

# United Kingdom Woodland Assurance Standard

Fourth edition (PRE-APPROVAL DRAFT)

UKWAS Revision 2013-16 (Pre-approval Draft) Consultation Report

Annex 1 – consolidated feedback on pre-approval draft

30th April 2016

**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 (PRE-APPROVAL DRAFT)

Approved by the Steering Group: 10<sup>th</sup> February 2016

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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](http://www.ukwas.org.uk).

## Introduction

### PLEASE MAKE COMMENTS ON THE INTRODUCTION HERE

[4] Looks OK, useful background (1); useful clarification approach on (2)

[11] *There shall be no evidence of complicity with illegal activity by the holder of the third party rights in respect of their exercising of these rights.* Is this really necessary? It smacks of conspiracy theory and sets the wrong tone for the document.

[Re. use of WMU in 'Flexibility in meeting requirements'] Use full wording until definition later in document.

[Re. 'Application of the certification standard to different scales etc.'] I recognise the decision to remove the fixed threshold for SLIMF however at a time when many owners are leaving certification schemes I believe that it is really important that the standard emphasizes the importance of not making the requirements or the evidence of conforming with the requirements overly burdensome.

[16, 17, 18] [Propose addition to 'The woodland management unit': '*woodland management planning for a forest district/equivalent can be fulfilled by strategic and work programme planning & monitoring at national or district/equivalent level as appropriate with forest design covered by individual or landscape grouped forest plans*'.]

[19] We would... like to express concern that the definition of a "woodland management unit" is not more specific. At present there is scope for an entire commercial forest to be considered as a single WMU, which we believe would not be in the spirit of the Standard.

#### [20] 1. Background and purpose

What is the purpose of the final sentence of the third paragraph? "*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](http://www.ukwas.org.uk)*" Is it superfluous given that both FSC and PEFC are already mentioned specifically in the previous sentence and the previous paragraph or is it to future-proof UKWAS?

#### 2. Procedure for use of the certification standard

This is the first time the term "verifiers" features. Either it needs defining here or the reader pointing to the definition on page 10.

Under the section dealing with third party rights/leases etc, we feel it is worth pro-actively stating that where an owner/manager is aware of or is made aware of instances whereby a third party either is or is intending to exercise their legal right which would disqualify the area from certification; that in such circumstances the owner/manager makes a commitment to declare this at the earliest opportunity. This is so that the affected area can be excised from the scope of UKWAS/certification at the earliest opportunity. Such proactive transparent action should help avoid negative publicity for certification of controversial activities – activities which do not and cannot meet UKWAS because they are beyond the legal control of the certified owner/manager.

Under the heading of Application of the certification standard to different scales etc should the phrase at the end of the first sentence "*and the risk of negative impacts*" be deleted? Is the risk of negative impacts really one of the criteria for determining a WMU?

We also still disagree with the statement that “every effort” has been made to ensure that requirements are sufficiently flexible to apply to all scales and intensities of management. We still feel it disadvantages owners/managers of genuinely small and low-risk woodlands.

**[20] Definition of Woodland Management Unit (WMU)**

Although helpful to now have a definition of this fundamental unit of measure, it does at the same time provide scope to interpret and apply Requirements at an enormous scale. A WMU can be a 10ha wood or a whole forest district covering tens of thousands of hectares. Even a whole country within the UK could quite feasibly be classed as a single WMU. This is attractive for larger enterprises (like ourselves) because it can simplify administration and potentially reduce auditing costs but equally concerning from an environmental perspective because some requirements such as Natural Reserves and Long-Term Retentions are expressed as minimum percentages by area. With very large WMUs, it’s possible to meet the Requirements for these (low) percentage thresholds in a certain geographic part of the WMU which then releases the rest of the WMU from these constraints. As a result, this is regrettably now a weakness of UKWAS.

The very large scale of some WMUs, something the proposed definition is likely to encourage further causes significant concern because some (particularly environmental and social) requirements can be fulfilled in a tiny proportion of the WMU only to leave potentially many tens of thousands of hectares legitimately unaffected by them. This is not right for a voluntary standard purporting the highest standards.

[21] The opening statement starts discussing WMUs before the explanation as to what one is.

The example of PAWS not applying to every site is a helpful explanation of why not all requirements apply in all circumstances. This would benefit from further illustration and if this covered that not every site will be managed for economic purposes would do much to address other comments made later on.

The introduction of the flexible definition for what constitutes a WMU appears to make sense for efficient administrative purposes. The definition however does allow for significant area and multiple holdings under the same ownership to be treated as the same management unit without regard to the different management requirements of different types of woodland or where other factors that affect the appropriate scale at which to manage blocks of woodland are fundamentally important. This issue is compounded in that other proposed changes principally relating to environmental requirements (natural reserves, dead wood, species diversity etc.) if allowed to stand could be applied more or less as ‘off-setting’ in a concentrated way to small isolated blocks of woodland, leaving potentially very large, distant areas of woodland under the same WMU able to state they are meeting high environmental standards without doing anything. This potential scenario needs to be addressed as it risks undermining the standard. Perhaps a way forward would be to further refine the definition such that where there is a case for large dispersed and/or very different types of woodland to sit under a single WMU due to the administrative benefit this brings, thresholds are set for sub WMUs where the requirements of the standard need to be applied at the sub unit level.

[25] The first sentence needs to include the legal requirements, “for example the EIA Forestry Regulations 1999”, that are not mentioned in the body of the UK Forestry Standard. Therefore we suggest that the first sentence of the introduction begins as follows:

Primarily, the certification standard is designed to reflect the **UK legal** requirements, **as well as the guidelines** set out in the governmental UK Forestry Standard

## 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](http://www.ukwas.org.uk).

## 2. Procedures for use of the certification standard

### Flexibility in meeting requirements

~~Not all requirements will be applicable to every WMU, for example requirements relating to plantations on ancient woodland sites can only apply if such sites are present. It is recognised that some woodland owners and managers may feel that certain requirements are not appropriate to their situation.~~

~~While all applicable requirements must be met, there may be flexibility in exactly how requirements are fulfilled. Any different approach taken must be an equally or more effective way of achieving the objectives intended by the requirement. The impacts of the approach taken shall be carefully monitored and recorded.~~

~~Some flexibility to allow local adaptation may therefore be acceptable if either:~~

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- ~~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).~~

See also 'Using the certification standard' regarding flexibility in verifiers.

### 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/~~manager~~ 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~~ **conformance to** 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~~ **conformance**. It is not however necessary for the third party to agree to ~~comply with~~ **conform to** 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~~ **conformance**.

**There shall be no evidence of complicity with illegal activity by the holder of the third party rights in respect of their exercising of these rights.**

### 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.

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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.

### **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.

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### Using the certification standard

**PLEASE MAKE COMMENTS ON 'USING THE CERTIFICATION STANDARD' HERE**

[4] Useful addition of 'most common example verifiers'

[11] [Re. 'owners/managers and certification bodies shall also take full account of the introduction, glossary and appendix'] See comment above [re. SLIMF etc.] about making the process over burdomesome and therefore expensive.

[17] A key FES concern relates to the length of some guidance sections which appear to be in danger of trying to cover/re-state best practice guidance published elsewhere. This makes the Standard very lengthy and unwieldy. It would seem more appropriate to keep the UKWAS Standard concise and refer to existing industry guidance as appropriate to each topic. Relating to this, there is a further concern about the detail contained in the guidance section effectively becoming part and parcel of the requirement, thereby reducing flexibility and leading to an increased demand for monitoring (and recording) that is time consuming and yet doesn't add significant value to effective management.

[20] It may be worth considering if the words "Management planning" of the term "Management planning documentation" are always required? There may be instances where documentation itself is correct and more relevant than Management Planning documentation.

In using the certification standard, owners/managers and certification bodies shall also take full account of the introduction, glossary and appendix.

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

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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.

The three most common example verifiers are:

- **Discussion with the owner/manager.** The owner/manager may explain in conversation with the auditor their understanding of the standard, their knowledge of the WMU or the rationale for management decisions, or they may describe actions they have taken to conform to the standard.
- **Field observation.** The auditor may look for tangible evidence in the WMU of conformance to the standard.
- **Management planning documentation.** The owner/manager may demonstrate through written documents, records or maps their knowledge of the WMU, the rationale for management decisions, or the actions they have taken to conform to the standard. Note that if specific management planning documentation is expected to be produced it will be described in the requirements of the standard.

### 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.

### Key to icons



References

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Check the Appendix for references providing further guidance.

1. Legal compliance and UKWAS conformance

	REQUIREMENT	EXAMPLE VERIFIERS	GUIDANCE	MAKE CONSULTATION COMMENTS / NOTES HERE
1.1	Compliance and conformance			
1.1.1	There shall be compliance with the law. There shall be no substantiated outstanding claims of non-compliance related to woodland management.	<ul style="list-style-type: none"> <li>No evidence of non-compliance from audit</li> <li>Evidence of correction of any previous non-compliance</li> <li>A system to be aware of and implement requirements of new legislation.</li> </ul>	<p>Certification bodies will be checking that there is no evidence of non-compliance with relevant legal requirements including that:</p> <ul style="list-style-type: none"> <li>Management and workers understand and comply with all legal requirements relevant to their <b>roles and responsibilities</b></li> <li>All documentation including procedures, work instructions, contracts and agreements meet legal requirements and are respected</li> <li>No issues of legal non-compliance are raised by regulatory authorities or other interested parties.</li> </ul>	<p>[25] We would like a bookmark under the requirement column, and this bookmark would lead to key legislations which should definitely include The EIA Forestry Regulations 1999. We have added them in our corrections to the appendix. Our experience with NRW regulators and SGS auditors for FSC demonstrates that the regulations are being minimised in practice, and will continue to be disregarded while not considered key legislation making this addition necessary.</p> <p>The certification auditors are required to know and understand the legal requirements sufficiently to be able to check management understanding of what is required, and that there is no evidence of non compliance.</p>

			<p>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.</p> 	
1.1.2	<p>There shall be conformance to the spirit of any relevant codes of practice or good practice guidelines.</p>	<ul style="list-style-type: none"> <li>• No evidence of non-conformance from audit</li> <li>• Evidence of correction of any <b>previous</b> non-conformance</li> <li>• A system to be aware of and conform to new codes of practice and good practice guidelines.</li> </ul>	<p>The Appendix provides further information on good practice guidelines and codes of practice.</p> <p>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:</p> <ul style="list-style-type: none"> <li>• Management and workers understand and <del>comply with all legal requirements</del> <b>conform to the spirit of codes and</b></li> </ul>	

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			<p><b>guidelines</b> relevant to their <b>roles and responsibilities</b></p> <ul style="list-style-type: none"> <li>All documentation including procedures, work instructions and contracts <del>meet legal requirements</del> <b>conform to the spirit of relevant codes and guidelines</b></li> <li><del>No issues of legal non-conformance are raised by regulatory authorities or other interested parties.</del></li> </ul> <p>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.</p> 	
1.1.3	The identity of the owner/ <del>tenant</del> <b>forestry leaseholder</b> and their legal	<ul style="list-style-type: none"> <li><b>Companies House records</b></li> <li>Long term unchallenged use</li> </ul>	Long term unchallenged use might be demonstrated by the existence of	[11] Suggest this [Companies House records] is moved to the bottom of the list so it is not seen as the primary

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	ownership or tenure shall be proven.	<ul style="list-style-type: none"> <li>• Integrated Agriculture Control System (IACS) registration</li> <li>• A signed declaration detailing nature and location of tenure documentation</li> <li>• Solicitor's letter</li> <li>• Title deeds</li> <li>• Land registry records.</li> </ul>	previous grant scheme documentation or long-term certification to this standard.	means of verification
1.1.4	<p>a) Mechanisms shall be employed to <b>identify, prevent and</b> resolve disputes over tenure claims and use rights <b>through appropriate consultation with interested parties.</b></p> <p>b) The owner/manager shall seek to resolve disputes out of court and in a timely manner.</p>	<ul style="list-style-type: none"> <li>• Use of dispute resolution mechanism.</li> </ul>	<p><b>Unresolved</b> disputes of substantial magnitude involving a significant number of interests will normally disqualify an entity from being certified.</p> <p><b>Examples of relevant tenure claims and use rights may include:</b></p> <ul style="list-style-type: none"> <li>• Water supplies</li> <li>• Joint access routes</li> <li>• Shooting rights.</li> </ul>	<p>[11] This [(a)] is a legal minefield that you enter at your peril. Whilst it makes sense to try and resolve disputes amicably it would be dangerous and wrong for any auditor to come to a view as to who is in the right in advance of an agreement or a court ruling.</p> <p>[17] Some disputes may be only resolved in Court. Point b) In the first column could be clarified as "<b>Where possible</b>, the owner/manager shall <b>make reasonable endeavours</b> to resolve disputes out of court and in a timely manner".</p>
1.1.5	<p>a) The owner/forestry tenant <b>leaseholder</b>, shall:</p> <ul style="list-style-type: none"> <li>• Commit to conformance to this certification standard, <b>and</b></li> <li>• Have declared an intention to protect and maintain the woodland management unit and its</li> </ul>	<ul style="list-style-type: none"> <li>• Signed declaration of commitment</li> <li>• Dissemination of the requirements of this certification standard to the <del>forestry workforce</del> <b>workers, licensees and leaseholders</b></li> <li>• Public statement of policy.</li> </ul>	<p><del>Examples of declarations of commitment are available from the UKWAS website.</del></p> <p>The forestry tenant is the holder of a forest lease that gives control over the management of forestry</p>	<p>[17] There is a disparity between the requirement at 1.1.5 and the "Third party rights - Leases, burdens in title, ownership rights and legal restrictions on management" section in the Introduction as they relate to the extent to which leaseholders must conform with the Standard. The wording in the Introduction reflects what we consider to be the intended meaning i.e. that is, whilst they should be made aware of those requirements of the standard which are relevant to the rights they hold and how they can</p>

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	<p>ecological integrity in the long term.</p> <p>b) A statement of these commitments shall be made publicly available upon request.</p>		<p>operations.</p> <p>The forestry workforce <b>Workers, licensees and leaseholders</b> 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 <del>work functions</del> <b>activities</b>. This might be done through, for example, meetings or briefings and the provision of appropriate written material.</p> <p>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.</p> <p><b>Advice to</b></p>	<p>assist with compliance conformance, it is not necessary for third parties to formally agree to conform to the requirements.</p> <p>[17] The [first bullet] is at odds with the... text [‘It is not however necessary for the third party to agree to conform to the requirements of the standard’] on Page 8 under the Section <b>”Third party rights - Leases, burdens in title, ownership rights and legal restrictions on management”</b>. FES understands the... text on Page 8 is the agreed position and that it is <b><u>not necessary for the third party to conform to the requirements of the standard.</u></b></p>
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			<p><b>owners/managers</b></p> <p>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 manager.</p>	
1.2	Protection from illegal activities			
1.2.1	<p>a) The owner/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.</p> <p>b) Where appropriate, measures shall include engagement with the police and statutory bodies to identify, report, control and discourage illegal or</p>	<ul style="list-style-type: none"> <li>• The owner/manager is aware of potential and actual problems</li> <li>• Evidence of response to actual current problems</li> <li>• Evidence of a pro-active approach to potential and actual problems including follow-up action</li> <li>• Engagement with statutory bodies.</li> </ul>	<p>The phrase ‘reasonable measures’ means measures that are both within the law, within the terms of any forestry tenancy and within the jurisdiction of the owner/manager and that the measures are economically viable and environmentally and socially acceptable.</p> <p>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</p>	<p>[11] I am not sure it is necessary to include this para [(b)]. Especially given the last para in guidance “The scope...</p> <p>[17] 1.2.1 b) the addition of this section of the requirement doesn’t appear to add anything to what’s already covered under a). Perhaps it’s more suited to including in the guidance.</p>

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	unauthorised activities.		'reasonable measures'.	
1.3	Genetically modified organisms			
1.3.1	Genetically modified organisms (GMOs) shall not be used.	<ul style="list-style-type: none"> <li>Plant supply records</li> <li>Discussion with the owner/manager.</li> </ul>	GMOs are created through gene transfer under laboratory conditions and are not the product of tree breeding, vegetative propagation, cloning or tissue culture programmes.	<p>[12] Whether we can use GMOs is a matter for government, not UKWAS.</p> <p>[20] Requirement Amend the requirement as follows: Genetically modified organisms (GMOs) shall not be used <b>and/or trialled/experimented with</b>.</p> <p>Reason: This addition would make it crystal clear that as well as not using GMOs on certified land; owners/managers are not involved in green-washing by using GMOs elsewhere.</p>

2. Management planning

	REQUIREMENT	EXAMPLE VERIFIERS	GUIDANCE	MAKE CONSULTATION COMMENTS / NOTES HERE
2.1	<del>Long term economic, environmental and social viability</del>		<del>Long term policy and objectives</del>	
2.1.1	<p>a) The owner/manager shall have a long term policy and management objectives which are environmentally sound, socially beneficial and economically viable.</p> <p>b) Summaries of the policy and objectives shall be proactively communicated to workers consistent with their roles and responsibilities.</p>	<ul style="list-style-type: none"> <li>• Discussion with the owner/manager and workers</li> <li>• Management planning documentation.</li> </ul>	<p>The long term policy should articulate the overall vision for woodland management. Management objectives should set out tangible, shorter term steps towards achieving that vision.</p> <p>The level of detail required in the policy and objectives should be proportionate to the scale and intensity of management. While a formal, written policy and detailed objectives may be appropriate for a large organisation, it may be appropriate for the owner of a small woodland managed at a low intensity to be able to communicate their vision and some simple objectives verbally.</p>	<p>[4] Useful addition</p> <p>[11] We object to the juxtaposition of the objectives [in (a)]. This certification standard is supposedly market driven so is of most relevance to productive economically viable forest businesses. The more you focus on the social and environmental objectives the less attractive and relevant the standard becomes to the majority of owners. This [(b)] is more pragmatic than in 1.1.5, but as below should it not be in 1.1.5</p> <p>Is this [guidance second paragraph] not already dealt with in 1.1.5</p> <p>[17] The guidance here seems unduly long and would benefit from making more concise.</p> <p>[20] Looking at the Table of Contents, one wonders whether this requirement might not logically sit neater after “Documentation” and “Consultation and co-operation” as it is the first genuine section of management planning.</p> <p>Proposal to insert the following addition to Requirement:</p> <p>c) Policies and Objectives shall consider the importance of</p>

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			<p>Workers should be aware of the policy and objectives to the extent necessary for them to contribute to achieving the aims of management; they should understand how their actions might have positive or negative effects on meeting those aims. Means of communicating policy and objectives to workers should always be proportionate to the extent of their influence on the outcomes of management, and might range from detailed notes or staff meetings to a simple verbal briefing. Where contractors are used, the emphasis should be on ensuring that those responsible for supervising them are appropriately briefed and can instruct them accordingly.</p>	<p>maintaining and where possible / necessary enhancing forest resilience.</p> <p>[21] Concern was raised about the requirement to be economically viable in comments on the previous draft. The wording here appears to have changed but it's still imprecise and open to interpretation. To reiterate, not all (a minority) of the intended audience with an interest in the standard are, nor should necessarily be, interested in economic management, even though an argument that economically viable management is likely to have a strong correlation with long term sustainable management can be made. Some differentiation is needed together with explanation in the guidance section. The explanation that the level of detail required should be proportionate doesn't quite cover it as the you are still looking for conformity to the requirement.</p>
2.1.4 2	<p>The <del>planning of woodland management operations</del> Woodland management planning shall take fully into account the long-term economic, environmental and social impacts of</p>	<ul style="list-style-type: none"> <li>• Discussion with the owner/manager</li> <li>• Management planning documentation.</li> </ul>	<p>Management planning should be proportionate to the scale and intensity of woodland management, and to the potential economic, environmental and social impacts of management</p>	<p>[20] Proposal: Amend the text of the requirement to read as follows: Woodland management planning shall take fully into account forest resilience and the long-term economic, environmental and social impacts of proposed operations</p>

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	proposed operations.		activities.	
2.2	Documentation			
2.2.1	<p>All areas in the WMU shall be covered by management planning documentation which shall be retained for at least five years and shall incorporate:</p> <p>a) A long-term policy for the woodland.</p> <p>b) Assessment of relevant components of the woodland resource, including environmental values.</p> <p>c) Identification of special characteristics and sensitivities of the woodland and appropriate treatments.</p> <p>d) 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 unknown.</p> <p>e) Identification of</p>	<ul style="list-style-type: none"> <li>Management planning documentation</li> <li>Appropriate maps and records</li> <li><del>Long-term management objectives will suffice to meet (a).</del></li> </ul>	<p>The subsequent sections of this standard provide additional guidance and information on how to meet this requirement.</p> <p><del>Assessment and mapping of the woodland resource should include appropriate aspects of biological, physical and human environment.</del></p> <p>There should be a link between features and sensitivities identified in (b), (c), (d) and (e) and the setting of management objectives. Equally, monitoring should be linked to potential positive and negative impacts of management on these features and sensitivities and to the delivery of management objectives.</p> <p>The documentation and level of detail associated with the planning process should be appropriate to scale, intensity and risk.</p>	<p>[11] [Re. guidance on documentation for 'other woodlands'] Confirm that FCE are actually working on a 20 year plan as opposed to 10 years.</p> <p>[17] The wording of paras f) and g) could be improved as they don't link well with the introductory paragraph.</p> <p>[19] The phrase "environmental values" should be defined.</p> <p>The inserted paragraph <i>"There should be a link between features and sensitivities identified in (b), (c), (d), and (e) and the setting of management objectives. Equally, monitoring should be linked to potential positive and negative impacts of management on these features and sensitivities and to the delivery of management objectives"</i> is very open and may allow economic objectives to override environmental and social objectives.</p> <p>[20] Proposal to amend the word "or" either to "and" or to "and/or" in requirement d)</p> <p>Specific measures to maintain <del>or</del> and enhance those areas identified under sections 4.1-4.5 and 4.8 Reason: To strengthen this requirement and maintain consistency with wording of the actual requirements listed.</p> <p>Is there scope to combine requirements g and j as both deal with rationale?</p> <p>Requirement m) refers to requirement 2.14.2. This has been deleted and should be 2.14.1.</p>

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<p>community and social needs and sensitivities.</p> <p>ef) Set and prioritise objectives, with targets.</p> <p>fg) Rationale for management prescriptions.</p> <p>gh) Outline planned felling and regeneration over the next 20 years.</p> <p>hi) Where applicable annual allowable harvest of non-timber woodland products (NTWPs).</p> <p>ij) Rationale for the operational techniques to be used.</p> <p>jk) Plans for implementation, first five years in detail.</p> <p>kl) Appropriate maps.</p> <p>lm) Plans to monitor, at least those elements identified under section 2.14.2 against the objectives.</p> <p>m) <del>Specific measures to maintain or enhance these areas identified under sections 4.1-4.5 and 4.8;</del></p>		<p>The documentation might include:</p> <ul style="list-style-type: none"> <li>• For low intensity managed woodlands: a brief statement of intent and an annotated map</li> <li>• For other woodlands: a plan covering a 20 year period and incorporating an assessment at the landscape level</li> <li>• For a WMU consisting of multiple areas: an overarching plan.</li> </ul> <p>The management planning documentation should cover all elements of the requirement but may refer to other documents as appropriate; these may include:</p> <ul style="list-style-type: none"> <li>• A fire plan</li> <li>• A deer management plan</li> <li>• An integrated pest management strategy</li> <li>• A research policy</li> <li>• Project plans</li> <li>• Necessary permissions from applicable</li> </ul>	
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	<p><del>considering areas where either the extent of these areas or their sensitivity to operations may be unknown.</del></p>		<p>regulatory and licensing authorities.</p> 	
<p>2.2.2</p>	<p>While respecting the confidentiality of information, woodland managers the owner/manager shall, upon request, make publicly available either:</p> <ul style="list-style-type: none"> <li>• Management planning documentation, or</li> <li>• A summary of the management planning documentation.</li> </ul>	<ul style="list-style-type: none"> <li>• Evidence of fulfilling requests for management planning documentation or summaries</li> <li>• A public contact point</li> <li>• Summary management planning documentation.</li> </ul>	<p>This requirement deliberately gives the owner/manager discretion as to how they make management planning documentation available to allow for situations where they are happy to provide documentation in full and where producing a summary may be an unnecessary administrative burden. This may often be the case for owners/managers of smaller woodlands or woodlands managed at a low intensity. However, owners/managers of woodlands with lengthy, complex management planning documentation should note that a summary may be more useful for non-specialist stakeholders.</p> <p>Owners/managers may demonstrate that they are receptive for requests to make documentation available by providing details</p>	<p>[17] The guidance here seems unduly long and would benefit from making more concise.</p>

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			<p>of a public contact point, for example in the form of a dedicated e-mail address.</p> <p>Examples of confidential information include data and content:</p> <ul style="list-style-type: none"> <li>• Related to investment decisions</li> <li>• About intellectual property rights</li> <li>• Which is client confidential</li> <li>• Which is, by law, confidential</li> <li>• Whose dissemination could put at risk the protection of wildlife species and habitats</li> <li>• About sites which are of special cultural and historical importance to local people, where they have requested confidentiality.</li> </ul>	
2.2.3	<p>The management planning documentation shall be reviewed <del>periodically (at least every ten years)</del> <del>every five years as a minimum,</del></p>	<ul style="list-style-type: none"> <li>• Management planning documentation.</li> </ul>	<p>Examples of changed circumstances include:</p> <ul style="list-style-type: none"> <li>• Major windthrow</li> <li>• Pest or disease</li> </ul>	<p>[4] Helpful relaxation to at least every 10 years</p> <p>[21] How does the change to reviewing MPs at least every 10 years stack up, given that in England the UKFS</p>

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	<p>taking into account:</p> <ul style="list-style-type: none"> <li>• Monitoring results,</li> <li>• Results of certification audits,</li> <li>• Results of stakeholder engagement,</li> <li>• New research and technical information, and</li> <li>• Changed environmental, social, or economic circumstances.</li> </ul>		<p>outbreaks</p> <ul style="list-style-type: none"> <li>• Changes in markets.</li> </ul> <p>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:</p> <ul style="list-style-type: none"> <li>• <del>The results of certification audits</del></li> <li>• <del>Monitoring data (see section 2.14.3)</del></li> <li>• <del>Advances in scientific research</del></li> <li>• <del>Improved technical and forestry practice guidance</del></li> <li>• <del>Results from stakeholder engagement, surveys, research and consultation relating to the woodland covered by the management planning documentation.</del></li> </ul>	<p>compliant MPs required to access CS funding state 10yr plans need to be reviewed every 5. Not strictly a UKFS requirement but it seems like consistency of approach/best practice is the goal to be striving for, where a review can still be light touch. You could still exempt minor changes from any public consultation requirements.</p>
2.3	Consultation and co-operation			
2.3.1	<p>a) Local people, relevant organisations and <del>interest groups</del> interested parties</p>	<ul style="list-style-type: none"> <li>• Consultation with the relevant forestry authority</li> <li>• Evidence that users of the</li> </ul>	<p>The owner should be able to justify the frequency and level of consultation and the</p>	<p>[4] Useful guidance on engaging local stakeholders/users</p>

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<p>shall be identified and made aware that:</p> <ul style="list-style-type: none"> <li>• New or revised management planning documentation, as specified under section 2.2.1, is being produced</li> <li>• <del>A new or revised forestry or woodland grant scheme application and associated documents are available for inspection</del></li> <li>• High impact operations are planned</li> <li>• The woodland is being evaluated for certification.</li> </ul> <p>b) The owner/manager shall ensure that there is full co-operation with the relevant forestry authority's consultation processes.</p> <p>c) The owner/manager shall consult <del>adequately</del> <b>appropriately</b> with local people and relevant organisations and provide opportunities for their engagement in planning</p>	<p><del>woodland</del> <b>WMU</b> are informed about high impact operations (e.g. signs, letters or other appropriate means).</p> <ul style="list-style-type: none"> <li>• A list of interested parties</li> <li>• Established means of pro-active communication.</li> <li>• A public contact point.</li> </ul>	<p>certification body will look for corroborating evidence. Examples of methods for identifying and making local people and relevant organisations aware include:</p> <ul style="list-style-type: none"> <li>• Statutory consultations by the relevant forestry authority or voluntary consultation with <del>relevant</del> <b>statutory</b> bodies</li> <li>• Letters to individuals or groups</li> <li>• Temporary or permanent signs in or near the affected woodland</li> <li>• Information in local newspapers or other publications</li> <li>• Meetings and dialogue</li> <li>• Internet</li> <li>• Consultation with the relevant archaeology service.</li> </ul> <p>Consultation and engagement with local people should be sufficient to identify:</p> <ul style="list-style-type: none"> <li>• their permissive or traditional uses of the woodland</li> </ul>	<p>[6] We have missed out an important constituency here. What about those who derive their income from the forest or are dependent on the supply of forest products such as forest workers, hauliers, timber processors etc? They are the most important of stakeholders but usually ignored.</p> <p>[17] The guidance here seems unduly long and would benefit from making more concise.</p> <p>[19] We would suggest that consultation with statutory bodies is most likely to occur when there is already a legal obligation to consult statutory agencies, for example when changes in management are proposed for a designated site. We would therefore suggest that the wording is altered to reflect that all relevant environmental stakeholders should be consulted when appropriate.</p> <p>We would propose that the following text is inserted in the guidance column: "for biodiversity issues, owners/managers should seek to identify and consult local representative groups or bodies which can represent biodiversity interests, including the Local Biodiversity Partnership (or equivalent) where relevant".</p>
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	<p>and monitoring processes.</p> <p>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 <del>incorporated into</del> <b>taken into account in</b> management planning and operations.</p> <p>e) At least 30 days shall be allowed for people to respond to notices, letters or meetings before certification.</p>		<ul style="list-style-type: none"> <li>• sites or features of special cultural or historical significance.</li> </ul> <p>For access issues, owners/managers should seek to identify and consult local representative groups or bodies which can represent users, including the statutory Local Access Forum where relevant.</p> <p>Consultation and engagement should be appropriate to the scale and intensity of woodland management and to the risk of potential impacts on the interests of stakeholders. For smaller woodlands, engagement may be informal and largely verbal. For larger woodlands with many potentially affected local people, it may be more appropriate to engage with representatives of local communities rather than with individuals.</p> <p>Whether an operation is high impact depends very much on circumstances and must be assessed on a case by case basis. A proportionate,</p>	
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			<p>risk-based assessment of social impacts might be carried out in a similar way to the assessment of environmental impacts required in section 2.5. The owner/manager should be able to demonstrate that they have considered how many interests will be affected, to what degree and over what timescale.</p> <p><i>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.</i></p> 	
2.3.2	<p>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.</p> <p>b) Management of invasive plants and of wild mammals shall be undertaken in co-</p>	<ul style="list-style-type: none"> <li>• Awareness of potential problems and verbal description of appropriate action</li> <li>• <b>Felling plan</b></li> <li>• Membership of a wildlife management group</li> <li>• Where there is a significant problem caused by wildlife, a documented plan (which may take the form of a contract or licence) for control.</li> </ul>	<p>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.</p> <p><b>An example of a wildlife management group might be a grey squirrel control group,</b></p>	<p>[4] Strongly support (b) particularly in relation to deer and squirrels – we have an active landowner collaboration policy in The National Forest to support this</p> <p>[11] Not sure why this [(c)] is a “shall”</p> <p>[12] The involvement of adjoining woodland owners in joint action plans will inevitably lead to delays in agreeing and implementing plans</p> <p>[17] 2.3.2 c) / 2.4.1</p>

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	ordination with neighbours where possible and practicable (see also section 2.11.1 in relation to deer).  c) Where appropriate and possible, the owner/manager shall consider opportunities for cooperating with neighbours in landscape scale conservation initiatives.		in which landowners and managers coordinated their control efforts in the context of a landscape-level plan.	This new clause 2.3.2.c & deletion of clause 2.4.1 needs careful thought as whether it should be included due to the potential difficulty of auditing conformance. Technically landscape scale conservation is possible everywhere if the budget is sufficient  [19] Grey squirrel control would only be supported by RSPB in woodlands where red squirrel conservation is a priority.  The phrase “ <i>ecological damage</i> ” is ambiguous and should be subject to an agreed definition.
2.4	Productive potential of the WMU			
2.4.1	<del>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.</del>	<del>• Management planning documentation.</del>	<del>Productive potential relates to both qualitative and quantitative aspects of the tree crop and non timber woodland products.</del>	
2.4.2 1	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, primarily in terms of soils and hydrology. Refer to relevant guidelines on soils and water.	[11] I don’t agree that this [guidance] should be confined to soils and hydrology. Even if this is the natural capital of the forest this also includes the carbon locked up in the forest and the capacity of the forest to provide provisioning services such as timber.  [19] The statement “ <i>Woodland management shall not diminish the long term productive capacity of the site</i> ” is potentially misleading. Habitat restoration may diminish long term productive capacity by reversing damage such as drainage or nutrient enrichment. This is acknowledged in the guidance column to an extent, so we would question why it is included as a standard.

				<p>[21] This requirement needs a caveat along the lines of 'unless there are clear management objectives for doing so'. PAWS or open habitat restoration in particular would be beneficial management but reduce productive capacity.</p>
<p>2.4.32</p>	<p>a) Timber harvesting and restocking plans shall not jeopardise the long-term productive potential of the WMU and are consistent with management objectives.</p> <p>b) Selective harvesting shall not be to the long-term detriment of the quality and value of stands.</p>	<ul style="list-style-type: none"> <li>• Compartment records</li> <li>• Growth and yield estimates</li> <li>• Production records or appropriate standing sale volume assessments and reconciliation with estimates</li> <li>• Demonstrated control of thinning intensity</li> <li>• Owner's/manager's knowledge Discussion with the owner/manager</li> <li>• Field observation.</li> </ul>	<p>The long-term productive potential in <del>woodlands of planted origin</del> plantations should be considered primarily in terms of timber production.</p> <p>Examples of growth and yield estimates include:</p> <ul style="list-style-type: none"> <li>• Average growth rates or yield class for major species on different site types</li> <li>• Predictions of thinning and felling yields for different crop types</li> <li>• Forecasts of areas to be subject to harvesting operations in future years.</li> </ul> <p>Accuracy of growth and yield estimates should be appropriate to the scale and intensity of the operation.</p> <p>The resilience of the woodland and different</p>	<p>[4] Does this include non-intervention or lack of management (ie reduced long term productivity)?</p> <p>[6] In a restructuring plan on a high WHC site harvesting is usually structured on a coupe basis (i.e by area) rather than a volume basis. Should we include this?</p> <p>[11] Disagree that this [guidance first paragraph] should be confined to plantations. "may" be a better word than "should"</p> <p>[17] In our view the Requirement at 2.4.2 not to jeopardise the long term productive potential of the WMU would be more appropriately focused on maintaining the long term potential productivity of the site/soil, rather than the level of timber production per se.</p> <p>[17] 2.4.2 b) – This clause is difficult – it is perfectly legitimate to selectively remove high quality stems to meet a specific market (eg telegraph poles, masts, veneer logs) – this inevitably leads to a change in the long-term quality and value of a <u>stand</u>.</p> <p>Suggest this requirement needs re-thinking as it may lead to unintended consequences – ie clear-felling to maximise income from such high value products. If this clause relates to selective harvesting of high value stands within a forest, there are also difficulties particularly where there are big differences in quality and growth rate between</p>

			<p>species to climate change should be considered.</p> <p>It is recognised that in some circumstances (e.g. during restructuring), or in response to disease, the harvest level will exceed the increment.</p> <p>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.</p> <p>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.</p>	<p>species.</p> <p>A further example relating to paragraph b requiring more clarity relates to instances where selective harvesting may be undertaken for conservation reasons (eg. native pinewoods) and may not be focussed on the quality and value of the stand in timber quality and monetary terms.</p> <p>The [penultimate paragraph of] guidance... appears to contradict the requirement. It would seem more appropriate to focus the requirement on requiring the productive potential of the site (ie. <u>soils</u>) to be maintained long-term, rather than the level of timber production planned or actually harvested.</p> <p>[19] We believe that there is insufficient justification for the following statements in terms of public benefit:  <i>“Timber harvesting and restocking plans shall not jeopardise the long-term productive potential of the WMU and are consistent with management objectives.”</i>  <i>“The long-term productive potential in plantations should be considered primarily in terms of timber production.”</i></p> <p>[21] Same issue as for 2.4.1.</p>
2.4.43	<p>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</p>	<ul style="list-style-type: none"> <li>Evidence from records and discussion with the owner/manager that quantities harvested are in line with sustainable growth rates and that there are no significant adverse</li> </ul>	<p>Non-timber woodland products include foliage, moss, fungi, berries, seed, venison and other animal products.</p> <p><b>It is recognised that objective</b></p>	<p>[12] There are some off-putting bits that have crept in, either jargon or bits that are gobbledygook which I feel could be tidied up. A couple of examples</p> <p>2.4.3 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.</p>

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	WMU.	environmental impacts.	<p>information on sustainable harvesting levels for NTWPs is limited, and also that in the case of venison it may be desirable to harvest at a level that reduces the deer population in the long term. However, in all cases the owner/manager should give careful thought to the annual allowable harvest and should be able to justify harvest levels on the basis of their objectives and best practice.</p> <p><del>Ecosystem services include water supply and rights to grazing.</del></p> <p><i>See also sections 2.3.2 in relation to protection from wild mammals, and section 4.9 in relation to game management.</i></p>	
2.4.54	Protected, rare and endangered plant and animal species shall not be exploited for commercial purposes.	<ul style="list-style-type: none"> <li>• Discussion with the owner/manager</li> <li>• Monitoring records</li> <li>• Species inventories.</li> </ul>	In this context exploitation means the species is utilised to its proven detriment.	<p>[19] Although we welcome wording to conserve threatened species, we would suggest that the word “priority” could be used to cover all species that require protection. Such species are identified in the relevant country level biodiversity lists. The word “priority” should be defined to ensure that there is no ambiguity in terms of its definition.</p> <p>“Proven detriment” is an ambiguous term, lack of evidence does not equate to lack of harm. An agreed definition should be included.</p>

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				[21] The requirement is absolute, yet the guidance seems to weaken the intent.
2.5	Assessment of environmental impacts			
2.5.1	<p>a) The impacts of new planting and other woodland plans on environmental values shall be assessed before operations are implemented, in a manner appropriate to the scale of the operations and the sensitivity of the site.</p> <p>b) 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.</p>	<ul style="list-style-type: none"> <li>• Management planning documentation</li> <li>• Documented environmental impact assessment or 'Appropriate Assessment' where such has been requested by the appropriate relevant forestry authority</li> <li>• <del>Design plans</del></li> <li>• Documented environmental appraisals</li> <li>• Discussion with the owner/manager</li> <li>• Field observation.</li> </ul>	<p>Environmental values relates to the biological, physical and human environment.</p> <p>Depending on scale and sensitivity the assessment of environmental impacts may be:</p> <ul style="list-style-type: none"> <li>• Brief environmental appraisals for planting or felling which might affect sites recognised for cultural, landscape, hydrological or ecological value</li> <li>• Ecological assessments of ancient semi-natural woodland and projections of their response to management and natural processes</li> <li>• Specific assessments for unusual and/or extensive operations</li> <li>• Specialist advice on impacts of woodland operations on <del>rare or vulnerable species</del> protected, rare and endangered species or special sites</li> <li>• Specialist advice with</li> </ul>	<p>[17] The guidance here seems unduly long and would benefit from making more concise.</p> <p>[19] Specialist advice for priority species and habitats may need to be sought and we would welcome some wording in the guidance section which acknowledges this.</p> <p>[20] b) The results of the environmental assessments shall be incorporated into planning and implementation. Change the word "implementation" to "implemented"?</p> <p>[21] Specialist advice is recommended in the guidance for flood risk and historic assessments, but not for some other equally specialist assessments. Could get around this with a simple generic statement in the guidance saying that specialist advice is often required to demonstrate ...</p> <p>[22] There is no reference to river basin planning and water body objectives and it would be highly relevant to include this in the final version. The most obvious place is in 2.5 Assessment of environmental impacts. Under 2.5.1 we could add something like: 'Assessment of current state of water environment and opportunities for improvement and restoration as identified in river basin management plans and supporting strategies and regulations.'</p> <p>Restoration regulations, by including supporting strategies and regulations in the statement above we can</p>

			<p>regard to flood risk mitigation potential in accordance with local flood risk plans or strategies</p> <ul style="list-style-type: none"> <li>Specialist advice on the impact of woodland operations on historic environment sites and landscapes</li> <li>Checks against relevant <del>UK Biodiversity Action Plan</del> <del>Habitat Action Plans (HAPs)</del> and <del>Species Action Plans (SAPs)</del> paying particular attention to <del>BAP</del> <b>country level plans</b> for priority habitats and species.</li> </ul> 	<p>encompass the new restoration regulations when they go live. Although we have no morphological downgrades linked to forestry, that does not mean that there are no opportunities for remeandering or restoring watercourses damaged by out-dated forestry practices.</p> <p>[22] Can this [guidance bullet re. specialist advice on flood risk] be expanded to include the need to identify and mitigate any potential negative impacts? Can sediment management and erosion be included as environmental impacts which should be considered here?</p> <p>Slight text change needed to the bullet above, see changes in bold. Specialist advice with regard to flood risk <b>and</b> mitigation potential in accordance with local flood risk <b>management</b> plans or strategies.</p> <p>[25] Requirement column <b>New a) The requirement of the EIA Forestry Regulations 1999 applies to afforestation, deforestation, roads and quarries. An Opinion assessment is needed if the project is above the prescribed thresholds. This decides if an Environmental Statement is required.</b> Old a) becomes b) <b>New b) The impacts of other woodland plans etc.</b> Old b) becomes <b>new c)</b></p> <p>Verifier column:</p> <ul style="list-style-type: none"> <li><b>Documented environmental impact assessment including EIA Opinions and/or Determinations or Appropriate...</b></li> </ul> <p><b>New verifier:</b></p>
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				<ul style="list-style-type: none"> <li>EIA register that lists each Opinion, Determination and Direction, and any supporting documents.</li> </ul> <p>Guidance column : Depending on thresholds the assessment of environmental impacts may be: ...</p> <ul style="list-style-type: none"> <li>Brief environmental appraisals-Opinions for planting or</li> <li>An Environmental Statement that may include any of the points that are listed below</li> </ul>
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.	<ul style="list-style-type: none"> <li>Management planning documentation</li> <li>Maps</li> <li>Discussion with the owner/manager</li> <li><del>Design plans.</del></li> </ul>	<p>In particular, planning including layout and design of woodland should take into account the following factors and action should be taken if required:</p> <ul style="list-style-type: none"> <li>The character of other woodland in the area</li> <li>Needs or impacts of animals (both wild and domestic) which use both woodland and surrounding land</li> <li>Impacts on flora in the woodland and on surrounding land</li> <li>Scale and pattern of open land</li> <li>Habitats which are</li> </ul>	<p>[6] I think we are a wee bit light on landscape guidance here especially as we have taken out the reference to Design Plans. We should refer to Landscape Character and woodland design guidance as a bullet point</p> <p>[17] The guidance here seems unduly long and would benefit from making more concise.</p> <p>[19] We would recommend that the guidance column includes a sentence recognising that new woodland planting should not fragment existing open habitats or break an existing ecological network.</p> <p>[22] No comment.</p>

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			<p>continuous from inside to outside the woodland (e.g. water courses)</p> <ul style="list-style-type: none"> <li>• Buffering of water courses and water bodies, and connectivity of riparian habitats</li> <li>• Woodland margins as transitional habitats</li> <li>• Linking open space within the woodland with similar habitats outside</li> <li>• The spread of invasive species into or out of the woodland</li> <li>• Impacts on natural features (e.g. wetlands, rock exposures, drainage patterns)</li> <li>• Catchment level impacts on water flows and flood risk</li> <li>• Nature of historic landscapes and links with similar relationships between historic environment sites inside and outside the woodland</li> <li>• Relevant UK Biodiversity Action Plan Habitat Action Plans (HAPs) and Species Action Plans (SAPs) Priority habitats and species.</li> </ul>	
2.5.3	<p>The results of the environmental assessments shall be incorporated into</p>	<ul style="list-style-type: none"> <li>• Management planning documentation</li> <li>• Discussions with</li> </ul>		

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	planning and implementation in order to avoid, minimise or repair adverse environmental impacts of management activities.	owner/manager ● Field observations.		
2.5.43	<p>a) The owner/manager shall assess the potential negative impacts of natural hazards on the WMU, including drought, floods, wind, fire, invasive plant and animal species, and other pests and diseases.</p> <p>b) Planting and restructuring plans shall be designed to minimise mitigate the risk of damage from natural hazards wind, fire, invasive plant and animal species, and other pests and diseases.</p>	<ul style="list-style-type: none"> <li>Management planning documentation</li> <li>Discussion with the owner/manager</li> <li>● Design plan.</li> </ul>	<p>Evaluation should consider:</p> <ul style="list-style-type: none"> <li>Robust planting design</li> <li>● Climate change adaptation Long-term forest resilience</li> <li>Diversity of species, ages and distribution of open ground.</li> </ul>	<p>[11] Considering the impact that climate change is having and will have on our forests it seems remarkable absent from the document and this is compounded by its removal here [guidance]. Are we climate change deniers?</p> <p>[22] Flood hazard maps produced by EA, SEPA, NRW could be referenced here.</p>
2.6	Woodland creation			
2.6.1	<p>New woodlands shall be located and designed in ways that will:</p> <ul style="list-style-type: none"> <li>● Deliver economic goods and ecosystem services,</li> <li>Maintain or enhance the visual, cultural and ecological value and character of the wider landscape, and</li> <li>● Deliver ecosystem goods and services</li> <li>● Ensure the creation of a</li> </ul>	<ul style="list-style-type: none"> <li>Management planning documentation</li> <li>Field surveys</li> <li>Discussion with the owner/manager</li> <li>Maps</li> <li>Field observation</li> <li>● Design plan.</li> </ul>	<p>New woodlands should contribute to the conservation of neighbouring semi-natural woodland and other habitats.</p> <p><del>BAP priority habitats and sites for BAP priority species as given in the UK and local Biodiversity Action Plans</del> Priority habitats and species should be protected.</p> <p>Historic environment features should be identified and protected.</p>	<p>[11] I am concerned that this [second bullet] is too restrictive and doesn't recognise the changes to landscape and habitats that will be required to deliver some of the societal benefits that woodland could deliver particularly with regard to water management and carbon sequestration both in the forest and in timber products. The ecological benefits of some existing "habitats" are under considerable question and this is not recognised in any way.</p> <p>[12] why can't I plant a 20ha block of pure eucalyptus on non-forestry land?</p> <p>[19] We are concerned that the standard now requires new woodlands "<i>Deliver economic goods and ecosystem</i></p>

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	diverse woodland over time.		<p>Examples of ecosystem goods and services include:</p> <ul style="list-style-type: none"> <li>• <del>Timber production</del></li> <li>• <del>Water catchment or soil protection</del></li> <li>• <del>Carbon sequestration.</del></li> </ul> <p>A diverse woodland may be achieved through one or more of the following:</p> <ul style="list-style-type: none"> <li>• Use of a diversity of species, clones and provenances</li> <li>• Planting mixed stands</li> <li>• Variation in site types and growth rates</li> <li>• <del>Management designed to avoid the need for felling over a very limited period</del></li> <li>• Phased planting</li> <li>• Retention of open ground</li> <li>• Design and creation of wind firm edges.</li> </ul> <p><del>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.</del></p> 	<p>services". Economic goods can be for private personal benefit only, and we would argue that such a statement has no place in this Standard. It should be entirely up to the owner if they want to deliver economic goods, and owners who deliver public benefits (non monetary) should not be penalised. We would be concerned that this requirement could lead to the degradation of environmental features in order to maximise economic benefits ("services").</p> <p>[20] (Re)insert the following text at the end of Guidance: The general aim should be to create a woodland that is sufficiently diverse to allow achievement of a phased felling programme.</p> <p>Reason: This would make it clear that phased felling rather than large-scale clear-felling is a desirable outcome from the outset. We feel it is further necessitated because of the abandonment of any maximum clearfell area thresholds.</p> <p>[21] Many but not all new woodland will be designed to deliver economic benefit. Those that don't appear excluded from UKWAS by this requirement. The previous wording seems fine.</p> <p>[22] Natural Flood Management (NFM) maps and FC opportunity maps could be referenced here.</p>
2.7	Woodland restructuring			
2.7.1	Even-aged woodlands shall be gradually restructured to <del>diversify ages and habitats</del> achieve an appropriate mosaic of species, sizes,	<ul style="list-style-type: none"> <li>• Management planning documentation</li> <li>• Discussion with the owner/manager</li> </ul>	Restructuring should be planned and implemented in conformance with good forest design practice.	[4] Despite reference to 'large' still implies that all woods should be restructured, irrespective of size – in landscapes such as The National Forest where there are many relatively small even aged woods, this would be

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	<p>ages, spatial scales, and regeneration cycles. This structural diversity shall be maintained.</p>	<ul style="list-style-type: none"> <li>• Maps</li> <li>• Field observation</li> <li>• <del>Design plan.</del></li> </ul>	<p><del>Design plans should ensure that</del> In large <b>larger</b> even-aged plantations, <b>the age structure should be improved</b> <del>the woodland improves in age structure through:</del></p> <ul style="list-style-type: none"> <li>• Phased felling</li> <li>• Prescribing restocking, which will provide options for further diversification and reduction in coupe size at the end of the next rotation.</li> </ul> <p>Site factors favouring larger coupe sizes might include:</p> <ul style="list-style-type: none"> <li>• Windthrow risk</li> <li>• Landscape scale</li> <li>• Current plantation design</li> <li>• Historic environment features</li> <li>• Wildlife habitats.</li> </ul> 	<p>more appropriate at a landscape scale rather than at an individual woodland scale, although see 2.9.2.</p> <p>[12] A presumption in favour of Continuous Cover Forestry is difficult to accept . It is relatively untested in English conditions and gives rise to both high supervisory and harvesting costs. [More relevant to 2.9.1?]</p> <p>[20] In requirement replace the words “an appropriate” with either “a diverse” or “an increasingly diverse”. Also the last sentence should be extended to read This structural diversity shall be maintained <b>and enhanced over time</b>”</p> <p>Reason: To emphasise the importance of building forest resilience over time, especially true for even-aged woodlands. The insertion “and enhanced over time” is consistent with what the Guidance states.</p> <p>In the Guidance insert the following: “Large coupe sizes should be discouraged for economic, environmental and social reasons. They are increasingly a product of historic decisions and counter best practice guidelines and UKWAS requirements.</p> <p>Reason: To compensate for the removal of maximum clearfelling coupe size thresholds and acknowledge the negative impacts very large coupe sizes can have economically, environmentally and socially.</p> <p>[21] The guidance touches on reducing coupe sizes in</p>
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				<p>larger plantations before offering a list of reasons why larger coupes might be retained. The first element of this should be strengthened to stress the reasons why larger coupe size is not a good idea before listing exceptions.</p> <p>The current (active) UKWAS provides maximum clearfell coupe size for plantations of 5ha in lowlands, 20ha in uplands. Setting maximum size thresholds is a useful mechanism and these is no explanation as to why this has been removed.</p>
2.8	Tree species selection			
2.8.1	<p>a) <del>Species selected for new woodlands, natural regeneration and restocking shall be suited to the site and matched to the owner's objectives.</del></p> <p>a) The range of species selected for new woodlands, and natural or artificial regeneration shall be suited to the site and shall take into consideration:</p> <ul style="list-style-type: none"> <li>• Management objectives</li> <li>• Long-term forest resilience</li> <li>• Scale of the WMU</li> <li>• Requirements for conservation and enhancement of biodiversity and restoration of habitats in section 4</li> </ul>	<ul style="list-style-type: none"> <li>• Discussion with the owner/manager demonstrates that consideration has been given to a range of species, including native species, in meeting management objectives</li> <li>• Evidence of Ecological Site Classification analysis</li> <li>• Management planning documentation</li> <li>• Field verification observation.</li> </ul>	<p>As a general principle, management should maintain or enhance species diversity.</p> <p>Larger WMUs will generally present more opportunities for species diversification.</p> <p>In semi-natural woodlands, regeneration should restore the pre-harvesting stand composition or should create a greater range of species and structural variation appropriate to the woodland type.</p> <p>In plantations on ancient woodland sites, regeneration should be in accordance with section 4.3.1.</p> <p>In other plantations, regeneration should restore the pre-harvesting stand composition, or should</p>	<p>[1] Clauses 2.8.1(c) and 2.8.2 are extremely hostile to non-native species, despite the fact that the UK timber industry is mainly reliant on these.</p> <p>[6] Perhaps we should include the old percentage figures in the guidance.</p> <p>As a guide the proportions of different species in new planting, or planned for the next rotation of an existing woodland, should be as follows:</p> <ul style="list-style-type: none"> <li>• primary species 65% to 75%</li> <li>• secondary species 10% to 20%</li> <li>• open space 10%</li> <li>• native broadleaf 5%</li> </ul> <p>b) is too FSC speak and not enough plain English albeit short.</p> <p>Restocking by planting or natural regeneration shall be carried out in a timely manner and shall maintain or enhance species diversity at least at pre-harvesting levels</p> <p>[10] I remain concerned about the discussion on species</p>

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<ul style="list-style-type: none"> <li>• <b>Landscape character.</b></li> </ul> <p><del>b) Species choice shall be informed by the need for long-term forest resilience.</del></p> <p><b>b) Natural or artificial regeneration shall restore stand composition in a timely manner to pre-harvesting or more natural conditions.</b></p> <p>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.</p> <p><del>d) New introductions of non-native species shall be made only when evidence or experience shows that any invasive impacts can be controlled effectively.</del></p> <p><del>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 an existing woodland.</del></p> <p>f) Where management</p>		<p><b>introduce greater species diversity in keeping with (a), or should create a proportion of semi-natural woodland appropriate to the site.</b></p> <p><b>Owners/managers should also be aware of the guidelines on species proportions and open ground in the UK Forestry Standard.</b></p> <p><del>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.</del></p> <p><del>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</del></p>	<p>composition and set percentages; whilst understandable and welcome in some circumstances it can also be a perverse driver for decision making. The focus should be on good forest management to sustainably meet the owners objectives, not simply “box ticking”. UKWAS should promote <i>good decision making not decisions to meet artificial thresholds.</i></p> <p>[11] Landscape character assessments are being abused to prevent land-use change to forest. Landscape is transitory the natural capital of woodland and the ecosystem services it delivers is longer. We should not be embedding current landscape character in this document [(a)].</p> <p>[12] There are some off-putting bits that have crept in, either jargon or bits that are gobbledygook which I feel could be tidied up. A couple of examples</p> <p>2.8.1 Natural or artificial regeneration shall restore stand composition in a timely manner to pre-harvesting or more natural conditions.</p> <p>[12] it really is time to move on from ‘native is best’. This does not represent government policy which is “right tree, right time, right place”</p> <p>[12] A presumption in favour of native species may render difficult a response to global warming by introduction of alternatives.</p> <p>[17] 2.8.1 b) – it is not clear how the ‘timely manner’ definition will be used here for regeneration. There will also be instances e.g. a change from productive conifers to productive broadleaves where the stand isn’t returned to its pre-harvesting composition.</p> <p>This requires clarification in the light of the two examples</p>
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	<p>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.</p>		<p>diseases-</p> <p>In planning species composition, owners/managers should take account of requirements for conservation and enhancement of biodiversity and restoration of habitats in section 4.</p> <p>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.</p> <p>In woodland of high conservation value (see sections 4.1-4.3 &amp; <del>and</del> 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.</p> <p>Soil analyses and use of Forest Research's Ecological Site Classification (ESC) tool are useful when considering economic and ecological resilience to climate change.</p>	<p>provided above.</p> <p>[19] We would like to reiterate the point made in previous consultation responses that whenever the term "resilience" is used it should have a prefix of "ecological". Resilience does not have an official legal definition. Economic resilience is often conflated with ecological resilience, and the actions taken can be heavily conflicting.</p> <p>The Standard asks for "<i>Evidence of Ecological Site Classification analysis</i>". This is a tool that primarily assesses yield class (i.e. timber production potential) in relation to climate change. It might indicate that a particular native tree species is unsuitable in future climate because it is likely to be low yielding, despite it still being able to function perfectly well ecologically. We would urge caution in the use of this tool.</p> <p>We are concerned that the following statement has been removed from 2.8.1:</p> <p><i>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 an existing woodland.</i></p> <p>We believe the removal of specific percentage guidelines may result in some woodland managers allocating a higher proportion of planting to a single species, which would be detrimental to forest ecological resilience. We would expect that the higher the diversity of tree species within a woodland, the more ecologically resilient that woodland will be in the face of climate change and the emergence of new pests, disease and invasive non-native species. We would therefore wish to see, as a minimum, a retention of existing diversity. Although the Standard sets out the spirit of enhancing diversity, the removal of percentage requirements leaves the requirement vulnerable to being exploited by those managers seeking</p>
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				<p>to reduce diversity for commercial profitability reasons.</p> <p>With regard to the guidance which states “use should be made of natural regeneration or planting stock from parental material (...) <b>where appropriate and possible</b>”, we would expect that owners/ managers should justify any situations where it is deemed inappropriate or impossible. Wording to this effect should be included in the guidance.</p> <p>[20] Draft UKWAS 4 still does not do enough to recognise the wider and multiple (economic, social and environmental) benefits of greater tree species diversity; particularly in the uplands. The new Requirement on tree species selection fails to recognise the very real and obvious threats posed by tree diseases and effects of climate change. With complete respect to different owners’ management objectives, if the prime objective is financial return (commendable in itself) the new Requirement makes it possible to reduce tree species diversity from the current level to a true mono-culture at significant scale (see WMU definition above). We find this approach incredible given the very real lessons ash dieback and <i>Phytophthora ramorum</i> are surely teaching us now. Especially given that UKWAS is voluntary and should therefore go beyond the minimum statutory requirements stated within the UKFS. UKWAS insisting on greater tree species diversity is not likely to be a realistic constraint in the lowlands but should be a constraint in the uplands if mono-culture plantation forestry is seeking certification. The current minimum threshold percentages of 75% and 65% have been proposed for deletion which means it would be relatively easy to end up with tree species compositions no different to those required by the UKFS. This is a lowering of the UKWAS requirement and a retrograde step. Furthermore, by manipulating (increasing) the scale of a WMU, it could be quite easy to meet the proposed requirement with significant expanses of a pure monoculture.</p>
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				<p>At the very least existing tree species diversity should be maintained, especially in upland plantations and wherever possible enhance woodland areas of poor tree species diversity. Removing minimum threshold percentages is desirably but not if the result could be lower tree species diversity.</p> <p>[20] Proposal to amend the wording of the first paragraph of the requirement as follows:</p> <p>a) The range of species selected for new woodlands, and natural or artificial regeneration shall be suited to the site and shall <b>primarily take account of the need for long-term forest resilience and secondarily</b> take into consideration:</p> <ul style="list-style-type: none"> <li>• Management objectives</li> <li>• Scale of the WMU</li> <li>• Requirements for conservation and enhancement of biodiversity and restoration of habitats in section 4</li> <li>• Landscape character</li> </ul> <p>Reason:</p> <p>To strengthen the importance of the concept of forest resilience. Without resilience there is a much greater threat to sustainable forestry, irrespective of objectives, WMU scale and landscape character.</p> <p>In the Guidance amend the wording of the first paragraph to the following:</p> <p>As a general principle, management should <b>(at least) maintain or and where possible</b> enhance species diversity <b>at the stand and WMU level.</b></p> <p>Reason:</p> <p>To re-emphasise the importance of not losing any existing</p>
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				<p>species diversity, especially given the great flexibility afforded by the definition of the WMU which could result in significant loss of existing species diversity at the stand level.</p> <p>If these proposals are not acceptable then we would request the re-insertion of paragraph f) amended as follows:</p> <p>Where management objectives and site conditions allow, and where more than one species is suited to the site, no more than 65% of the <del>WMU</del> site shall be allocated to a single species in new planting or in regeneration plans for the next rotation of an existing woodland. <b>No single species shall occupy blocks greater than 50ha in size.</b></p> <p>Reason: To protect existing species diversity at the site level and mitigate against future pest and disease outbreaks.</p> <p>[21] Deleted requirements 'e' and 'f' – commented on in previous draft -remains a cause of significant concern as this weakens the previous requirement over minimum species diversity. The guidance element refers to the need to abide by the currently higher percentage figures applied for individual species (or mixes when conditions allow) as set out in the UKFS. Our view though, is that the UKFS climate change guidelines which only came out towards the end of the last revision consultation period operate as a stand-alone document. It is not embedded in the management section of the main UKFS document, which continues to allow for high risk 'near monocultures', taking insufficient account of resilience against future climate change or the arrival of new pests and diseases. Other changes proposed in this UKWAS document effectively increasing the potential size of WMU potentially compound the risk, as this potentially allows for large areas with single species as no maximum block size is provided.</p>
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				<p>The UKFS will be subject to review where there will be the opportunity to embed better the climate change guidelines, but this is not guaranteed. We are therefore not convinced that the weakening of the previous requirement in the UKWAS is justified, nor how it demonstrates the highest sustainable forest management standards expected.</p> <p>The guidance section needs to stress up front the need to take long term forest resilience into account and why diversity reduces risk.</p> <p>The ESC tool <u>is</u> (not <u>are</u>) useful .... Yes refer to as good source of advice, but should also recommend looking at wider advice in the case of semi-natural, especially ASNW.</p>
2.8.2	<p>a) Non-native plant (non-tree) and animal species shall only be introduced if <del>they are non-invasive and bring environmental benefits to the WMU when evidence or experience shows that any invasive impacts can be controlled effectively.</del></p> <p>b) All new introductions shall be carefully monitored, and effective mitigation measures shall be implemented to control their spread outside the area in which they are</p>	<ul style="list-style-type: none"> <li>• Documented impact assessment of any introductions made after the first certification</li> <li>• Discussion with the owner/manager</li> <li>• Field observation.</li> </ul>	<p>The requirement includes the re-introduction of once native animals not currently present within the United Kingdom.</p> <p>Owners/managers should be aware that introduced species may exhibit differing degrees of invasiveness in different habitats or parts of the country.</p> <p>Use of non-native biological control agents such as <i>Rhizophagus grandis</i> may be desirable to control non-native pests.</p> <p>Game species may be introduced if managed in</p>	<p>[1] Clauses 2.8.1(c) and 2.8.2 are extremely hostile to non-native species, despite the fact that the UK timber industry is mainly reliant on these.</p> <p>[16] Reference to non-native species in this section has a detrimental effect on the new version of the standard in comparison to Version 3.1 as it applies to trees only. I would suggest that this section would be more appropriately located within 2.11 Protection and worded as follows;</p> <p>2.11.3 a) Non-native plant (non-tree) and animal species shall only be introduced to the WMU when evidence or experience shows that any invasive impacts can be controlled effectively.</p> <p>b) All new introductions shall be carefully monitored, and effective mitigation measures shall be implemented to control their spread outside the area in which they are established.</p>

	<p>established.</p>		<p>accordance with section 4.9.</p>	<p>[19] a) <i>Non-native species shall only be introduced to the WMU when evidence or experience shows that any invasive impacts can be controlled effectively.</i> We believe that this statement represents a <b>serious weakening</b> of the previous standard.</p> <p>We are also concerned that deliberately introducing some invasive species is in contravention of legislation. We would therefore welcome acknowledgement of which non-native species (in general terms) are being referred to in this requirement. For example, those which are exempt from legislation such as the Wildlife and Natural Environment (Scotland) Act 2011.</p> <p>In reality:</p> <ul style="list-style-type: none"> <li>• We cannot accurately predict which species will become invasive;</li> <li>• Plants have a lag period during which they are established in the wild but don't have a detectable impact – there can be a century or more before invasiveness emerges.</li> <li>• When invasiveness does become evident, it is often too late to take effective control action: this is why guidance emphasises prevention of introduction over remedial action.</li> <li>• Climate change is expected (and evidence is showing this is right) to make conditions more conducive for the establishment and spread of more non-native species</li> <li>• There are huge uncertainties over the efficacy of control measures for invasive plant species.</li> </ul> <p>We would recommend that wording such as “<i>no plant shall be introduced or caused to grow in a WMU that evidence and/or experience shows may have invasive</i></p>
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				<p><i>capacity</i>” is included in the requirement.</p> <p>We recommend that a biosecurity response plan is in place, which sets out how managers/ owners will respond should new INNS/ pests/ diseases be encountered. This is linked to requirement 3.4.2.</p> <p>[21] The change in requirement ‘a’ from only introducing non-invasive non-natives to being able to introduce invasive species if their impacts can be controlled seems high risk. Hypothetically, how for example does this take into account of an introduction with the potential be become more aggressively invasive with a changing climate. Expert opinion, if not already provided, needs to be sought.</p>
2.9	Silvicultural systems			
2.9.1	<p>a) Appropriate silvicultural systems shall be adopted which are suited to species, sites, wind risk, tree health risks and management objectives and which stipulate soundly-based planting, establishment, thinning, felling and regeneration plans.</p> <p>b) 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.</p>	<ul style="list-style-type: none"> <li>• Management planning documentation</li> <li>• Discussion with the owner/manager</li> <li>• Field observation.</li> </ul>	<p>The choice of silvicultural system should take into account:</p> <ul style="list-style-type: none"> <li>• Silvicultural characteristics of the species</li> <li>• Management objectives</li> <li>• Site limitations including potential growth rates and wind firmness</li> <li>• Intended stem size and quality</li> <li>• Current and future markets for timber products</li> <li>• Impacts on the landscape and wildlife</li> <li>• Age-structure and felling plan of nearby woodlands</li> <li>• Ecological processes and</li> </ul>	<p>[20] In the Guidance column, move the 9<sup>th</sup> bullet point ‘Future resilience’ to the top although we accept these are not ranked in priority order.</p> <p>[26] We have previously commented that there is inconsistency in the revised wording of this section which will cause confusion among users and will result in an undesirable weakening of the previous editions’ endorsement of the use of alternative silvicultural systems on suitable sites. We submit that this problem is still apparent in this version. Thus section a) says that appropriate silvicultural systems should be employed taking into account a range of measures such as wind risk, site etc. This should allow for conventional patch clear felling to continue to be used where it can be justified by reference to site/stand/management related factors. In many cases, this will not be problematic given constraints from exposure, poor access, a historic lack of</p>

			<p>natural disturbance regime for that woodland type</p> <ul style="list-style-type: none"> <li>• Future resilience</li> <li>• Historical management practices</li> <li>• Views of local people.</li> </ul> <p>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 the certification standard.</p> <p>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.</p> 	<p>thinning, etc.</p> <p>Please also note that the term ‘lower impact silvicultural systems’ is widely considered to cover the full range of silvicultural system from patch clear felling of areas of less than 2.0 ha to selection systems and coppice systems – see references on the NRW website and the helpful diagram in:  <a href="http://www.forestry.gov.uk/pdf/IPIN_1306_CCF_Case_Studies.pdf/\$FILE/IPIN_1306_CCF_Case_Studies.pdf">http://www.forestry.gov.uk/pdf/IPIN_1306_CCF_Case_Studies.pdf/\$FILE/IPIN_1306_CCF_Case_Studies.pdf</a> . For further reading see:  <a href="http://www.ccfq.org.uk/events/downloads/2008/Silv_Systems.pdf">http://www.ccfq.org.uk/events/downloads/2008/Silv_Systems.pdf</a>.</p> <p>It is therefore far from clear to the reader what ‘silvicultural approaches’ are not encompassed by the reference to LISS other than large scale clear felling. Furthermore, the definition of LISS given in the glossary for this draft is incorrect since it appears to start with group felling (which is smaller in scale than 2.0 ha) and goes down to smaller scales and therefore is much closer to the definitions of CCF than of LISS. See the references above for better definitions.</p> <p>We therefore submit that in section b) the phrase “a range of silvicultural approaches including” is redundant and will only cause confusion amongst owners, managers and certifiers. The impact will be to significantly dilute any effect that the certification standard might have in moving the forest sector away from considering patch clear felling as the default silvicultural practice in all situations.  The CCFG therefore proposes that section b) should read:  <i>“Where species, sites, wind risk, tree health risk and</i></p>
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				<p><i>management objectives allow, lower impact silvicultural systems shall be adopted with the aim of diversifying ages, species and stand structures”.</i></p> <p>We would also note in passing the inconsistency with the prescription that LISS should be the preferred option in semi-natural woodlands – section 2.9.2.</p> <p>Lastly, it is not clear why the highlighted guidance about establishment of research trials is confined to the section on silvicultural systems when it applies equally to the sections on species choice (2.8 above). Arguably this will tend to constrain operational managers further in any attempts to use alternative silvicultural systems to diversity current forests in Britain which is an undesirable outcome. We would suggest that the phrase “in the context of a research policy” should be removed and replaced by a phrase such as “only if properly documented and monitored so that the information can be used in the future”.</p>
2.9.2	<p>a) 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.</p> <p>b) In semi-natural woodlands over 10 ha, no more than 10% shall be felled in any five-year</p>	<ul style="list-style-type: none"> <li>• Management planning documentation</li> <li>• Discussion with the owner/manager</li> <li>• Field observation.</li> </ul>	<p>For areas with UKBAP priority habitats and species, consider consulting with relevant species and habitat experts in statutory nature conservation and countryside agencies or NGOs.</p> <p>There may be practical or biodiversity enhancement reasons for clearfelling in some semi-natural woodlands, but owners/managers should be aware that best practice</p>	<p>[11] It is unlikely that the FC will be producing any new guidance and existing guidance will rapidly become out of date even if there is a repository for it.</p> <p>[12] Semi natural woodland. The condition that conversion will be limited to 10% in any five year period is an inhibiting stipulation when time may be of the essence</p> <p>[20] Requirement 2.9.2 b) This could be unduly restrictive for example in sweet chestnut or hazel coppice woods. Whether chestnut is grown on a 25 year rotation or hazel on a 7 year rotation, this may be unduly restrictive. There is no longer a similar restriction for non-semi-natural woodlands.</p>

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	<p>period unless justified in terms of biodiversity enhancement or lower impact.</p>		<p>guidance for semi-natural woodlands managed as high forest generally advises small coupe fellings which, depending on the type of woodland, may be up around 2 ha in size.</p> 	<p>[21] The guidance section should also be stressing need to follow EPS guidance, unless it's covered elsewhere (but which still then be referenced).</p> <p>Requirement 'b' has the potential to inadvertently restrict some coppice management, so a further clause needs to be added.</p>
2.10	Conservation			
2.10.1	<p>a) Management planning shall identify a minimum of 15% of the WMU managed with conservation and enhancement of biodiversity as a major objective.</p> <p>b) This shall include conservation areas and features identified in the following sections:</p> <ul style="list-style-type: none"> <li>• Statutory designated sites (section 4.1)</li> <li>• Ancient semi-natural woodland (section 4.2)</li> <li>• Plantations on ancient woodland sites (section 4.3)</li> <li>• Other valuable semi-natural habitats (section 4.4)</li> <li>• Areas and features of critical importance for watershed management or erosion</li> </ul>	<ul style="list-style-type: none"> <li>• Management planning documentation including maps</li> <li>• Field observation.</li> </ul>	<p>Where areas and features identified in (b) <del>and c)</del> comprise less than 15% of the WMU additional areas should be identified.</p> <p>The balance of areas managed with conservation and enhancement of biodiversity as a major objective may include:</p> <ul style="list-style-type: none"> <li>• Existing open habitats integral to the WMU</li> <li>• Natural reserves</li> <li>• Long-term retentions</li> <li>• Lower impact silvicultural systems</li> <li>• Riparian zones integral to the WMU.</li> </ul> <p>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</p>	<p>[12] The condition that 15% of the W.M.U be managed for conservation or the enhancement of bio diversity is impractical in that not all woods are suitable for this treatment</p> <p>[19] We believe that statutory protected areas should not count towards the 15% as there is already a legal obligation to manage these areas for their designated feature(s). The 15% should be an additional area to ensure that a balance between economic and wider environmental and social objectives is achieved. This is in the spirit of the Standard encouraging owners/ mangers to go beyond the minimum legal requirements. The 15% should be as consolidated as possible, not disparate features which are combined to meet the total. The exception to this would be where disparate features require protection in their own right.</p> <p>[20] Proposal: Insert a new paragraph c) into Requirements:</p> <p>All existing and previously managed areas of Natural Reserves and Long Term Retentions shall be maintained and enhanced.</p>

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	<p>control (section 4.5)</p> <ul style="list-style-type: none"> <li>Natural Reserves (section 4.6.1)</li> <li>Long-term retentions and/or areas managed under lower impact silvicultural systems (LISS) (section 4.6.2).</li> </ul>		<p>woodland management unit.</p> <p>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.</p> <p>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.</p>	<p>Reason: To not lose what has previously been identified and secured and in many cases managed according to this requirement for many years.</p> <p>Guidance: Although the bulleted list is not ranked in order of priority we would nevertheless suggest re-ordering it as follows:</p> <ul style="list-style-type: none"> <li>Natural reserves</li> <li>Long-term retentions</li> <li>Riparian zones integral to the WMU</li> <li>Lower impact silvicultural systems</li> <li>Existing open habitats integral to the WMU</li> </ul> <p>Add a new sentence at the end of the existing guidance to expand on the new Requirement c) as follows: It is important to protect all existing and previously established Natural Reserves and areas of Long Term Retention, particularly when amendments to the WMU occur.</p> <p>[21] Refer to earlier concerns [in the introduction] about the definition of WMU allowing for very large dispersed land holdings. Comments on the need for requirements to apply at an appropriate management sub unit apply.</p> <p>[22] No comment.</p>
2.11	Protection			
2.11.1	<p>Management of wild deer shall be based on a written strategy that identifies the management objectives, and aims to regulate the impact of deer.</p>	<ul style="list-style-type: none"> <li>Awareness of potential problems</li> <li>Awareness of actual damage</li> <li>Description of appropriate action in the management</li> </ul>	<p>This requirement may involve the setting of cull targets and should involve the membership of a Deer Management Group where appropriate.</p>	<p>[20] Proposal:</p> <p>In the Requirement delete the word “written” because this unduly penalizes owners/managers of small woodlands.</p> <p>In Guidance a new sentence to be added before the</p>

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		<p>planning documentation</p> <ul style="list-style-type: none"> <li>• Membership of a deer management group</li> <li>• Evidence of cull targets and achievements</li> <li>• Where there is a significant problem caused by deer, a documented plan for control; this may take the form of a contract or licence.</li> </ul>		<p>existing sentence. For large enterprises and WMUs, the strategy should be in writing.</p>
2.11.2	<p><del>A fire plan shall be developed as appropriate to the level of risk.</del> There shall be an emergency response plan appropriate to the level of risk.</p>	<ul style="list-style-type: none"> <li>• Discussion with the owner/manager</li> <li>• Fire plan</li> <li>• In sites with high risk of fire, evidence of contact with the fire and rescue service and that their advice has been <del>heeded</del> taken into consideration.</li> </ul>	<p>Incidents may include:</p> <ul style="list-style-type: none"> <li>• Fire</li> <li>• Extreme weather events</li> <li>• Accidents</li> <li>• Chemical spills and other pollution.</li> </ul> <p>Fire Where appropriate, plans may be as simple as a reference card, but as a minimum should include:</p> <ul style="list-style-type: none"> <li>• Responsibilities for action</li> <li>• Contact details</li> <li>• Emergency procedures.</li> </ul> <p>Plans should take into account FISA best practice guidance and issues such as the remoteness of some WMUs, which may affect both communication and the ability of emergency services to reach sites in timely manner.</p>	<p>[20] In the Example Verifiers add a bullet point of “Emergency response plans” otherwise all the existing points still only refer to fires.</p>

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2.12	Conversion			
2.12.1	<p>a) Woodland identified in sections 4.1-4.3 shall not be converted to plantation or non-forested land.</p> <p>b) Areas converted from ancient and other semi-natural woodlands after 1994 shall not normally qualify for certification.</p>	<ul style="list-style-type: none"> <li>No evidence of conversion</li> <li>Field observation</li> <li>Discussion with the owner/manager</li> <li>Management planning documentation.</li> </ul>	<p>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.</p> <p>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.</p>	<p>[6] I think it should read sections 4.1 and 4.2 not 4.1 to 4.3.</p> <p>[12] The restriction upon non forestry use inhibits the construction of glades and loading points</p> <p>[20] This is a positive addition to UKWAS 4. It strengthens the case for non-conversion and we welcome it.</p>
2.12.2	<p>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 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,</p>	<ul style="list-style-type: none"> <li>Field <del>inspection</del> observation</li> <li>Management records.</li> </ul>	<p>The requirement restricting conversion relates to use for growing Christmas trees of less than 4 metres in height.</p> <p>The chemicals regime for Christmas trees must meet all the requirements of section 3.4.</p> <p>Examples of Christmas trees which may be covered by a certificate are:</p> <ul style="list-style-type: none"> <li>Trees (&lt;4 m in height) grown on areas within the woodland matrix used solely for Christmas tree</li> </ul>	<p>[20] Consider swapping the order of this requirement with 2.12.3.?</p> <p>Although we all know what is meant by the final sentence in Guidance, it's probably not strictly true. Possibly more accurate to say they are outside the scope of UKWAS?</p>

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	non-intensive techniques.		<p>production</p> <ul style="list-style-type: none"> <li>• Trees (&lt;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</li> <li>• Thinnings from forest tree crops</li> <li>• Tops from harvested forest tree crops</li> <li>• Trees grown by interplanting of forest tree crops</li> <li>• Mature trees (&gt;4 m height)</li> <li>• 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.</li> </ul> <p>Christmas trees grown as a horticultural or nursery crop cannot be covered by a certificate.</p>	
2.12.3	a) Conversion to non-forested land shall take	<ul style="list-style-type: none"> <li>• Transition plan</li> <li>• Management planning</li> </ul>	Conversion to non-forested land should be planned and	[22] Conversion to non-forested land may be a way of meeting RBMP objectives, for example it could contribute

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<p>place only in certain limited circumstances as set out in this requirement.</p> <p>b) The new land use shall be more valuable than any type of practicably achievable woodland cover in terms of its biodiversity, landscape or historic environment benefits, and <b>all of the following</b> conditions <b>a, b, c and d</b> shall be met:</p> <ul style="list-style-type: none"> <li>• The woodland is not identified as of high conservation value in sections 4.1-4.3 &amp; <b>and</b> 4.5, nor identified as contributing to the cultural and historical values in section 4.8.</li> <li>• There is no evidence of unresolved substantial dispute.</li> <li>• <b>The</b> conversion and subsequent site management protect and substantially enhance at least one of the following:             <ul style="list-style-type: none"> <li>○ The status and condition of <del>UK Biodiversity Action Plan</del> priority</li> </ul> </li> </ul>	<p>documentation for the converted area after felling</p> <ul style="list-style-type: none"> <li>• Records of planning process and discussions</li> <li>• Consultation with interested parties</li> <li>• Monitoring records</li> <li>• Environmental impact assessment process documentation.</li> </ul>	<p>implemented in accordance with the UKFS Guidelines on biodiversity, landscape and historic environment.</p> <p>A transition plan should set out as a minimum the justification for conversion and a strategy for implementation, subsequent management and monitoring.</p> <p>Under current regulations an environmental impact assessment may be required before such conversions are implemented.</p> <p>Planning consent or an approved Environmental Statement can provide sufficient evidence that there is no unresolved substantial dispute.</p> <p>Deforestation to facilitate infrastructure or built development which is not integral to the management of the rest of the woodland cannot meet this requirement.</p> <p><i>See also section 4.4.2 in relation to restoration of small-scale habitats within a woodland matrix.</i></p>	<p>to the reduction of acidification in particularly sensitive catchments. If we could include a reference to the RBMPs it would be very positive. Something along the lines of 'The conversion of the site contributes to the objectives set out in the river basin management plans.'</p> <p>[25] Under current regulations an <b>Environmental Impact Opinion may be needed or Determination assessment</b> may be required before such conversions are implemented</p>
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	<p>species and habitats</p> <ul style="list-style-type: none"> <li>○ Important landscape features and character</li> <li>○ Important historic environment features and character</li> <li>○ Important carbon stores.</li> </ul> <ul style="list-style-type: none"> <li>• The subsequent management of the converted area shall be integrated with the rest of the WMU.</li> </ul>		<p><b>Advice to owners/managers</b></p> <p>Only timber felled in accordance with this requirement can be certified.</p> <p>Owners/managers are advised to seek guidance from their certification body or group scheme manager.</p> 	
2.13	Implementation, amendment and revision of the plan			
2.13.1	<p>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 integrity of the woodland maintained.</p>	<ul style="list-style-type: none"> <li>• Cross-correlation between the management planning documentation, annual work programmes and operations seen on the ground</li> <li>• Owner's/manager's familiarity with the management planning documentation and woodland</li> <li>• Documentation or owner's/manager's explanation of any deviation.</li> </ul>	<p>Changes in planned timing of operations should be such that they do not jeopardise the ecological integrity of the woodland in the long term.</p> <p>Changes in planned timing may be justified on economic grounds if overall management practices continue to conform to the other requirements of this certification standard.</p> <p>Catastrophic events such as wind damage or pest and disease outbreaks may necessitate amendment of the work programme and</p>	

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			management planning documentation.  <i>Refer to See also section 2.9.1 for information about in relation to thinning, felling and regeneration plans.</i>	
2.14	Monitoring			
2.14.1	<p>a) The owner/manager shall devise and implement a monitoring programme appropriate to the scale and intensity of management.</p> <p>b) The monitoring programme This shall:</p> <ul style="list-style-type: none"> <li>• Be part of the management planning documentation- <del>Monitoring procedures shall</del></li> <li>• Be consistent and replicable over time to allow comparison of results and assessment of change, <del>and records shall</del></li> <li>• Be kept in a form that ensures that <del>they</del> results are of use over the long term.</li> </ul> <p>c) The owner/manager shall where applicable monitor and record:</p> <ul style="list-style-type: none"> <li>• <del>Implementation of the</del></li> </ul>	<ul style="list-style-type: none"> <li>• A monitoring programme as part of management planning documentation</li> <li>• Evidence of a consistent approach to recording site visits</li> <li>• Discussion with the owner/manager</li> <li>• <b>Monitoring records.</b></li> </ul>	<p>The primary purpose of monitoring is to help the owner/manager to implement and adapt the management of the WMU to meet the management objectives.</p> <p>Monitoring should be linked to potential positive and negative impacts of management on the condition of features and sensitivities of the WMU identified in section 2.2.1, and to the delivery of management objectives.</p> <p><del>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</del></p>	<p>[4] Highlight eg fixed point photography which may be most useful scale of monitoring in small woods</p> <p>[12] Monitoring , The establishment of records of treatment , timber volumes , and progress against targets on a wide range will inevitably require a data base which will be expensive to implement and administer .</p> <p>[17] The guidance here seems unduly long and would benefit from making more concise.</p> <p>[20] Guidance: Insert the words “and actual” in the second paragraph to read as follows: Monitoring should be linked to potential <b>and actual</b> positive and negative impacts of management on the condition of features and sensitivities of the WMU identified in section 2.2.1, and to the delivery of management objectives.</p>

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<p>management plan</p> <ul style="list-style-type: none"> <li>• The achievement of objectives and verifiable targets</li> <li>• Implementation of operational plans</li> <li>• <b>woodland operations</b></li> <li>• <del>Economic viability</del></li> <li>• Harvesting yields</li> <li>• Social impacts of management.</li> <li>• Environmental impacts of management, including:             <ul style="list-style-type: none"> <li>○ <del>Impacts of operations on priority habitats and species, landscape values, water and soils</del></li> <li>○ <del>Impacts of non-native species, including invasiveness</del></li> <li>○ <del>Impacts of grazing and browsing</del></li> </ul> </li> <li>• Changes in environmental condition, including:             <ul style="list-style-type: none"> <li>○ <del>Tree health</del></li> <li>○ <del>Woodland composition and structure</del></li> <li>○ <del>Areas and features of conservation value</del></li> <li>○ <del>Ancient woodland features and remnants, including responses to</del></li> </ul> </li> </ul>		<p>part of adaptive management.</p> <p>Monitoring may include:</p> <ul style="list-style-type: none"> <li>• Supervision during <b>woodland</b> operations</li> <li>• Regular management visits and systematic collection of information</li> <li>• <del>Longer-term studies, where appropriate, particularly on changes to the woodland ecosystem, particularly for special environmental features. Information from studies (particularly 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.</del></li> </ul> <p><del>Owners/managers should be aware of the potential usefulness of information gathered for other purposes, for example to fulfil statutory requirements, which may</del></p>	
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	<p>management and any threats</p> <ul style="list-style-type: none"> <li>○ Cultural heritage features</li> </ul> <ul style="list-style-type: none"> <li>• Usage of pesticides, biological control agents and fertilisers and any adverse impacts</li> <li>• Environmentally appropriate disposal of waste materials.</li> </ul> <p>d) Monitoring targets shall fully consider any special features of the WMU.</p>		<p><del>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.</del></p> <p>Examples of appropriate monitoring include:</p> <ul style="list-style-type: none"> <li>• Implementation of woodland operations             <ul style="list-style-type: none"> <li>○ Health and Safety</li> <li>○ Compliance with Forest and Water Guidelines</li> <li>○ Worksite supervision</li> </ul> </li> <li>• Harvesting yields             <ul style="list-style-type: none"> <li>○ Information from sales invoices or weight tickets compared to predicted yields from production forecasts or timber inventories</li> </ul> </li> <li>• Social impacts             <ul style="list-style-type: none"> <li>○ Condition and accessibility of public access facilities</li> <li>○ Impacts of timber haulage</li> </ul> </li> <li>• Environmental impacts</li> </ul>	
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			<ul style="list-style-type: none"> <li>○ Impacts of operations on priority habitats and species, landscape or water and soils</li> <li>○ Impacts of non-native invasive species</li> <li>○ Impacts of grazing and browsing</li> <li>● Changes in environmental condition             <ul style="list-style-type: none"> <li>○ Tree health</li> <li>○ Woodland composition and structure</li> <li>○ Areas and features of conservation value</li> <li>○ Ancient woodland features and remnants, including responses to management and any threats</li> <li>○ Condition of cultural heritage features.</li> </ul> </li> </ul> <p>When monitoring environmental impacts and changes in environmental condition, particular attention should be paid to the features of high conservation value identified in sections 4.1-4.3</p>	
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			<p>and 4.5 and to the cultural and historical values identified in section 4.8.</p> <p>Detail of information collected should be appropriate to the:</p> <ul style="list-style-type: none"> <li>• Size of the enterprise</li> <li>• Intensity of operations</li> <li>• Objectives of management</li> <li>• Sensitivity of the site.</li> </ul> <p><del>Monitoring records should be appropriate to the same factors, as well as to the frequency with which monitoring is carried out. The</del> owner/manager may consider:</p> <ul style="list-style-type: none"> <li>• Formal written records</li> <li>• A less formal site diary</li> <li>• Photographic records</li> <li>• Verbally communicated records.</li> </ul> <p>Note that there may be legal requirements for record keeping in some cases, for example pesticide usage.</p> <p>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</p>	
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			<p>be possible to make use of freely available information from sources such as statutory authorities bodies or local interest groups.</p>	
<p>2.14.2</p>	<p>The owner/manager shall where applicable monitor and record:</p> <ul style="list-style-type: none"> <li>• Implementation of the management plan</li> <li>• The achievement of objectives and verifiable targets</li> <li>• Implementation of operational plans</li> <li>• Economic viability</li> <li>• Harvesting yields</li> <li>• Environmental impacts of management, including: <ul style="list-style-type: none"> <li>○ Impacts of operations on priority habitats and species, landscape values, water and soils</li> <li>○ Impacts of non-native species, including invasiveness</li> <li>○ Impacts of grazing and browsing</li> </ul> </li> <li>• Social impacts of management.</li> <li>• Changes in environmental condition, including: <ul style="list-style-type: none"> <li>○ Tree health</li> <li>○ Woodland</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• <del>Monitoring records</del></li> <li>• Discussions with owner/manager.</li> </ul>	<p>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.</p>	

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	<p>composition and structure</p> <ul style="list-style-type: none"> <li>○ Areas and features of conservation value</li> <li>○ Ancient woodland features and remnants, including responses to management and any threats</li> <li>○ Cultural heritage features</li> <li>● Usage of pesticides, biological control agents and fertilisers and any adverse impacts</li> <li>● Environmentally appropriate disposal of waste materials.</li> </ul>			
2.14.3 2	The owner/manager shall take monitoring findings into account, particularly during revision of the management planning documentation.	<ul style="list-style-type: none"> <li>● Monitoring records</li> <li>● Management planning documentation</li> <li>● Discussion with the owner/manager.</li> </ul>	Expert advice should be sought where necessary and taken into account.	
2.14.4 3	Monitoring findings, or summaries thereof, shall be made publicly available upon request.	<ul style="list-style-type: none"> <li>● Written or verbal evidence of responses to requests.</li> </ul>	<p>The monitoring findings or summaries may exclude confidential information.</p> <p>The means of sharing monitoring findings should be appropriate to the nature of the records and to the needs of the interested parties.</p> <p>Owners/managers of smaller</p>	

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			<p>management units, relying more on informal monitoring methods and records, may find it more appropriate to communicate results verbally.</p> <p>Owners/managers of larger management units, relying more on formal surveys and reports, may find it more appropriate to produce a written summary.</p> <p><i>See section 2.2.2 for examples of confidential information.</i></p>	
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3. Forestry Woodland operations

[11] Not Clear of the rationale for this change. Both Forest and Woodland are used throughout the rest of the document. Perhaps this should read Forestry and Woodland operations.

	REQUIREMENT	EXAMPLE VERIFIERS	GUIDANCE	MAKE CONSULTATION COMMENTS / NOTES HERE
3.1	General			
3.1.1	<p><del>Forest</del> Woodland operations shall conform to forestry best practice guidance.</p>	<ul style="list-style-type: none"> <li>Field observation</li> <li>Discussion with the owner/manager and <del>forestry workforce</del> workers</li> <li>Monitoring and internal audit records.</li> </ul>		
3.1.2	<p>The planning of woodland operations shall include:</p> <ul style="list-style-type: none"> <li>Obtaining any relevant permission and giving any formal notification required.</li> <li>Assessing and taking into account on and off-site impacts.</li> <li>Taking measures to protect <del>special features,</del> water resources and soils, and prevent disturbance of and damage to protected, rare and threatened species, habitats, ecosystems and landscape values, including adapting standard prescriptions where required. Any disturbance or damage</li> </ul>	<ul style="list-style-type: none"> <li>Documented permissions</li> <li>Contracts</li> <li>Discussion with the owner/manager and workers</li> <li>Demonstration of awareness of impacts and measures taken</li> <li>Site-specific, documented assessment of impacts</li> <li>Operational site assessments.</li> </ul>	<p>Particular attention should be given to ensuring that:</p> <ul style="list-style-type: none"> <li>local people potentially affected <del>have been</del> are informed at the onset of operations</li> <li><del>the forestry workforce has been</del> workers are involved in the planning of operations at the implementation stage.</li> </ul> <p>Checks should be made against relevant <del>UK Biodiversity Action Plan Habitat Action Plans (HAPs) and Species Action Plans (SAPs)</del> country level plans for priority habitats and species.</p>	<p>[17] There will inevitably be instances where, despite all efforts, it isn't possible to mitigate or repair certain types of disturbance or damage. In these cases the focus will be on mitigating/avoiding any future re-occurrence.</p>

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	<p>which does occur shall be mitigated and/or repaired.</p> <ul style="list-style-type: none"> <li>Measures to maintain and, where appropriate, enhance the value of identified services and resources such as watersheds and fisheries.</li> </ul>			
3.1.3	<p>Operational plans shall be 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.</p>	<ul style="list-style-type: none"> <li>Discussion with <del>staff and</del> workers</li> <li>Records of pre-commencement meetings</li> <li>Field observation</li> <li>Biosecurity policy</li> <li>Relevant plans and procedures.</li> </ul>	<p>Contracts can be in writing or <del>the forestry workforce</del> workers may be given oral instructions where this is appropriate to the scale and sensitivity of the operation.</p>	<p>[12] Difficulties are likely to arise in the supervision and monitoring of staff employed in harvesting operations in standing sales.</p>
3.1.4	<p>Operations shall cease or relocate immediately where:</p> <ul style="list-style-type: none"> <li>They damage sites or features of conservation value or of special cultural and historical significance identified in sections 4.1-4.5 and 4.8. Operations in the vicinity shall recommence only when action has been taken to repair damage and prevent any further damage, including establishing buffer areas</li> </ul>	<ul style="list-style-type: none"> <li>Discussion with the owner/manager</li> <li>Site diaries</li> <li>Field observation.</li> </ul>		<p>[17] The definition of features of conservation interest is not defined in the appendix, which will make auditing more difficult.</p> <p>[20] This is a positive requirement and we welcome its inclusion in UKWAS 4.</p>

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	<p>where appropriate.</p> <ul style="list-style-type: none"> <li>They reveal previously unknown sites or features which may be of conservation value or of special cultural and historical significance. Operations in the vicinity shall recommence only when the sites or features have been investigated and appropriate management agreed, where relevant in discussion with statutory bodies and/or local people.</li> </ul>			
3.2	Harvest operations			
3.2.1	<p>a) Timber and non-timber woodland products (NTWPs) shall be harvested efficiently and with minimum loss or damage to environmental values.</p> <p>b) Timber harvesting <del>should</del> shall particularly seek to avoid:</p> <ul style="list-style-type: none"> <li>Damage to soil and water courses during felling, extraction and burning</li> <li>Damage to standing trees during felling, extraction and burning</li> </ul>	<ul style="list-style-type: none"> <li>Field observation.</li> </ul>	<p><del>Timber harvesting should particularly seek to avoid:</del></p> <ul style="list-style-type: none"> <li><del>Damage to soil and water courses during felling, extraction and burning</del></li> <li><del>Damage to standing trees during felling, extraction and burning</del></li> <li><del>Timber degrade.</del></li> </ul> <p>Thinning/cutting trees to waste may be appropriate in some circumstances.</p> 	<p>[17] If an example of timber degrade is found, how does the auditor satisfy themselves that the manager 'sought to avoid'.</p> <p>[20] This is a positive requirement and we welcome it.</p> <p>[21] Guidance should stress the particular vulnerability of veteran trees.</p>

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	<ul style="list-style-type: none"> <li>• Timber degrade.</li> </ul>			
3.2.2	<p>Harvesting and sales documentation shall enable all timber and non-timber woodland products (NTWPs) that are to be sold as certified to be traced back to the woodland of origin.</p>	<ul style="list-style-type: none"> <li>• Harvesting output records</li> <li>• Contract documents</li> <li>• Sales documentation.</li> </ul>	<p>The purpose of this requirement is to ensure that certified products can be traced back to the point of sale from the woodland (in 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.</p> <p>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.</p> <p><b>Advice to owners/managers</b></p> <p>Certification schemes may require certificate holders to provide additional information on sales documentation relating to:</p> <ul style="list-style-type: none"> <li>• chain-of-custody certification, and</li> <li>• the use of certification scheme trademarks</li> </ul>	<p>[20] Guidance:</p> <p>Last word of the first paragraph. We believe 'supply' should be changed to 'sale' as it is not the supply but the legal change in ownership which is relevant for chain of custody.</p>

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			<p>Certification schemes may also require documentation to be retained for a specific time.</p> <p>Owners/managers are advised to seek guidance from their certification body or group scheme manager.</p>	
3.2.43	<p>Whole tree harvesting or stump removal shall <del>not</del> be practised <b>only where there is demonstrable management benefit, and where a full consideration of impacts shows that there are not likely to be any where it is likely to have significant negative effects.</b></p>	<ul style="list-style-type: none"> <li>• Discussion with the owner/manager demonstrates awareness that impacts have been considered</li> <li>• Documented appraisal.</li> </ul>	<p>Significant negative impacts to consider include:</p> <ul style="list-style-type: none"> <li>• Leaching</li> <li>• Soil compaction</li> <li>• Soil erosion</li> <li>• Soil carbon <b>loss</b></li> <li>• Nutrient loss</li> <li>• Damage to historical features and archaeological deposits.</li> </ul> 	
3.2.34	<p>Lop and top shall be burnt only where there is demonstrable management benefit, <b>and where a</b> after full consideration of impacts <b>shows that there are not likely to be any significant negative effects.</b></p>	<ul style="list-style-type: none"> <li>• Discussion with the owner/manager demonstrates awareness that impacts have been considered</li> <li>• Evidence of registration of exempt activity</li> <li>• Documented appraisal.</li> </ul>	<p>If lop and top is burned:</p> <ul style="list-style-type: none"> <li>• The location and density of fire sites should be carefully planned.</li> <li>• Some lop and top should be left unburned as habitat except where it will result in pest or disease problems.</li> <li>• <del>Statutory</del> <b>The requirements required by of the relevant statutory</b></li> </ul>	<p>[4] Are arisings 'waste' or an unwanted byproduct – if the latter is exemption under waste management regulations required?</p> <p>[12] A presumption against burning of lop and top will give rise to problems in preparing felled sites for replanting.</p> <p>[17] The highlighted paragraph appears to be a requirement rather than guidance.</p>

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			<p>environment protection agencies should be met.</p> <p>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).</p> 	
3.3	Forest roads and associated infrastructure			
3.3.1	<p><del>For new roads, all necessary consents shall be obtained.</del></p> <p>All necessary consents shall be obtained for construction, extension and upgrades of:</p> <ul style="list-style-type: none"> <li>• Forest roads</li> <li>• Mineral extraction sites</li> <li>• Other infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>• Records of consents</li> <li>• Environmental assessment where required.</li> </ul>	<p><del>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.</del></p> <p>Consents may relate to planning, environmental impact assessment or construction regulations.</p> 	
3.3.2	Roads and timber extraction tracks and associated drainage shall	<ul style="list-style-type: none"> <li>• Documented plans for the design and creation of permanent roads and tracks</li> </ul>	<p>Where new roads are planned, a documented evaluation should be made to</p>	<p>[15] Good Practice Guidance on timber transport is here <a href="http://timbertransportforum.org.uk/work/good-practice/guidance">http://timbertransportforum.org.uk/work/good-practice/guidance</a></p>

	<p>be designed, created, used and maintained in a manner that minimises their environmental impact.</p>	<ul style="list-style-type: none"> <li>• Control systems for the creation and use of temporary tracks and extraction routes</li> <li>• Field observation</li> <li>• Documented maintenance plans.</li> </ul>	<p>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.</p> <p>Particular attention should be paid to:</p> <ul style="list-style-type: none"> <li>• Avoiding features of historic environment, biological, geological or cultural value</li> <li>• Use of bridges, arches or culverts to cross water courses</li> <li>• Ensuring that verges and ditches are created and managed to promote their habitat value</li> <li>• Materials used, especially rock type, are in keeping with the ecology of the woodland</li> <li>• Avoiding erosion and adverse impacts on water systems and wildlife habitats</li> <li>• Careful landscaping of roads, both internally and externally</li> <li>• Use of brash mats.</li> </ul> 	<p>The Forum shall be publishing a further good practice Guide on 10th march titled 'Loading Timber From Roadside Forests'.</p> <p>[20] Proposal: Amend the text of the requirement as follows: Roads, timber extraction tracks, <b>visitor access infrastructure</b> and associated drainage shall be designed, created, used and maintained in a manner that minimises their environmental impact.</p> <p>Reason: Car parks, visitor centres and other built structures for recreational purposes can have just as much impact as forestry infrastructure.</p> <p>[22] SEPA has found a number of barriers to fish movement associated with haulage routes. These can be substantial structures (such as pipe bridges) or just poorly maintained culverts which have become perched above the water course. There does not appear to be any references to fish barriers in the document and this is a significant omission. We could add an additional clause here, something along the lines of: 'The impact of existing water crossing points on routes and haulage tracks is assessed and any barriers to fish movement documented and easement measures put in place.'</p>
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3.4	Pesticides, biological control agents and fertilisers			
3.4.1	<p>The owner/manager shall: <del>minimise their use of pesticides, biological control agents and fertilisers and endeavour to avoid the use of pesticides and fertilisers where practicable.</del></p> <ul style="list-style-type: none"> <li>• Avoid the use of pesticides and fertilisers where practicable,</li> <li>• Minimise their use of pesticides, biological control agents and fertilisers, and</li> <li>• <b>Avoid, mitigate and/or repair damage to environmental values from pesticide and biological control agent use.</b></li> </ul>	<ul style="list-style-type: none"> <li>• Discussion with the owner/manager</li> <li>• Pesticide policy or position statement.</li> </ul>	<p><del>Where there is no practicable alternative, in terms of economic, social and environmental costs, owners/managers should provide justification for their use.</del></p>	<p>[12] There's plenty of protective legislation on pesticides and no need for UKWAS to add to the burden.</p> <p>Generally there is quite a lot of common sense in the document, but then they simply can't resist 'nanny knows best' in the detail.</p> <p>[17] Comment as for 3.1.2 - There will inevitably be instances where, despite all efforts, it isn't possible to mitigate or repair damage. In these cases the focus will be on mitigating/avoiding any future re-occurrence.</p>
3.4.2	<p>a) The owner/manager shall prepare and implement an effective integrated pest management strategy that:</p> <ul style="list-style-type: none"> <li>• <b>Is appropriate to the scale of the woodland and the intensity of management,</b></li> <li>• Adopts management systems that shall promote the development and application of non-chemical methods of pest and crop</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Discussion with the owner/manager</b></li> <li>• Written policy and strategy or statement.</li> </ul>	<p>Sites <b>and features</b> with special biodiversity attributes include:</p> <ul style="list-style-type: none"> <li>• All ancient woodland <b>sites</b> <del>on the inventory of ancient woodland, and other known sites which meet the same criteria, distinguishing between the categories of the individual national inventories</del></li> <li>• <del>Semi-natural features in plantations on ancient woodland sites</del></li> <li>• Valuable or diverse wildlife</li> </ul>	<p>[17] 3.4.2 a) (2<sup>nd</sup> Bullet Point)</p> <p>Adopts management 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, <b>where feasible.</b></p> <p>The concern here is the reference to a fallback of biological control methods, which in terms of Hylobius for instance would be the use of Nematodes. FES does not use Nematodes due to reasons such as the scale of operations, difficulty of terrain, lack of contractor capacity and unacceptable cost.</p>

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<p>management by placing primary reliance on prevention and, where this is not practicable, biological control methods,</p> <ul style="list-style-type: none"> <li>• Takes account of the importance of safeguarding the value of sites <b>and features</b> with special biodiversity attributes (<del>see also sections 4.1—4.3</del>) when considering methods of control, <b>and</b></li> <li>• Demonstrates knowledge of the latest published advice and its appropriate application.</li> </ul> <p>b) <del>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. The strategy shall 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.</del></p> <p>c) <del>The strategy shall specify aims for the minimisation or</del></p>		<p>communities</p> <ul style="list-style-type: none"> <li>• <del>Rare and vulnerable</del> <b>Protected, rare and endangered</b> species</li> <li>• <del>UK Biodiversity Action Plan</del> Priority habitats and species</li> <li>• Breeding sites, feeding areas and habitats of notable species</li> <li>• Water courses, ponds and lakes</li> <li>• Wetland habitats</li> <li>• Lowland heath</li> <li>• Peatlands covered by the policies of relevant forestry authorities.</li> <li>• Rides and open ground</li> <li>• Woodland margins and hedges</li> <li>• Veteran trees</li> <li>• Decaying deadwood habitat</li> <li>• Any other valuable habitats or features.</li> </ul> <p>Identification and mapping of areas and features may be carried out on an ongoing basis, provided that it has been completed for an area prior to operations taking place.</p> <p><b>Collection of information on</b></p>	<p>[19] We would welcome clarification on the definition of a “notable” species.</p> <p>[20] Amend the first bullet of the Guidance to help clarify what is meant as follows: All ancient woodland sites <b>and their (remnant or other) semi-natural features.</b></p> <p>In the final paragraph replace the word ‘may’ with ‘should’ to read as follows: Collection of information on pesticide usage <del>may</del> <b>should</b> enable trends to be observed and future action targeted accordingly, including any necessary revision of the strategy</p> <p>[21] Guidance should mention that disease can affect other non-woodland remnant/restorable habitats too.</p>
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	<p><del>elimination of pesticide usage, taking into account considerations of cost (economic, social and environmental), and the cyclical nature of woodland management operations.</del>  <b>Where pesticides and biological control agents are to be used the strategy shall justify their use demonstrating that there is no practicable alternative, in terms of economic, social and environmental costs.</b></p> <p>d) 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.</p> <p>e) <del>The strategy shall be appropriate to the scale of the woodland and the intensity of management.</del></p>		<p>pesticide usage may enable trends to be observed and future action targeted accordingly, including any necessary revision of the strategy.</p> <p><i>See also section 4 in relation to conservation values.</i></p> 	
3.4.3	<p>Where pesticides and biological control agents are to be used:</p> <ul style="list-style-type: none"> <li><del>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.</del></li> </ul>	<ul style="list-style-type: none"> <li>• COSHH assessments</li> <li>• <b>Risk assessments</b></li> <li>• <b>Record of reason for use and pesticide choice</b></li> <li>• <b>Personal protective equipment</b></li> <li>• FEPA records</li> <li>• Waste transfer notes</li> <li>• Discussion with the owner/manager and workers</li> </ul>	<p>Usage should be recorded in such a way that comparisons can be made year on year <b>and fed back into the integrated pest management strategy.</b> Therefore additional to the <del>requirement to record information under current legislation</del> <b>legal recording requirements</b> (which includes product, application rates and</p>	<p>[17] • The owner/manager shall be able to demonstrate that they are conforming to best practice.</p> <p>This part of the requirement seems unnecessary as it could be repeated throughout each element of the Standard</p> <p>[20] Guidance          Amend the first sentence to read as follows:          Usage should be recorded in such a way that comparisons can be made year on year and fed back into</p>

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	<ul style="list-style-type: none"> <li>The owner/manager and workers 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 fertilizers.)</li> <li>The owner/manager shall be able to demonstrate that they are conforming to best practice.</li> <li>The owner/manager shall keep records of pesticide usage and biological control agents as required by current legislation.</li> </ul>	<ul style="list-style-type: none"> <li>Field observation, particularly in respect to storage, application sites, protective clothing, and warning signs and availability of lockable boxes for transport of pesticides</li> <li>Operators are trained and competent, and hold pesticide operator certification</li> <li>Adequate written procedures, work instructions, and other documentation</li> <li>FEP record of the precise usage including the rationale, method of application, site and quantity</li> <li>Availability of appropriate absorbent materials</li> <li>Emergency plan.</li> </ul>	<p>area treated), owners and managers should <b>may find it useful to</b> sub-divide usage according to operations (e.g. establishment of broadleaves, establishment of conifers, harvesting, control of invasive species). This <b>may enable trends to be observed and future action targeted accordingly, including any necessary revision of the strategy.</b></p> 	<p>the integrated pest management strategy <b>to demonstrate meeting Requirement 3.4.2 to avoid and/or minimise usage.</b></p>
3.4.4	<p>Where pesticides or biological control agents are to be used <b>the owner/manager shall be able to demonstrate that they are</b> meeting the requirements of <b>best practice</b> for use of pesticides and biological control agents.</p>	<ul style="list-style-type: none"> <li><del>Field observation of facilities for storage and disposal</del></li> <li><del>Safety equipment</del></li> <li><del>Availability of lockable boxes for transport</del></li> <li><del>Availability of absorbent materials</del></li> <li><del>Risk assessments</del></li> <li><del>Safety equipment</del></li> <li><del>Emergency plans</del></li> <li><del>Operators are trained and competent, and hold pesticide operator certification where required</del></li> </ul>		

<p>3.4.54</p>	<p>a) Pesticides and biological control agents shall only be used if:</p> <ul style="list-style-type: none"> <li>• They are approved for forest use by the UK regulatory authorities, <del>and</del></li> <li>• They are not banned by international agreement, and</li> <li>• Their use is permitted by the certificate holder's certification scheme.</li> </ul> <p>b) 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:</p> <ul style="list-style-type: none"> <li>• No effective and practicable alternatives are available, <del>and</del></li> <li>• Their use is sanctioned using a mechanism endorsed by the certificate holder's certification scheme, and</li> <li>• Any such mechanism provides for their use to be justified and on the condition that usage shall be discontinued once effective and practicable alternatives</li> </ul>	<ul style="list-style-type: none"> <li>• <del>Written emergency plan.</del></li> <li>• Records of chemicals purchased and used</li> <li>• Field observation</li> <li>• Discussion with <b>the</b> owner/manager and workers.</li> </ul>	<p><b>Advice to owners/managers</b></p> <p>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.</p> 	
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3.4.65	<p>are available.</p> <p>Fertilizers (<del>inorganic and organic</del>):</p> <p>a) Fertilisers (<b>inorganic and organic</b>) shall only be used where they are necessary to secure establishment or to correct subsequent nutrient deficiencies.</p> <p>b) Where fertilisers are to be used the owner/manager and workers shall be aware of and shall be implementing legal requirements and best practice guidance for their use in forestry. <b>No fertilisers shall be applied in or around rare plant communities.</b></p> <p>c) In addition, bio-solids shall only be used following an assessment of environmental impacts in accordance with section 2.5.</p> <p>d) The owner/manager shall keep a record of fertiliser usage, <b>including types, rates, frequencies and sites of application.</b></p>	<ul style="list-style-type: none"> <li>• Discussion with <b>the</b> owner/manager, <del>staff and contractors</del> <b>and workers</b></li> <li>• Field observation, particularly in respect to storage, application sites, protective clothing and warning signs</li> <li>• Adequate written procedures, work instructions, and other documentation.</li> </ul>	<p>Unnecessary use of fertilisers may be avoided through the appropriate choice of species.</p> 	<p>[17] As there's no definition of a 'rare plant community' in the glossary, this would be difficult to audit.</p> <p>[19] We would suggest that fertilisers are not used in areas with soils which are sensitive to nutrient enrichment. The suitability of such sites for woodland (commercial) planting should be seriously considered.</p> <p>[21] Requirement 'b' – add that fertilisers shouldn't be used around veteran trees either.</p>
3.5	Fencing			

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3.5.1	Where appropriate, wildlife management and control shall be used in preference to fencing.	<ul style="list-style-type: none"> <li>• Discussion with the owner/manager.</li> </ul>	<p>This requirement is especially important in areas where Capercaillie (<i>Tetrao urogallus</i>) and Black grouse (<del>Lyrurus</del> <i>Tetrao tetrix</i>) are present.</p> 	[18] Does this relate to deer fencing?
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.	<ul style="list-style-type: none"> <li>• Field visits to verify alignments chosen</li> <li>• Discussion with the owner/manager demonstrates an awareness of impacts of fence alignments and of the alternatives</li> <li>• Documented policy or guidelines regarding any specific significant impacts</li> <li>• Expert advice sought for significant one-off fencing operations.</li> </ul>	<p>Decisions to erect fences and their alignment should take account of:</p> <ul style="list-style-type: none"> <li>• Landscape</li> <li>• Public rights of way</li> <li>• Existing users of the woodland</li> <li>• Wildlife especially woodland grouse</li> <li>• The historic environment</li> <li>• The need for badger gates, tunnels and ladders.</li> </ul> <p>Where fence crossings are provided they should be appropriate to the abilities of likely users.</p> 	
3.6	Waste			
3.6.1	Waste disposal shall be in accordance with current waste management	<ul style="list-style-type: none"> <li>• No evidence of significant impacts from waste disposal</li> <li>• Documented policy or guidelines on waste disposal</li> </ul>	<p>Waste includes:</p> <ul style="list-style-type: none"> <li>• Plastic waste including tree shelters and tree bags</li> </ul>	

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	legislation and regulations.	including segregation, storage, recycling, return to manufacturer.	<ul style="list-style-type: none"> <li>• Surplus chemicals</li> <li>• Chemical containers</li> <li>• Plastic waste</li> <li>• Fuels and lubricants.</li> </ul> 	
3.6.2	The owner/manager shall prepare and implement a prioritised plan to manage and progressively remove redundant materials.	<ul style="list-style-type: none"> <li>• Field observation</li> <li>• Removal plan</li> <li>• Budget.</li> </ul>	<p>Prioritisation and timescales for removal should take into account social, environmental and economic impacts.</p> <p>Examples of redundant materials include:</p> <ul style="list-style-type: none"> <li>• Tree shelters</li> <li>• Fencing</li> <li>• Culvert pipes</li> <li>• High seats.</li> </ul>	
3.7	Pollution			
3.7.1	The owner/manager shall adopt management practices that minimise diffuse pollution arising from forest woodland operations.	<ul style="list-style-type: none"> <li>• Records of consultation with statutory environment protection agencies</li> <li>• Field inspection observation</li> <li>• Operational plans</li> <li>• Incident response plans</li> <li>• Diffuse pollution risk assessment in high risk situations</li> <li>• Use of biodegradable lubricants.</li> </ul>	<p>Diffuse pollution includes may arise from:</p> <ul style="list-style-type: none"> <li>• Oil spills and leaks</li> <li>• Cutting-chain lubricants</li> <li>• Siltation of water courses or drains that connect to watercourses</li> <li>• Pesticide or fertilizer runoff</li> <li>• Smoke.</li> </ul> <p>Biodegradable cutting-chain lubricants should be used where practicable.</p>	

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			Practicability encompasses operator health and costs of running machinery.	
3.7.2	Plans and equipment shall be in place to deal with accidental spillages.	<ul style="list-style-type: none"> <li>• Discussion with <b>the</b> owner/manager and relevant <b>staff-workers</b></li> <li>• Appropriate equipment available in the field</li> <li>• Written plans.</li> </ul>		

4. Natural, and historical and cultural environment

	REQUIREMENT	EXAMPLE VERIFIERS	GUIDANCE	MAKE CONSULTATION COMMENTS / NOTES HERE
4.1	<del>Protection of rare species, habitats and natural resources including</del> Statutory designated sites and protected species			
4.1.1	<p>a) Areas and features of high conservation value having particular significance for biodiversity, including sites important for <b>protected, rare and endangered</b> but mobile species, shall be identified by reference to statutory designations at national or regional level and/or through assessment on the ground.</p> <p>b) The identified areas, species and features of high conservation value shall be maintained and, where possible, enhanced, <b>adopting a precautionary approach.</b></p> <p>c) There shall be ongoing communication and/or consultation with statutory bodies, local authorities, wildlife trusts and other</p>	<ul style="list-style-type: none"> <li>All known areas and features mapped</li> <li>Field <del>inspection</del> <b>observation</b></li> <li>Approval of forest plan by the relevant forestry authority</li> <li>Workers are aware of such sites and of plans for their management</li> <li>For all potentially damaging operations, awareness is demonstrated of how areas will be protected and/or safeguarded</li> <li>Management plans for statutory conservation areas and monitoring of implementation of those plans</li> <li>Condition statements from statutory bodies</li> <li>Maps</li> <li>Discussion with the owner/manager demonstrates how areas will</li> </ul>	<p>The system of designated sites in the UK forms a representative sample of existing ecosystems within the landscape.</p> <p>These areas and features of high conservation value include:</p> <ul style="list-style-type: none"> <li>Areas designated as: <ul style="list-style-type: none"> <li>Special Areas for of Conservation</li> <li>Special Protection Areas</li> <li><del>Biological</del> Sites of Special Scientific Interest or Areas of Special Scientific Interest</li> <li>Ramsar Sites</li> <li>National Nature Reserves</li> </ul> </li> <li><b>Features such as breeding sites, resting places and display sites of protected, rare and</b></li> </ul>	<p>[11] Not sure why when rare has been removed from the section title it has been inserted here [(a)]. If this is a section on statutory designations it should not include ambiguous terms like rare.</p> <p>[19] 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 condition. This appears to be a weakening against previous standard.</p>

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	<p>relevant organisations.</p> <p>d) <del>The areas and features</del> <b>Statutory designated sites</b> shall be managed in accordance with plans agreed with nature conservation agencies, and shall be marked on maps.</p>	<p>be safeguarded and/or enhanced</p> <ul style="list-style-type: none"> <li>• Planning documentation shows how areas will be safeguarded and/or enhanced</li> <li>• Pro-active approach to the identification of areas and features of significance for biodiversity, appropriate to likely biodiversity value.</li> </ul>	<p><b>endangered species.</b></p> <p>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.</p>	
4.2	Conservation of ancient semi-natural woodlands (ASNW)			[11] No reference to the devastating effect that Chalara, AOD and OPM are/will have upon our ASNW or any discussion on what an ASNW may look like in the future
4.2.1	<p>a) Ancient semi-natural woodland shall be identified by reference to published maps and/or by assessment on the ground.</p> <p>b) The high conservation value of ancient semi-natural woodlands shall be maintained and, where possible, enhanced, <b>adopting a precautionary approach.</b></p> <p>c) Adverse ecological impacts of non-native species shall be identified and inform management.</p>	<ul style="list-style-type: none"> <li>• Field observation</li> <li>• Discussion with the owner/manager</li> <li>• Management planning documentation including relevant forestry authority management plan and restocking plans</li> <li>• Ancient woodland inventories</li> <li>• Other studies</li> <li>• Monitoring records.</li> </ul>	<p>Ancient semi-natural woodlands are the key priority sites for woodland conservation in the UK.</p> <p>Establishing the validity of the site's status <del>need</del> <b>should</b> not solely rely on ancient woodland inventories. Assessment on the ground should take account of:</p> <ul style="list-style-type: none"> <li>• Soils</li> <li>• Vegetation</li> <li>• Old trees</li> <li>• Historical and archaeological features and landscape implications.</li> </ul> <p>Use should be made of natural regeneration or planting stock from parental</p>	<p>[17] 4.2.1 b) needs better wording. It's not clear whether the precautionary approach is in relation to enhancement, or maintenance, or both?</p> <p>[21] Guidance section on regeneration/restocking should be mentioning impact of disease and seeking further guidance from statutory bodies, especially on ash dieback currently – published guidance is available.</p>

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			<p>material growing in the local native seed zone where appropriate and possible.</p> <p>Maintenance of biodiversity values often requires targeted interventions. Management should be in accordance with the relevant FC practice guides for semi-natural woodlands.</p> <p>Potential adverse impacts may include:</p> <ul style="list-style-type: none"> <li>• Browsing by rabbits, deer and other animals</li> <li>• Grazing by livestock</li> <li>• Colonisation by invasive non-native species.</li> </ul>	
4.3	Plantations on ancient woodland sites (PAWS)			<p>[11] Ref above comment [on 4.2] there needs to be a real discussion about what we are restoring to.</p> <p>[20] The section title for 4.3 should be renamed to “<b>Restoration of</b> Plantations on ancient woodland sites (PAWS)”</p> <p>Reason – to make it consistent with the preceding and following sections which deal with “Conservation of ASNW” and “Protection of semi-natural woods/habitats”. This section is about the restoration of PAWS.</p>
4.3.1	<p>a) The owner/manager shall maintain and enhance features and areas of high conservation value within plantations on ancient woodland sites.</p>	<ul style="list-style-type: none"> <li>• Management planning documentation, <del>including a long term policy</del></li> <li>• Ancient woodland inventories</li> <li>• Other studies</li> </ul>	<p>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:</p>	<p>[17] The guidance here seems unduly long and would benefit from making more concise.</p> <p>[19] We believe that this section is a significant weakening compared to the previous standard. We believe that this section represents a change in emphasis from the progressive improvement of PAWS to one which</p>

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	<p>b) The owner/manager shall:</p> <ul style="list-style-type: none"> <li>• Identify and evaluate remnant features,</li> <li>• Identify and evaluate threats,</li> <li>• Adopting a precautionary approach, prioritise actions based on the level of threat and the value of remnants, and</li> <li>• Implement targeted actions.</li> </ul>	<ul style="list-style-type: none"> <li>• Remnant threat analyses</li> <li>• Field observation</li> <li>• Discussion with the owner/manager.</li> </ul>	<ul style="list-style-type: none"> <li>• Historical and archaeological features and landscape implications</li> <li>• Remnant features</li> <li>• The relationship with other biodiversity features and priorities and management objectives within the WMU and adjacent land use as a whole.</li> </ul> <p>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.</p> <p>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.</p> <p>Threats may include shading, deer browsing, windthrow and ground damage from</p>	<p>advocates maintenance of the existing conditions. We would strongly suggest that the wording of this requirement from the current UKWAS 3 document is retained.</p>
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			<p>harvesting, and damage to veteran trees from woodland operations.</p> <p>Where remnants are not threatened or where site characteristics allow a more rapid approach may be adopted. In some situations, such as inaccessible, unthinned stands or where there are heavy shade casting species present, 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 operations.</p> <p>Exploratory silvicultural interventions may help inform the choice of management prescriptions. 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</p>	
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			features, including ground flora, and mitigate against damage to them.	
4.4	Protection of conservation values in other woodlands and semi-natural habitats			[20] We would suggest deleting the words “conservation values in” to make it consistent with headings for sections 4.1 to 4.3.
4.4.1	<p>a) Areas, species and features of conservation value in other woodlands shall be identified.</p> <p>b) The identified areas, species and features of conservation value shall be maintained and where possible enhanced.</p> <p>c) Adverse ecological impacts shall be identified and inform management.</p>	<ul style="list-style-type: none"> <li>• Field observation</li> <li>• Discussion with the owner/manager</li> <li>• Management planning documentation <del>including relevant forestry authority approved management plan and restocking plans</del></li> <li>• Historical maps</li> <li>• Monitoring records.</li> </ul>	<p>This requirement relates to woodlands other than ASNW and PAWS (see <b>sections 4.2 &amp; and 4.3</b>).</p> <p>Priority should be given to woodlands or woodland relicts that may have retained/acquired valuable ecological characteristics.</p> <p>Typically these values may be found in:</p> <ul style="list-style-type: none"> <li>• Semi-natural woodlands</li> <li>• Long established woodlands of planted origin</li> <li>• Woodland relicts</li> <li>• Veteran trees</li> <li>• New native woodlands</li> </ul> <p>Potential adverse impacts may include:</p> <ul style="list-style-type: none"> <li>• Browsing by rabbits, deer and other animals</li> </ul>	<p>[17] Suggest an amendment of “Monitoring records” (see highlighted text), “Monitoring records of prioritised sites”. Without this distinction there is a possibility of being required to monitor all semi-natural woodland, not just ANSW and some of the prioritised other semi-natural woodland.</p> <p>Note: In this section, does ‘species’ encompass animal species? It’s not clear and the term ‘conservation values’ is ambiguous and vague. The protection of animal species should be explicit, as in 4.1.1 above. For example, the title could be changed to ‘Protection of plant and animal species in other woodlands and semi-natural habitats’.</p> <p>[21] Why is visitor pressure identified here and not for ASNW, though not really the same level of general threat as other issues cited.</p>

			<ul style="list-style-type: none"> <li>• Grazing by livestock</li> <li>• Colonisation by invasive non-native species</li> <li>• <b>Visitor pressure.</b></li> </ul>	
4.4.2	<p>a) Valuable semi-natural habitats (<del>e.g. moorland, heathland, wood pasture and grassland</del>) 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.</p> <p>b) Adverse ecological impacts shall be identified and inform management.</p>	<ul style="list-style-type: none"> <li>• Workers are aware of such sites and of any plans for their management</li> <li>• For all potentially damaging operations, awareness demonstrated of how areas shall be protected and/or safeguarded</li> <li>• Discussion with <b>the</b> owner/manager demonstrate how such areas will be managed</li> <li>• Planning documentation shows how areas will be managed.</li> </ul>	<p>This requirement relates to small-scale habitats within the WMU, <b>which may include:</b></p> <ul style="list-style-type: none"> <li>• Moorland</li> <li>• Peatland</li> <li>• Heathland</li> <li>• Wood pasture</li> <li>• Grassland.</li> </ul> <p>Appropriate management may include:</p> <ul style="list-style-type: none"> <li>• Rides and glades containing remnant semi-natural communities are widened and extended</li> <li>• Areas with a rich ground flora and shrub layer are heavily thinned</li> <li>• Remnants of wood pasture, veteran trees or other 'open-forest' habitat are gradually opened up</li> <li>• Heathland, bog and other open habitats are re-created by premature felling without restocking</li> <li>• Maintenance of open ground around historic environment sites.</li> </ul>	<p>[11] This [(a)] is all going to be challenged if there is to be significant land-use change to forestry to deliver water management and other benefits. The rewilding debate strongly challenges the ecological value of some existing land use types.</p> <p>[19] We would suggest that freshwater habitats such as ponds are added to the list of "small-scale habitats within the WMU".</p> <p><i>"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 <b>does not lead to further degradation to potential for restoration</b>"</i></p> <p>We recommend that the wording is altered to that shown in red. This could protect against moves towards continuous cover systems on important open habitats like heathland, where CCF would prevent the seed bank renewing. It would also guard against inappropriate broadleaf planting on open habitats or sites which currently have the potential to be restored to their natural open state.</p>

			<p><del>Priority should be given to habitats identified in the Forestry Commission's forests and peatlands policy or the Forest Service's afforestation and environmental policy and UK national and local Biodiversity Action Plans.</del></p> <p>Particular attention should be paid to priority habitats and to habitats identified in country level forest and peatland policies.</p> <p><del>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.</del></p> <p>Potential adverse impacts may include:</p> <ul style="list-style-type: none"> <li>• Browsing by rabbits, deer and other animals</li> <li>• Grazing by livestock</li> <li>• Colonisation by invasive non-native species</li> </ul>	
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			<ul style="list-style-type: none"> <li>• <b>Drainage.</b></li> </ul> <p>Non-native species may be retained where they have a high ecological or cultural value.</p> <p>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.</p> <p><i>See also section 2.12.3 which covers larger scale habitat restoration through conversion to non-forested land.</i></p> <p><b>Advice to owners/managers</b></p> <p>Only timber felled in accordance with this requirement can be certified.</p> <p>Owners/managers are advised to seek guidance from their certification body or group scheme manager.</p>	
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4.5	Watershed management and erosion control			
4.5.1	<p>a) Areas and features of critical importance for watershed management or erosion control shall be identified in consultation with relevant statutory bodies.</p> <p>b) Where critically important areas or features are identified, their management shall be agreed with the relevant statutory bodies, <b>adopting a precautionary approach.</b></p>	<ul style="list-style-type: none"> <li>Records of consultation</li> <li>Management planning documentation</li> <li>Monitoring records</li> <li>Licences or consents.</li> </ul>	<p>Situations where forest management is critical for watershed management or erosion control are relatively rare, and are likely to be identified during consultation processes.</p> <p>Further information is available in UKFS Guidelines on soils and water.</p>	<p>[17] 4.5.1 b) – this wording forces the UKWAS manager to adopt a precautionary approach, even if this is against the advice of the relevant statutory body and therefore a better form of wording is required - eg 'in line with the recommendations of the relevant statutory body'</p> <p>[22] No comment.</p>
4.6	Maintenance of biodiversity and ecological functions			
4.6.1	<p>Natural reserves shall constitute a minimum of 1% of the WMU in plantations and 5% of the WMU in semi-natural woodlands.</p>	<ul style="list-style-type: none"> <li>Management planning documentation including maps</li> <li>Field observation.</li> </ul>	<p><del>Larger and more widespread woodland estates may fulfil this requirement across the estate as a whole rather than reserving specified areas in each and every wood or woodland management unit.</del></p> <p><b>This requirement should be addressed at the WMU level. Where a WMU is made up of more than one woodland, the owner/manager should locate natural reserves where they will deliver greatest biodiversity benefit, rather than necessarily in every individual woodland.</b></p>	<p>[19] The current Standard (UKWAS 3) states “<i>Natural reserves: areas of woodland have been set aside where biodiversity is the prime objective. Natural reserves shall comprise at least 1% of plantations and 5% of semi-natural woodlands.</i>” We would question why the 5% figure has been removed from the revised Standard? Ideally we would like to see at least 5% natural reserve in <b>all</b> woodlands so the removal of this figure for semi-natural woodlands appears to be a retrograde step.</p> <p>[20] The point to make is that after what will be almost 20 years of certification, voluntary as it is, the thresholds for Natural Reserves and Long-Term Retentions are still at only 1% of a WMU; WMUs as mentioned earlier which could now cover a whole country in extreme cases. From</p>

			<p><del>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.</del></p> <p>Areas managed as natural reserves within the areas identified by sections 4.1-4.5 may fulfil this requirement.</p>	<p>a resilience perspective, it is in exotic plantations where Natural Reserves and Long-Term Retentions are particularly important.</p> <p>The very low minimum percentage thresholds for Natural Reserves and Long-Term Retentions, together with the cumulative effects of more relaxed species selection criteria, maximum clearfell thresholds gone and scope to increase the size of WMUs all combined sends out a negative message because it would appear that UKWAS 4 favours those wishing to certify large scale plantations.</p> <p>[20] Requirement</p> <p>Proposal: To increase the minimum 1% to a minimum of 5% irrespective of the type of woodland.</p> <p>Reason: Given that this requirement doesn't have to be met at the stand level but can be met at the WMU level and in practice is most likely not going to be applied to every individual WMU but across a certified estate as a whole, we feel that after almost 20 years of UKWAS, 5% is not an unrealistic minimum.</p> <p>Insert a second sentence/paragraph in requirement as follows: <b>Existing and previous natural reserves shall be maintained and where possible enhanced/buffered.</b></p> <p>Reason: To protect and secure those Natural reserves which in some cases will have been in place for 15 years or more</p>
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				<p>and which could be under threat from changes to the WMU.</p> <p>Guidance: Delete the first sentence as it is superfluous. “This requirement should be addressed at the WMU level” All requirements should be addressed at the WMU level. Insert a sentence at the end of the first paragraph as follows: <b>There should be no loss of existing Natural Reserves.</b> Reason – to emphasise the new proposed insertion in the requirement.</p> <p>[21] This change – the dropping of the requirement for 5% natural reserves to 1% in semi-natural woodlands devalues the standard. No explanation is provided for this significant change. 1% elsewhere is not very ambitious.</p> <p>Previous concerns raised about operating across a very large/dispersed WMU apply.</p> <p>[24] I suggest that the Long Term Retentions and Natural Reserves be simplified even further and made more flexible. Essentially, LTRs be incorporated within NRs, along the lines of ‘NRs shall constitute at least 2% of the WMU. NRs shall, where practicable, include a significant proportion of individual or clumps of mature trees of a size or age considered to be of environmental benefit.’</p>
4.6.2	Long-term retentions and/or areas managed under lower impact silvicultural systems (LISS) shall constitute a minimum of 1% of the WMU. Where this is	<ul style="list-style-type: none"> <li>• Management planning documentation including maps</li> <li>• Field observation.</li> </ul>	<p><del>Larger and more widespread woodland estates may fulfil this requirement across the estate as a whole rather than reserving specified areas in each and every wood or</del></p>	<p>[17] Typo - This [guidance first paragraph] may be meant to read: “This requirement should be addressed at the WMU level. Where a WMU is made up of more than one woodland, the owner/manager should <b>locate? / identify?</b> long-term retentions or LISS areas where they will deliver</p>

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	<p>impracticable, an additional minimum 1% of natural reserve shall be identified.</p>		<p><del>woodland management unit.</del></p> <p>This requirement should be addressed at the WMU level. Where a WMU is made up of more than one woodland, the owner/manager should long-term retentions or LISS areas where they will deliver greatest biodiversity benefit, rather than necessarily in every individual woodland.</p> <p>Areas managed as long-term retentions and/or LISS within the areas identified by sections 4.1-4.5 may fulfil this requirement.</p>	<p>greatest biodiversity benefit, rather than necessarily in every individual woodland”</p> <p>The guidance [second paragraph] text does not convey true meaning: ASNW (as referred to in 4.2) would not be selected as Long Term Retentions as this implies clear felling ultimately.</p> <p>[20] The point to make is that after what will be almost 20 years of certification, voluntary as it is, the thresholds for Natural Reserves and Long-Term Retentions are still at only 1% of a WMU; WMUs as mentioned earlier which could now cover a whole country in extreme cases. From a resilience perspective, it is in exotic plantations where Natural Reserves and Long-Term Retentions are particularly important.</p> <p>The very low minimum percentage thresholds for Natural Reserves and Long-Term Retentions, together with the cumulative effects of more relaxed species selection criteria, maximum clearfell thresholds gone and scope to increase the size of WMUs all combined sends out a negative message because it would appear that UKWAS 4 favours those wishing to certify large scale plantations.</p> <p>[20] Requirement          Insert a second paragraph in requirement as follows:          Existing and previous long-term retentions shall be maintained and where possible enhanced/buffered.          Reason – to make it consistent with the previous requirement on natural reserves and to protect and secure those Long-term retentions which in some cases will have been in place for 15 years or more and which could be</p>
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				<p>under threat from changes to the WMU</p> <p>Guidance: Delete the first sentence as it is superfluous. "This requirement should be addressed at the WMU level" All requirements should be addressed at the WMU level. Insert a sentence at the end of the first paragraph as follows: <b>There should be no loss of existing Long-term retentions and no reduction in the areas previously managed for long-term retentions.</b> Reason – to emphasise the new proposed insertion in the requirement.</p> <p>[21] Missing word in the [guidance].</p> <p>[24] [See comment on 4.6.1 re. combining requirements.]</p>
4.6.3	<p>The owner/manager shall plan and take action to maintain continuity of veteran tree habitat by:</p> <ul style="list-style-type: none"> <li>• Keeping existing veteran trees, <b>and</b></li> <li>• Managing or establishing suitable trees to eventually take the place of existing veterans.</li> </ul>	<ul style="list-style-type: none"> <li>• Field observation</li> <li>• Harvesting contracts</li> <li>• Discussion with <b>the</b> owner/manager and workers</li> <li>• If there is a conflict with safety, the issues have been documented</li> <li>• Management planning documentation.</li> </ul>	<p>This requirement applies in WMUs where there are existing veteran trees.</p> <p>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.</p> <p>Actions may include:</p> <ul style="list-style-type: none"> <li>• Freeing from shading and/or competition</li> <li>• Pollarding younger trees or lopping older trees to prolong their life.</li> </ul>	<p>[12] The plotting of veteran trees is a time consuming operation and a treatment programme is both difficult to implement and difficult to record and monitor.</p> <p>[21] The clause on releasing VTs from competition should stress that this should be done carefully, potentially over a number of years.</p> <p>The risk of catastrophic failure should highlighted, as is the need for specialist surgery if remedial action is required.</p> <p>The risk of physical damage from forestry operations should be highlighted, as risk is even higher for VTs than for other trees.</p> <p>Fallen branches/deadwood should be left uncut and in situ.</p> <p>Fuller guidance can be provided or we can discuss further</p>

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			Veteran tree management should not conflict with safety of the public or forestry workers.	if helpful.
4.6.4	<p>a) The owner/manager shall plan and take action to <del>identify areas where deadwood is likely to be of greatest ecological benefit</del> accumulate a diversity of both standing and fallen deadwood over time <del>throughout in all wooded parts of the WMU, including felled areas.</del></p> <p>b) The owner/manager shall identify areas where deadwood is likely to be of greatest nature conservation benefit, and shall plan and take action to accumulate large dimension standing and fallen deadwood and deadwood in living trees in those areas.</p>	<ul style="list-style-type: none"> <li>Field observation</li> <li>Harvesting contracts</li> <li>Discussion with the owner/manager and workers</li> <li>If there is a conflict with safety or woodland health, the issues have been documented</li> <li>Management planning documentation.</li> </ul>	<p><del>This requirement should be fulfilled throughout the WMU, with action targeted to identified areas of greatest ecological benefit.</del></p> <p>The owner/manager should refer to deadwood guidance produced by relevant forestry authorities when identifying areas of greatest nature conservation benefit and when planning actions to accumulate deadwood.</p> <p>Current evidence suggests that, over the long term, deadwood (not including stumps, which are usually retained after felling) should accumulate to roughly 20 m<sup>3</sup> per hectare averaged – though not uniformly distributed – across the WMU.</p> <p>In most hectares there should be a few standing and fallen stems contributing to the overall deadwood provision.</p> <p>There should be no removal</p>	<p>[12] The management of standing deadwood frequently clashes with public safety issues and is difficult to monitor.</p> <p>[17] The Guidance statement ‘there should be no removal of existing deadwood’ needs to be challenged for a variety of reasons. Its inclusion is at odds with the current understanding of deadwood in all UK forest conditions. In unthinned crops there are 10s if not 100s T per ha of deadwood which are routinely harvested for existing markets. Harvesting of windblow also involves the removal of deadwood – the application of this clause would severely compromise the clearance of windblow. Similarly some deadwood may need to be removed for safety reasons and FES policy is to focus deadwood in certain areas. This may mean that there could be no deadwood in certain productive areas, providing that sufficient overall volumes of deadwood can be accumulated elsewhere in the forest, The word ALL in Section 4.6.4 a) should be replaced with “most” which would be in keeping with the use of “MOST” within the guidance (both words highlighted in black).</p> <p>The guidance [‘Only harvesting windblow when it is of significant value unless more than 3 m<sup>3</sup>/ha is blown and sufficient deadwood is already accumulating on site’] seems overly specific. This is another example where the guidance can effectively be treated as a req’t.</p> <p>[18] In most hectares there should be a few standing and fallen stems contributing to the overall deadwood provision – not sure this makes sense?</p> <p>There should be no removal of existing deadwood. – as</p>

			<p>of existing deadwood.</p> <p>Deadwood management should not conflict with safety of the public or forestry workers or the health of the woodland.</p> <p>Actions may include:</p> <ul style="list-style-type: none"> <li>• Keeping standing dead trees and snags</li> <li>• Keeping and protecting old, previously pollarded trees alive through appropriate management</li> <li>• Only harvesting windblow when it is of significant value unless more than 3 m<sup>3</sup>/ha is blown and sufficient deadwood is already accumulating on site</li> <li>• Keeping naturally fallen trees or major branches</li> <li>• When thinning or clearfelling, and where safe to do so, creating snags and providing fallen deadwood where insufficient has already accumulated.</li> </ul> <p>The accumulation of deadwood throughout a rotation provides for greater continuity of the full range of</p>	<p>above? Could there be situations when there could be removal of deadwood if it does not impact on sensitive spp or within areas of high conservation value?</p> <p>[19] We believe that this requirement represents a weakening of the Standard in UKWAS 3. We believe that the importance of having a <b>variety</b> of deadwood types is not adequately reflected.</p> <p>[20] The draft deadwood requirement has changed considerably, not for the worse necessarily but it does rely very heavily on guidance now so that much of the rigour within the current Requirement is not there anymore. For biodiversity, it is critical that the wording as proposed “in all wooded parts of the WMU, including felled areas” is retained otherwise there is a real threat of no deadwood left at all on extensive clearfell sites.</p> <p>It is very important to ensure that both standing and fallen deadwood is maintained and enhanced throughout all wooded parts of a WMU, especially on extensive clearfelled areas.</p> <p>[20] Guidance Amend the first sentence as follows: The owner/manager should refer to deadwood guidance produced by relevant <b>statutory conservation agencies</b> forestry authorities <b>and others</b> when identifying areas of greatest nature conservation benefit and when planning actions to accumulate deadwood. Reason: There are many different sources of guidance for deadwood, not merely forestry authorities but more likely nature conservation authorities and several others, eg Ancient Tree Forum.</p> <p>Amendment to the second bullet point under Actions may include as follows:</p> <ul style="list-style-type: none"> <li>• Keeping and protecting old <b>and/or</b> previously</li> </ul>
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			<p>deadwood habitat types.</p> <p>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:</p> <ul style="list-style-type: none"> <li>• Wood pasture/parklands</li> <li>• Ancient semi-natural woodland with veteran trees</li> <li>• Long-term retentions and natural reserves</li> <li>• Riparian or wet woodland.</li> </ul> <p>Retained deadwood should be matched to the requirements of those species likely to be important on the site. Habitat diversity is improved by having:</p> <ul style="list-style-type: none"> <li>• Stems of greater than 20 cm diameter, particularly large dimension timber from native species</li> <li>• Snags at variable height</li> <li>• A range of tree/shrub species at varying stages</li> </ul>	<p>pollarded trees alive through appropriate management</p> <p>Reason: The value of deadwood is not only confined to previously pollarded trees but can include other old trees which have not been pollarded..</p> <p>[21] Previous comments about large dispersed WMUs apply.</p> <p>The citing of the current evidence in the guidance section that roughly 20m<sup>3</sup>/ha doesn't define sites or management units in the same way as this document now does.</p> <p>[22] Suggest adding "Deadwood management should not increase the risk of flooding due to blockages of downstream structures."</p>
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			<p>of decay and in a variety of light conditions</p> <ul style="list-style-type: none"> <li>• Deadwood in living trees.</li> </ul> <p><del>Owners/managers should refer to deadwood guidance produced by relevant forestry authorities.</del></p> <p>See also section 5.2.1 relating <i>in relation</i> to mitigation of risks to public health and safety.</p> 	
4.7	Maintenance of local native seed sources			
4.7.1	<p>a) 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).</p> <p>b) 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 (<del>see</del></p>	<ul style="list-style-type: none"> <li>• Seed and plant supply invoices and other relevant records</li> <li>• Evidence of efforts to identify planting stock from source-identified stands in the local native seed zone.</li> </ul>	<p>There should be clear justification where non-local sources are used. This may include reasons of tree vigour, timber quality, and <b>long term forest resilience</b> <del>pest and disease resilience and climate change adaptation.</del></p> <p>The identity code used for parental material includes an 'N' when it applies to native material from known indigenous sources.</p> 	<p>[6] Should b) read <b>whenever</b> not <b>wherever</b></p> <p>[11] Even these woodlands [(a)] will be affected by climate change and we must be encouraged to take actions that will make them more resilient. This policy is still to restrictive and needs to be more challenging.</p> <p>[17] 4.7.1b) [Second sentence] – unclear how this part of the req't differs from the first sentence.</p>

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	FRM). If timber quality is an objective of the planting, the use of stock deriving from selected stands within the local native seed zone shall be considered appropriate.			
4.8	Cultural and historical features/sites			
4.8.1	<p>Through engagement with the relevant <del>authorities</del> <b>statutory historic environment agencies</b>, local people and other interested parties, and using other relevant sources of information, the owner/manager shall:</p> <ul style="list-style-type: none"> <li>Identify sites and features of special cultural and historical significance,</li> <li>Assess their condition, and</li> <li>Devise and implement measures to maintain and/or enhance them, adopting a precautionary approach.</li> </ul> <p><i>See also section 2.3.1.</i></p>	<ul style="list-style-type: none"> <li>Any known features mapped and/or documented</li> <li>Discussion with the owner/manager demonstrates rationale for management of relevant sites</li> <li>Records of consultation with statutory bodies, local authorities and interest groups to identify features</li> <li>Documented plans.</li> </ul>	<p>Examples of relevant sources of information include:</p> <ul style="list-style-type: none"> <li>Maps</li> <li>Databases</li> <li>Field observations.</li> </ul> <p>Typical examples include:</p> <ul style="list-style-type: none"> <li>Prominent viewing points</li> <li>Landscape features</li> <li>Veteran and other notable trees</li> <li>Historical features and archaeological sites</li> <li>Woodlands which feature in literature or which are of artistic significance</li> <li>Historic landscapes and woodlands which are still managed under traditional systems.</li> </ul> <p>Where relevant, a professional archaeological walkover survey may be required to inform decisions and provide baseline</p>	<p>[12] A growing number of consul tees in this area particularly locally , make this excessively time consuming thus making agreement difficult.</p>

			<p>evidence.</p> <p>Sites of potential historical importance discovered during the course of forest management should be reported to the relevant <del>authorities</del> <b>statutory historic environment agencies</b>.</p> <p><i>See also section 2.3.1 in relation to consultation.</i></p> 	
4.9	Game <b>and fisheries</b> management			
4.9.1	<p>Game rearing <b>and release</b>, shooting and fishing shall be carried out in accordance with the spirit of codes of practice produced by relevant organisations.</p>	<ul style="list-style-type: none"> <li><del>• From Field observation no evidence that relevant codes of practice have been broken</del></li> <li>• Relevant permissions and leases</li> <li>• Discussion with the owner/manager/responsible person demonstrates awareness of the law and good practice</li> <li>• Discussion with interested parties</li> <li>• Permissions from statutory <del>Authorities</del> <b>bodies</b> where these are required</li> <li>• Membership of sporting and conservation organisation.</li> </ul>	<p>Consider impacts on native species, principally priority habitats and priority species identified under <del>biodiversity/environment strategies in England, Northern Ireland, Scotland and Wales.</del></p> <ul style="list-style-type: none"> <li><del>• Species that currently have local or regional restrictions on shooting include Black grouse (<i>Lyrurus tetrix</i>) and wild hares (<i>Lepus timidus</i>).</del></li> </ul> <p><del>Feeding and rearing</del> <b>Release and feeding</b> areas should be located in areas where there will be low impact on ground flora.</p>	<p>[19] We would once again state our <b>strong opinion</b> that the use of lead-free ammunition must be a part of a higher level voluntary sustainable forest management standard. The use of lead ammunition is environmentally unsustainable and we would welcome the introduction of an UKWAS requirement to restrict its use in all habitats, not just wetlands.</p>

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			<p>Predator control should be carried out in line with best practice.</p> <p>The use of lead shot over wetland is restricted in <del>relevant codes of practice</del> by regulations.</p>	
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5. People, communities and workforce workers

	REQUIREMENT	EXAMPLE VERIFIERS	GUIDANCE	MAKE CONSULTATION COMMENTS / NOTES HERE
5.1	Woodland access and recreation including traditional and permissive use rights			<p>[11] With regard to access given that in the UK woodland accounts for only about 12% of landuse it is totally false to artificially isolate access in relation to woodland. It must be considered in the context of the total land holding.</p> <p>[12] I have misgivings about unqualified public access; for instance I don't want my badger setts to become widely known for fear of illegal digging. Kingfishers also very prone to disturbance at nesting time. And dogs not on leads can disturb ground nesting birds but may deter roe deer from settling in. The ecological sensitivities of some woodlands are not therefore adequately recognised in this document. [Comment made against 2.3.1]</p>
5.1.1	<p>a) 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.</p> <p>b) A precautionary approach shall be adopted in relation to water supplies.</p>	<ul style="list-style-type: none"> <li>Documentation or maps of all existing permissive and traditional uses of the woodland</li> <li>Discussion with interested parties</li> <li>Field observation of public rights of way</li> <li>Evidence presented to justify any restriction of permissive or traditional uses.</li> </ul>	<p>Permissive and traditional uses include:</p> <ul style="list-style-type: none"> <li>Permissive <del>footpaths and bridleways</del> <b>access routes</b></li> <li><i>De facto</i> access to well-known landmarks</li> <li>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)</li> </ul>	<p>[11] This requirement fails to understand the concept of permissive and is counter productive. Land owners get very annoyed at attempts to make permissive access permanent and this requirement will continue to be a reason why owners do not take up certification.</p> <p>[12] Gathering wild fungi: This is becoming a major problem and FC has been criticised for not pressing for more stringent conditions than the high 1.5kg per person limit per day. If one's land has some sort of Nature Reserve status, it is possible to ban picking except for identification purposes. I do believe the text needs modification here, at the very least to state the present limit which may be unknown to many woodland owners. The owners, it should be recognised, should be able to take down details of indiscriminate collectors, eg car</p>

			<ul style="list-style-type: none"> <li>Water supplies.</li> </ul> <p>Permissive routes can be closed annually to maintain their permissive status.</p> <p>Traditional uses that exploit the woodland resource (e.g. peat cutting) should be carried out at a traditional scale.</p> <p>'Integrity' refers principally to the ecological maintenance of the woodland.</p> 	<p>numbers or photos. This should have the support of UKWAS.</p> <p>[17] [Propose adding requirement title 'Permissive use' and deleting verifier 'Field observation of public rights of way']</p>
5.1.2	<p>a) There shall be provision for some public access subject only to limited exemptions.</p> <p>b) 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.</p>	<ul style="list-style-type: none"> <li>Field observation to confirm that access is available</li> <li>Maps show public rights of way through or beside the wood</li> <li>Evidence of publicised annual open days or guided walks</li> <li>Access agreements with local authorities</li> <li>Evidence that account has been taken of local demand</li> <li>Evidence from consultation with interested parties</li> <li>Records of publicised annual open days or guided walks, school visits or research undertaken in the woodland</li> </ul>	<p>Woodlands containing or adjoining notable historic environment or ecological features may attract large numbers of visitors even to small properties. <b>This presents an opportunity to promote public access and/or educate visitors about the multiple benefits of forestry.</b></p> <p>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.</p>	<p>[12] Where Public access exists via rights of way they frequently become a target for extended public use demands . This provision suggests a presumption in favour of such demands.</p> <p>[17] [Propose adding requirement titles 'Public access' to (a) and 'Added value public recreation provision' to (b).]</p> <p>[Propose replacing (a) with 'There shall be provision for public access in accordance with legislation'.]</p> <p>[Propose adding 'and core paths' to second verifier and 'cultural and' to final verifier.]</p> <p>[Propose adding verifiers:</p> <p>Discussions with access authorities          Number of complaints or access issues          Public rights of way through or beside the wood in plans and kept open          Permissive access on specified routes</p>

		<ul style="list-style-type: none"> <li>Evidence of access provision, path maintenance, conservation management (particularly in regard to visitor erosion) and interpretation at significant historic environment assets.</li> </ul>	<p><b>In Scotland:</b></p> <p>The Land Reform (Scotland) Act (2003) grants a right of responsible access to land, including woodland.</p> <p>Guidance on responsible behaviour together with circumstances where access may be restricted is set out in the Scottish Outdoor Access Code. <b>Some restrictions may present opportunities to raise awareness of ways in which the public can protect woodlands, for example by avoiding fires or adopting biosecurity measures.</b></p> <p><b>In England, Wales and Northern Ireland:</b></p> <p>There is no statutory right of general access to woodland <del>but public access</del> <b>thus emphasising the value of allowing some public access which</b> may be provided through one or more of:</p> <ul style="list-style-type: none"> <li>A permissive freedom to roam</li> <li>Public rights of way through or beside the wood</li> <li>Publicised open days or guided walks each year</li> </ul>	<p>A permissive freedom to roam Evidence of recreation or visitor experience plans]</p> <p>[Propose moving first two paragraphs of guidance to end. Propose replacing guidance for Scotland with:</p> <p>The Land Reform (Scotland) Act (2003) provides for responsible access on foot, cycle or horse and also for responsible management of access by land owners and managers.</p> <p>The Scottish Outdoor Access Code provides guidance on responsible behaviour of those taking and managing access together with circumstances where access may be restricted.</p> <p>In addition supplementary guidance is published on specific aspects such as events and core paths.]</p>
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			<ul style="list-style-type: none"> <li>• Permissive access on specified routes</li> <li>• Access management agreements with local authorities</li> <li>• In England and Wales only - by voluntarily dedicating woodland for public access under the Countryside and Rights of Way Act 2000 (CROW).</li> </ul> <p>Public access, other than on public rights of way, and environmental education may be denied in the following example situations:</p> <ul style="list-style-type: none"> <li>• Woodlands under 10 ha in size with a high private amenity value</li> <li>• Areas that adjoin dwellings or private gardens</li> <li>• Isolated woodlands to which there is no ready access route for the public across adjoining land</li> <li>• Woodlands where there is current evidence of serious and sustained abuse or damage. Persistent vandalism may force owners/managers to place particular</li> </ul>	
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			<p>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</p> <ul style="list-style-type: none"> <li>• Areas of the woodland that contain sites, species or features that would be particularly vulnerable to disturbance</li> <li>• Periods or days when country sports, outdoor recreation or special events would be jeopardised</li> <li>• Temporary closures in order to ensure public safety.</li> </ul> 	
5.2	Minimising adverse impacts			
5.2.1	<p>The owner/manager shall mitigate the risks to public health and safety and other negative impacts of woodland operations on local people.</p>	<ul style="list-style-type: none"> <li>• No evidence of legal non-compliance</li> <li>• Evidence that complaints have been dealt with constructively</li> <li>• Documented evidence that owners/managers have considered actual and potential impacts of operations on local people and interest groups and</li> </ul>	<p>Examples of impacts include:</p> <ul style="list-style-type: none"> <li>• Public safety and access implications of woodland operations</li> <li>• Timber traffic, particularly in and around the woodland</li> <li>• Natural hazards to <del>operators</del> <b>workers</b> and <b>the public</b>, e.g. <del>unsafe</del> <b>hazardous</b> trees</li> </ul>	<p>[17] [Propose changing final verifier to 'Use of risk assessment and site management with safety signs and diversions around active operational sites'.]</p> <p>[Propose adding 'Management of hazards caused by visitor use' to list in guidance.]</p>

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		<ul style="list-style-type: none"> <li>have taken steps to mitigate them</li> <li>Use of safety signs and diversions around active operational sites.</li> </ul>	<ul style="list-style-type: none"> <li>Smoke.</li> </ul> 	
5.2.2	<p>The owner/manager shall respond constructively to complaints, seek to resolve grievances through engagement with complainants in the first instance, and shall follow established legal process should this become necessary.</p>	<ul style="list-style-type: none"> <li>Discussion with interested parties</li> <li>A complaints process</li> <li>A public contact point.</li> </ul>		
5.3	Rural economy			
5.3.1	<p>The owner/manager shall promote the integration of woodlands into the local economy by:</p> <ul style="list-style-type: none"> <li>Making the best use of the woodland's potential products and services consistent with other objectives.</li> <li>Providing local people with equitable opportunities for employment and to supply goods and services.</li> </ul>	<p>Evidence of:</p> <ul style="list-style-type: none"> <li>Local or specialist market opportunities</li> <li>Promoting and encouraging enterprises to strengthen and diversify the local economy</li> <li>Provision for local employment and suppliers.</li> </ul>	<p>Promotion of integration into the local economy may be achieved by:</p> <ul style="list-style-type: none"> <li>Allowing local or specialist markets opportunities to purchase small scale or specialist parcels</li> <li>Promoting and encouraging enterprises which will strengthen and diversify the woodland economy and the local economy</li> <li>Making equitable provision for local employment for contractors and suppliers to provide services and supplies and making this known.</li> </ul>	<p>[11] How does this [second bullet] fit with current EU rules on employment and freedom of movement?</p>

			<p>The woodland's potential products include non-timber forest woodland products and recreational activities.</p> <p>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.</p> <p>Reference to country forestry strategies and engagement with local woodland and community forest initiatives may highlight opportunities to fulfil this requirement.</p>	
5.4	Health and safety			
5.4.1	<p>There shall be:</p> <ul style="list-style-type: none"> <li>• Compliance with health and safety legislation.</li> <li>• Conformance with associated codes of practice.</li> <li>• Conformance with FISA guidance.</li> <li>• Contingency plans for any accidents.</li> <li>• Appropriate competency.</li> </ul>	<ul style="list-style-type: none"> <li>• Field observation that health and safety legislation and codes of practice are being implemented</li> <li>• Discussion with workers demonstrates that they are aware of relevant requirements and have access to appropriate FISA codes of practice</li> <li>• Contracts specifying health and safety requirements</li> <li>• Records maintained and up to date (e.g. accident book, site risk assessments, chemical record book, tree</li> </ul>	<p>This requirement relates to anyone on the work site, including workers and members of the public.</p> <p><b>Advice to owners/managers</b></p> <p>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</p>	

		<p>safety reports)</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• Procedure for monitoring compliance with safety requirements (written for larger organisations) and for dealing with situations where safety requirements are not met</li> <li>• Documented health and safety policy and consideration of issues in all procedures and work instructions</li> <li>• Evidence of a systematic approach to accident prevention.</li> </ul>	<p>guidance.</p> <p>See FISA Guidance listed in the Appendix.</p> 	
5.5	Training and continuing development			
5.5.1	<p>All workers shall have appropriate qualifications, training and/or experience to carry out their roles in conformance to the requirements of this standard, <del>Only those with relevant qualifications, training and/or experience shall be engaged to carry out any work unless working under proper</del></p>	<ul style="list-style-type: none"> <li>• Copies of appropriate certificates of competence</li> <li>• Discussion with workers</li> <li>• System to ensure that only workers who are appropriately trained or supervised work in the woodland</li> <li>• No evidence of <del>personnel</del> workers without relevant training, experience or</li> </ul>	<p>Where requirements of the work are likely to change, a programme of ongoing training and development should be undertaken.</p>	

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	supervision if they are currently undergoing training.	<p>qualifications working in the woodland</p> <ul style="list-style-type: none"> <li>• Documented training programme for <b>staff employees</b></li> <li>• <del>Documented system to ensure that only workers who are appropriately trained or supervised work in the woodland</del></li> <li>• Training records for all <b>staff employees</b>.</li> </ul>		
5.5.2	The owner/manager of large enterprises shall promote training, and encourage and support new recruits to the industry.	<ul style="list-style-type: none"> <li>• Documented policy</li> <li>• Involvement with industry bodies promoting training, including FISA</li> <li>• Records of training sessions, provision of sites for training, subsidies for training courses.</li> </ul>	<p>Promotion of training may be achieved through:</p> <ul style="list-style-type: none"> <li>• Providing sites for training courses</li> <li>• Offering subsidies for training courses.</li> </ul>	
5.6	Workers' rights			
5.6.1	<p>Workers' rights shall be respected, including:</p> <ul style="list-style-type: none"> <li>• Workers shall not be deterred from joining a trade union or employee association.</li> <li>• Workers shall be permitted to negotiate terms and conditions collectively with their employers should they so wish.</li> <li>• There shall be compliance with equality legislation.</li> </ul>	<ul style="list-style-type: none"> <li>• Discussion with workers</li> <li>• Documented policies.</li> </ul>		[14] could suggest under section 5.6.1 c) <i>there shall be compliance with equality, <u>anti-slavery and human trafficking legislation</u></i>

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5.7	Insurance			
5.7.1	The owner/manager and workers shall <del>hold and demonstrate</del> <b>be covered by</b> adequate public liability and employer's liability insurance.	<ul style="list-style-type: none"> <li>• Insurance documents</li> <li>• Self-insurance with a policy statement.</li> </ul>		[16] The Department of Agriculture and Rural Development carries its own risk and does not take out third party public liability insurance. A form of words to cover this scenario may include; The owner/manager and workers shall be covered by adequate insurance including public liability and employers liability insurance where required.

## Glossary of Terms

### PLEASE MAKE COMMENTS ON THE GLOSSARY OF TERMS HERE

[12] There are some off-putting bits that have crept in, either jargon or bits that are gobbledegook which I feel could be tidied up. A couple of examples  
Environmental values Why introduce this terminology when all it really means is “the environment”?  
Precautionary approach. What does this mean in practice and how will an external auditor interpret this? A potential black hole at audit.

[20] We maintain that it is counter-productive and short sighted of UKWAS not to make provision for owners/managers of genuinely small woodlands.  
Even a definition within this glossary would keep a door open to what will otherwise be seen as a negative message.

[25] Environmental Appraisal

*Generic term for the process of assessing the impact of plans or operations on the environment. This includes both the Opinion stage and the Determination stage*

Environmental impact assessment

*Environmental impact assessment (EIA) is the process and documentation associated with the statutory requirement under “the ~~EU Environmental Assessment Directive~~.  
EIA Forestry Regulations 1999”. (England and Wales, Scotland and Northern Ireland)*

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.*

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Ancient woodland site	See <i>Woodland</i> .
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)	<del>A statutory designation in Northern Ireland that offers statutory protection to habitats and species.</del> A designated site providing statutory protection for the best examples of the flora, fauna, or geological or physiographical features of Northern Ireland. ASSIs also underpin other national and international nature conservation designations.
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.
Broadleaves	Broadleaved trees are characterised by their broad leaves and most are deciduous. They produce 'hardwood' timber. <i>Also see Conifers.</i>
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

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	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. <i>Also see Broadleaves.</i>
Coppice	Management based on regeneration by re-growth from cut stumps (coppice stools). The same stool is used through several cycles of cutting and re-growth. <i>Also see short rotation coppice.</i>
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	<del>Department of Agriculture and Rural Development – the government department responsible for the regulation of forestry and the</del>

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	<p><del>management of the state woodlands in Northern Ireland. Also see <i>Forest Service</i>.</del></p>
Deadwood	<p>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.</p>
Design Plan (Forest Design Plan)	<p><del>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.</del></p> <p>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 implications of the proposed felling.</p>
Diffuse pollution	<p>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.</p>
Drainage	<p>An operation to remove excess water from an area in a controlled way. In woodlands, drains are usually open, unlined channels.</p>
Ecosystem	<p>A community of plants and animals (including humans) interacting with each other and the forces of nature.</p>
Ecosystem services	<p>The benefits people obtain from ecosystems. These include:</p> <ul style="list-style-type: none"><li>• provisioning services such as food, forest products and water;</li></ul>

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	<ul style="list-style-type: none"><li>• regulating services such as regulation of floods, drought, land degradation, air quality, climate and disease;</li><li>• supporting services such as soil formation and nutrient cycling; and</li><li>• cultural services and cultural values such as recreational, spiritual, religious and other non-material benefits.</li></ul>
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	<p>The following set of elements of the biophysical and human environment:</p> <ul style="list-style-type: none"><li>• ecosystem functions (including carbon sequestration and storage);</li><li>• biological diversity;</li><li>• water resources;</li><li>• soils;</li><li>• atmosphere;</li><li>• landscape values (including cultural and spiritual values).</li></ul> <p>The actual worth attributed to these elements depends on human and societal perceptions.</p>
FC	<i>See Forestry Commission.</i>
Felling licence	Licence issued by the <del>Forestry Commission</del> <b>relevant forestry authority</b> to permit trees to be felled. With certain exceptions it is illegal to fell trees in <del>Great Britain</del> without prior <del>Forestry</del>

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	<del>Commission approval. Similar arrangements are anticipated in Northern Ireland.</del>
FEPA	Food and Environment Protection Act 1985.
FISA	Forest Industry Safety Accord.
Forest	Synonymous to woodland. <i>See Woodland.</i>
Forest management unit (FMU)	Synonymous to woodland management unit. <i>See Woodland management unit (WMU).</i>
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, <a href="#">Department of Agriculture and Rural Development</a> /Northern Ireland Forest Service, Forestry Commission Scotland and Welsh Government/Natural Resources Wales or their successor bodies.
<a href="#">Forestry leaseholder</a>	<a href="#">The holder of a forest lease that grants control over the management of forestry operations.</a>
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 woodland.
Group selection	A method of managing irregular stands in which regeneration is achieved by felling trees in small groups.

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High conservation value	Areas and features of ecological and biodiversity interest identified in sections 4.1-4.3 and 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 <a href="http://www.fco.gov.uk">www.fco.gov.uk</a> 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.
Landscape level	The level of the landscape unit.
Landscape unit	An area of broadly homogeneous landscape character.
Local Authority	<i>See Statutory body.</i>
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

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	<p>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.</p>
Long-term retention	<p>Individual, stable stands and clumps of trees retained for environmental benefit significantly beyond the age or size generally adopted by the woodland enterprise.</p>
Lop and top	<p>Woody debris from cutting operations, sometimes converted into chippings.</p>
Low intensity managed woodland	<p>Woodland management units are classed as being managed in a low intensity manner when:</p> <p>a) the rate of timber harvesting is less than 20% of the mean annual increment (MAI) within the total production woodland area of the unit</p> <p>AND</p> <p>either</p> <p>b) the annual harvest from the total production woodland area is less than 5,000 cubic metres</p> <p>or</p> <p>c) the <i>average</i> annual timber harvest from the total production woodland is less than 5,000 m<sup>3</sup>/year during the period of validity of the certificate as verified by harvest reports and surveillance audits.</p> <p><i>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.</i></p>

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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	<i>See Woodland management plan.</i>
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)	<del>A statutory designation that offers statutory protection to habitats and species.</del> A designated site containing examples of some of the most important natural and semi-natural terrestrial and coastal ecosystems, managed to conserve their habitats or to provide special opportunities for scientific study of the habitats, communities and species represented within them. In addition they may be managed to provide public recreation that is compatible with their natural heritage interests.
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-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 conditions	Native species, associations of native species and other environmental values that are typical of the locality.
Natural reserve	Natural reserves are predominantly wooded usually mature and intended to reach biological maturity. They are permanently

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	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.
Owner/manager	The person or entity holding or applying for certification and therefore responsible for demonstrating conformance to this standard.
PAWS	Plantation on ancient woodland site. <i>See Woodland.</i>
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.
Plantation	<i>See Woodland.</i>
Plantation on ancient woodland site (PAWS)	<i>See Woodland.</i>
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

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Priority habitats and species	<p>Development)</p> <p>Priority habitats and priority species identified by statutory nature conservation and countryside agencies under biodiversity/environment strategies in England, Northern Ireland, Scotland and Wales. Priority species include Red List species.</p> <p><i>Also see Statutory body.</i></p>
Protected, rare and endangered species	<p>Species which are:</p> <ul style="list-style-type: none"><li>• protected under European law (European Protected Species),</li><li>• protected under the Wildlife and Countryside Act 1981, and/or</li><li>• categorised as Near Threatened, Vulnerable, Endangered or Critically Endangered in the IUCN Red List.</li></ul>
Provenance	<p>Location of trees from which seed or cuttings are collected.</p> <p>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.</p>
Publicly available	<p>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.</p>
Public Rights of Way	<p>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.</p> <p>In Northern Ireland, records of public rights of way are held by district councils.</p>

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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.)  <i>Also see Access.</i>
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.  These include: <ul style="list-style-type: none"><li>• Woodland specialist flora. These are species with a strong affinity for ancient woodland but may vary in relation to geographic region</li><li>• Trees originating from the pre-plantation stand. They can be maidens, standards, coppice stools or pollards and may include ancient or veteran trees</li><li>• Deadwood originating from the pre-plantation stand, coarse woody debris and associated decomposer communities</li><li>• Undisturbed woodland soil profile.</li></ul> These features provide the continuity of habitat with the pre-plantation phase.
Restocking	Replacing felled areas by sowing seed, planting or natural

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	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	<i>See Woodland.</i>
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. <i>Also see coppice.</i>
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)	<del>A statutory designation in Great Britain that offers statutory protection to habitats and species.</del> <b>A designated site providing statutory protection for the best examples of the flora, fauna, or geological or physiographical features of England, Scotland and Wales. SSSIs also underpin other national and international nature conservation designations.</b>
Small coupe felling	A small scale clearfelling system. The system is imprecisely defined 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.

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Snag	A standing dead tree that has lost its top.
Special Area for of 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)	<p>There are four categories:</p> <ul style="list-style-type: none"><li>• The statutory nature conservation and countryside agencies: Natural England, Scottish Natural Heritage, Natural Resources Wales and the Northern Ireland Environment Agency or their successor bodies</li><li>• 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</li><li>• The statutory historic environment agencies: <del>English Heritage</del> <b>Historic England</b>, Historic Scotland, Cadw (in Wales) and the Northern Ireland Environment Agency or their successor bodies</li><li>• Local authorities responsible for a wide range of functions including highways and planning.</li></ul>
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.
Timely manner	<b>As promptly as circumstances reasonably allow; not intentionally postponed by the owner/manager.</b>
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

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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.

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 **relevant forestry authority** ~~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)**.

Woodland management plan

The collection of documents, reports, records and maps that

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	<p>describe, justify and regulate the activities carried out by any manager, staff or organization in a management unit, including statements of objectives and policies.</p>
Woodland management unit (WMU)	<p>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.</p>
Workers	<p>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.</p>

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

### PLEASE MAKE COMMENTS ON THE APPENDIX HERE

[14] In the appendix draft version 2 Feb 2016 add in the reference *Modern Slavery Act 2015*

[17] Should the Scottish Government Policy on Woodland Removal be added?

(<http://scotland.forestry.gov.uk/supporting/strategy-policy-guidance/woodland-expansion/control-of-woodland-removal>)

[25] Key Legislation - add

1999 The Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999

1999 The Environmental Impact Assessment (Forestry) (Scotland) Regulations 1999

2000 The Environmental Impact Assessment (Forestry) (Northern Ireland) Regulations 2000

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 February 2016 but should 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.jncce.defra.gov.uk](http://www.jncce.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

## **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](http://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](http://www.netregs.gov.uk).

## **Other Reference Documents**

Other main reference documents are provided in a separate Appendix document available on [www.ukwas.org.uk](http://www.ukwas.org.uk).

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

## **The following are new or changed references to be inserted into the online Appendix document:**

### **1.1 Compliance and conformance**

Legislation:  
2010: Bribery Act 2010

Ministry of Justice Quick Start Guide  
Undated: Bribery Act 2010

### **2.2 Documentation**

Forestry Commission Scotland:  
2009: The Scottish Government's Policy on Non-Timber Forest Products

### **2.8 Tree species selection**

Forestry Commission Bulletin:  
2001: No. 124, An Ecological Site Classification for Forestry in Great Britain

Forest Research:

Online: Ecological Site Classification Decision Support System (ESC –DSS) ([www.forestry.gov.uk/fr/infd-5v8jdg](http://www.forestry.gov.uk/fr/infd-5v8jdg))

## 2.11 Protection

Deer Initiative ([www.thedeerinitiative.co.uk](http://www.thedeerinitiative.co.uk)):

Various: Best Practice Guides

Scottish Natural Heritage (and others):

Online: Best Practice Guides (<http://www.bestpracticeguides.org.uk/guides>)

## 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?

Forestry Commission Technical Note:

2005: No. 11, Protecting the Environment during Mechanised Harvesting Operations

3.6 Waste

Up to date waste regulations?

## 4.3 Plantations on ancient woodland sites (PAWS)

Forestry Commission Practice Guides:

2003: No. 14, Restoration of Native Woodland on Ancient Woodland Sites

2013: No. 21, Choosing Stand Management Methods for Restoring Planted Ancient Woodland Sites

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

Forestry Commission Practice Guide:

2014: No. 24, Managing Open Habitats in Upland Forests

Forestry Commission Guideline Note:

2000: No. 1, Forests and Peatland Habitats

Forestry Commission Scotland Practice Guide:

2015: No. 104, Deciding future management options for afforested deep peatland

Northern Ireland Forest Service:

1993: Afforestation – The DANI Statement on Environmental Policy

#### **4.9 Game management**

British Association for Shooting and Conservation (and others) ([www.codeofgoodshootingpractice.org.uk](http://www.codeofgoodshootingpractice.org.uk)):  
2012: Code of Good Shooting Practice

Game and Wildlife Conservation Trust ([www.gwct.org.uk](http://www.gwct.org.uk)):  
2007: Guidelines for Sustainable Gamebird Releasing

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

Legislation:

2000: Countryside and Rights of Way Act 2000

2003: Land Reform (Scotland) Act 2003

Department for Food and Rural Affairs:

2010: Authorising structures (gaps, gates & stiles) on rights of way: Good practice guidance for local authorities on compliance with the Equality Act 2010

2015: The Guide to Cross Compliance in England.

Forestry Commission Scotland Practice Note:

2013: No. 104, Managing Woodland Access and Forest Operations in Scotland

Natural England:

Online: Public rights of way: landowner responsibilities ([www.gov.uk/guidance/public-rights-of-way-landowner-responsibilities](http://www.gov.uk/guidance/public-rights-of-way-landowner-responsibilities))

Online: Open access land: management, rights and responsibilities ([www.gov.uk/guidance/open-access-land-management-rights-and-responsibilities](http://www.gov.uk/guidance/open-access-land-management-rights-and-responsibilities))

Scottish Outdoor Access Code ([www.outdooraccess-scotland.com](http://www.outdooraccess-scotland.com)):

2005: Scottish Outdoor Access Code

#### **5.4 Health and safety**

Forest Industry Safety Accord Guides:

General:

2014: Guidance on Managing Health and Safety in Forestry

Establishment:

102 Pre-Planting Spraying of Container-Grown Seedlings

103 Planting

104 Fencing

Lifting and Handling:

LOLER: How the Regulations apply to Forestry

LOLER: How the Regulations apply to Arboriculture

Maintenance:

203 Clearing Saw

204 Flails and Mulchers in Tree Work

Chainsaws:

301 Using Petrol-Driven Chainsaws

302 Basic Chainsaw Felling and Manual Takedown

303 Chainsaw Snedding

304 Chainsaw Cross-Cutting and Manual Stacking

306 Chainsaw Clearance of Windblow  
307 Chainsaw Felling of Large Trees  
310 Use of Winches in Directional Felling and Takedown

Extraction:

501 Tractors Units in Tree Work  
502 Extraction by Skidder  
503 Extraction by Forwarder  
504 Extraction by Cable Crane  
506 Extraction by Horse

Processing:

601 Mobile Circular Saw Bench  
602 Mobile Peeling Machine  
603 Mechanical Harvesting  
604 Wood Chippers  
605 Mechanical Roadside Processing  
607 Firewood Processors

Vehicles:

701 ATV Quad Bikes  
702 All-Terrain Vehicles  
703 Debogging and Recovery of Forestry Machines  
704 Excavators in Tree Work  
705 Steep Slope Working in Forestry

General Safety:

802 Emergency Planning  
803 Firefighting  
804 Electricity at Work: Forestry  
805 Training and Certification

Forestry Commission Practice Note:

2013: No. 19, Managing public safety on harvesting sites

Health and Safety Executive (HSE):

1999: Simple guide to the Lifting Operations and Lifting Equipment Regulations 1998  
1999: Simple guide to the Provision and Use of Work Equipment Regulations 1998  
2012: A guide to the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995  
2013: Chainsaws at Work

**5.6 Workers' rights**

Advisory, Conciliation and Arbitration Service (ACAS) Guides:

2015: Equality and discrimination: understand the basics  
2015: Prevent discrimination: Support equality  
2015: Discrimination: What to do if it happens

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