

United Kingdom Woodland Assurance Standard

UKWAS Revision 2013-16 (Pre-approval Draft) (March 2016)

Consultation Report & Steering Group Responses

30th April 2016

The Steering Group responses reflect discussions as follows:

- UKWAS Drafting Group – 22-23.03.16
- UKWAS Drafting Group – 29.03.16
- UKWAS Steering Group – 12.04.16

Key:

Proposals highlighted in **green** are those where a change has been made, those highlighted in **red** are those where no change has been made. Steering Group responses to the consultation feedback received are shown in **red**.

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1. Introduction

1.1 Background

A public consultation to generate feedback on the Pre-approval Draft of the UK Woodland Assurance Standard was carried out for 30 days between 15 February 2016 and 16 March 2016.

The following documents were made available on the UKWAS website:

- A Consultation Paper.
- The Pre-approval Draft Standard in two versions:
 - A short version which included requirements only.
 - A full version which included a consultation feedback column.
- The Standard Appendix.
- A Consultation Report on the previous public consultation (September-October 2015), including annexes containing details of all comments received.

The responses were analysed in March 2016.

The Pre-approval Draft Standard is broken down into Requirements as follows:

- 5 principal sections (e.g. 3: *Forestry operations*).
- 40 sub-sections (e.g. 3.1: *General*).
- 78 clauses (e.g. 3.1.1).

The Consultation Paper did not request answers to any specific questions, but stakeholders were reminded that ‘this is the third opportunity to make input and we are seeking comments primarily on the changes made since the previous Consultation Draft was issued in September’.

Some comments were made directly on copies of the Pre-approval Draft Standard, some were submitted in other written forms, and some respondents provided comments in both forms. One respondent commented by telephone. Comments made directly on the Standard have been combined into the consolidated feedback in Annex 1 to this report. Comments submitted in other forms have been combined into the unedited general comments in Annex 2 to this report, but where they clearly apply to specific sections of the Standard they are also included in Annex 1.

General comments are summarised in Part 2 of this report, including a summary checklist. Specific comments are summarised in Part 3. These two parts are intended as the working checklists to make it easy for the drafting team to consider each issue without recourse to the raw responses. However, the reader is recommended to refer to each respondent’s full comments given in Annex 1 and Annex 2 since these often contain important elaboration on the summary point. Respondents are identified by the numbers in Appendix 1 (no respondents requested that their names be withheld).

1.2 Characteristics of respondents

26 organisations or individuals responded to the consultation.

All the comments were from organisations based in the UK and can be characterised as follows:

- Woodland owners and forestry practitioners (13)
- Wood processing industry (2)
- Country forestry authorities and forestry enterprises (3)
- Environmental organisations (2)
- UK countryside, environment and heritage agencies (2)
- Forest user organisations (1)
- Certification bodies (1)
- Other (2)

Where an organisation has two or more roles, the organisation's most relevant role was taken as its primary interest category.

A full list of respondents is given in Appendix 1.

2. General overall comments

18 respondents made comments which were general in nature or applied to several sections of the standard. The full text of these comments may be found in Annex 2.

2.1 Positive feedback

Several respondents gave positive feedback [1, 3, 10, 20, 21] or indicated that they had no outstanding issues with the Pre-approval Draft [7, 8, 23]. Positive feedback largely related to the improved structure of the standard or the general nature of changes, but other areas attracting praise were the relative brevity [1], the move away from a prescriptive 'forestry by numbers' approach [10], the 'size neutral' approach [10], the greater emphasis on protecting woodlands from conversion to other land uses [20], the new requirement on veteran trees [20], the new requirement to halt operations when they damage valuable habitats or features [20], and the greater protection of non-timber woodland products during harvesting [20].

Two respondents voiced general support for certification against UKWAS [13, 22]. One respondent [12], reporting the views of their members, stated that 'A small number of respondents (8 or 12%) are open minded or supportive of certification on the grounds of:

- i. The business case is strong
- ii. Access to markets justifies the effort
- iii. It is seen as a useful tool to improve the quality of woodland management
- iv. It supports UK forestry and is a safeguard against illegal logging'

2.2 Negative feedback

2.2.1 General

One respondent [12] canvassed their members for views not just on the Draft Standard but also on certification in general. While some members commented on specific sections (as recorded in Annex 1), the respondent summarised the negative feedback as follows:

Of the 63 responses, the majority (52%) are not persuaded by the revised standard. The views expressed are not based on a close (or any) examination of the draft standard, but are nevertheless strongly held. This would indicate that despite efforts to make the revised standard more simple and accessible, it will not have a material, if any impact on levels of participation.

The detailed feedback from this respondent [12] on their members' views on barriers to certification may be found in Annex 2.

Other respondents shared the view that the Standard was not attractive to many woodland owners. One [1] suggested that 'Small woodland owners will still view it with dismay, and farmers will still be discouraged from planting woodland', while another [11] stated that 'I am not convinced that any of the changes have made certification more attractive to the vast majority of owners'. Another respondent [10] noted that while 'UK Certification has become the norm for the FC, NRW and the large investment plantation companies, ... it has struggled to gain traction and has in fact alienated many other forest owners. The next 12 months is crucial for certification to demonstrate that it is appropriate and applicable for all forest owners and managers, not just the biggest and simplest.'

2.2.2 Revision process

One respondent [5] was critical of the previous public consultation, noting the 'dismal response' of 25 respondents and 'the almost total failure to adopt any of the suggestions offered by consultees', and observing that 'at least 15 of 25 consultee respondents are members of UKWAS or on the panel'. Another respondent [19] noted that 'many of our comments from the second public consultation have been discounted'.

Two respondents [19, 20] raised concerns about the 'imbalance of stakeholder interests' represented at Drafting Group and Steering Group meetings. While one [20] voiced general concerns about what this might mean for the 'weighting of stakeholder feedback' and the ratification of UKWAS 4 by FSC International and PEFC International, the other [19] expressed the specific concern that 'the UKWAS Steering Group appears to be comprised mainly of stakeholders with an economic interest in commercial forestry':

We feel that the revisions to the Standard reflect this apparent imbalance, with a lessening of environmental and social content, compared to previous versions, being evident. We believe that the Standard must not prioritise economic benefits, particularly where the benefits are directed towards private interests, as opposed to public good.

2.3 Other observations

Other general comments are summarised in the four sub-sections below. Any remaining comments have been incorporated into the consolidated feedback in section 3 and Annex 1.

2.3.1 Structure and content of the Standard

Two respondents [3, 17] commented on the nature and role of guidance in the Draft Standard. One [17] considered some guidance to be too lengthy, and also observed ‘instances where the guidance is effectively being presented as part of the requirement’; in these instances, it was suggested, the requirement should, where appropriate, ‘be amended to incorporate the relevant aspects covered in the guidance’. The other respondent [3] saw guidance as fundamental to the interpretation of the standard, particularly by auditors, and considered that ‘changes (if any) should focus on making the guidance notes more flexible’. A number of specific comments on guidance are included in Annex 1.

It was suggested that ‘The standard could benefit from a review to ensure it is written in plain English’ [12]. Some specific comments on terminology are included in Annex 1. One respondent [11] questioned the removal of the terms ‘forest’ and ‘forestry’ and asked that they be reinstated.

One respondent [9] reiterated a request for a guide to changes between UKWAS 3.1 and UKWAS 4.

2.3.2 Small or low intensity managed (SLIM) woodlands

One respondent [20] disagreed that the ‘size neutral’ approach was a positive development (compare the opposing view of another respondent [10] noted in section 2.1 above). They noted that UKWAS treats the many UK woodlands less than 10 ha in size, which the respondent viewed as ‘low risk’, in almost the same way as ‘intensively managed and/or extensive forests’. They suggested that ‘Having an UKWAS which at least recognises and even better caters specifically for genuinely small woods, is the first step towards making certification more accessible and ultimately more affordable to an audience of owners and managers who quite understandably do not engage – there is little if any incentive for them to do so at present’. As a minimum, they proposed that a definition of a small woodland be retained in the Glossary:

Deleting all reference to small woodlands sends out a negative message by UKWAS given that this is the reality of woodland ownership in the UK... Both the Woodland Trust and FSC-UK are prepared to do more to help genuine small woodlands so shutting the door completely at this stage is unhelpful.

They also reiterated their opposition to the definition of a small woodland in UKWAS 3.1 as one of 500 ha or smaller.

Another respondent [19] shared the concern that ‘the definition of “small woodland” has been removed’.

2.3.3 Compliance with the law

One respondent [1] reiterated their view that requirements for compliance with the law were superfluous:

Clauses 1.1.1, 1.1.3, 1.2.1, 3.3.1, and 5.4.1 first bullet point, all just amount to “obey the law”: but everyone should obey the law anyway, so these clauses are pointless.

However, another respondent [14] highlighted a need ‘to declare compliance (or continuous improvement towards that)’ with the Modern Slavery Act 2015 ‘not only for our company but also for our supply chain’, and suggested that UKWAS could be a good vehicle for demonstrating supply chain compliance. With the addition of explicit references to anti-slavery and human trafficking legislation, businesses in the forest products sector could ‘refer to UKWAS as a means of awareness and continuous improvement’. Specific suggestions to address this issue are included in Annex 1.

2.3.4 Woodland management issues

A number of comments related to specific woodland management issues without necessarily relating to particular requirements in the Draft Standard. They are covered below in the approximate order in which they are addressed in the Standard.

One respondent [12] queried the basis for consultation requirements:

A point I suggest requiring reconsideration concerns the provisions under 2.2 and 2.3. The object of certification is to ensure sustainability in all aspects. A good owner or manager will do that anyway - it is fundamental to good forestry practice. However another principle for a manager is that management complies with the owners wishes (if these are unsound then a manager will advise the owner accordingly and if his advice is not accepted should decline to act). However the owner has property rights. If he accepts grants from the State, then he may be required to accept some restrictions on those rights to obtain the grant - that is his choice. He may also choose not to accept the grants. It would then be an infringement on his property rights to expect compliance with the provisions under 2.2 and 2.3 before certification is granted. The requirements under the these sections concerning consultation etc. have NOTHING to do with sustainability and at best can only be described as SOCIAL ENGINEERING. As a woodland owner I would not expect to give my views or advise on cropping patterns in a neighbours’ fields or for that matter on the colour of a house to be seen in the distance.

One respondent [2] felt that UKWAS failed to address the two most important issues in woodland sustainability, namely:

Understanding and management of the soil, including management and replenishment of nutrients, micronutrients and minerals and understanding and care of the microbiome of the soil, evolved over hundreds of millions of years, about which we know little and to which we can inadvertently do so much harm. Without the soil and its support the woodland or forest would not exist.

Understanding and management of the appropriate trees and associated plants, insects, etc. Without such understanding we cannot hope to succeed.

The respondent suggested that the second point was addressed indirectly through various best practice, but that the first and most important was not addressed at all.

One respondent [20] expressed concern that ‘maximum clearfell thresholds for plantations which are currently 5ha in the lowlands and 20ha in the uplands have been removed’ (current requirement 3.4.2 in UKWAS 3.1):

Clearfell coupes of significant size (over the thresholds set in UKWAS 3.1) have significant negative impacts on social and environmental values. For the public, large clearfell sites are the poorest advert for forestry and are of questionable ecological and social benefit, particularly for deadwood dependent invertebrates and bird-life and recreational values.

This issue is also raised in specific comments on requirement 2.7.1 in Annex 1.

One respondent [11] raised concerns that the Draft Standard ‘does not reflect the changes that will be necessary to respond to climate change and pests and diseases’. A number of specific comments relating to forest resilience are included in Annex 1.

One respondent [19] reiterated their concerns that ‘the revision represents an easing of environmental standards and a movement towards being a certification scheme for large scale timber production’, that ‘the content and approach of the revised Standard does not sufficiently drive biodiversity enhancement for priority species and habitats’, and that ‘this iteration of the Standard appears to represent a weakening of safeguards for environmental objectives compared to previous versions’. However, another respondent [12] raised concerns about the level of emphasis on species and habitat action plans:

I am concerned about the constant ebbing away at productive forestry – as if Forestry was a highly damaging activity, and as if it was making dreadful contributions to biodiversity and climate change – when compared to nearly all other land uses it has many climate change and biodiversity merits.

Also on the subject of habitats, a further respondent [11] observed that the Standard ‘takes no account of the current discussions about what constitutes a valuable habitat (rewilding) i.e. that’s what is happening when trees colonise open land’.

The same respondent [11] suggested that the Standard did not reflect ‘land use changes that will be necessary to enable trees woods and forests to play a full role in improved water management’. Another respondent [22] suggested that there should be clearer references to River Basin Management Plans and flood risk:

Well managed forestry provides opportunities to protect and improve the water environment and deliver the targets set in the river basin management plans for the Scotland and Solway Tweed river basin districts. There are a number of options for using forestry to control runoff and reduce soil erosion and sediment delivery. These include targeted woodland planting to protect erosion sources, the use of woodland shelterbelts or buffer areas to interrupt the transport and delivery of sediment to watercourses, and the restoration of riparian and floodplain woodland to protect river banks and enhance sediment retention by slowing down the flow of flood water.

While stressing the importance of conformance to UKWAS, this respondent also emphasised the importance of complying with legislation such as the Water Environment (Controlled Activities) (Scotland) Regulations and Environmental Impact Assessment (EIA) Regulations.

2.4 Summary of general comments

This is a summary of the comments in the preceding sections, provided for the convenience of the drafting team when considering the issues raised. Individual respondents are not identified.

2.4.1 Structure and content of the Standard

Issues:

- Shorten guidance.
Steering Group response: The Group agrees that brevity is preferable in all parts of the Standard. However, there are still many areas where Standard users seek clarification and there have been a number of requests for further additions to guidance even in this most recent consultation. Guidance should be seen as aiding, rather than hindering, conformance to the Standard.
- Move guidance text to requirement where appropriate.
Steering Group response: This has been done wherever it was considered necessary earlier in the revision process; the Group is now confident that all such issues have been addressed.
- Make guidance more flexible.
Steering Group response: The explanation of guidance in ‘Using the certification standard’ makes it clear that it is intended to help Standard users, and while it may contain recommendations or examples of appropriate action the owner/manager is not bound to follow it.
- Rewrite Standard in plain English.
Steering Group response: The Group acknowledges that much could be done to simplify the language of the Standard. However, the current wording reflects a consensus agreed among a wide range of interests, and to radically simplify the language would require considerable negotiation to ensure that all of the nuances of meaning were preserved; this is beyond the scope of the current revision. The Group has taken whatever opportunities it can to simplify and shorten text where this will not affect the interpretation of the Standard.
- Reinstate terms ‘forest’ and ‘forestry’.
Steering Group response: These terms are still used in the Standard, but the preponderance of the term ‘woodland’ is consistent with the UKWAS name.
- Provide a summary of changes to the Standard.
Steering Group response: It is still the intention of the Group to provide a narrative summary of changes to the Standard at the end of the revision process.

2.4.2 Small or low intensity managed (SLIM) woodlands

Issues:

- Reconsider stance on small woodlands, as a minimum reinstating a definition in the Glossary.
Steering Group response: The Group stands by its decision to make the Standard size-neutral, on the basis that flexibility in application will offer the greatest advantages to all sizes of woodland. It is not appropriate to include in the Glossary a term which is not used in the Standard.

2.4.3 Compliance with the law

Issues:

- Consider necessity of requirements for compliance with the law.
Steering Group response: Legal compliance is a fundamental element of certification. There are many instances where explicit mention of certification scheme requirements is avoided in UKWAS through reference to legal requirements; legal compliance must therefore be included in the Standard requirements so that appropriate elements may be audited and corrective action taken where there are failings.
- Consider role for UKWAS in demonstrating compliance with the Modern Slavery Act 2015.
Steering Group response: The Group does not believe that reference to anti-slavery and human trafficking legislation is appropriate within the Standard requirements, but the *Modern Slavery Act 2015* has been added to the Appendix.

2.4.4 Woodland management issues

Issues:

- Consider basis for consultation requirements.
Steering Group response: Consultation is a vital part of the social element of sustainable forest management.
- Address fundamental woodland ecology.
Steering Group response: The current draft Standard goes further than ever before, in requirement 2.4.1, to address the fundamental importance of woodland soils. It is not appropriate for the Standard to address in detail the understanding and management of woodland vegetation, but the appropriate choice of tree species and silvicultural systems are long-standing requirements.
- Reinstate maximum clearfell coupe sizes.
Steering Group response: The Group believes that the removal of these limits was pragmatic and appropriate, and that there are sufficient checks on coupe sizes, particularly in terms of landscape, within the Standard.
- Consider further changes to address climate change and tree pests and diseases.
Steering Group response: Long-term forest resilience, including responses to climate change and tree pests and diseases, is addressed throughout the Standard, and further explicit references have been included in response to feedback in this consultation.
- Consider stance on biodiversity enhancement and safeguards for environmental objectives.
Steering Group response: The Group does not believe that environmental requirements have been weakened in this revision, and on the contrary would point to new requirements on veteran trees and diffuse pollution as examples of an even stronger emphasis on biodiversity enhancement and environmental protection.
- Consider stance on priority species and habitats.
Steering Group response: The Group is well aware of the many environmental benefits of forestry, but these do not do away with the need to afford national priority habitats and species every protection.

- Consider stance on rewilding/colonisation by trees of open habitats.
Steering Group response: The Group does not consider it necessary or desirable to steer owners/managers on this subject. Appropriate management of semi-natural habitats should be determined on a case by case basis, guided by expert advice where necessary. Open habitats are valued for a variety of reasons by many stakeholders.
- Consider further opportunities to address River Basin Management Plans and flood risk.
Steering Group response: The Group is reluctant to make explicit references to River Basin Management Plans without a clearer understanding of what the implications might be for woodland management. However, guidance steers the owner/manager to consider the effects of management on water catchments.

3. Detailed comments

The full text of comments on specific points in the standard are contained in the consolidated feedback in Annex 1, with individual respondents identified as per Appendix 1. The following sections summarise the main issues in these comments, and do not identify individual respondents.

Introduction section

Sub-section 1: Background and purpose

Issues:

- **Add** reference to legal requirements.
Steering Group response: This is not appropriate here, the existing wording being an accurate reflection of the basis for the Standard. However, guidance has been added to 1.1.1.
- **Consider** necessity of reference to list of certification schemes.
Steering Group response: Retained to future-proof the Standard.

Sub-section 2: Procedures for use of the certification standard

Flexibility in meeting requirements

Issues:

- **Term** 'WMU' used before is it defined.
Steering Group response: The WMU definition has been moved to the beginning of the sub-section.
- **Consider** explaining that not every woodland will be managed for economic purposes.
Steering Group response: The Group considers this to be self-explanatory.
- **Term** 'verifiers' used before it is defined.
Steering Group response: Reference added to verifier definition.

Third party rights

Issues:

- **Reconsider** requirement for 'no evidence of complicity with illegal activity'.
Steering Group response: Deleted as unnecessarily negative.
- **Consider** pro-active declaration of foreseen third-party activity which would disqualify areas from certification.
Steering Group response: Suggestion dropped on discussion.

The woodland management unit

Issues:

- **Add** detail on appropriate management planning to definition of WMU.
Steering Group response: The wording suggested by the respondents was too specific, but a more generic explanation has been added.
- **Reconsider** definition of WMU.
Steering Group response: The definition is deliberately broad to allow flexibility of application, but a point of principle has been added to the definition to address large and/or widely geographically dispersed WMUs.
- **Consider** sub-units of WMUs.
Steering Group response: This suggestion has not been adopted on the grounds that it would introduce too much complication and too many practical difficulties.

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

Issues:

- **Emphasise** importance of requirements and evidence of conformance not being overly burdensome.
Steering Group response: The Group considers that it is clear from the existing wording that effort should be proportionate.
- **Delete** 'and the risk of negative impacts'.
Steering Group response: Disagree; this wording is consistent with the concept of scale, intensity and risk.
- **Reconsider** statement that 'every effort has been made to ensure that requirements are sufficiently flexible to apply to all scales and intensities of management'.
Steering Group response: Observation only.

Sub-section 3: Interpretation of the certification standard

No issues.

Certification Standard

Using the certification standard

Issues:

- **Consider** burden imposed by taking 'full account of the introduction, glossary and appendix'.
Steering Group response: This is a clarifying statement of what has always been the case.
- **Consider** reducing length of guidance by reference to published best practice (but cf. comment on 2.9.2 re. likely limited lifespan of some existing guidance).
Steering Group response: The Standard defers to published best practice wherever possible, but there are instances where stakeholders have argued for specific details to be included in guidance.

- **Consider** whether 'Documentation' is more appropriate than 'Management planning documentation'.

Steering Group response: While there may well be merit in this suggestion, the Group is reluctant to make such a change without the opportunity to consider the full implications. However, the definition has been broadened to include third party documents.

Key to icons

No issues.

Section 1

Legal compliance and UKWAS conformance

This section attracted relatively few comments. Changes to clause 1.1.4 attracted some attention, as did the addition of 1.2.1(b). Also, a disparity was observed between 1.1.5 and the introductory section on 'Third party rights'.

Sub-section 1.1: Compliance and conformance

Issues:

- 1.1.1 Requirement: **Reference** key legislation including EIA regulations.
Steering Group response: The Group believes that the current system for directing Standard users to the Appendix is adequate. However, in response to this comment and to a comment on the introduction, guidance has been added to clarify the relationship between the Standard and legislation.
- 1.1.3 Example verifiers: **Move** 'Companies House records' to bottom of list.
Steering Group response: Agree.
- 1.1.4(a) Requirement: **Consider** legal implications.
Steering Group response: The Group believes that this comment is based on a misinterpretation of the auditor's role; there is no suggestion that auditors should be responsible for determining the outcome of disputes.
- 1.1.4(b) Requirement: **Reword** to address disputes which can only be addressed in court.
Steering Group response: Agree in part with suggested text changes.
- 1.1.5(a) Requirement: **Resolve** disparity with introductory section on 'Third party rights'.
Steering Group response: The Group does not believe that there is any disparity, and that this comment is based on a misinterpretation of this requirement; requirement wording has been changed to clarify its application.

Sub-section 1.2: Protection from illegal activities

Issues:

- 1.2.1(b) Requirement: **Reconsider**, potentially as guidance.
Steering Group response: Engagement with police and statutory bodies is a potentially important element of this requirement, but the requirement has been shortened and simplified by combining (a) and (b).

Sub-section 1.3: Genetically modified organisms

Issues:

- 1.3.1 Requirement: **Delete** as a matter for government.
Steering Group response: Both FSC and PEFC prohibit the use of GMOs in certified forests.
- 1.3.1 Requirement: **Add** 'and/or trialled/experimented with'.
Steering Group response: Suggestion dropped on discussion; while the suggestion is consistent with FSC and PEFC positions, the current wording is clear.

Section 2

Management planning

This long section continued to draw the most feedback. As in the previous consultation, clause 2.8.1 attracted a number of conflicting views. Clause 2.5.1 also attracted a large number of comments. Sub-section 2.14 on 'Monitoring' drew far fewer comments than in the previous consultation.

Sub-section 2.1: Long-term policy and objectives

Issues:

- 2.1.1 Requirement: **Move** to after 'Documentation' and 'Consultation and co-operation'.
Steering Group response: Position retained as objective-setting is fundamental to all subsequent management planning.
- 2.1.1 Requirement: **Add** (c) regarding forest resilience.
Steering Group response: Guidance added to address forest resilience.
- 2.1.1(a) Requirement: **Reconsider** juxtaposition of objectives.
Steering Group response: This is a fundamental requirement of certification schemes and sustainable forest management.
- 2.1.1(a) Requirement: **Reconsider** requirement for economic viability.
Steering Group response: Economic viability is a fundamental requirement of certification schemes and sustainable forest management. Guidance added to explain economic viability in its broadest sense.
- 2.1.1(b) Requirement/Guidance: **Consider** whether this is already covered by UKWAS 1.1.5.
Steering Group response: The requirements are different; 1.1.5 is about a commitment to the general principles of certification, while 2.1.1 is about policy and objectives specific to the WMU and communicated to workers to guide their work.
- 2.1.1 Guidance: **Shorten**.
Steering Group response: The guidance is considered to be useful, especially for less experienced owners/managers.
- 2.1.2 Requirement: **Add** reference to forest resilience.
Steering Group response: The Group believes that resilience is adequately addressed elsewhere in the Standard, and that a reference here would be confusing and difficult to audit.

Sub-section 2.2: Documentation

Issues:

- 2.2.1 Requirement: **Define** 'environmental values' in (b).
Steering Group response: 'Environmental values' are already defined in the Glossary. (This and similar comments highlight the need for a mechanism to signpost defined terms.)
- 2.2.1 Requirement: **Reword** (d) for consistency with section 4.
Steering Group response: Agree.

- 2.2.1 Requirement: **Reword** (f) and (g).
Steering Group response: (f) reworded.
- 2.2.1 Requirement: **Combine** (g) and (j).
Steering Group response: While there is scope to combine these requirements, it is considered useful to maintain the distinction between them.
- 2.2.1 Requirement: **Correct** reference in (m) from 2.14.2 to 2.14.1.
Steering Group response: Agree.
- 2.2.1 Guidance: **Consider** potential interpretations of link between features and sensitivities and the setting of management objectives.
Steering Group response: The respondent feared that this guidance ‘may allow economic objectives to over-ride environmental and social objectives’, but it is intended to achieve the opposite; management objectives should take account of features and sensitivities of the WMU.
- 2.2.2 Guidance: **Shorten**.
Steering Group response: The guidance is considered to be useful, especially for less experienced owners/managers.
- 2.2.3 Requirement: **Consider** consistency with UK Forestry Standard.
Steering Group response: The Group does not consider this to be an issue.

Sub-section 2.3: Consultation and co-operation

Issues:

- 2.3.1 Requirement: **Include** those who derive their income from the forest or are dependent on the supply of forest products.
Steering Group response: Guidance added.
- 2.3.1 Requirement: **Reword** to reflect that all relevant environmental stakeholders should be consulted when appropriate.
Steering Group response: No change made to requirement, but guidance added; see below.
- 2.3.1 Guidance: **Shorten**.
Steering Group response: The guidance is considered to be useful, especially for less experienced owners/managers.
- 2.3.1 Guidance: **Add** suggested consultees for biodiversity issues.
Steering Group response: Agree.
- 2.3.2(c) Requirement: **Consider** whether this should be a requirement.
Steering Group response: This is presented as a requirement to give the strongest possible steer towards a desirable outcome, while allowing sufficient flexibility for situations where neighbours are unable or unwilling to cooperate.
- 2.3.2(c) Requirement: **Consider** delays arising from this requirement.
Steering Group response: The Group accepts the observation, but does not consider it to lessen the value of the requirement.
- 2.3.2(c) Requirement: **Consider** potential difficulty of auditing conformance.
Steering Group response: This requirement is couched in such terms that it gives the strongest possible steer towards a desirable outcome, while allowing sufficient flexibility for it to be applied and audited reasonably.

- 2.3.2 Guidance: **Define** 'ecological damage'.
Steering Group response: The term is deliberately broad in scope.
- 2.3.2 Guidance: **Consider** support for grey squirrel control.
Steering Group response: Observation only.

Sub-section 2.4: Productive potential of the WMU

Issues:

- 2.4.1 Requirement: **Reconsider** as not consistent with guidance.
Steering Group response: Rewritten to clarify intent and improve auditability, focussing on soils and hydrology.
- 2.4.1 Requirement: **Add** caveat for habitat restoration.
Steering Group response: The Group feels that this is not necessary in the light of the rewritten requirement.
- 2.4.1 Guidance: **Expand** beyond soils and hydrology.
Steering Group response: Disagree; this requirement, especially as rewritten, is concerned with the fundamental characteristics of sites. Productivity of trees is addressed in 2.4.2.
- 2.4.2 Requirement/Guidance: **Consider** whether this is justified in terms of public benefit.
Steering Group response: Reference to 'productive potential' removed; rewritten to focus simply on timber harvesting.
- 2.4.2 Requirement: **Consider** non-intervention or lack of management.
Steering Group response: The Group feels that this is not necessary in the light of the rewritten requirement.
- 2.4.2 Requirement: **Focus** on maintaining long term potential productivity of the site/soil.
Steering Group response: This is addressed in 2.4.1.
- 2.4.2 Requirement: **Add** caveat for habitat restoration.
Steering Group response: Guidance added.
- 2.4.2(b) Requirement: **Clarify** and consider consistency with guidance.
Steering Group response: Guidance added.
- 2.4.2 Guidance: **Expand** first paragraph so not limited to plantations.
Steering Group response: Guidance deleted as no longer relevant to the rewritten requirement.
- 2.4.2 Guidance: **Recognise** that harvesting for restructuring may be area-based.
Steering Group response: Agree.
- 2.4.3 Requirement: **Reword**.
Steering Group response: Agree.
- 2.4.4 Requirement: **Reword** using 'priority species'.
Steering Group response: Agree, subject to a redefinition of priority species.
- 2.4.4 Guidance: **Clarify** 'proven detriment'.
Steering Group response: Guidance deleted; see below.
- 2.4.4 Guidance: **Consider** effect on intent of requirement.
Steering Group response: Clarified by rewording requirement and deleting guidance.

Sub-section 2.5: Assessment of environmental impacts

Issues:

- 2.5.1 Requirement: **Add** new (a) referencing EIA regulations.
Steering Group response: Too specific, but see below re. more generic addition to guidance.
- 2.5.1(b) Requirement: **Change** 'implementation' to 'implemented'.
Steering Group response: Disagree.
- 2.5.1 Example verifiers: **Change**/add to fully address EIA Opinions, Determinations etc.
Steering Group response: Too specific; more generic verifiers retained.
- 2.5.1 Guidance: **Shorten**.
Steering Group response: Guidance has been rationalised.
- 2.5.1 Guidance: **Add** specialist advice for priority species and habitats.
Steering Group response: Agree.
- 2.5.1 Guidance: **Make** more general statement about specialist advice.
Steering Group response: Agree.
- 2.5.1 Guidance[?]: **Add** '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'.
Steering Group response: See response to general comment on River Basin Management Plans in section 2.4.4 of this report.
- 2.5.1 Guidance: **Reword** bullet on flood risk, including 'the need to identify and mitigate any potential negative impacts'.
Steering Group response: Reworded, but negative impacts not added for brevity.
- 2.5.1 Guidance: **Add** sediment management and erosion as environmental impacts.
Steering Group response: Too specific in this context.
- 2.5.1 Guidance: **Change** to reflect thresholds and distinction between Opinions and Environmental Statements.
Steering Group response: Too specific, but a more generic addition has been made to guidance.
- 2.5.2 Guidance: **Add** Landscape Character and woodland design guidance (but cf. comment on 2.8.1(a) Requirement).
Steering Group response: Not appropriate here; this requirement addresses landscape level impacts rather than landscape design.
- 2.5.2 Guidance: **Shorten**.
Steering Group response: The guidance is considered to be useful, especially for less experienced owners/managers.
- 2.5.2 Guidance: **Recognise** that new woodland planting should not fragment existing open habitats or break an existing ecological network.
Steering Group response: Suggestion dropped on discussion as already addressed.
- 2.5.3 Guidance: **Reconsider** deletion of 'Climate change adaptation'.
Steering Group response: The Group stands by its decision to use the term 'long-term forest resilience' resilience to encompass more than climate change.

- 2.5.3 Guidance: **Add** reference to EA, SEPA and NRW flood hazard maps.
Steering Group response: Agree; generic reference added.

Sub-section 2.6: Woodland creation

Issues:

- 2.6.1 Requirement: **Reconsider** 'economic goods and ecosystem services'.
Steering Group response: Minor change to requirement text. Guidance added.
- 2.6.1 Requirement: **Consider** possible exclusion of woodlands not planted for economic benefit.
Steering Group response: Addressed as above.
- 2.6.1 Requirement: **Consider** restrictiveness of second bullet.
Steering Group response: The Group does not believe that this is an issue in reality.
- 2.6.1 Requirement: **Allow** pure plantations.
Steering Group response: Beyond the scope of UKWAS.
- 2.6.1 Guidance: **Restore** guidance on general aim.
Steering Group response: Agree; guidance reworded.
- 2.6.1 Guidance: **Add** reference to Natural Flood Management (NFM) maps and FC opportunity maps.
Steering Group response: The Group believes that these sources of information should be addressed through the Appendix.

Sub-section 2.7: Woodland restructuring

Issues:

- 2.7.1 Requirement: **Consider** appropriate scales for restructuring.
Steering Group response: Guidance added.
- 2.7.1 Requirement: **Consider** appropriateness of continuous cover forestry.
Steering Group response: This requirement does not presume CCF management; restructuring may be on the basis of small patch clearfelling, for example.
- 2.7.1 Requirement: **Change** 'an appropriate' to 'a diverse' or 'an increasingly diverse', and add 'and enhanced over time'.
Steering Group response: Agree; changes made along these lines.
- 2.7.1 Guidance: **Add** guidance discouraging large coupe sizes.
Steering Group response: Agree; positive guidance added promoting small coupe sizes.
- 2.7.1 Guidance: **Emphasise** reasons for avoiding large coupes before listing exceptions.
Steering Group response: Agree; see above.

Sub-section 2.8: Tree species selection

Issues:

- 2.8.1 Requirement: **Avoid** percentage limits.
Steering Group response: Agree.

- 2.8.1 Requirement: **Restore** percentage limits.
Steering Group response: Disagree; the Group is reluctant to restore limits which may have unintended consequences if applied uncritically, and rather than quoting or paraphrasing limits in UKFS prefers to refer to it in guidance.
- 2.8.1 Requirement: **Restore** (f) and add 'No single species shall occupy blocks greater than 50ha in size'.
Steering Group response: Disagree; see above regarding species limits.
- 2.8.1(a) Requirement: **Delete** 'Landscape character' (but cf. comment on 2.5.2 Guidance).
Steering Group response: Disagree; landscape design remains an integral part of forest planning in the UK.
- 2.8.1(a) Requirement: **Reword** to emphasise primacy of forest resilience.
Steering Group response: Disagree; the Group considers it appropriate that species suitability be given primacy and all other considerations be treated equally in this requirement.
- 2.8.1(b) Requirement: **Change** to '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'.
Steering Group response: Disagree, but 'Natural or artificial regeneration' has been replaced with 'Regeneration (natural or planted)'.
- 2.8.1(b) Requirement: **Reword**.
Steering Group response: Agree; see above.
- 2.8.1(b) Requirement: **Clarify** 'timely manner'.
Steering Group response: The Group is content that this is a matter for auditor interpretation on a case by case basis.
- 2.8.1(c) Requirement: **Reconsider** stance on non-native species, especially in light of climate change.
Steering Group response: The wording of this requirement allows for the use of non-native species either in order to meet the owner's objectives or to achieve long-term forest resilience, which includes the effects of climate change.
- 2.8.1: Requirement/Guidance: **Prefix** 'resilience' with 'ecological'.
Steering Group response: Disagree; this is addressed in the Glossary definition of 'Forest resilience'.
- 2.8.1 Example verifiers: **Exercise** caution in use of ESC.
Steering Group response: Guidance changed.
- 2.8.1 Guidance: **Add** percentage limits.
Steering Group response: Disagree; see above regarding species limits.
- 2.8.1 Guidance: **Add** statement that justification must be given for not using natural regeneration or planting stock from parental material growing in the local native seed zone in woodland of high conservation value.
Steering Group response: Current guidance removed and replaced with a cross-reference to 4.7.1 which addresses this issue.
- 2.8.1 Guidance: **Reword** first paragraph to promote species diversity at stand and WMU levels.

Steering Group response: On discussion, agreed to emphasise diversity at the woodland level.

- 2.8.1 Guidance: **Stress** the need to take long-term forest resilience into account and why diversity reduces risk.

Steering Group response: The Group feels that there is already sufficient emphasis on long-term forest resilience in the reworded requirement.

- 2.8.1 Guidance: **Consider** sources of advice other than ESC.

Steering Group response: Agree.

- 2.8.2 Requirement: **Reconsider** stance on non-native species.

Steering Group response: There is sufficient flexibility in the use of non-native tree species in practice, but it is appropriate to exercise caution, especially when introducing new species.

- 2.8.2 Requirement: **Move** to 2.11 and change to address 'plant (non-tree) and animal species'.

Steering Group response: Moved to new sub-section. Separate requirements introduced for tree and other non-native species.

- 2.8.2 Requirement: **Change** to include 'no plant shall be introduced or caused to grow in a WMU that evidence and/or experience shows may have invasive capacity'.

Steering Group response: Wording of current UKWAS 3.3.4(a) restored for non-tree species to address these concerns.

- 2.8.2 Requirement: **Consider** need for a biosecurity response plan.

Steering Group response: This is covered in general terms in the existing requirement.

- 2.8.2 Requirement: **Seek** expert advice.

Steering Group response: Wording of current UKWAS 3.3.4(a) restored for non-tree species to address these concerns.

Sub-section 2.9: Silvicultural systems

Issues:

- 2.9.1: **Reconsider** Glossary definition of 'lower impact silvicultural systems'.

Steering Group response: The current Glossary definition includes 'small coupe felling' and is believed to be consistent with published literature.

- 2.9.1 Requirement: **Consider** consistency with 2.9.2.

Steering Group response: This requirement deliberately permits clearfelling where appropriate outside semi-natural woodland.

- 2.9.1(b) Requirement: **Change** to 'Where species, sites, wind risk, tree health risk and management objectives allow, lower impact silvicultural systems shall be adopted with the aim of diversifying ages, species and stand structures'.

Steering Group response: Disagree; the current wording deliberately permits clearfelling to be included in the range of silvicultural approaches. Nevertheless, wording changed to place greater emphasis on LISS.

- 2.9.1 Guidance: **Move** 'Future resilience' to top of list.

Steering Group response: Agree; replaced with 'Long-term forest resilience'.

- 2.9.1 Guidance: **Replace** 'in the context of a research policy' with 'only if properly documented and monitored so that the information can be used in the future'.
Steering Group response: The Group disagrees with the proposed wording, but agrees that guidance on research and trials is relevant beyond this requirement; the guidance has been deleted and a generic version added to the introduction.
- 2.9.2(a) Requirement: **Consider** longevity of references to FC guidance (but cf. comment on 'Using the certification standard' re. reduced guidance text by reference to published guidance).
Steering Group response: The value of this published guidance outweighs the risk of it becoming obsolete.
- 2.9.2(b) Requirement: **Reconsider** limits, especially in the context of coppice management.
Steering Group response: Current wording allows flexibility for biodiversity enhancement or lower impact.
- 2.9.2 Guidance: **Add** reference to European Protected Species guidance.
Steering Group response: The Group agrees that reference to EPS guidance is appropriate, but feels that it is relevant to many requirements and best addressed in the Appendix.

Sub-section 2.10: Conservation

Issues:

- 2.10.1 Requirement: **Reconsider** 15 % area requirement as impractical.
Steering Group response: This is a long-standing requirement of fundamental importance to the enhancement of biodiversity in certified woodlands, and is successfully applied in a wide variety of woodlands.
- 2.10.1 Requirement: **Exclude** statutory designated sites from the 15 % area, and require that the area be as consolidated as possible.
Steering Group response: A number of stakeholders in the UKWAS revision process cannot accept this change; in the absence of consensus, the status quo is preserved.
- 2.10.1 Requirement: **Add** (c) 'All existing and previously managed areas of Natural Reserves and Long Term Retentions shall be maintained and enhanced'.
Steering Group response: Better addressed in 4.6.
- 2.10.1 Requirement: **Consider** application at the level of sub-units of WMUs.
Steering Group response: Disagree; see response to comment on 'Procedures for use of the certification standard'. However, guidance reworded to make it clear that this requirement must be met at the WMU level.
- 2.10.1 Guidance: **Reorder** list and add guidance on protecting natural reserves and long term retentions.
Steering Group response: Agree to re-ordering of list. Natural reserves and long term retentions better addressed in 4.6.

Sub-section 2.11: Protection

Issues:

- 2.11.1 Requirement: **Delete** 'written'.
Steering Group response: Agree.

- 2.11.1 Guidance: **Add** 'For large enterprises and WMUs, the strategy should be in writing'.
Steering Group response: Agree.
- 2.11.2 Example verifiers: **Add** 'Emergency response plans'.
Steering Group response: Agree.

Sub-section 2.12: Conversion

Issues:

- 2.12.1(a) Requirement: **Consider** restriction on creation of glades and loading points.
Steering Group response: The examples given would be integral to the management of the woodland and therefore not prohibited by the 'restriction upon non forestry use'.
- 2.12.1(a) Requirement: **Change** '4.1-4.3' to '4.1 and 4.3'.
Steering Group response: Suggestion dropped on discussion.
- 2.12.2 Requirement: **Move** to after 2.12.3.
Steering Group response: Agree.
- 2.12.2 Guidance: **Clarify** that Christmas trees grown as a horticultural or nursery crop are outside the scope of UKWAS.
Steering Group response: Agree.
- 2.12.3(b) Requirement: **Add** 'The conversion of the site contributes to the objectives set out in the river basin management plans'.
Steering Group response: Disagree; the Group is not willing to include this text without a better understanding of the implications, but believes that there are already mechanisms within the requirement to address some issues in RBMPs.
- 2.12.3 Requirement: **Change** 'environmental impact assessment' to 'Environmental Impact Opinion may be needed or Determination'.
Steering Group response: Too specific.

Sub-section 2.13: Implementation, amendment and revision of the plan

No issues.

Sub-section 2.14: Monitoring

Issues:

- 2.14.1 Monitoring: **Consider** cost implications.
Steering Group response: As per the introduction to the Standard and the guidance to this requirement, monitoring efforts should be proportional to the scale and intensity of woodland management and risk of negative impacts.
- 2.14.1 Guidance[?]: **Highlight** fixed point photography.
Steering Group response: Already addressed more broadly as 'Photographic records'.
- 2.14.1 Guidance: **Shorten**.
Steering Group response: The guidance is considered to be useful, especially for less experienced owners/managers.

- 2.14.1 Guidance: **Change** 'potential positive and negative impacts' to 'potential and actual positive and negative impacts'.
Steering Group response: Agree.

Section 3

Woodland operations

This section did not attract much attention, although the issue of burning lop and top in clause 3.2.4 did prompt some comments, as did pesticides, biological control agents and fertilisers in sub-section 3.4.

Issues:

- **Restore** term 'forestry' to section heading.
Steering Group response: See response to general comment on the terms 'forest' and 'forestry' in section 2.4.1 of this report. The preponderance of the term 'woodland' is consistent with the UKWAS name

Sub-section 3.1: General

Issues:

- 3.1.2 Requirement: **Recognise** cases where it is not possible to mitigate or repair certain types of disturbance or damage.
Steering Group response: Requirement changed to address avoidance of recurrence.
- 3.1.3 Requirement: **Recognise** difficulties in the supervision of staff in standing sales harvesting operations.
Steering Group response: The difficulties are recognised but can be overcome, and the Group notes that there are legal requirements for communication with workers especially in the context of health and safety.
- 3.1.4 Requirement: **Clarify** 'features of conservation interest'.
Steering Group response: The Group considers the meaning to be clear in this context, which clearly refers to features identified in specific sections of the Standard.

Sub-section 3.2: Harvest operations

Issues:

- 3.2.1(b) Requirement: **Consider** how owner/manager would demonstrate that they sought to avoid timber degrade.
Steering Group response: Requirement clarified and verifier added.
- 3.2.1 Guidance: **Emphasise** the particular vulnerability of veteran trees.
Steering Group response: Agree; addressed in requirement.
- 3.2.2 Guidance: **Change** 'first point of supply' to 'first point of sale'.
Steering Group response: Disagree; a change of ownership may come about without money changing hands. Wording of requirement changed to reflect this.
- 3.2.4 Requirement: **Consider** whether lop and top constitute waste.
Steering Group response: The Group considers the requirement and guidance to be accurate.

- 3.2.4 Requirement: **Consider** implications for preparing felled sites for replanting.
Steering Group response: Lop and top may be burnt where there is management benefit provided there are no significant negative effects.
- 3.2.4 Guidance: **Consider** whether paragraph on registering an exempt activity is a requirement.
Steering Group response: This is a statement of legal responsibilities. It has been reworded to make its advisory nature clear.

Sub-section 3.3: Forest roads and associated infrastructure

Issues:

- 3.3.2 Requirement: **Add** 'visitor access infrastructure'.
Steering Group response: Agree.
- 3.3.2 Guidance: **Add** good practice guidance on timber transport.
Steering Group response: Added to Appendix.
- 3.3.2 Guidance: **Add** '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'.
Steering Group response: Agree; modified wording adopted.

Sub-section 3.4: Pesticides, biological control agents and fertilisers

Issues:

- 3.4.1 Requirement: **Defer** to legislation on pesticides.
Steering Group response: Certification schemes have clear positions on pesticides.
- 3.4.1 Requirement: **Recognise** cases where it is not possible to mitigate or repair damage.
Steering Group response: Requirement changed to address avoidance of recurrence.
- 3.4.2(a) Requirement: **Add** 'where feasible' after 'biological control methods'.
Steering Group response: The Group considers the interpretation of this requirement to be clear.
- 3.4.2 Guidance: **Define** 'notable species'.
Steering Group response: Guidance reworded to avoid this term.
- 3.4.2 Guidance: **Change** 'All ancient woodland sites' to 'All ancient woodland sites and their (remnant or other) semi-natural features'.
Steering Group response: Disagree; this change would not add value to the guidance.
- 3.4.2 Guidance: **Change** 'may' to 'should' in the last paragraph.
Steering Group response: Agree.
- 3.4.2 Guidance: **Add** reference to disease affecting other non-woodland remnant/restorable habitats.
Steering Group response: This comment does not make sense in this context.
- 3.4.3 Requirement: **Delete** 'The owner/manager shall be able to demonstrate that they are conforming to best practice' as superfluous.
Steering Group response: Agree.

- 3.4.3 Guidance: **Add** 'to demonstrate meeting Requirement 3.4.2 to avoid and/or minimise usage' to the end of the first sentence.
Steering Group response: Agree; modified wording adopted.
- 3.4.5(b) Requirement: **Define** 'rare plant community'.
Steering Group response: Requirement reworded to refer to priority plant species.
- 3.4.5(b) Requirement: **Add** that fertilisers should not be used in areas with soils which are sensitive to nutrient enrichment.
Steering Group response: Addressed by referring to priority habitats.
- 3.4.5(b) Requirement: **Add** that fertilisers should not be used around veteran trees.
Steering Group response: Agree.

Sub-section 3.5: Fencing

Issues:

- 3.5.1 Requirement: Clarify whether this relates to deer fencing.
Steering Group response: This requirement applies to all fencing.

Sub-section 3.6: Waste

No issues.

Sub-section 3.7: Pollution

No issues.

Section 4

Natural, historical and cultural environment

The subject of deadwood (clause 4.6.4) continued to attract a great deal of comment, and natural reserves and long-term retentions (clauses 4.6.1 and 4.6.2) were also the subject of much feedback.

Sub-section 4.1: Statutory designated sites and protected species

Issues:

- 4.1.1(a) Requirement: **Reconsider** use of 'rare'.
Steering Group response: Addressed by redefining 'priority species'.
- 4.1.1(b) Requirement: **Strengthen** requirement.
Steering Group response: The wording 'maintained and, where possible, enhanced' is unchanged from UKWAS 3.1. Guidance added to address situations where enhancement may not be possible.

Sub-section 4.2: Conservation of ancient semi-natural woodlands (ASNW)

Issues:

- **Consider** future status of ASNW.
Steering Group response: Beyond the scope of UKWAS.
- 4.2.1(b) Requirement: **Clarify** application of precautionary approach.
Steering Group response: Reworded (and equivalent change also made to 4.1.1).
- 4.2.1 Guidance: **Add** reference to impact of disease and guidance from statutory bodies.
Steering Group response: Changes made to requirement and guidance.

Sub-section 4.3: Plantations on Ancient Woodland Sites (PAWS)

Issues:

- As for ASNW in sub-section 4.2, **consider** what PAWS should be restored to.
Steering Group response: Beyond the scope of UKWAS.
- **Add** 'Restoration of' to sub-section heading.
Steering Group response: Disagree on the basis that the Standard does not explicitly require PAWS restoration. However, for consistency with other sub-sections, 'Management of' added.
- 4.3.1 Requirement: **Restore** wording from UKWAS 3.1.
Steering Group response: Minor change made to wording.
- 4.3.1 Guidance: **Shorten**.
Steering Group response: The length of this guidance is a consequence of the dramatic shortening of the requirement during this revision.

Sub-section 4.4: Protection of conservation values in other woodlands and semi-natural habitats

Issues:

- **Delete** 'conservation values in' from sub-section heading.
Steering Group response: Disagree; the current title is accurate.
- 4.4.1(a) Requirement: **Clarify** what species are covered and what is meant by 'conservation value', if necessary changing sub-section heading.
Steering Group response: The term 'species' is used without qualification because this requirement addresses all species of conservation value. The Group does not believe that it is necessary to define the term 'conservation value'.
- 4.4.1 Example verifiers: **Change** 'Monitoring records' to 'Monitoring records of prioritised sites'.
Steering Group response: Disagree; the more generic term is appropriate.
- 4.4.1 Guidance: **Consider** whether 'Visitor pressure' should also apply to ASNW.
Steering Group response: Agree; addition made to 4.2.1 guidance.
- 4.4.2(a) Requirement: **Reconsider** in the light of water management and rewilding.
Steering Group response: Neither of these drivers invalidates the approach to valuable small-scale semi-natural habitats.
- 4.4.2(a) Requirement: **Change** 'further loss of biodiversity or cultural value' to 'further degradation to potential for restoration'.
Steering Group response: Agree, with the clarification that this requirement applies only to 'small-scale' habitats as per the guidance; larger scale habitat restoration would be addressed as conversion.
- 4.4.2 Guidance: **Add** freshwater habitats such as ponds are added to the list of small-scale habitats within the WMU.
Steering Group response: Agree.

Sub-section 4.5: Watershed management and erosion control

Issues:

- 4.5.1(b) Requirement: **Consider** potential conflict between precautionary approach and advise of relevant statutory bodies.
Steering Group response: Agree; reference to precautionary approach removed on the basis that acting only on the advice of relevant statutory bodies is in itself a precautionary approach.

Sub-section 4.6: Maintenance of biodiversity and ecological functions

Issues:

- 4.6.1 Requirement: **Change** 1 % to 5 %.
Steering Group response: Disagree; a change in the proportion of plantations given over to natural reserves is not acceptable to economic stakeholders.
- 4.6.1 Requirement: **Add** 'Existing and previous natural reserves shall be maintained and where possible enhanced/buffered'.
Steering Group response: Disagree, but see below re. guidance.

- 4.6.1 Requirement: **Change** to ‘Natural reserves shall constitute at least 2% of the WMU. Natural reserves 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.’
Steering Group response: Disagree; it is not appropriate to combine natural reserve and long-term retention requirements, as they currently differ and because long-term retentions may have value if located outside natural reserves.
- 4.6.1 Guidance: **Delete** first sentence as superfluous.
Steering Group response: Agree.
- 4.6.1 Guidance: **Add** ‘There should be no loss of existing Natural Reserves’.
Steering Group response: Agree.
- 4.6.2 Requirement: **Add** ‘Existing and previous long-term retentions shall be maintained and where possible enhanced/buffered’.
Steering Group response: Disagree; long-term retentions do not have the same permanence as natural reserves.
- 4.6.2 Guidance: **Add** missing ‘locate’ in first paragraph.
Steering Group response: Agree.
- 4.6.2 Guidance: **Clarify** application of long-term retentions in ASNW.
Steering Group response: The Group disagrees with the respondent’s interpretation. There is no presumption that areas with long-term retentions will be clear felled; they may be subject to selective harvesting.
- 4.6.2 Guidance: **Delete** first sentence as superfluous.
Steering Group response: Agree.
- 4.6.2 Guidance: **Add** ‘There should be no loss of existing Long-term retentions and no reduction in the areas previously managed for long-term retentions’.
Steering Group response: Disagree; long-term retentions do not have the same permanence as natural reserves.
- 4.6.3 Requirement: **Consider** difficulties of implementing, recording and monitoring.
Steering Group response: Efforts should be proportional to the scale and intensity of woodland management and risk of negative impacts.
- 4.6.3 Guidance: **Expand** to address careful release from competition, risk of catastrophic failure, risk of damage from forestry operations and deadwood.
Steering Group response: Better to refer to best practice; *Ancient and other veteran trees: further guidance on management added to Appendix.*
- 4.6.4 Requirement: **Consider** public safety issues and monitoring difficulties.
Steering Group response: Issues with public safety are addressed in guidance. Monitoring efforts should be proportional to the scale and intensity of woodland management and risk of negative impacts.
- 4.6.4 Requirement: **Better** reflect need for a variety of deadwood.
Steering Group response: The Group notes that this requirement already explicitly calls for ‘a diversity of both standing and fallen deadwood’, ‘large dimension standing and fallen deadwood and deadwood in living trees’. Further detail of desirable variation in deadwood should be addressed through reference to published best practice.

- 4.6.4(a) Requirement: **Change** 'all' to 'most'.
Steering Group response: Disagree; there is an important distinction between 'all wooded parts' and 'most hectares'.
- 4.6.4(a) Requirement: **Retain** 'in all wooded parts of the WMU, including felled areas'.
Steering Group response: Agree.
- 4.6.4 Guidance: **Reconsider** no removal of existing deadwood.
Steering Group response: Deleted.
- 4.6.4 Guidance: **Consider** specificity and status of windthrow guidance.
Steering Group response: In context this is clearly only an example of a possible action.
- 4.6.4 Guidance: **Clarify** 'In most hectares there should be a few standing and fallen stems contributing to the overall deadwood provision'.
Steering Group response: The Group considers this statement to be clear.
- 4.6.4 Guidance: **Change** 'relevant forestry authorities' to 'relevant statutory conservation agencies forestry authorities and others'.
Steering Group response: Agree.
- 4.6.4 Guidance: **Change** 'old, previously pollarded trees' to 'old and/or previously pollarded trees'.
Steering Group response: Agree.
- 4.6.4 Guidance: **Consider** how guidance on current evidence relates to WMU definition.
Steering Group response: The Group does not perceive an issue in the interpretation of this published guidance.
- 4.6.4 Guidance[?]: **Add** 'Deadwood management should not increase the risk of flooding due to blockages of downstream structures'.
Steering Group response: While recognising the issue, the Group does not see how this could be implemented or audited without removing all deadwood from riparian zones and watercourses, which would have negative implications for biodiversity and natural slowing of water flows.

Sub-section 4.7: Maintenance of local native seed sources

Issues:

- 4.7.1(a) Requirement: **Reconsider** in the light of climate change.
Steering Group response: The Group does not believe that there is a compelling case to change this requirement.
- 4.7.1(b) Requirement: **Change** 'wherever' to 'whenever'.
Steering Group response: Changed to 'if'.
- 4.7.1(b) Requirement: **Clarify** how second sentence differs from first.
Steering Group response: There is a difference between source-identified stands and selected stands.

Sub-section 4.8: Cultural and historical features/sites

Issues:

- 4.8.1 Requirement: **Consider** implications of growing numbers of consultees.
Steering Group response: Consultation efforts should be proportional to the scale and intensity of woodland management and risk of negative impacts.

Sub-section 4.9: Game and fisheries management

Issues:

- 4.9.1 Requirement: **Reconsider** stance on lead-free ammunition.
Steering Group response: The Steering Group stands by its previous decision, but all relevant regulations will be included in the Appendix.

Section 5

People, communities and workers

There were few comments here, mostly relating to public access (sub-section 5.1), although there was also an interesting suggestion for an addition relating to workers' rights (clause 5.6.1).

Sub-section 5.1: Woodland access and recreation including traditional and permissive use rights

Issues:

- **Consider** access in context of other land uses.
Steering Group response: The Group accepts the observation, and recognises cases where, for example, a woodland owner cannot offer public access because there is no public access over surrounding land. However, the Group sets requirements which apply at the WMU level, and these cannot be offset by activities elsewhere.
- **Consider** ecological sensitivities of woodlands.
Steering Group response: This issue is addressed in the guidance to 5.1.2.
- 5.1.1(a) Requirement: **Reconsider** stance on permissive access.
Steering Group response: The Group believes that this comment is based on a misreading of the requirement, which only requires that existing permissive uses be sustained. Even then they may be halted if there are negative impacts, and guidance explicitly allows for closing permissive routes annually to maintain their permissive status.
- 5.1.1 Example verifiers: **Delete** 'Field observation of public rights of way'.
Steering Group response: Disagree.
- 5.1.1 Guidance: **Add** detail on limits to gathering fungi.
Steering Group response: Guidance clearly directs Standard users to published best practice, which is more appropriate than including detail here. Illegal or unauthorised activities are covered by 1.2.1.
- 5.1.2 Requirement: **Reconsider** stance on public access.
Steering Group response: The Group believes that this comment is based on a misreading of the requirement; if there is access via rights of way, the only requirement is to make reasonable efforts to meet special demand for further public access for the purpose of environmental education.
- 5.1.2(a) Requirement: **Change** to 'There shall be provision for public access in accordance with legislation'.
Steering Group response: Disagree; this wording is very different in intent to the current wording.
- 5.1.2 Example verifiers: **Change** 'Maps show public rights of way through or beside the wood' to 'Maps show public rights of way and core paths through or beside the wood' and change 'significant historic environment assets' to 'significant cultural and historic environment assets' in final verifier.
Steering Group response: Agree.
- 5.1.2 Example verifiers: **Add** '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', 'A permissive freedom to roam'; and 'Evidence of

recreation or visitor experience plans’.

Steering Group response: Disagree; the current verifiers, modified as above, are adequate as examples.

- 5.1.2 Guidance: **Change** guidance for Scotland.
Steering Group response: Agree.

Sub-section 5.2: Minimising adverse impacts

Issues:

- 5.2.1 Example verifiers: **Change** ‘Use of safety signs and diversions around active operational sites’ to ‘Use of risk assessment and site management with safety signs and diversions around active operational sites’.
Steering Group response: Agree.
- 5.2.1 Guidance: **Add** ‘Management of hazards caused by visitor use’ to list.
Steering Group response: Agree.

Sub-section 5.3: Rural economy

Issues:

- 5.3.1 Requirement: **Consider** interaction with EU rules on employment and freedom of movement.
Steering Group response: The Group believes this requirement to be consistent with the law.

Sub-section 5.4: Health and safety

No issues.

Sub-section 5.5: Training and continuing development

No issues.

Sub-section 5.6: Workers’ rights

Issues:

- 5.6.1 Requirement: **Change** ‘There shall be compliance with equality legislation’ to ‘There shall be compliance with equality, anti-slavery and human trafficking legislation’.
Steering Group response: The Group feels that this would be difficult to audit proactively, but agrees that the *Modern Slavery Act 2015* should be added to the Appendix.

Sub-section 5.7: Insurance

Issues:

- 5.7.1 Requirement: **Change** to 'The owner/manager and workers shall be covered by adequate insurance including public liability and employer's liability insurance where required'.

Steering Group response: Disagree; self-insurance is sufficient to meet this requirement, and is explicitly mentioned in example verifiers.

Glossary of terms

Issues:

- Environmental appraisal: **Add** 'This includes both the Opinion stage and the Determination stage'.
Steering Group response: Too specific; the current wording is deliberately generic.
- Environmental impact assessment: **Change** 'the EU Environmental Assessment Directive' to 'the EIA Forestry Regulations 1999 (England and Wales, Scotland and Northern Ireland)'.
Steering Group response: This wording inappropriately narrows the scope of the definition, which must encompass regulations other than those limited to forestry to take account of e.g. development of windfarms.
- Environmental values: **Reconsider**.
Steering Group response: Disagree; this term is clearly defined in the Glossary, rather than relying on individual interpretations of what is meant by 'the environment'.
- Precautionary approach: **Clarify** what this means in practice.
Steering Group response: The Group considers the Glossary definition to be clear.
- Small woodland: **Restore** definition.
Steering Group response: Disagree; it is not appropriate to define a term which is not used in the Standard.

Appendix

Issues:

- Under 'Key legislation', **add** EIA regulations.
Steering Group response: Agree.
- **Add** Modern Slavery Act 2015.
Steering Group response: Agree.
- **Add** Scottish Government Policy on Woodland Removal.
Steering Group response: Agree.

Appendix 1

Full list of respondents

Id #	Respondent	Organisation	Nature of interest	Location
Woodland owners and forestry practitioners				
1	David Williams	Individual	Woodland owner	Aberdeen
2	Patrick Mannix	Individual	Woodland owner	Surrey
3	Robert Smith	Carbon Neutral Solutions	Forest management company	UK
4	Simon West	National Forest Company	Government sponsored woodland creation company	England (Midlands)
5	David Atkinson	Edwin Thompson	Forest management company/ group scheme manager	Scotland and Northern England
6	Stuart Wilkie	Scottish Woodlands	Forest management company/ group scheme manager	UK
7	Ewan McIntosh	Tilhill	Forest management company/ group scheme manager	UK
8	Simon Hart	Egger	Forest management company/ group scheme manager	Scotland and Northern England
9	Diana McMullen	Verderer's Group Scheme	Forest management company/ group scheme manager	England
10	Andrew Heald	Confor	Trade association	UK
11	Mike Seville	Country Land and Business Association (CLA)	Membership body	England and Wales
12	Simon Lloyd	Royal Forestry Society (RFS)*	Membership body	England, Northern Ireland and Wales
13	Robert Gladstone	Royal Scottish Forestry Society (RSFS)	Membership body	Scotland
Wood processing industry				
14	Hamish Macleod	BSW Timber Group	Sawmill operator	England, Scotland and Wales
15	Roland Stiven	Timber Transport	Haulage association	England,

		Forum		Scotland and Wales
Country forestry authorities and forestry enterprises				
16	Ian Irwin	Forest Service	Government department/ national forest service	Northern Ireland
17	Angus Mackie	Forest Enterprise (FE) Scotland	Government department/ national forest service	Scotland
18	Rachel Chamberlain	Natural Resources Wales (NRW)	Government department/ national forest service	Wales
Environmental organisations				
19	Siân Williams and Nick Phillips	Royal Society for the Protection of Birds (RSPB)	Woodland owner/ environmental NGO	UK
20	Gordon Pfetscher	Woodland Trust	Woodland owner/ environmental NGO	UK
UK countryside, environment and heritage agencies				
21	Rob Green	Natural England	Countryside Agency	England
22	Mark Aitken	Scottish Environment Protection Agency (SEPA)	Environment agency	Scotland
Forest user organisations				
23	Paul Williamson	British Association for Shooting and Conservation (BASC)	Social NGO	UK
Certification bodies				
24	Douglas Orr	SGS	Certification body	UK
Other				
25	Doug Somerville	Individual	Interested party	Trawsfynydd
26	Bill Mason	Continuous Cover Forestry Group (CCFG)	Silvicultural interest group	GB

* Note that the views expressed in RFS feedback are those of individual members and not of the Society itself.

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