

United Kingdom Woodland Assurance Standard

UKWAS Revision 2009-11 (Pre-approval Draft) (April 2011)

Consultation Report on Pre-approval Draft

Annex 1: Consolidated Feedback

21st June 2011

This document contains the full comments received allocated to the appropriate section of the UKWAS.

Analysis of the feedback is in the main Consultation Report

www.ukwas.org.uk

Full list of respondents (N.B. The Identifier Number is used to identify respondents' comments.)

Id #	Respondent	Organisation	Nature of interest	Location
Woodland owners & forestry practitioners				
1	Grant Murray	Alba Trees plc	Tree Nursery	East Lothian, Scotland
2	Rob Gazzard	Individual	Chartered Forester and Surveyor, District Forester - Forestry Commission	England
State forest enterprises				
3	Mariska van der Linden	Forestry Commission England	Government department/ national forest service	England
Environmental and heritage organisations				
4	Hilary Miller	Countryside Council for Wales	Conservation agency	Wales
Certification bodies and group scheme managers				
5	Richard Peberdy	UPM Tilhill	Forest management company/ group scheme manager	UK-wide

Introduction	
Your proposed amendments	Justification for proposed amendments
1. Background and purpose	
2. Use of the certification standard	
3. Structure of the certification standard	
4. Procedures for use of the certification standard	
<p>2.</p> <p>Low Intensity Management</p> <p>The impact of woodlands not being in active management is a critical weakness for the sector to building resilience to wildfire. The adoptions of Low Intensity Management (LIM) or non-intervention management practice on wildfire risk sites, such as those within or adjacent to open habitat sites, coniferous woodlands and key infrastructure is of serious concern. If UKWAS supported these practices in such circumstances it should be of considerable concern. In many cases such practices can be counter productive to the aims of the landowner.</p> <p>The build up of vegetation fuel loading caused by LIM and non-intervention should be of considerable concern due the increased levels of ‘fine fuel’ leading to:</p> <ul style="list-style-type: none"> • Exceptionally high stocking level densities of trees as well as invasive natural regeneration • Excessive suppression of lower canopy branches in conifers increasing the amount of dead and dry fuels on trees in vertical alignment. This increases the likelihood of fires ‘crowning’ from the surface and the risk of transition into ‘crown fires’ • High levels of built up needle and leaf litter increasing the risk of surface fires • Reduction of the effectiveness of fire and fuel breaks and fire belts as well as other control measures. <p>These characterises are reduced where woodlands are managed to management table intensity.</p>	

<p>5.</p> <p>Small woodland definition should be consistent with other countries i.e. 1,000ha.</p> <p>Note P15 of the draft refers to small at 100ha, not the 500 used in the glossary.</p>	<p>The UK is recognised by FSC as low risk in the controlled wood risk assessment. The UK is very heavily regulated with almost no recent history or evidence of forestry exploitation.</p> <p>This change in definition would lower auditing costs and will encourage more owners to use certification.</p> <p>Tilhill represent 300 woodland properties in our scheme and members are constantly looking at costs of membership against value of being certified.</p>
<p>5. Interpretation and revision of the certification standard</p>	
<p>5.</p> <p>Note P15 of the draft refers to small at 100ha, not the 500 used in the glossary.</p>	

Certification Standard				
1. Compliance with the law and conformance with the requirements of the certification standard				
1.1 Compliance and conformance				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>
	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
1.1.1				
1.1.2				
1.1.3				
1.1.4				
1.1.5	5.		Remove new advice to owners/managers	This takes up space and does not add value – this is a standard not a guide to the standard.
1.2 Protection from illegal activities				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>
	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
1.2.1				
2. Management planning				
2.1 Documentation				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>
	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
2.1.1	2. m) Short summary of severe weather (i.e. flooding, wildfire, high winds /storms) impacts that management could cause to the site, adjacent land or infrastructure	As defined		See Appendix 1.
	5.			Remove 211I- Additional cost for no benefit.

2.1.2	5. Punctuation in requirement			
2.1.3				
2.2 Productive potential				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
2.2.1	2. c) Shall increase the woodlands resilience to severe weather incidents	As defined		See Appendix 1.
2.2.2				
2.2.3				
2.2.4	5.		Remove new advice to owners/managers	This takes up space and does not add value – this is a standard not a guide to the standard.
2.3 Implementation and revision of the plan				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
2.3.1				
2.3.2	2. c) Severe weather incidents	All woodlands • Fire Reports	• Fire reporting should be based on templates laid out in the UK Vegetation Fire Standard	See Appendix 1.
2.3.3				
2.3.4				
2.3.5				
2.3.6				

3. Woodland design: creation, felling and replanting				
3.1 Assessment of environmental impacts				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>
	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
3.1.1	2. As defined	As defined	<ul style="list-style-type: none"> Needs or impacts on resilience to severe weather incidents (flooding, wildfire, high snowfall and storms and highwinds). 	See Appendix 1.
	3.			We believe the WMU definition can be improved to provide increased clarity as to the sampling frame appropriate for auditing. This has already been raised and we know this is being looked at.
	4.		Add: BAP priority habitats and species	Guidance refers to BAP Habitat and Species Plans, but not specifically to BAP priority habitat. There needs to be a spatial element which identifies habitats on the site and assesses them against any relevant HAPs / SAPs. The role of EIA is important here – but many cases are deemed not to require EIA by the competent authority.
3.1.2	2. As defined	As defined	<ul style="list-style-type: none"> Needs or impacts on resilience to severe weather incidents (flooding, wildfire, high snowfall and storms and highwinds). 	See Appendix 1.
3.1.3				
3.2 Location and design				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>

	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
3.2.1	2. New woodlands shall be located and designed in ways that will maintain or enhance the visual, cultural, and ecological value and character of the wider landscape and build resilience to severe weather incidents	As defined	As defined	See Appendix 1.
	4.		Change 'endangered habitats' to BAP priority habitats / species and or refer to S42 habitats of principal importance (NERC 2006 – Wales)	'Endangered habitats' - is this the right terminology? BAP Priority Habitats should be protected (BAP targets for habitats include no loss and potential for restoration). Also check against designated sites (SAC / SSSI). Also add a reference to Section 42 habitats of principal importance (Wales) under the NERC Act 2006. NB different section for England and separate legislation for Scotland.
3.2.2				
3.2.3				
3.2.4				
3.2.5	2. Where appropriate, sites at high risk from severe weather incidents, shall ensure that an integrated network of prevention control measures are used to increase resilience	All woodlands <ul style="list-style-type: none"> • Management planning documentation • Design plan 	The design should consider the use of: <ul style="list-style-type: none"> • Fire and fuel breaks and fire belts • Non-LIM management in or near high risk areas • Selection of fire 	See Appendix 1.

			<p>resilient species in and next to areas of high risk.</p> <p>The design should consider the identification of:</p> <ul style="list-style-type: none"> • High risk areas of open habitats and pine, spruce and fir compartments. • Hazards and risk factors such as property key infrastructure (road, rail, powerlines etc.), social, economic and environmental assets. • Public access. • Past fire incident locations from reports and other evidence (e.g. Fire and Rescue Service). 	
3.3 Species selection				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
3.3.1				
3.3.2				
3.3.3				

3.3.4				
3.4 Silvicultural systems				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
3.4.1	2. As defined	As defined	<ul style="list-style-type: none"> Building resilience to severe weather incidents i.e. flood, wildfire, high snowfall and storms / high winds. 	See Appendix 1.
3.4.2				
3.4.3				
3.5 Conversion to non-forested land				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
3.5.1	1. d) The conversion must be carbon neutral		Advice to owners/managers – deforested areas must be replanted within the UK with a forest of equivalent potential carbon sequestration value. The carbon code may be used.	Without these amendments, the clause could result in an increase in the UK's carbon footprint. Windfarms must now have compensatory planting agreements and these should have them too.
	3.			Excision of part of the WMU is still limited to situations where it achieves 'landscape, biodiversity and historic environment benefits'. This is too narrow and excludes situations where limited felling could bring really public and environmental benefit e.g. building a forest school, which would ultimately

				benefit the woodland through increased awareness as well as benefiting those who would learn at the school. See also comments under 6.1.3 on compensatory planting.
	4. ..provide a net benefit compared to other feasible woodland cover for that site Conditions c i – iii –add deep peat / carbon			Rather than ‘the new land use shall be more valuable.’ Conditions (c i – iii) doesn’t take any account of soils / deep peat and carbon implications. Removal of woodland for peatland isn’t covered (other than for the restoration of the vegetation on top of the peat).
	5. Remove the additional "test" clause, regarding "any woodland cover".			Prior to consideration for certification - any proposed deforestation or significant development will have either required full planning permission and/or FC consultation, and in turn formal determination as to whether an EIA is required. The EIA will consider a range of alternative land uses, including other forms of woodland cover. The proposed deforestation will have been subject to a significant investigation by a range of formal authorities – if consent has been granted for the deforestation, the application of additional hurdles within UKWAS will not deliver any additional value.
3.5.2				
4. Operations				
4.1 General				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>
	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
4.1.1	4.		Add designated sites	Consents may be required from the statutory conservation

			(SSSI / SAC) to checks	authority
4.1.2				
4.2 Harvest operations				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
4.2.1				
4.2.2				
4.2.3	2. As defined	As defined	<ul style="list-style-type: none"> Appropriate control measure should be in place when burning is within proximity to areas of high fire risk or during periods of drought or heatwave. 	See Appendix 1.
4.2.X				
4.2.4				
4.3 Forest roads				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
4.3.1				
4.3.2				
4.4	2. Prescribed fire operations	As defined	As defined	See Appendix 1.
4.4.1	2. Prescribed fire burning	All woodlands: <ul style="list-style-type: none"> Management 	Prescribed burning should:	See Appendix 1.

	shall undertaken only to reduce fuel loading and achieve other benefits after full consideration of the impacts.	<p>planning documentation</p> <ul style="list-style-type: none"> • Follow legislation and regulations • Design plan • Record of consents • Discussions with adjacent landowners/managers, Fire and Rescue Service, owner, manager, staff, contractors and local community • Field observations • Records of relevant staff training and equipment to under the operation. 	<ul style="list-style-type: none"> • Use appropriate control measures, especially when within proximity to hazards, risk factors and areas of high fire risk. 	
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5. Protection and maintenance

5.1 Planning

Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
5.1.1				
5.1.2				
5.1.X	4.		Add: signs of undergrazing	The Guidance section should add that signs of undergrazing also need to be identified in native woodland, particularly sites important for lichens, mosses and ferns where absence of grazing may result in bramble or other undergrowth which

				impacts negatively on these species.
5.1.3	4.	Invasive species not reflected in this column	Invasive species not reflected in this column	Note the increased emphasis on combating invasive non-native species (GB Non-native Species Secretariat, FIRA NNSS) https://secure.fera.defra.gov.uk/nonnativespecies/home/index.cfm
5.1.4				
5.1.5	2. A vegetation fire management plan shall be developed as appropriate to the level of wildfire risk	<p>All woodlands:</p> <ul style="list-style-type: none"> • Management planning documentation • Design plan • Operations • Protection and maintenance • The community • Record of consents • Discussions with adjacent landowners/managers, owner, manager, staff, contractors and local community • In sites with a high risk of fire, evidence of contact with the Fire and Rescue Service and that their advice has been heeded. • Field observations • Records of relevant 	<p>The vegetation fire plan will identify:</p> <ul style="list-style-type: none"> • Site and landscape priorities (i.e. to life, property and environment). • Social, economic, environmental and climate change assets and major infrastructure at risk • Impact of public access • Risk assessment of hazards • Appropriate control measures to build resilience and lower risk to a low level <p>The vegetation fire plan will help define:</p> <ul style="list-style-type: none"> • Silviculture systems • Species • Conversion to non- 	See Appendix 1.

		staff training and equipment to under the operation.	forested land <ul style="list-style-type: none"> • Harvesting and prescribed burning operations • Protection and maintenance • Fire suppression and community response to sites that have recently used fertilisers • Pollution from smoke particulates on public, staff and fire fighter health 	
	5.			Remove “vegetation management” - serves no purpose.
5.1.6				
5.2 Pesticides, biological control agents and fertilizers				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
Back-ground	1. Principles. A number of non-chemical control methods for pest and disease now exist and they should be evaluated when considering practicable alternatives.		The options to consider, in order of desirability are: management strategy; physical barrier; planting at a high density with a view compensatory thinning; chemical treatment on the nursery; a combination of the above; use of chemicals	The cheapest option is still being preferred (chemical use in the forest) without consideration to environmental factors, esp when controlling hylobius. Decision support tools, WeeNets and higher-density planting are all successfully used by some environmentally-conscious foresters and the increased use of these methods should be encouraged.

			in the forest. Every effort should be made to reduced run-off	
5.2				
5.2.1				
5.2.2				
5.2.3				
5.2.4				
5.2.5	1. The impact of the use of fertilisers should be reduced where practicable		Targeted application of fertiliser is preferred to broad-cast. Controlled release is preferred.	Foresters often do not attempt to assess how much run-off is being caused by rock phosphate application and act simply from historical precedence. The market now has controlled-release alternatives which can be applied directly around the root system, which is an economic application method (applied at time of planting). Efforts should be made to ensure that foresters not only consider whether, when the use of fert is appropriate, that they use an environmentally-appropriate application method.
5.3 Genetically modified organisms				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>
	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
5.3.1				
5.4 Fencing				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>
	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
5.4.1				

5.4.2				
5.5 Pollution				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
5.5.1				
5.5.2				
5.5.3				
5.5.4	2. Ensure that areas of high wildfire risk plan for the impact smoke particulates impacts on public health	All woodlands: • Discussions with adjacent landowners/managers, owner, manager, staff, contractors, Fire and Rescue Service, local authority and local community	Help ensure that wildfires are identified in local authority Community Risk Registers (CRR).	See Appendix 1.
6. Conservation and enhancement of biodiversity				
6.1 Protection of rare species, habitats and natural resources				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
6.1.1	4. Terminology: Change 'endangered [mobile] species' to Species / Habitats of Principal Importance (NERC (2006), S42 - Wales			The definition of 'endangered [mobile] species' is open to different interpretation. Suggest using an established terminology. The appropriate reference may be to Species / Habitats of Principal Importance included in the Section 42 lists for Wales (NERC Act – Natural Environment and Rural Communities Act 2006 – England and Wales: Scotland has separate legislation).

6.1.2				
6.1.3	2. As defined	As defined	<ul style="list-style-type: none"> Building resilience to severe weather impacts such as wildfire. Where appropriate this may include not using LIM practices. 	See Appendix 1.
	3.			The proposed version of UKWAS does not include a clause on compensatory planting, claiming that this needs to be tackled through the planning system. However we still believe there is a role for UKWAS in promoting and encouraging compensatory planting as part of a flexible sustainable forest management approach.
6.2 Maintenance of biodiversity and ecological functions				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
6.2				
6.2.1				
6.2.2	5.		Remove "avoid uniform distribution"	The guidance already talks about the importance of concentrating deadwood in the most suitable areas. We support the increase in stem size to 20cm
6.3 Conservation of semi-natural woodlands and plantations on ancient woodland sites				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
6.3.1				
6.3.2				

6.3.3				
6.4 Game management				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
6.4.1				
6.4.2				
6.4.3				
7. The community				
7.1 Consultation				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
7.1.1	1.	Judgement of FC		Current wording allows for any consultee to comment on any issue. Planting schemes in the highlands have been delayed by consultees commenting on issues outside their scope – their objection contradicting published FC policy. Consultees need to be confined to their stated area of interest and expertise in order to ensure they are representing their members’ interests and not contradicting the nominated experts – this highly undesirable situation has occurred in the past.
	b. consultation processes. The owner/manager shall consult adequately with local people and relevant organisations on their specified area of interest and expertise and make a reasonable response to issues raised or requests for ongoing dialogue and engagement.	Decision Making Body.		
	5.			We welcome removal of re-assessment clause.

7.2 Woodland access and recreation including traditional and permissive use rights				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
7.2.1				
7.2.2	2. As defined	<ul style="list-style-type: none"> Monitoring of access and incidents of fire setting 	<ul style="list-style-type: none"> Liaison with Fire and Rescue Service via Wildfire Groups. 	See Appendix 1.
7.2.3				
7.3 Rural economy				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
7.3.1				
7.3.2	5. Remove			Ill defined. Challenging and time consuming to prove. 7.3.1 is adequate.
7.4 Minimising adverse impacts				
Section	Your proposed amendments			Comments and justification for proposed amendments
	Requirement	Means of Verification	Guidance	
7.4.1	2. As defined	As defined	<ul style="list-style-type: none"> Areas at risk from severe weather incidents. 	See Appendix 1.
7.4.2	2. As defined	As defined	<ul style="list-style-type: none"> Periods of severe weather incidents e.g. drought or heatwaves increasing risk of wildfires 	See Appendix 1.
7.4.3	5.	Remove "A complaints process and public contact point."		Overly bureaucratic, and of doubtful worth. No evidence of necessity over the past 10 years.
8. Forestry workforce				

8.1 Health and safety				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>
	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
8.1.1				
8.1.2				
8.2 Training and continuing development				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>
	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
8.2.1				
8.2.2				
8.3 Workers' rights				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>
	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
8.3.1				
8.3.2				
8.4 Insurance				
<i>Section</i>	<i>Your proposed amendments</i>			<i>Comments and justification for proposed amendments</i>
	<i>Requirement</i>	<i>Means of Verification</i>	<i>Guidance</i>	
8.4.1				
Glossary of Terms				
<i>Term</i>	<i>Your proposed deletions, insertions or amendments</i>			<i>Comments and justification</i>
WMU	5.			See comments in introduction 4.

documents : Pg 85		

Please make any other observations here		
2. See comments on wildfire from Rob Gazzard in Appendix 1.		

Comments from Rob Gazzard B.Sc. (Hons), M.Sc. MICFor, MRICS (respondent 2)

As the past few weeks wildfire has shown that this is now a critical requirement to reflect this in governance documents given our changing climate, density of population and close proximity to critical national infrastructure in peri-rural areas.

No doubt the impact of wildfire upon Scottish and Irish forests and processing sector, in the press in recent weeks, highlights our present vulnerability.

The European Forest Institute proposal to adopt a European Framework Directive on Integrated Fire Management, along with considerable work by Defra, Forestry Commission and other government departments on the relationship between wildfire and climate, will lend support for the wider addition of greater emphasis on wildfire in UKWAS. Please see Annex A for more details.

As requested below are a number of bullet points linked to the most appropriate UKWAS headings. I appreciate there is considerable repetition but I believe this reflects the crosscutting nature of severe weather impacts within the UKWAS framework.

Although 5.1.5 deals specifically with protection and maintenance, the embedding of preparedness, protection, response and recovery in other sections is vital. Many of these are not obvious, but have subtle and cumulative impacts on contingency phases. I have used the table below to highlight these:

UKWAS Section	Contingency Phase
2. Management Planning	<ul style="list-style-type: none"> ● Preparedness
3. Woodland design: creation, felling and replanting	<ul style="list-style-type: none"> ● Preparedness ● Prevention
4. Operations	<ul style="list-style-type: none"> ● Prevention ● Response ● Recovery
5. Protection and maintenance	<ul style="list-style-type: none"> ● Preparedness ● Prevention

6. Conservation and enhancement of biodiversity	<ul style="list-style-type: none"> • Preparedness • Prevention
7. Community	<ul style="list-style-type: none"> • Preparedness • Prevention
8. Forestry workforce	<ul style="list-style-type: none"> • Preparedness • Prevention • Response • Recovery

ANNEX A – WILDFIRE POLICYS

Defra: Climate Change Plan 2010

- Policy and Practical Response (p40-41) "wildfire - monitoring and contingency planning"
- Forestry Actions (p42): "The Forestry Commission will work with the UK Fire and Rescue Services, Communities and Local Government (CLG), Natural England and stakeholders to establish improved fire monitoring for forest and heathland fires and develop a risk assessment approach."
- Climate Change in National Parks and the boards (p133): Four key actions: "adaptation to climate change on a landscape scale, through, for example, expanding woodland habitat networks and wildfire risk management";

Defra: UK Climate Change Risk Assessment (CCRA) - Forestry Sector Phase 1 Report (2010)

- (p8) Effect on forest fires to the forest sector and need for appropriate infrastructure [i.e. resolved in forest design planning] and specialist training

Defra: UK CCRA - Biodiversity Sector Workshop Record (2010)

- Climate effect, impact: medium, Consequence of wildfire incidents on biodiversity (p6) and forestry (p27) from open habitat species

Defra: UK CCRA - Agriculture Sector Workshop Record (2010)

- Climate effect, impact: medium, Consequence of wildfire incidents on agricultural crops (p13 and 33)
- Note: The Forestry Commission England and Forest Research are working with Defra on their Climate Change Risk Assessment (CCRA) on Biodiversity, Forestry and Agriculture.

Forestry Commission England: When to convert woods and forests to open habitat in England: Government policy (Open Habitats Policy)

- (p22) "Evidence indicates that open habitats generally present greater wildfire risk than woodland. This is a particular issue for lowland heathland. We will routinely look at the impact of wildfire risk in the scoping exercise for all proposals for converting woodland to open habitat that are over thresholds for

environmental impact assessment. Where we require an environmental statement, and wildfire risk is identified as an issue, the practitioner should liaise with the local fire authority to agree appropriate mitigation and control measures."

Forestry Commission Scotland: Scottish Climate Change Action Plan 2009-2011

Adapting to Climate Change (p28):

- Risk: Increased risk of forest fires, particularly in late summer
- Likelihood and Impact: Medium
- Response: Treat
- Control: Maintenance of fit-for-purpose, integrated fire plans and standard operating procedures in the forestry sector.
- Action: Review of forest fire preparedness, prevention, response, recovery and monitoring in Scotland – in partnership with Scottish Government Justice Directorate, Fire & Rescue Services, Scottish Wildfire Forum, private sector forestry interests, Forestry Commission Fire Forum, and the wider land management community.
- Overarching Action: Review listed risks and, where necessary, develop detailed risk management plans.

Community and Local Government: IRMP Steering Group Integrated Risk Management Planning: Policy Guidance - Wildfire (2008)

- (p9) Broad Habitat Classification Conifer Woodlands and Dwarf Heath Scrub: High Risk, Suspect able Species at risk - Young: Pines (*Pinus* species), Spruce (*Picea* species), Firs (*Abies* species), Bioenergy plantations (*Eucalyptus* species) Old: Bioenergy plantations (*Eucalyptus* species), Heather, Gorse, Mollinia

European Forest Institute: Towards an Integrated Fire Management - Policy Brief 4

- Concepts of integrating fire Management into land management including: Traditional burning, appropriate traditional fire use, technical fires such as fire within prescription (prescribed burning and wildfire within prescription), suppression fire as well as wildfire.
- Defining the need for a European Framework Directive on Fire