strategies. It would be helpful to clarify the terms and allow for require one strategy policy to cover both aspects. |

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| | specify aims for the minimisation or elimination of pesticide usage, taking into account considerations of cost (economic, social and environmental), and the cyclical nature of woodland management operations.<br><br>d) The strategy shall be appropriate to the scale of the woodland and the intensity of management. | | been completed for an area prior to operations taking place.<br>**BAP**<br>**MP** | |
| 3.4.3 | Where pesticides and biological control agents are to be used:<br><br>a) The owner/manager shall provide reasons to justify their use demonstrating that there is no practicable alternative, in terms of economic, social and environmental costs.<br>b) The owner/managerandworkers shall be aware of and implement legal requirements and non-legislative guidance for use of pesticides and biological control agents in forestry. (See also section 3.4.6 on | • COSHH assessments<br>• FEPA records<br>• Waste transfer notes<br>• Discussions with the owner/manager and workers<br>• Field observation, particularly in respect to storage, application sites, protective clothing and warning signs<br><br>• Adequate written procedures, work instructions, and other documentation<br>• FEPA record of the precise usage including the rationale, method of application, site and quantity. | Usage should be recorded in such a way that comparisons can be made year on year. Therefore additional to the requirement to record information under current legislation (which includes product, application rates and area treated), owners and managers should sub-divide usage according to operations (e.g. establishment of broadleaves, establishment of conifers, harvesting, control of invasive species). This may enable trends to be observed and future action targeted accordingly, including any necessary revision of the strategy. | [10] Is the level of detail suggested in the guidance not excessive |

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| | fertilizers.)<br>c) The owner/manager shall keep records of pesticide usage and biological control agents as required by current legislation. | | | |
| 3.4.4 | Where pesticides or biological control agents are to be used the owner/manager shall be able to demonstrate that they are meeting the requirements of best practice for use of pesticides and biological control agents. | • Field observation of facilities for storage and disposal<br>• Safety equipment<br>• Availability of lockable boxes for transport<br>• Availability of absorbent materials<br>• Risk assessments<br>• Safety equipment<br>• Emergency plans<br>• Operators are trained and competent, and hold pesticide operator certification where required<br>• Written emergency plan. | | [10] [Proposed edit to requirement: Where pesticides or biological control agents are to be used the owner/manager shall be able to demonstrate that they are meeting the requirements of best practice ~~for use of pesticides and biological control agents~~.] |
| 3.4.5 | Pesticides and biological control agents shall only be used if:<br><br>a) They are approved for forest use by the UK regulatory authorities, and<br><br>b) They are not banned by international agreement, and<br><br>c) Their use is permitted by the certificate holder's | • Records of chemicals purchased and used<br>• Field observation<br>• Discussions with owner/managerand workers. | **Advice to owners/managers**<br><br>Owners/managers are advised to seek guidance from their certification body or group scheme manager on any additional certification scheme requirements relating to the use of pesticides. | |

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| | certification scheme.<br><br>Pesticides categorised as Type 1A and 1B by the World Health Organization or any other pesticides whose use is restricted by the certificate holder's certification scheme shall not be used unless:<br><br>a) no effective and practicable alternatives are available, and<br><br>b) their use is sanctioned using a mechanism endorsed by the certificate holder's certification scheme, and<br><br>c) any such mechanism provides for their use to be justified and on the condition that usage shall be discontinued once effective and practicable alternatives are available. | | | |
| 3.4.6 | Fertilizers (inorganic and organic):<br><br>a) Fertilizers shall only be used where they are necessary to secure establishment or to correct subsequent nutrient deficiencies.<br>b) Where fertilizers are to be used the owner/managerand | • Discussions with owner/manager, staff and contractors<br>• Field observation, particularly in respect to storage, application sites, protective clothing and warning signs<br><br>• Adequate written procedures, work instructions, and other | Unnecessary use of fertilizers may be avoided through the appropriate choice of species.<br><br>📖 | [16] There needs to be some clarification/guidance on what type of evidence would be required to demonstrate compliance with a). eg. the level or resolution of information/data needed to justify fertilizer use. |

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| | workers shall be aware of and shall be implementing legal requirements and best practice guidance for their use in forestry.<br>c) In addition, bio-solids shall only be used following an assessment of environmental impacts in accordance with section 2.5 .<br>d) The owner/manager shall keep a record of fertilizer usage. | documentation. | | |
| 3.5 | Fencing | | | |
| 3.5.1 | Where appropriate, wildlife management and control shall be used in preference to fencing. | • Discussion with the owner/manager. | This requirement is especially important in areas where Capercaillie (*Tetrao urogallus*) and Black grouse (*Lyrurus tetrix*) are present.<br>**MP** | |
| 3.5.2 | Where fences are used, alignment shall be designed to minimise impacts on access (particularly public rights of way), landscape, wildlife and historic environment sites. | • Field visits to verify alignments chosenDiscussions with the owner/manager demonstrate an awareness of impacts of fence alignments and of the alternatives<br>• Documented policy or guidelines regarding any specific significant impacts; | Decisions to erect fences and their alignment should take account of:<br>• Landscape<br>• Public rights of way<br>• Existing users of the woodland<br>• Wildlife especially | [22] The Ramblers supports the British Standard 5709:2006 on Gaps, Gates and Stiles which requires the least restrictive option for all potential users, including people with disabilities or limited mobility.<br><br>We also welcome the replacement of all stiles with more accessible alternatives, except where stiles themselves are heritage structures, in which case they can be supplemented by an adjacent more accessible alternative. |

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| | | or<br>• Expert advice sought for significant one-off fencing operations. | woodland grouse<br>• The historic environmentThe need for badger gates, tunnels and ladders.<br>MP | We would expect landowners and land managers to take note of the existing good practice guidance for local authorities on compliance with authorising structures (gaps, gates & stiles) on rights of way:<br>http://webarchive.nationalarchives.gov.uk/20130402151656/http:/archive.defra.gov.uk/rural/documents/countryside/prow/gpg-equality.pdf |
| 3.6 | Waste | | | |
| 3.6.1 | Waste disposal shall be in accordance with current waste management legislation and regulations. | • No evidence of significant impacts from waste disposal<br>• Documented policy or guidelines on waste disposal including segregation, storage, recycling, return to manufacturer. | Waste includes:<br>• Surplus chemicals<br>• Chemical containers<br>• Plastic waste<br>• Fuels and lubricants.<br>MP | |
| 3.6.2 | Owners/managers shall prepare and implement a plan to progressively remove redundant materials. | • Field observation<br>• Removal plan<br>• Budget. | Examples of redundant materials include:<br>• Tree shelters<br>• Fencing<br>• Culvert pipes<br>• High seats. | [5] Remove. Vague and meaningless statement<br><br>[9] Whoaaaaaaaaaaaaa!<br><br>Has anyone costed this. As written there is no discretion. It is an absolute requirement to remove all redundant tree shelters and fences. At a conservative estimate there are 25-30million shelters in UK forestry and it costs circa 30p ea to remove. This is a £10M item.Then add fences.<br><br>[16] 'Progressively' is open to interpretation by an auditor and has no time scale, better to remove the word? |
| 3.7 | Pollution | | | [18] The RSPB is of the strong opinion that the use of lead-free ammunition has to be part of a higher level voluntary sustainable forest management standard, rather than relying purely on what is legal, but environmentally |

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| | | | | unsustainable.<br><br>The RSPB would welcome the introduction of an UKWAS requirement related to the restriction of the use of lead ammunition for control of vertebrates.<br><br>There should be a presumption against the use of lead ammunition with consideration of alternative materials and methods. This is due to the toxicity to wildlife, in particular wild birds, from spent lead ammunition left in the environment.<br><br>This could be written into Section 5 'Protection & Maintenance' in a requirement under pollution control (5.5) with cross-referencing from the deer management requirement (5.1.5).<br><br>The time from when the revised UKWAS standard is introduced and the time that all certified owners/managers are given to comply would provide a phasing in period for such a requirement. |
| 3.7.1 | Owners/managers shall adopt management practices that minimise diffuse pollution arising from forest operations. | • Field inspection<br>• Operation plans<br>• Incident response plans<br>• Diffuse pollution risk assessment in high risk situations<br>• Use of biodegradable lubricants. | Diffuse pollution includes:<br>• Oil spills and leaks<br>• Cutting-chain lubricants<br>• Siltation of water courses<br>• Pesticide or fertilizer runoff<br>• Smoke.<br><br>Biodegradable cutting-chain lubricants should be used where practicable. Practicability encompasses | [9] No VWs then?<br><br>[11] "Operation Plans" should be Operational Plans". After "Siltation of water courses" add "or drains that connect to watercourses".<br><br>[15] We recommend amending the first sentence to read 'Owners/managers must take reasonable steps to prevent diffuse pollution arising from forest operations'.<br><br>The guidance refers to both point-source pollution and diffuse pollution- please clarify.<br><br>[16] 'Minimise' is open to considerable interpretation, |

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| | | | operator health and costs of running machinery. | wording is appropriate but the term minimise will mean something different eg. to a SEPA inspector than it will to a Standing Sale Merchant. Further guidance would be helpful.<br><br>Evidence could include site design and work plans |
| 3.7.2 | Plans and equipment shall be in place to deal with accidental spillages. | • Discussions with owner/manager and relevant staff<br>• Appropriate equipment available in the field<br>• Written plans. | **MP** | |

## 4 Natural and historic environment

**Commented [OD12]:** [16] Surprised that hydrological systems aren't mentioned more in section 4
Should this section heading also refer to the cultural environment?

| | REQUIREMENT | EXAMPLE VERIFIERS | GUIDANCE | [2] Farms & grouse moors are only expected to comply with a fraction of this! |
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| 4.1 | Protection of rare species, habitats and natural resources including statutory designated sites and protected species | | | [16] 4.1 and 4.4 Potential impacts include those caused by access takers. This should be recognised and along with the action taken by owners/managers to do avoid or ameliorate impacts should be acknowledged |
| 4.1.1 | a) Areas and features of high conservation value having particular significance for biodiversity, including sites important for endangered but mobile species, shall be identified by reference to statutory designations at national or regional level and/or through assessment on the ground.<br>b) The identified areas, species and features of high conservation value shall be maintained and, where possible, enhanced.<br>c) There shall be ongoing communication and/or consultation with statutory bodies, local authorities, wildlife trusts | • All known areas and features mapped<br>• Field inspection<br>• Approval of forest plan by the relevant forestry authority<br>• Workers are aware of such sites and of plans for their management<br>• For all potentially damaging operations, awareness is demonstrated of how areas will be protected and/or safeguarded<br>• Management plans for statutory conservation areas and monitoring of implementation of those plans<br>• Condition statements from statutory bodies<br>• Maps<br>• Discussions with owner/manager demonstrate how areas will be | The system of designated sites in the UK forms a representative sample of existing ecosystems within the landscape.<br><br>These areas and features of high conservation value include:<br>• Areas designated as:<br>○ Special Areas for Conservation<br>○ Special Protection Areas<br>○ Biological Sites of Special Scientific Interest or Areas of Special Scientific Interest<br>○ Ramsar Sites<br>○ National Nature Reserves | [5] Remove "the need for assessment on the ground" [from 4.1.1(a)]<br>Remove or restrict to SSSI, SAC or NNR [from 4.1.1(d)]<br><br>[11] Should be Special Areas of Conservation. Remove "Biological" from in front of "Sites of Special Scientific Interest".<br><br>After "has been completed for an area prior to significant woodland management operations taking place" add "and for which consent will be required from the statutory nature conservation agency within sites designated as SSSIs".<br><br>[16] As it stands, only designated sites and features are expressly included, with no mention of other non-designated features, species or habitats. The sentence (removed) that was present in 3rd edition could perhaps be re-instated: "Areas supporting priority habitats and species listed in the UK Biodiversity Action Plan" within the requirement itself or the guidance.<br>[Proposed addition to list in guidance: Features include breeding sites, resting places and display sites of |

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| | and other relevant organisations.<br>d) The areas and features shall be managed in accordance with plans agreed with nature conservation agencies, and shall be marked on maps. | safeguarded and/or enhancedPlanning documentation shows how areas will be safeguarded and/or enhanced<br>• Pro-active approach to the identification of areas and features of significance for biodiversity, appropriate to likely biodiversity value. | Identification and mapping of these features may be carried out on an ongoing basis, provided that it has been completed for an area prior to significant woodland management operations taking place.<br>**BAP**<br>**MP** | protected species]<br><br>[18] RSPB welcomes the continued inclusion in the standard of requirements for the conservation of priority habitats, priority species and designated wildlife sites.<br><br>The RSPB, however, is concerned that the proposed requirement 4.1.1 is only to maintain the most important designated wildlife sites. This is unacceptable as it conflicts with country, UK and international biodiversity and sustainable forestry commitments – 'maintain' might mean in keeping it in poor ecological condition. This appears to be an unacceptable weakening of what is in the current UKWAS standard.<br><br>The RSPB also remains concerned that the content and approach of the UKWAS standard does not sufficiently drive biodiversity enhancement for priority habitats and priority species, for example the restoration of peatland and lowland heathland habitats from inappropriately located forestry plantations, as well as native woodland habitat restoration. The UKWAS approach allows restoration rather than pushing it.<br><br>UK Forestry Standard requirements should not be used solely in UKWAS to try to meet FSC Principles and Criteria for high conservation value forests.<br><br>We are looking for the revision to address these important biodiversity protection and enhancement aspects, while recognising that UKWAS is not the complete delivery plan for country biodiversity/environment strategies. UKWAS should, however, encourage owners/managers to go |

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| | | | | further than the UK Forestry Standard minima for biodiversity enhancement, as well as the protection of designated wildlife sites and species.<br><br>[18] The requirement to only 'maintain' the most important sites is unacceptable and conflicts with national and international commitments. 'Maintain' might mean in keeping it in poor ecological condition. This appears to be a weakening of the current standard. |
| 4.2 | Conservation of ancient semi-natural woodlands | | | [10] [Proposed adding (ASNW).] |
| 4.2.1 | a) Ancient semi-natural woodland shall be identified by reference to published maps and/or by assessment on the ground.<br>b) The high conservation value of ancient semi-natural woodlands shall be maintained and where possible enhanced.<br>c) Adverse ecological impacts of non-native species shall be identified and inform management. . | • Field observations<br>• Discussions with the owner/manager<br>• Management planning documentation including relevant forestry authority management plan and restocking plans<br>• Ancient woodland inventories<br>• Other studies<br>• Monitoring records. | Ancient semi-natural woodlands are the key priority sites for woodland conservation in the UK.<br><br>Establishing the validity of the site's status need not solely rely on ancient woodland inventories. Assessment on the ground should take account of:<br>• Soils<br>• Vegetation<br>• Old trees<br>• Historical and archaeological features and landscape implications.<br><br>Use should be made of natural regeneration or planting stock from parental material growing in the local native seed zone where | [11] Establishing the validity of the site's status need not solely rely on ancient woodland inventories. Replace "need" with "should". |

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| | | | appropriate and possible.<br><br>Maintenance of biodiversity values often requires targeted interventions. Management should be in accordance with the relevant FC practice guides for semi-natural woodlands.<br><br>Potential adverse impacts may include:<br>• Browsing by rabbits, deer and other animals<br>• Grazing by livestock<br>• Colonisation by invasive non-native species | |
| 4.3 | Plantations on Ancient Woodland Sites (PAWS) | | | |
| 4.3.1 | Owners/managers shall maintain and enhance features and areas of high conservation value within plantations on ancient woodland sites<br><br>Owners/managers shall:<br>• Identify and evaluate remnant features<br>• Identify and evaluate threats<br>• Adopting a precautionary approach, prioritise | • Management planning documentation, including a long term policy<br>• Ancient woodland inventories<br>• Other studies<br>• Remnant threat analyses<br>• Field observations<br>• Discussions with owner/manager. | Establishing the validity of the site's status need not solely rely on ancient woodland inventories. In evaluating,, prioritising and implementing actions owners/managers should take account of:<br>• Historical and archaeological features and landscape implications<br>• Remnant features<br>• The relationship with other biodiversity features and priorities and | [5] Over the top<br>Shorter and tighter statement needed. Suggest – Owners will restore or enhance a minimum of 20% of PAWS woodland.<br><br>[11] "Threats may include shading, deer browsing, windthrow and ground damage from harvesting". Not only ground damage but damage to veteran trees from woodland operations.<br>Also 4.3.1 "prescription" should be "prescriptions"<br><br>[14, 17] FEE/NRW welcomes and supports the revised version of the standard with respect to PAWS. |

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| | actions based on the level of threat and the value of remnants<br>• Implement targeted actions. | | management objectives within the WMU and adjacent land use as a whole.<br><br>Active management is likely to be required to maintain the biodiversity, environmental and cultural values of these sites, including where continued growth of plantations for timber or woodfuel production is to be undertaken. Restocking and thinning should be carried out in such a way that remnant features are enhanced and buffered.<br><br>A precautionary approach is appropriate in most instances even if initially no remnant features may appear to be present. A gradual approach should be the default where remnants are threatened.<br><br>Threats may include shading, deer browsing, windthrow and ground damage from harvesting<br><br>Where remnants are not threatened or where site characteristics allow a more rapid approach may be adopted. In some situations, such as inaccessible, | There may be a need to remove reference to a 'long term policy' under verification as this is not relevant given the requirements are sufficient to set direction.<br><br>We also suggest that the text 'identify and evaluate threats' from is removed from requirements and moved to guidance where it seems most appropriately placed.<br><br>We also note that dramatic interventions may in certain circumstances be beneficial, in contrast to the guidance, where they remove threats such as the presence of extensive rhododendron or western hemlock plantations, and should not be regarded as unsuitable actions by implication of the adoption of gradual approaches to restoration.<br><br>[15] We believe that this section is contradictory in places and open to confusion. We recommend amending the third bullet-point to remove reference to the precautionary approach in the Requirement column to read 'Prioritise actions based on the level of threat and the value of remnants.<br>In the Guidance column amend to read 'A precautionary approach is maybe appropriate even if initially no remnant features may appear to be present. A gradual approach should be the default where remnants are threatened'.<br><br>[18] This proposed section is a strong dilution of the current standard. This changes the emphasis from progressive improvement of the ecological condition of PAWS to something far weaker. The RSPB would support the retention of the current UKWAS Requirements in UKWAS 3.1 in the revised standard. |

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| | | | unthinned stands it may not be possible to apply a gradual approach, even though it would be the preferred option for threatened remnant features. In such circumstances, where possible, remnant features should be bolstered before clear felling.<br><br>Exploratory silvicultural interventions may help inform the choice of management prescription. Where complete canopy removal has occurred it will be important to ensure a successor canopy is established as soon as possible to alleviate further threats. The context of the site within the WMU and wider landscape will also inform any prioritised restoration plans. All operations within PAWS need to take account of remnant features, including ground flora, and mitigate against damage to them.<br><br>**MP** | |
| 4.4 | Protection of conservation values in other woodlands and semi-natural habitats | | | [3, 4] This clause is confusing if read separately from 4.3 – suggest that it is simplified to read “Protection of |

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| | | | | conservation values in woodlands …. "<br><br>[16] 4.1 and 4.4 Potential impacts include those caused by access takers. This should be recognised and along with the action taken by owners/managers to do avoid or ameliorate impacts should be acknowledged |
| 4.4.1 | a) Areas, species and features of conservation value in other woodlands shall be identified.<br>b) The identified areas, species and features of conservation value shall be maintained and where possible enhanced.<br>c) Adverse ecological impacts shall be identified and inform management. | • Field observations<br>• Discussions with the owner/manager<br>• Management planning documentation including relevant forestry authority approved management plan and restocking plans<br>• Historical maps<br>• Monitoring records. | This requirement relates to woodlands other than ASNW and PAWS (see 4.2 & 4.3).<br><br>Priority should be given to woodlands or woodland relicts that may have retained/acquired valuable ecological characteristics.<br><br>Typically these values may be found in:<br>• Semi-natural woodlands<br>• Long established woodlands of planted origin<br>• Woodland relicts<br>• Veteran trees<br>• New native woodlands<br><br>Potential adverse impacts may include:<br>• Browsing by rabbits, deer and other animals | [9] "features of conservation value"<br>"High" has been omitted in this version. This is too open-ended. An auditor is bound to point out that a cluster of birch developing in a Sitka plantation is no longer a weed but is now a feature of conservation value and must now be enhanced.<br><br>[11] "Plan" should be "plans"<br>Also 4.4.1 "planted origin" should be "plantation origin" |

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| | | | • Grazing by livestock<br>• Colonisation by invasive non-native species | |
| 4.4.2 | a) Valuable semi-natural habitats (e.g. moorland, heathland, wood pasture and grassland) that have been colonised, planted, or incorporated into the WMU, but which have retained their ecological characteristics (or have a high potential to be restored), shall be identified and enhanced, restored or treated in a manner that does not lead to further loss of biodiversity or cultural value.<br><br>b) Adverse ecological impacts shall be identified and inform management. | • Workers are aware of such sites and of any plans for their management<br>• For all potentially damaging operations, awareness demonstrated of how areas shall be protected and/or safeguarded<br>• Discussions with owner/manager demonstrate how such areas will be managed<br>• Planning documentation shows how areas will be managed. | This requirement relates to small-scale habitats within the WMU.<br>Appropriate management may include:<br>• Rides and glades containing remnant semi-natural communities are widened and extended<br>• Areas with a rich ground flora and shrub layer are heavily thinned<br>• Remnants of wood pasture, veteran trees or other 'open-forest' habitat are gradually opened up<br>• Heathland, bog and other open habitats are re-created by premature felling without restocking<br>• Maintenance of open ground around historic environment sites.<br>Priority should be given to habitats identified in the Forestry Commission's forests and peatlands policy or the Forest Service's afforestation and | [3, 4] Is this requirement too "open-ended" – much planted moorland has a "high potential" to be restored?<br><br>[11] Add "peatland" after "moorland".<br>Also 4.4.2 "Areas with a rich ground flora and shrub layer are heavily thinned" Add "species-" in front of rich.<br>Also 4.4.2 Add Cross-refer to FCs Managing open habitats in upland forests.<br>Also 4.4.2 Add "drainage" to "Potential adverse impacts may include":<br><br>[16] In the 'guidance' column, suggest that the word significant is included as below – this provides clarity in regards to the actual requirement.<br><br>Maintenance of open ground around significant historic environment sites.<br><br>"Woodland removal to facilitate infrastructure or built development which is not integral to the management of the rest of the woodland cannot meet this requirement" appears out of context. It suggests that if the development is integral to the management of the forest, then it doesn't fall within this requirement - even if it doesn't result in a biodiversity gain. Helpful to clarify this |

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| | | | environmental policy and UK national and local Biodiversity Action Plans.<br><br>Woodland removal to facilitate infrastructure or built development which is not integral to the management of the rest of the woodland cannot meet this requirement.<br><br>Potential adverse impacts may include:<br>• Browsing by rabbits, deer and other animals<br>• Grazing by livestock<br>• Colonisation by invasive non-native species<br><br>Non-native species may be retained where they have a high ecological or cultural value.<br><br>*See also section 2.12.3 that covers larger scale habitat restoration through conversion to non-forested land.* | area.<br><br>[18] Suggested change in italics below, to ensure that important non-woodland habitats are not under threat for example using continuous cover forestry (CCF) systems on important lowland heathland habitats. Moving to CCF would mean that the seed bank could not renew like it would in plantation high forest clearfell. Also could be used to stop shifting to broadleaves on a potential open habitats which would change soil type and remove potential for future ecological restoration.<br><br>"Valuable semi-natural habitats (e.g. moorland, heathland, wood pasture and grassland) that have been colonised, planted, or incorporated into the WMU, but which have retained their ecological characteristics (or have a high potential to be restored), shall be identified and enhanced, restored or treated in a manner that *does not lead to further degradation to potential for restoration*".<br><br>[24] Reference here should be made to Natural Resources Wales.<br><br>NRW does have a peatland policy inherited from FCW<br><br>I am unclear whether this advice note refers only to timber sold from the valuable semi-natural habitats within the WMU or all timber from the WMU when a certifier has judged this requirement has not been met and presumably a CAR issued. |

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| | | | **Advice to owners/managers**<br><br>Only timber felled in accordance with this requirement can be certified.<br><br>Owners/managers are advised to seek guidance from their certification body or group scheme manager.<br><br>**MP** | |
| 4.5 | Watershed management and erosion control | | | |
| 4.5.1 | a) Areas and features of critical importance for watershed management or erosion control shall be identified in consultation with relevant statutory bodies.<br>b) Where critically important areas or features are identified, their management shall be agreed with the relevant statutory bodies. | • Records of consultation<br>• Management planning documentation<br>• Monitoring records<br>• Licences or consents. | Situations where forest management is critical for watershed management or erosion control are relatively rare, and are likely to be identified during consultation processes.<br><br>Further information is available in UKFS guidelines on soils and water. | [16] May prove difficult to define/assess 'critical' in this context – helpful if guidance could refer to recognised data sources on eg. slope stability 'critical squares'.<br><br>Need to consider consistency of interpretation. |
| 4.6 | Maintenance of biodiversity and ecological functions | | | [5] Good revision |
| 4.6.1 | Natural reserves shall constitute a minimum of 1% of the WMU in plantations and 5% of the WMU in | • Management planning documentation including maps<br>• Field observation. | Larger and more widespread woodland estates may fulfill this requirement across the estate as a whole rather than | [14, 17] FEE/NRW welcome the clear statement of the role and extent of natural reserves in 4.6.1 but suggest that it is also in the guidance that plantations in this context cover both conifer and broadleaved plantations |

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| | semi-natural woodlands. | | reserving specified areas in each and every wood or woodland management unit.<br><br>Where there is a mixture of semi-natural woodland and plantations within the WMU the requirement for long-term retentions and natural reserves should be met pro rata.<br><br>Areas managed as natural reserves within the areas identified by sections 4.1 – 4.5 may fulfil this requirement. | (such as oak and beech plantations). We have made suggested changes to the text in the guidance column [as below].<br><br>[Proposed addition to guidance: Plantation woodlands can be comprised of either conifer stands or broadleaved stands (for example beech plantations).]<br><br>[16] Whilst the guidance re: fulfilling this requirement across the whole estate is very helpful, it is not reflected in the requirement itself.<br><br>Suggest the following wording of this requirement could be clearer. Perhaps: "Within the WMU, a minimum of 1% of the plantation area and 5% of the semi-natural woodland area shall be designated as Natural Reserves".<br><br>The current wording suggests that 5% of the WMU needs to be retained as semi-natural woodland NR when the entire semi-natural woodland resource in the WMU may not be as large as 5%.<br><br>Not entirely clear what the second paragraph in the 4th column means? Why refer here to LTRs?<br><br>It may be better to be allowed the flexibility to offset a lack of area in plantation with excess area of SNW. This would put the focus on the quality of the reserve, rather than area? |
| 4.6.2 | Long-term retentions and/or areas managed under lower impact silvicultural systems (LISS) shall | • Management planning documentation including maps<br>• Field observation. | Larger and more widespread woodland estates may fulfill this requirement across the estate as a whole rather than | [16] Unclear what the basis is for increasing the NR area is where LTR or LISS are impractical? Fulfilling this this over the "estate as a whole" may be helpful but is not reflected in the requirement. |

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| | constitute a minimum of 1% of the WMU. Where this is impracticable, an additional minimum 1% of natural reserve shall be identified. | | reserving specified areas in each and every wood or woodland management unit.<br><br>Areas managed as long-term retentions and/or LISS within the areas identified by sections 4.1 – 4.5 may fulfil this requirement. | |
| 4.6.3 | Owners/managers shall plan and take action to maintain continuity of veteran tree habitat by:<br>• Keeping existing veteran trees<br>• Managing or establishing suitable trees to eventually take the place of existing veterans. | • Field observation<br>• Harvesting contracts<br>• Discussions with owners/managers, and workers<br>• If there is a conflict with safety, the issues have been documented<br>• Management planning documentation. | This requirement applies in WMUs where there are existing veteran trees.<br><br>Owners/managers of WMUs without veteran trees may choose to promote future veteran trees, as part of their wider management to maintain and/or enhance biodiversity value.<br><br>Actions may include:<br>• Freeing from shading and/or competition<br>• Pollarding younger trees or lopping older trees to prolong their life.<br><br>Veteran tree management should not conflict with safety of the public or forestry workers. | [9] The requirement to plant new trees to replace veteran trees unfairly penalises traditional estates. If veteran trees are of such value there should be a requirement to create them within all woodlands – as with deadwood.<br><br>[16] Good to separate out the veteran trees from deadwood and the revised approach to deadwood is helpful.<br><br>[19] We support the inclusion of a specific Requirement on veteran trees and their management as this is a resource certified UK woodlands can play a lead role in, in both a European and indeed international context. |
| 4.6.4 | Owners/managers shall plan and take action to:<br>• Identify areas where deadwood is likely to | • Field observation<br>• Harvesting contracts<br>• Discussions with | This requirement should be fulfilled throughout the WMU, with action targeted to identified areas of greatest | [6] I believe the revised wording will lead to even less standing deadwood than the current low levels already seen in certified woods and needs to be changed. The Standard should give a clear guide on how much |

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| | be of greatest ecological benefit<br>• Accumulate a diversity of both standing and fallen deadwood over time throughout the WMU. | owners/managers and workers<br>• If there is a conflict with safety or woodland health, the issues have been documented<br>• Management planning documentation. | ecological benefit.<br><br>Deadwood management should not conflict with safety of the public or forestry workers or the health of the woodland.<br><br>Actions may include:<br>• Keeping standing dead trees and snags<br>• Keeping and protecting old, previously pollarded trees alive through appropriate management<br>• Only harvesting windblow when it is of significant value unless more than 3 $m^3$/ha is blown and sufficient deadwood is already accumulating on site<br>• Keeping naturally fallen trees or major branches<br>• When thinning or clearfelling, and where safe to do so, creating snags and providing fallen deadwood where insufficient has already accumulated.<br>The accumulation of deadwood throughout a rotation provides for greater continuity of the full range of deadwood habitat types. | (numbers, volume, dimension) is expected in a typical conifer clearfell. This is the one part of a rotation where a manager can make a big impact on levels of deadwood. Feedback from eg English Nature, stresses the value of having deadwood throughout the site and not just concentrated in certain areas. Compliance with current UKWAS deadwood is variable and often poor. As worded in the draft I believe this will exacerbate the situation.<br><br>[7] We believe that the revised wording of 4.6.4 will lead to even less standing deadwood than the current low levels already seen in certified woods and needs to be changed. The Standard should give a clear guide on how much (numbers, volume, dimension) is expected in a typical conifer clear fell. This is the one part of a rotation where a manager can make a big impact on levels of deadwood. The current Forestry Commission guidance is limited for plantations (i.e. what we are certifying) and most managers won't be aware of it. Putting a simple guidance in the Standard would, in our opinion, be an advantage.<br><br>[16] This section appears to follows current guidance and is now a lot clearer than the previous wording.<br><br>Note: Continuous input of new deadwood is important e.g. on an annual basis.<br><br>Note: Dying trees are a key component of the deadwood habitat spectrum. In this regard, wind-blown trees are important. Suggest adding to guidance 'documentation or a map showing areas of greatest ecological benefit where deadwood will be concentrated'.<br><br>[18] The proposed deadwood wording is much weaker than the current standard. The draft UKWAS 4 removes an important driver to produce, protect, maintain and enhance high quality deadwood habitats in a targeted manner across the Woodland Management Unit. The draft UKWAS 4 misses out on the importance of different types of deadwood and leaving wind-blow. |

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| | | | The most valuable areas within which to develop deadwood habitats are where linkages can be made with existing deadwood habitats to develop ecological connectivity over time; these areas include:<br>• Wood pasture/parklands<br>• Ancient semi-natural woodland with veteran trees<br>• Long-term retentions and natural reserves<br>• Riparian or wet woodland.<br><br>Retained deadwood should be matched to the requirements of those species likely to be important on the site. Habitat diversity is improved by having:<br>• Stems of greater than 20 cm diameter, particularly large dimension timber from native species<br>• Snags at variable height<br>• A range of tree/shrub species at varying stages of decay and in a variety of light conditions | It important that high quality deadwood habitats are produced, protected and managed appropriately for high quality biodiversity benefits.<br><br>Note that the existing practice guidance on deadwood habitats was produced on behalf of UKWAS for an earlier revision and contains detailed advice. The requirement on deadwood should better articulate how to better meet the content and intent of this guidance, along with means of verification of evidence, rather than remove any meaningful deadwood requirement.<br><br>There may be audit and interpretation issues with how the current standard, and the underlying UK Forestry Standard Forests & Biodiversity Guidelines and deadwood practice guidance, are being met in UKWAS certified woodlands. It is important not to dilute the UKWAS requirements for deadwood and their application but to improve their targeting for priority species and priority habitats at a suitable scale and locations. Better environmental quality deadwood needs to be created, managed and protected in key locations across WMUs.<br><br>Major changes to UKWAS on deadwood, for example relating to scale and application at the Woodland Management Unit could mean loss of deadwood in existing UKWAS certified woodlands.<br><br>[19] We welcome the important words “throughout the WMU” in Requirement 4.6.4 on the basis that, as per the points made on tree species diversity above, we would not wish to see (intended or unintended) a loss of existing deadwood, often created at considerable effort over the last 15 years, at the coupe level.<br><br>[In addition to the consultation comments above, the opportunity is taken here to record formally comments and suggestions submitted by Douglas Orr (SGS) and Kenny Kortland (FE Scotland) at the time the consultation draft |

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| | | | • Deadwood in living trees.<br><br>Owners/managers should refer to deadwood guidance produced by relevant forestry authorities.<br><br>*See also section 5.2.1 relating to mitigation of risks to public health and safety.*<br><br>**MP** | was being finalised; this feedback was received too late to influence the consultation draft, and should be considered in drawing up the next draft. Supplementary material from FES is also available for consideration.]<br><br>Presumably the requirement for 20 cubic metres per hectare is still in there? And the inability to include stumps as a contribution to this target?<br><br>The deadwood structural indicators (of biodiversity) that have empirical support are **volume** and **diversity**, there is increasing evidence that both are positively correlated with measures of biodiversity (species richness). Although, so far, relatively few statistically significant relationships have been elucidated – it's a matter of time though, I guess. There is also a cogent case for connectivity of deadwood, although there is limited empirical support as yet.<br><br>So, the Requirement should reflect the need for maximum volumes, maximum diversity, and connectedness. It does try to do that, but I think the language could be simplified and the Guidance could be rewritten to reflect the key parameters of: abundance (volume), tree species (diversity), size (diversity), decay class/inputs (diversity), and position (diversity).<br><br>[Proposed edit to requirement:<br>• Accumulate over time a diversity of both standing and fallen deadwood throughout the WMU, taking into account connectivity<br>• Produce a deadwood strategy and/or an indicative map appropriate to the WMU that forms part of the MP]<br><br>[Proposed edit to guidance:<br>• When thinning or clearfelling, and where safe to do so, creating ~~snags~~ standing deadwood and dying wood and providing fallen deadwood where insufficient has already accumulated.] |

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| | | | | [Proposed edit to guidance:<br>• Stems of greater than 20 cm diameter of all species, particularly large dimension timber from native and broadleaf species plus Scots pine where it is not native<br>• Snags at variable height<br>• A range of tree/shrub species at varying stages of decay and in a variety of light conditions<br>• Deadwood in living trees, i.e. the inclusion within a deadwood strategy of future deadwood from dying, damaged and identified mature trees retained from future harvesting.] |
| 4.7 | Maintenance of local native seed sources | | | [16] This section is a great improvement over previous. |
| 4.7.1 | In woodlands identified in sections 4.1 – 4.4, where appropriate and possible, owners/managers shall use natural regeneration or planting stock from parental material growing in the local native seed zone (native species).<br><br>In ancient and other semi-natural woodland, where natural regeneration is insufficient, planting stock from 'source-identified' stands in the local native seed zone shall be used wherever it is available (see FRM). If timber quality is an objective of the planting, the use of stock deriving from selected stands within the local native seed zone | • Seed and plant supply invoices and other relevant records<br>• Evidence of efforts to identify planting stock from source-identified stands in the local native seed zone. | There should be clear justification where non-local sources are used. This may include reasons of tree vigour, timber quality, pest and disease resilience and climate change adaptation.<br><br>The identity code used for parental material includes an 'N' when it applies to native material from known indigenous sources.<br>**FRM**<br>**MP** | [3, 4] Is this too restrictive and impractical, give the impact of climate change. Should we be sourcing "native" seeds from more southerly regions?<br><br>[5] Good<br><br>[14] In section 4.7.1 we welcome the acknowledgement of the importance of mitigating against the impacts of climate change. However, whilst acknowledging the case for addressing climate change there is a clear preference within the standard for maintaining the status quo, which does not demonstrate progressive forward thinking. FEE staff are clearly of the view that the Standard should be promoting climate change adaptation measures far more forcefully than it does at present.<br><br>[16] There is no mention of the difficulty of acquiring the correct sources and species available. Especially when operational plans change or do not complete on time. It would be useful to have noted under guidance the difficulties with the timing of operational processes and basic biology (mast years) for getting local source plants. |

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| | shall be considered appropriate. | | | |
| 4.8 | Cultural and historical features/sites | | | |
| 4.8.1 | Through engagement with the relevant authorities, local people and other interested parties, and using other relevant sources of information, the owner/manager shall:<br>a) identify sites and features of special cultural and historical significance,<br>b) assess their condition, and<br>c) devise and implement measures to maintain and/or enhance them, adopting a precautionary approach.<br><br>*See also section 2.3.1.* | • Any known features mapped and/or documented<br>• Discussions with the owner/manager demonstrate rationale for management of relevant sites<br>• Records of consultation with statutory bodies, local authorities and interest groups to identify features<br>• Documented plans. | Examples of relevant sources of information include:<br>• Maps<br>• Databases<br>• Field observations.<br><br>Typical examples include:<br>• Prominent viewing points<br>• Landscape features<br>• Veteran and other notable trees<br>• Historical features and archaeological sites<br>• Woodlands which feature in literature or which are of artistic significance<br>• Historic landscapes and woodlands which are still managed under traditional systems.<br><br>Where relevant, a professional archaeological walkover survey may be required to inform decisions and provide baseline evidence.<br><br>Sites of potential historical importance discovered during the course of forest management should be | [5] Remove [4.8.1(b)]<br><br>[14] Remove relict text<br><br>[18] The RSPB welcomes the proposed introduction in the draft UKWAS 4 of clearly stated requirements on historic environment protection and conservation for both features and designated sites.<br><br>Historic environment protection and conservation is part of UK Forestry Standard and its associated Forest Guidelines on Historic Environment, and hence part of UKWAS. It is part of management planning, design, operation and connect with veteran trees, deadwood biodiversity, access and social aspects of UKWAS. |

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| | | | reported to the relevant authorities.<br>MP | |
| 4.9 | Game management | | | |
| 4.9.1 | Game rearing, shooting and fishing shall be carried out in accordance with the spirit of codes of practice produced by relevant organisations. | • From field observation no evidence that relevant codes of practice have been broken<br>• Relevant permissions and leases<br>• Discussions with the owner/manager/responsible person demonstrate awareness of the law and good practice<br>• Discussions with interested parties<br>• Permissions from Statutory Authorities where these are required<br>• Membership of sporting and conservation organisation.<br>• | Consider impacts on native species principally priority habitats and priority species identified under biodiversity/environment strategies in England, Northern Ireland, Scotland and Wales.<br>• Species that currently have local or regional restrictions on shooting include Black grouse (*Lyrurus tetrix*) and wild hares (*Lepus timidus*).<br><br>Feeding and rearing areas should be located in areas where there will be low impact on ground flora.<br><br>Predator control should be carried out in line with best practice.<br><br>The use of lead shot over wetland is restricted in relevant codes of practice.<br><br>*CODES OF PRACTICE ARE LISTED IN THE APPENDIX* | [11] In UK we use Tetrao tetrix for black grouse though Lyrurus tetrix is a synonym used in Europe.<br><br>[18] [See comment re. lead-free ammunition against 3.7.1.]<br><br>[21] A) BASC recommends the current "Requirement" wording is changed from:<br><br>Game rearing, shooting and fishing shall be carried out in accordance with the spirit of codes of practice produced by relevant organisations.<br><br>To now read:<br><br>Shooting, other country sports and associated activities shall be carried out in accordance with the "Code of Good Shooting Practice" and the spirit of codes of practice produced by relevant organisations.<br><br>Reference to "Game rearing" is removed as animals and birds are not reared in a woodland environment. Game birds are released into a woodland environment and BASC believes this activity together with other shooting related management will be covered by the "associated activities" wording.<br><br>Reference to "fishing" has been removed as the act of fishing is not referred to as "Game Management". If fishing is important to UKWAS then BASC recommends a separate subsection within Section 4.<br><br>BASC recommends additional robustness with respect to |

**Commented [AJ13]:** Check name Tetrao tetrix?

**Commented [AJ14]:** Check if Scottish legislation applies to mountain hares only or also brown hares.

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| | | | | the references made to codes of practice. BASC suggests "activities shall be carried out in accordance with the "Code of Good Shooting Practice" and the spirit of codes of practice produced by relevant organisations." The "Code of Good Shooting Practice" is supported by all the shooting organisations and therefore provides the definitive guidance which all member organisations then interpret for their respective memberships. Please note BASC provides the Secretariat to the "Code of Good Shooting Practice" and is therefore in a position to provide direct support to UKWAS on issues relating to the code.<br><br>B) BASC recommends the current "Guidance" wording:<br><br>"Consider impacts on native species principally priority habitats and priority species identified under biodiversity/environment strategies in England, Northern Ireland, Scotland and Wales."<br><br>Should now read:<br><br>"Recognise, within the woodland environment, the positive impacts game management has on native species principally priority habitats and priority species identified under biodiversity/environment strategies in England, Northern Ireland, Scotland and Wales."<br><br>In 2014 BASC together [with] 15 other shooting organisations commissioned an independent survey (http://www.shootingfacts.co.uk/). The results indicated that Shoots manage 500,000 hectares of woodland and manage 100,000 ha of copses specifically planted to shelter game. Woodland management for shooting improves habitat for a broad range of wildlife and increases biodiversity, particularly species of birds and butterflies.<br><br>C) BASC does **not** believe the bulleted "Guidance" commentary regarding "Species that currently have local or regional restrictions on shooting…" adds value and |

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| | | | | should be deleted.<br><br>D) BASC recommends the current “Guidance” wording:<br><br>“Feeding and rearing areas should be located in areas where there will be low impact on ground flora.”<br><br>Should now read:<br><br>“Release and feeding areas should be located in areas where there will be low impact on ground flora.”<br><br>E) The “Guidance” commentary concerning “The use of lead shot over wetland…” is no longer restricted by codes of practice but by government regulations. BASC recommends the following new wording<br><br>“The use of lead shot over wetland is restricted by regulations.” |

**5. People, communities and workforce**

| | REQUIREMENT | EXAMPLE VERIFIERS | GUIDANCE | |
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| 5.1 | Woodland access and recreation including traditional and permissive use rights | | | |
| 5.1.1 | Existing permissive or traditional uses of the woodland shall be sustained except when such uses can be shown to threaten the integrity of the woodland or the achievement of the objectives of management.<br><br>A precautionary approach shall be adopted in relation to water supplies. | * Documentation or maps of all existing permissive and traditional uses of the woodland<br>* Discussions with interested parties<br>* Field observation of public rights of way<br>* Evidence presented to justify any restriction of permissive or traditional uses. | Permissive and traditional uses include:<br>* Permissive footpaths and bridleways<br>* *De facto* access to well-known landmarks<br>* Gathering fruit or fungi by the public for their own consumption where this does not jeopardise the achievement of biodiversity objectives (having regard to codes of good practice)<br>* Water supplies.<br><br>Permissive routes can be closed annually to maintain their permissive status.<br>Traditional uses that exploit the woodland resource (e.g. peat cutting) should be carried out at a traditional scale.<br><br>'Integrity' refers principally to the ecological maintenance of the woodland. | [16] Permissive uses; remove 'footpaths' (as these can be vehicular, drove roads, horse access etc as well as on foot and not necessarily on a path). May be more appropriate just to Eng & Wales?<br><br>Are 'water supplies' relevant to this requirement – perhaps they don't need to be separated out. Not clear what a "precautionary" principle means in relation to a water supply. May be better to say protect the water supply?<br><br>Many water supplies are not permissive as such and are covered by Servitudes, wayleaves etc - this is confusing…..and is covered under legal documentation<br><br>[22] The Ramblers welcomes the inclusion of woodland access and recreation as a section within the criteria set for people, communities and workforce.<br><br>Owners or managers of woods with any form of public access, be it via statutory or others means. including permissive or traditional access, should seek to identify and consult local representative groups or bodies which can represent users.<br><br>The statutory Local Access Forum for the area should also be included in any consultation. |

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| 5.1.2 | There shall be provision for some public access subject only to limited exemptions.<br><br>Where there is a special demand for further public access for the purpose of environmental education, the owner/manager shall make reasonable efforts to meet this demand. | * Field observation to confirm that access is available<br>* Maps show public rights of way through or beside the wood<br>* Evidence of publicised annual open days or guided walks<br>* Access agreements with local authorities<br>* Evidence that account has been taken of local demand.<br>* Evidence from consultation with interested parties.<br>* Records of publicised annual open days or guided walks, school visits or research undertaken in the woodland. | Woodlands containing or adjoining notable historic environment or ecological features may attract large numbers of visitors even to small properties.<br><br>Professional associations can advise on necessary safety and insurance provisions, ways of supporting educational visits and studies, and methods for recovering some or all of the extra costs of satisfying public demand.<br><br>**In Scotland:**<br>The Land Reform (Scotland) Act (2003) grants a right of responsible access to land, including woodland.<br><br>Guidance on responsible behaviour together with circumstances where access may be restricted is set out in the Scottish Outdoor Access Code.<br><br>**In England, Wales and Northern Ireland:**<br><br>There is no statutory right of general access to woodland but public access may be provided through one or more | [11] Add Scottish Outdoor Access Code to Appendix.<br><br>[14] Remove relict text<br><br>[16] This represents a real opportunity to promote best practice management and presentation of significant historic environment assets.<br><br>Suggest adding as an 'example verifier':<br><br>Evidence of access provision, path maintenance, conservation management (particularly in regard to visitor erosion) and interpretation at significant historic environment assets.<br><br>Suggest adding to the 'guidance' column:<br><br>Woodlands containing or adjoining notable historic environment or ecological features may attract large numbers of visitors even to small properties. Enhancing and / or maintaining public access (paths), conservation management initiatives and presentation (interpretation media) to significant features should be included within forest planning and considered a key element of attracting public grants. Additional funding streams may be available in regard to designated historic assets.<br><br>[22] The Ramblers welcomes the inclusion of the provision for public access within this requirement but are concerned that the guidance could be taken as being negative in tone.<br><br>A more balanced set of guidance and pointers could be helpful if the requirement is to be met. Positive management solutions should be included alongside examples of exemptions to achieve this balance. |

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| | | | of:<br>* A permissive freedom to roam<br>* Public rights of way through or beside the wood<br>* Publicised open days or guided walks each year<br>* Permissive access on specified routes<br>* Access management agreements with local authorities<br>* In England and Wales only - by voluntarily dedicating woodland for public access under the Countryside and Rights of Way Act 2000 (CROW).<br><br>Public access, other than on public rights of way, and environmental education may be denied in the following example situations:<br><br>• Woodlands under 10 ha in size with a high private amenity value<br>• Areas that adjoin dwellings or private gardens<br>• Isolated woodlands to which there is no ready access route for the public across adjoining | |

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| | | | land<br>* Woodlands where there is current evidence of serious and sustained abuse or damage. Persistent vandalism may force owners/managers to place particular woodland blocks or areas 'out of bounds'. Reasons should be communicated through local schools, libraries, post offices and parish halls to help stimulate community co-operation to combat damage<br>• Areas of the woodland that contain sites, species or features that would be particularly vulnerable to disturbance<br>• Periods or days when country sports, outdoor recreation or special events would be jeopardised<br>• Temporary closures in order to ensure public safety.<br><br>• REFERENCE TO *MANAGING WOODLAND ACCESS AND FOREST OPERATIONS IN SCOTLAND* ADDED TO THE APPENDIX<br>**MP** | |

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| 5.2 | Minimising adverse impacts | | | |
| 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. | * No evidence of legal non-compliance<br>* Evidence that complaints have been dealt with constructively<br>* Documented evidence that owners/managers have considered actual and potential impacts of operations on local people and interest groups and have taken steps to mitigate them. | Examples of impacts include:<br>* Public safety and access implications of woodland operations<br>* Timber traffic, particularly in and around the woodland<br>* Natural hazards to operators and public, e.g. unsafe trees<br>* Smoke.<br>**MP** | [16] Use term 'hazardous' rather than unsafe trees?<br><br>Perhaps add 'use of safety signs and diversions around active operational sites' as an example verifier. |
| 5.2.2 | The owner/manager shall respond constructively to complaints and shall follow established legal process should this become necessary. | • Discussions with interested parties<br>• A complaints process<br>• A public contact point. | **MP** | |
| 5.3 | Rural economy | | | |
| 5.3.1 | Owners/managers shall promote the integration of woodlands into the local economy by:<br>a) Making the best use of the woodland's potential products and services consistent with other objectives.<br>b) Providing local people with equitable opportunities | Evidence of:<br>• Local or specialist market opportunities<br>• Promoting and encouraging enterprises to strengthen and diversify the local economy<br>Provision for local employment and suppliers. | Promotion of integration into the local economy may be achieved by:<br>• Allowing local or specialist markets opportunities to purchase small scale or specialist parcels<br>• Promoting and encouraging enterprises | [9] Is this section necessary? In the UK context what does it deliver? Has anyone ever had an NC against this requirement? How would meaningful auditing be carried out? If the requirement is required it should be turned around – "owners/managers shall not adversely exclude local people from……"<br><br>If it doesn't deliver anything – don't include it.<br><br>[21] BASC wholeheartedly supports the UKWAS wording |

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| | for employment and to supply goods and services. | | which will strengthen and diversify the woodland economy and the local economy<br>• Making equitable provision for local employment for contractors and suppliers to provide services and supplies and making this known.<br><br>The woodland's potential products include non-timber forest products and recreational activities.<br><br>An example of how the owner/manager might help to diversify the processing industry is that a proportion of timber parcels are advertised and sold by open tender or auction.<br><br>Reference to country forestry strategies~~,~~ and engagement with local woodland and community forest initiatives may highlight opportunities to fulfil this requirement. | within this very important section. In particular BASC endorses the "Guidance" that relates to<br><br>"The woodland's potential products include non-timber forest products and recreational activities."<br><br>BASC recommends that further clarity is given to this guidance by specifically using shooting as an example and propose the following wording:<br><br>"An example of a recreational activity which supports the rural economy is shooting. Shooting is worth £2 billion per annum to the UK economy and supports the equivalent of 74,000 full time jobs. Shooters' maintenance of woodlands provides 1,500 FTE jobs. http://www.shootingfacts.co.uk/." |
| 5.4 | Health and safety | | | |
| 5.4.1 | There shall be:<br>a) Compliance with health and safety legislation. | * Field observation that health and safety legislation and codes of practice are being | This requirement relates to anyone on the work site, including workers and | [5] Excellent concise wording – consider rewording the rest of the document in a similar style.<br>Remove FISA. Replace with current National Guidance |

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| | b) Conformance with associated codes of practice.<br>c) Conformance with FISA guidance.<br>d) Contingency plans for any accidents.<br>e) Appropriate competency. | implemented<br>* Discussions with workers demonstrates that they are aware of relevant requirements and have access to appropriate FISA codes of practice<br>* Contracts specifying health and safety requirements<br>* Records maintained and up to date (e.g. accident book, site risk assessments, chemical record book, tree safety reports)<br>* System to ensure that anyone working in the woodland has had relevant instruction in safe working practice and that the appropriate number has had training in basic first aid and, where relevant, holds a certificate of competence<br>* Procedure for monitoring compliance with safety requirements (written for larger organisations) and for dealing with situations where safety requirements are not met<br>* Documented health and safety policy and consideration of issues in all procedures and work instructions<br>* Evidence of a systematic approach to accident prevention. | members of the public.<br><br>**Advice to owners/managers**<br><br>With respect to health and safety, it is important for owners/managers to be aware of their legal responsibilities in regard to fulfilling one or more of the relevant management roles as described in FISA guidance.<br><br>See FISA Guidance listed in the Appendix.<br><br>ALL FISA GUIDANCE IN THE APPENDIX | Body.<br><br>[9] See my general remarks. This is an area where the cost of producing evidence that the manager/owner has a system and has recorded checks is disproportionate to the risks. It mitigates against smaller / mixed estates who do not engage large commercial enterprises. Much of the requirement is also a legal requirement.<br><br>The requirement should remain - however there is scope for the verification to be more proportionate (to the issue and the risks). It could vary from the CB auditor carrying out spot-checks on operators / operations to the manager evidencing that they have undertaken sample checks. |

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| 5.5 | Training and continuing development | | | [5] Good |
| 5.5.1 | Only those with relevant qualifications, training and/or experience shall be engaged to carry out any work unless working under proper supervision if they are currently undergoing training. | * Copies of appropriate certificates of competence<br>* Discussions with workers<br>* System to ensure that only workers who are appropriately trained or supervised work in the woodland<br>* No evidence of personnel without relevant training, experience or qualifications working in the woodland<br>* Documented training programme for staff<br>* Documented system to ensure that only workers who are appropriately trained or supervised work in the woodland<br>* Training records for all staff. | Where requirements of the work are likely to change, a programme of ongoing training and development should be undertaken. | [9] Is this requirement needed? Section 1.1.1 requires compliance with the law. |
| 5.5.2 | The owner/manager of large enterprises shall promote training, and encourage and support new recruits to the industry. | • Documented policy<br>• Involvement with industry bodies promoting training, including FISA<br>• Records of training sessions, provision of sites for training, subsidies for training courses. | Promotion of training may be achieved through:<br>* Providing sites for training courses<br>* Offering subsidies for training courses. | [16] 'large' enterprises may need defining |
| 5.6 | Workers' rights | | | |
| 5.6.1 | Workers' rights shall be respected, including:<br>a) Workers shall not be deterred from joining a trade union or employee | * Discussions with workers<br>* Documented policies. | | [9] "There shall be compliance with equality legislation".<br>This is a legal requirement. What does it add to forest sustainability?<br>Slipping in clauses such as this undermine the credibility of UKWAS as a measure of sustainable forestry. |

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| | association.<br>b) Workers shall be permitted to negotiate terms and conditions collectively with their employers should they so wish.<br>c) There shall be compliance with equality legislation. | | | How would one audit this? |
| 5.7 | Insurance | | | |
| 5.7.1 | Owners/managers and workers shall hold and demonstrate adequate public liability and employer's liability insurance. | * Insurance documents<br>* Self-insurance with a policy statement. | | [9] Very few workers have pli / eli. Again this is a legal requirement and covered by requirement 1.1.1. Demonstrating insurance is held should not be a requirement.<br>The requirement to "demonstrate" is a barrier for some growers as the full implication of this is that the grower must obtain copies of insurances from everyone who might operate on the property and then set up a system (spreadsheet) to monitor the expirys then check the sheet regularly then chase up the operators.<br>Sounds simple but much more onerous in practice and is it necessary - when it is a legal requirement. |

**Glossary of Terms**

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| Access (for public) | Refers to woodland and its associated land open to the public for recreational or educational use (sometimes subject to charges). |
| Accreditation service | An authoritative body which evaluates and recognises the competence of bodies to certify that woodland management conforms to the specific requirements of the UK Woodland Assurance Standard. Accreditation Services International (ASI) and the United Kingdom Accreditation Service (UKAS) both provide an accreditation service in the UK. Those bodies which are accredited are referred to as certification bodies. |
| Ancient semi-natural woodland (ASNW) | *See Woodland.* |
| Ancient woodland | *See Woodland.* |
| Ancient woodland site | *See Woodland*. |
| Appropriate Assessment | Appropriate Assessment (AA) is the process and documentation associated with the statutory requirement under the EU Habitats and Species Directive. |
| Area of Special Scientific Interest (ASSI) | A statutory designation in Northern Ireland that offers statutory protection to habitats and species. |
| Biodiversity | The variety of ecosystems and living organisms (species), including genetic variation within species. |
| Biological control agent | A living organism used to eliminate or regulate the population of another living organism. Their use can play an important role in an integrated pest management strategy. |
| Brash mats | Cut branches spread along the route where forest machinery will be driving to reduce soil damage. |

**Commented [OD15]:** [11] Remove second "statutory".

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| Broadleaves | Broadleaved trees are characterised by their broad leaves and most are deciduous. They produce 'hardwood' timber. *Also see Conifers.* |
| Buffer | An area of non-invasive trees or other land use of sufficient width to protect semi-natural woodland from significant invasion by seed from a nearby non-native source. |
| Certification body | A body which is accredited by an accreditation service to certify (by giving written assurance) that woodland management conforms to the specific requirements of the UK Woodland Assurance Standard. Also sometimes referred to as a conformity assessment body. |
| Certification scheme | A scheme that establishes a set of standards and processes that govern a system to verify that its standards (e.g. for sustainable forest management and chain-of-custody) are met and thereby provide assurance to customers and stakeholders. |
| Chain-of-custody certification | Chain-of-custody certification is a traceability system that ensures that certified products come from a well-managed source. The chain starts at the forest and is maintained through every link of the chain through to the end user. |
| Clearfelling | Cutting down of an area of woodland (if it is within a larger area of woodland it is typically a felling greater than 0.25 ha). Sometimes a scatter or small clumps of trees may be left standing within the felled area. |
| Compliance | In the context of this certification standard, the term 'compliance' refers to meeting legal requirements. |
| Conformance | In the context of this certification standard, the term 'conformance' refers to meeting the requirements of the certification standard. |
| Conifers | Coniferous trees are characterised by their needle or scale-like leaves and most are evergreen. They produce 'softwood' timber. *Also see Broadleaves*. |
| Coppice | Management based on regeneration by re-growth from cut stumps |

**Commented [OD16]:** [9] No – Liss can include felling coupes up to 5ha.

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| | (coppice stools). The same stool is used through several cycles of cutting and re-growth.<br>*Also see short rotation coppice.* |
| Coppice with standards | Coppice with a scatter of trees of seedling or coppice origin, grown on a long rotation to produce larger sized timber and to regenerate new seedlings to replace worn out stools. |
| COSHH | Control of Substances Hazardous to Health Regulations. |
| Coupe | An area of woodland that has been or is planned for clearfelling. |
| Cultural features | Historic environment sites, historic buildings and heritage landscapes including ancient woodlands. |
| DARD | Department of Agriculture and Rural Development - the government department responsible for the regulation of forestry and the management of the state woodlands in Northern Ireland. *Also see Forest Service*. |
| Deadwood | All types of wood that are dead including whole or wind-snapped standing trees, fallen branch wood and stumps, decaying wood habitats on living trees such as rot holes, dead limbs, decay columns in trunks and limbs, and wood below the ground as roots or stumps. |
| Design Plan (Forest Design Plan) | Long term outline planting or felling and regeneration plan (20 years or more) which takes account of the environmental characteristics of the woodland as well as the management of the growing stock. The first few years planting, felling, regeneration and environmental management plans are shown in detail. For woodlands managed by the FC, referred to as a Forest Design Plan. Design plans for private woodlands are encouraged through some grant schemes.<br>Where a design plan is in preparation but has not received full approval at the time of the intended felling operation, an approved felling licence may constitute an acceptable short term substitute with regard to the requirement in section 3.4.2, provided that the licence application deals comprehensively with the environmental |

**Commented [OD17]:** [17] [Proposed insertion: For woodlands managed by NRW, referred to as a Forest Resource Plan.]

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| | implications of the proposed felling. |
| Diffuse pollution | Diffuse pollution comes from non-point source, widespread activities in the forest environment. Of particular relevance to woodland operations are oil spills and leaks, cutting-chain lubricants, siltation of water-courses, pesticide or fertilizer runoff and smoke. |
| Drainage | An operation to remove excess water from an area in a controlled way. In woodlands, drains are usually open, unlined channels. |
| Ecosystem | A community of plants and animals (including humans) interacting with each other and the forces of nature. |
| Ecological integrity | The health and vitality of the woodland's physical and biological components. |
| Environmental appraisal | Generic term for the process of assessing the impact of plans or operations on the environment. |
| Environmental impact assessment | Environmental impact assessment (EIA) is the process and documentation associated with the statutory requirement under the EU Environmental Assessment Directive. |
| Environmental values | The following set of elements of the biophysical and human environment:<br>• ecosystem functions (including carbon sequestration and storage);<br>• biological diversity;<br>• water resources;<br>• soils;<br>• atmosphere;<br>• landscape values (including cultural and spiritual values).<br>The actual worth attributed to these elements depends on human and societal perceptions. |

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| FC | *See Forestry Commission*. |
| Felling licence | Licence issued by the Forestry Commission to permit trees to be felled. With certain exceptions it is illegal to fell trees in Great Britain without prior Forestry Commission approval. Similar arrangements are anticipated in Northern Ireland. |
| FEPA | Food and Environment Protection Act 1985. |
| FISA | Forest Industry Safety Accord. |
| Forest | Synonymous to woodland.<br>*See Woodland* |
| Forest management unit (FMU) | Synonymous to woodland management unit.<br>*See Woodland management unit (WMU)* |
| Forest resilience | The ability of a forest system to recover from short-term disturbances or to adapt to long-term changes, such as climate change, pests or diseases, while retaining the same basic structure and ways of functioning. Resilience should be considered in both ecological and economic terms. |
| Forestry | The science and art of managing woodlands. |
| Forestry authority(ies) | The competent body with responsibility for the regulation of forestry in each country of the United Kingdom: Forestry Commission England, Northern Ireland Forest Service, Forestry Commission Scotland and Welsh Government/Natural Resources Wales or their successor bodies. |
| Game | Animals, either wild or reared, managed for hunting or shot for food. |
| Genotype | The genetic constitution of an organism, as contrasted with its expressed characteristics which are known as the phenotype. |
| Glade | Small area of open ground which forms an integral part of the |

**Commented [OD18]:** [17] [Proposed edits: Licence issued by the Forestry Commission or Natural Resources Wales to permit trees to be felled. With certain exceptions it is illegal to fell trees in Great Britain without prior Forestry Commission or Natural Resources Wales approval. Similar arrangements are anticipated in Northern Ireland.]

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| | woodland. |
| Group selection | A method of managing irregular stands in which regeneration is achieved by felling trees in small groups. |
| High conservation value | Areas and features of ecological and biodiversity interest identified in sections 4.1 to 4.3, & 4.5. |
| Historic environment | Several thousand years of human activity has contributed to the landscape of the UK that we experience today. The surviving elements of the past take many forms, including ancient woods and forests, veteran trees, earthworks, ruined structures and features buried below ground. Together these elements provide a rich source of information about past societies and how they used and managed the land including their woods and forests. |
| Horticultural | In relation to section 3.3.3 on Christmas trees: intensive production on a small or large scale in a setting that cannot reasonably be considered to be a forest or woodland. |
| International agreement | An agreement under international law entered into by sovereign states and international organizations which may also be known as a treaty, protocol, covenant, convention, exchange of letters, etc. It provides a means for willing parties to assume obligations among themselves, and a party that fails to live up to their obligations can be held liable under international law. The Foreign & Commonwealth Office's 'UK Treaties Online' database on www.fco.gov.uk lists those involving the UK. |
| Interested parties | People directly affected by or who have a significant interest in the woodland being managed. |
| Invasive (species) | Introduced non-native species which spread readily and dominate native species. |

**Commented [OD19]:** [9] Define significant

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| Landscape level | The level of the landscape unit. |
| Landscape unit | An area of broadly homogeneous landscape character. |
| Local Authority | *See statutory body*. |
| Local people | Anyone living or working in the vicinity who has an interest in the woodland. It is intentional that this term is not more closely defined, and the wider public is not excluded. It is particularly difficult to be precise about how local people are to be contacted or consulted. In some situations, it would be appropriate for this simply to mean those living beside the woodland (e.g. concerning noise disturbance). In other cases (such as using local services) a much wider geographical area will be appropriate. If there is difficulty in identifying local contacts, then the elected representatives should be the first choice. |
| Long-term retention | Individual, stable stands and clumps of trees retained for environmental benefit significantly beyond the age or size generally adopted by the woodland enterprise. |
| Lop and top | Woody debris from cutting operations, sometimes converted into chippings. |
| Low intensity managed woodland | Woodland management units are classed as being managed in a low intensity manner when:<br><br>a) the rate of timber harvesting is less than 20% of the mean annual increment (MAI)[1] within the total production woodland area of the unit<br><br>AND |

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| | either<br><br>b) the annual harvest from the total production woodland area is less than 5,000 cubic metres<br><br>or<br><br>c) the *average* annual timber harvest from the total production woodland is less than 5,000 $m^3$/year during the period of validity of the certificate as verified by harvest reports and surveillance audits.<br><br>*Note: where Woodland Management Unit-specific estimates of mean annual increment are unavailable or impracticable, regional estimates of growth rates for specific woodland types may be used.* |
| Lower impact silvicultural systems (LISS) | 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. |
| Management planning documentation | *See Woodland management plan.* |
| Minimum intervention | Management with no systematic felling or planting of trees. Operations normally permitted are fencing, control of exotic plant species and vertebrate pests, maintenance of paths and rides and safety work. |
| National Nature Reserve (NNR) | A statutory designation that offers statutory protection to habitats and species. |
| Native (species) | A species that has arrived and inhabited an area naturally, without deliberate assistance by man, or would occur had it not been removed through past management. For trees and shrubs in the UK this is usually taken to mean those species present after post- |

**Commented [OD20]:** [11] [Proposed rewording to: A statutory designation that offers protection to habitats, species, geology or landform or a combination of these.]

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| | glacial recolonisation and before historic times. Some species are only native in particular regions. Differences in characteristics and adaptation to conditions occur more locally hence the term 'locally native'. |
| Natural reserve | Natural reserves are predominantly wooded usually mature and intended to reach biological maturity. They are permanently identified and in locations which are of particularly high wildlife interest or potential. They are managed by minimum intervention unless alternative interventions have higher conservation or biodiversity value. |
| Non-timber woodland products (NTWP) | Non-timber woodland products include foliage, moss, fungi, berries, seed, venison and other animal products. Also known as non-timber forest products (NTFP). |
| Open space | In a woodland this includes streams, ponds and well laid-out roads and rides. |
| Origin (of seed) | The original natural genetic source of those trees which are native to the site. |
| PAWS | Plantation on ancient woodland site.<br>*See Woodland.* |
| Permissive (access/use) | Use is by permission whether written or implied, rather than by right. |
| Pesticides | Any substance, preparation or organism prepared or used, among other uses, to protect plants or wood or other plant products from harmful organisms, to regulate the growth of plants, to give protection against harmful creatures or to render such creatures harmless. |

**Commented [OD21]:** [17] [Proposed new entry: Natural Resources Wales (NRW) The government department responsible for the regulation of forestry and the management of the state woodlands in Wales. *Also see Forest Service*]

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| Plantation | *See Woodland.* |
| Plantation on ancient woodland site (PAWS) | *See Woodland.* |
| Precautionary approach | Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental damage. (Based on Principle 15 of the Rio Declaration on Environment and Development) |
| Priority habitats and species | Priority habitats and priority species identified under biodiversity/environment strategies in England, Northern Ireland, Scotland and Wales. Priority species include Red List species. |
| Provenance | Location of trees from which seed or cuttings are collected. Designation of Regions of Provenance under the Forest Reproductive Materials regulations is used to help nurseries and growers select suitable material. The term is often confused with 'origin' which is the original natural genetic source. |
| Publicly available | Accessible to local people or other interested parties. For example, placing material on a website or on signage, providing electronic or hard copies of documents, or making documents available for inspection at a local office. In most cases, a charge may not be made for making material publicly available. However, where a summary of material has been made publicly available free of charge, a charge to cover costs of reproduction and handling may be made if any additional material is requested. |
| Public Rights of Way | Public Rights of Way are statutory rights of way in England and Wales and are recorded on Definitive Maps held by local authorities showing whether the right of way is by foot, horse or vehicle.<br><br>In Northern Ireland, records of public rights of way are held by district councils. |

**Commented [OD22]:** [18] The guidance and definitions section of UKWAS 4 may need to make clear what 'priority habitats' and 'priority species' are in devolved country contexts.

This could be defined as country nature conservation priorities: listed on Natural Environmental and Rural Communities Act 2006 - Section 41 (for England), Natural Environmental and Rural Communities Act 2006 Section 42 (for Wales), the Northern Ireland Biodiversity List and the Scottish Biodiversity List. These country biodiversity priorities embody the original UK Biodiversity Action plan priority species and priority habitats approach and lists.

It would also be helpful in guidance to mention the need to consider other important species that may be present, for example Red Data list species and Birds of Conservation Concern, as well as noting there may also be legal obligations for country, UK and EU protected species.

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| Ramsar sites | Wetlands of international importance designated under the Ramsar Convention. |
| Recreation | Activity or experience of the visitor's own choice within a woodland setting. (Facilities may sometimes be provided and charges levied for their use.) *Also see Access*. |
| Red List species | The IUCN Red List of Threatened Species is widely recognised as the most comprehensive, objective global approach for evaluating the conservation status of plant and animal species. It provides a global context for the establishment of conservation priorities at the local level. |
| Regeneration | Renewal of woodland through sowing, planting, or natural regeneration. |
| Relict | A remnant of a formally widespread species or habitat that persists in an isolated area from a previous land-use or vegetation cover. |
| Remnant | The baseline of surviving ancient woodland features found in PAWS, for which there is physical or documentary evidence.<br><br>These include:<br><br>• Woodland specialist flora. These are species with a strong affinity for ancient woodland but may vary in relation to geographic region<br>• Trees originating from the pre-plantation stand. They can be maidens, standards, coppice stools or pollards and may include ancient or veteran trees<br>• Deadwood originating from the pre-plantation stand, coarse woody debris and associated decomposer communities<br>• Undisturbed woodland soil profile.<br><br>These features provide the continuity of habitat with the pre-plantation phase. |

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| Restocking | Replacing felled areas by sowing seed, planting or natural regeneration. |
| Retentions | Trees retained, usually for environmental benefit, significantly beyond the age or size generally adopted by the owner for felling. |
| Ride | Permanent unsurfaced access route through woodland. |
| Semi-natural woodland | *See Woodland.* |
| Shelterwood | The shelterwood system involves the felling of a proportion of the mature trees within an area whilst leaving some trees as a seed source and shelter for natural regeneration. The seed trees are subsequently removed. Note that the term 'seed tree system' is often used to describe 'shelterwoods' with densities of <50 retained mature trees per hectare. |
| Short rotation coppice (SRC) | Short rotation coppice (usually willow or poplar) typically grown as an energy crop and harvested every 3 years.<br>*Also see coppice.* |
| Short rotation forestry (SRF) | Short rotation forestry crops are typically harvested at between 8 and 20 years. |
| Silviculture (silvicultural) | The techniques of tending and regenerating woodlands, and harvesting their physical products. |
| Single tree selection | A method of managing irregular stands in which individual trees of any size are removed more or less uniformly throughout the stand. |
| Site of Special Scientific Interest (SSSI) | A statutory designation in Great Britain that offers statutory protection to habitats and species. |
| Small coupe felling | A small scale clearfelling system. The system is imprecisely defined |

**Commented [OD23]:** [11] [Proposed rewording to: A statutory designation in Great Britain that offers statutory protection to habitats, species, geology, landform or a combination of these.]

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| | but coupes are typically between 0.5 ha and 2.0 ha in extent, with the larger coupes elongated in shape so the edge effect is still high.<br>. |
| Snag | A standing dead tree that has lost its top. |
| Special Area for Conservation (SAC) | Area designated under the EU Habitats and Species Directive. |
| Special Protection Area (SPA) | Area designated under the EU Birds Directive. |
| Spirit, conformance to | Conformance to the spirit means that the owner/manager is aiming to achieve the principles set out in the certification standard. |
| Statutory body(ies) | There are four categories:<br>• The statutory nature conservation and countryside agencies: Natural England, Scottish Natural Heritage, Natural Resources Walesand the Northern Ireland Environment Agency or their successor bodies<br>• The statutory environment protection agencies: Environment Agency in England, Scottish Environment Protection Agency, Natural Resources Wales and the Northern Ireland Environment Agency or their successor bodies<br>• The statutory historic environment agencies: English Heritage, Historic Scotland, Cadw (in Wales) and the Northern Ireland Environment Agency or their successor bodies<br>• Local authorities responsible for a wide range of functions including highways and planning. |
| Thinning | Tree removal, which results in a temporary reduction in basal area, made after canopy closure to promote growth and greater value in the remaining trees. |
| Trademarks | 'UKWAS' and 'United Kingdom Woodland Assurance Standard' are registered trademarks. |
| Traditional | In relation to section 2.12.2 on Christmas trees: production on a small scale in a setting that can reasonably be considered to be a |

**Commented [OD24]:** [11] [Proposed correction to: Special Area of Conservation]

**Commented [OD25]:** [11] [Proposed correction to: Historic England]

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| | woodland. |
| Traditional rights | Rights which result from a long series of habitual or customary actions, which have, by uninterrupted acquiescence, acquired the force of a law within a geographical or sociological unit. |
| Under-planting | The planting of young trees under the canopy of an existing stand – often combined with a shelterwood or group selection system. |
| United Kingdom | References to the 'United Kingdom' or 'UK' refer to the 'United Kingdom of Great Britain and Northern Ireland' which comprises England, Scotland and Wales (collectively referred to as 'Great Britain') and Northern Ireland. |
| Value(s) | The weights given to economic, biodiversity, recreational, environmental, social and cultural impacts when considering management options. |
| Veteran tree | A tree that is of interest biologically, culturally or aesthetically because of its age, size or condition, including the presence of deadwood micro-habitats. |
| Water course | Streams and rivers. References to forestry practice on adjacent land should be taken as applying also to adjacent water e.g. ponds and lakes. |
| Whole tree harvesting | The removal from the harvesting site of every part of the tree above ground or above and below ground. |
| Windthrow | Uprooting of trees by the wind. |
| Windthrow risk | A technical assessment of risk based on local climate, topography, site conditions and tree height. |
| Wood pasture | Areas of historical, cultural and ecological interest, where grazing is managed in combination with a proportion of open tree canopy cover. |
| Woodland | Predominantly tree covered land whether in large tracts (generally |

called forests) or smaller units (known by a variety of terms such as woodlands, woods, copses and shelterbelts).

Those woodlands which are comprised mainly of locally native trees and shrubs, and have some structural characteristics of natural woodland are referred to as **semi-natural woodland**.

Those woodlands which are derived principally from the human activity of planting, sowing or intensive silvicultural treatment but lack most of the principal characteristics and key elements of semi-natural woodland are generally referred to as **plantations** or **woodlands of planted origin**. They often include a proportion of naturally regenerated trees and are often managed to become more like natural woodlands over time.

Woodland is referred to as **ancient woodland** when it has been in continuous existence since before AD 1600 in England, Wales and Northern Ireland or since before AD 1750 in Scotland.

**Commented [OD26]:** [9] I think it is 1860 now.

The term **ancient semi-natural woodland (ASNW)** is used to describe those semi-natural stands on ancient woodland sites. The precise definition varies according to the local circumstances in each country within the United Kingdom and guidance should be sought from the Forestry Commission or Forest Service as appropriate.

The term **ancient woodland site** refers to the site of an ancient woodland irrespective of its current tree cover. Where the native tree cover has been felled and replaced by planting of tree species not native to the site it is referred to as a **plantation on ancient woodland site (PAWS).**

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| Woodland management plan | The collection of documents, reports, records and maps that describe, justify and regulate the activities carried out by any manager, staff or organization in a management unit, including statements of objectives and policies. |
| Woodland management unit (WMU) | The woodland management unit (WMU) is the area to which the management planning documentation relates. A WMU is a clearly defined woodland area, or areas, with mapped boundaries, managed to a set of explicit long term objectives. |
| Workers | All employed persons including public employees as well as self-employed persons and volunteers. This includes part-time and seasonal employees, of all ranks and categories, including labourers, administrators, supervisors, executives, contractor employees, self-employed contractors and sub-contractors and other licensed operators. |

## APPENDIX: Main legislation, regulations, guidelines and codes of practice referred to in the UKWAS

**Commented [OD27]:** [25] The Appendix states on the frontpiece that it is the 'Main legislation, regulations, guidelines and codes of practice referred to in the UKWAS.' This is also what is stated in the Contents. However, the EIA Forestry Regulations 1999 are not referred to in the UKWAS. The only reference to them is in the Appendix.
It is surprising that these regulations are not listed in the Appendix under Key Legislation. Charles Mynors in "The Law of Trees, Forests and Hedges" 2nd Edition devotes an entire chapter to the background and requirements of this important legislation. The four forestry projects involved are "projects that in any sensible system would require planning permission." These regulations are the only planning controls on public forestry activities.

The main legislation, guidelines and codes of practice relevant to the UK Woodland Assurance Standard are shown here. These are correct and as complete as possible as at August 2011 butshould not be treated as an exhaustive list. It is important at all times to refer to the most recent and/or new documents and relevant websites should be checked frequently.

The following abbreviations have been used throughout the text to highlight sources of additional information:

**MP** **Management Planning**

Check the UKWAS website for sources on developing management planning documentation. Any sources or examples posted are not definitive and following the guidance provides no guarantee of achieving certification.

**BAP** **Biodiversity Action Plan**

Check the relevant Habitat Action Plans (HAPs) or Species Action Plans (SAPs) of the UK Biodiversity Action Plan available at www.jncc.defra.gov.uk.

**FRM** **Forest Reproductive Material Regulations**

Check Forestry Commission Information Note 53: Recent Changes to the Control of Forest Reproductive Material (2003) which describes the arrangements in Great Britain. Details of the arrangements in Northern Ireland may be obtained from the Forest Service.

**Main Reference Documents**

Refer to the relevant documents in this Appendix.

The key main documents are listed below and the other main documents under the eight section headings of the certification standard.

**Key Legislation**

1967: Forestry Act 1967 (as amended)
1967: Plant Health Act 1967
1982: Forestry Commission Bye-laws
1953: Forestry Act (Northern Ireland) 1953
2010: Forestry Act (Northern Ireland) 2010
OTHERS?

**Key Forestry Commission Publications**

2011: The UK Forestry Standard
2011: UKFS Guidelines series:
- Forests and Biodiversity
- Forests and Climate Change
- Forests and Historic Environment

Forests and Landscape
Forests and People
Forests and Soil
Forests and Water

See www.forestry.gov.uk/ukfs for further information and to download the UK Forestry Standard and UKFS Guidelines series.

Information on forestry grant schemes and regulations may be obtained from the relevant forestry authorities. Guidance on environmental regulations is provided for small businesses on www.netregs.gov.uk.

**Other Reference Documents**

Other main reference documents are provided in a separate Appendix document available on www.ukwas.org.uk.

For easy reference, the documents are assigned to the appropriate section headings of the certification standard.

***New references to insert in the online Appendix document:***

**Section 2: Management Planning**

**2.2 Documentation**

Forestry Commission Scotland:
(2009) *The Scottish Government's Policy on Non-Timber Forest Products*
http://scotland.forestry.gov.uk/images/corporate/pdf/NTFPpolicypublic.pdf
*Anything equivalent for the other UK countries?*

**2.8 Tree species selection**

Forest Research:
Ecological Site Classification (ESC)
Pyatt, G.; Ray, D.; Fletcher, J. (2001) *An Ecological Site Classification for Forestry in Great Britain* (Forestry Commission Bulletin 124 (2001))
http://www.forestry.gov.uk/pdf/ESCBulletin.pdf/$file/ESCBulletin.pdf

AND/OR

Forest Research:
The online *Ecological Site Classification Decision Support System (ESC –DSS)*
*http://www.forestry.gov.uk/fr/infd-5v8jdq*

Secretariat of the Convention on Biological Diversity:
Thompson, I.; Mackey, B.; McNulty, S.; & Mosseler, A. (2009) *Forest Resilience, Biodiversity, and Climate Change. A Synthesis of the Biodiversity/Resilience/Stability Relationship in Forest Ecosystems.* CBD Technical Series No. 43.
https://www.cbd.int/doc/publications/cbd-ts-43-en.pdf

**2.11 Protection**

Scottish Natural Heritage
Best Practice Guides to Deer Management
*Full list of Deer Best Practice guides: http://www.bestpracticeguides.org.uk/guides*

*OR*

*Statutory Guides: http://www.bestpracticeguides.org.uk/reference*

*OR*

*SNH website on deer management: http://www.snh.gov.uk/land-and-sea/managing-wildlife/managing-deer/*

*NB: The SNH website information is not all Guides and the Best Practice Guides are published by a group of organisations that include SNH and also BASC & Forestry Commission Scotland etc. Best ask Stuart perhaps who suggested these as a reference in the first place.*

**3.2 Harvest Operations**

Burning lop and top legislation:

England & Wales:
The Environmental Permitting (England and Wales) Regulations 2010 (Exemption D7 - Burning Waste in the open (Non-agricultural Waste only). http://www.legislation.gov.uk/ukdsi/2010/9780111491423/contents
*If forest management includes burning lop and top, please note recent changes to legislation regarding registration of exempt activity. Previously registered under exemption 30 of the Waste Management Regulations 1994, these registrations were 'oneoff' with no renewal date. Registration is now required through the above legislation. Registration can be completed online: https://www.gov.uk/waste-exemption-d7-burning-waste-in-the-open*

Scotland?

Northern Ireland?

**4.4 Protection of conservation values in other woodlands and semi-natural habitats**

England & Wales
"Forests and Peatlands Policy"
*Forest and Peatland Habitats*?
http://www.forestry.gov.uk/PDF/fcgn1.pdf/$FILE/fcgn1.pdf
*Clarification needed here*

Scotland
Forestry Commission Scotland
Peatland habitat guidance
http://scotland.forestry.gov.uk/supporting/strategy-policy-guidance/soil-and-water-management/peatland-habitats
*More precision needed here re exact references.*

Northern Ireland
Forest Service:
(1993) *Afforestation – The DANI Statement on Environmental Policy*
http://www.dardni.gov.uk/afforestation-the-dani-statement-on-environmental-policy.pdf

**4.9 Game management**

(2012) *Code of Good Shooting Practice*
(Endorsed by Country Land and Business Association, National Gamekeepers' Organisation, Game and Wildlife Conservation Trust, Scottish Land and Estates, Scottish Gamekeepers' Association, Countryside Alliance, Game Farmers' Association, BASC) http://www.codeofgoodshootingpractice.org.uk/

**Commented [OD28]:** [21] Please note… the list of organisations should also include "The Moorland Association".

Game and Wildlife Conservation Trust
"Guidelines for Sustainable Game Bird Releasing"
http://www.gwct.org.uk/game/advice/game-bird-releasing/sustainable-gamebird-releasing/
*Appears to be webpage only rather than a publication*

### 5.1 Woodland access and recreation including traditional and permissive use rights

Scotland
Forestry Commission Scotland
Ogilvie, J., & Lafferty, K. (2013) *Managing Woodland Access and Forest Operations in Scotland.* Practice Note
http://www.forestry.gov.uk/PDF/FCPN104.pdf/$FILE/FCPN104.pdf
*Applicable to England Wales and Northern Ireland in this (ie UKWAS only) case?*

#### 5.4 Health and safety

Forest Industry Safety Accord (FISA) UK

*All guidance documents to be listed in the Appendix – NB most are the same as the old HSE Guidance listed in the old UKWAS online only Appendix. List needs to be checked and reconciled.*

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**UKWAS Support Unit**
**59 George Street**
**Edinburgh**
**EH2 2JG**

T: 0131 240 1419
E: ukwas@confor.org.uk