

UKWAS Revision 2020-23 Initial Revision Draft (March 2021)

Consultation Report & Working Group Responses
V1-0, 29 September 2021

The Working Group responses reflect discussions as follows:

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1. Introduction

1.1 Background

A public consultation to generate feedback on the Initial Revision Draft of the UK Woodland Assurance Standard was carried out for 60 days between 1 March 2021 and 30 April 2021; at the request of some consultees, later submissions were also accepted.

The following documents were made available on the UKWAS website:

- A Consultation Paper.
- The Initial Revision Draft of the Standard in two versions:
 - A full version.
 - A short version which included requirements only.
- A Consultation Template which included the full text of the Initial Revision Draft plus boxes for stakeholder feedback.

The responses were analysed in May 2021.

The Initial Revision Draft of the Standard is broken down into Requirements as follows:

- 5 principal sections (e.g. 3: Woodland operations)
- 41 sub-sections (e.g. 3.1: General)
- 97 clauses (e.g. 3.1.1)

The Consultation Paper requested answers to the following questions:

1. Sub-section 2.12.1 b) – draft requirement proposes that only non-toxic (i.e. non-lead) ammunition is used in the management of wild deer. What are your views on the practicability of this proposal?
2. Sub-section 2.4.3 – draft guidance specifies which Non-wood Forest Products (NWFPs) are explicitly included within scope of the standard. Is this a complete list?
3. Sub-section 5.4 Health and safety – the working group is giving further thought to this sub-section and only minor changes to guidance have been made to date. Do you have suggestions?
4. Sub-section 5.6 Workers' rights – the working group is giving further thought to this sub-section. Do you have suggestions?

1.2 Characteristics of respondents

38 individuals or organisations responded to the consultation.

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

- Woodland owners (4, including two responses from individuals at the same organisation)
- Forestry practitioners (9)
- Country forestry authorities and forestry enterprises (1)
- Environmental organisations (9, including two responses from individuals at the same organisation)
- UK countryside, environment and heritage agencies (6, including two responses from individuals at the same organisation)
- Forestry standard setting (1)

- Forest user organisations (3)
- Wood products trade (1)
- Local government and National Park Authorities (2)
- Other (2)

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

In addition, a further submission from a forest user organisation was received in June 2021.

A full list of respondents is given in Appendix 1.

1.3 Presentation of consultation responses

General comments or comments not relating to specific sections of the Standard are summarised in Part 2 of this report, and are provided in full in Appendix 2.

Comments on specific sections of the Standard are summarised in Part 3 of this Report, and are provided in full in the separate Annex 1 alongside the text of the Initial Revision Draft. The summary in Part 3 is intended as a checklist for the UKWAS Working Group to ensure that each issue is considered, and to provide a basis for recording Working Group responses. However, the reader is recommended to refer to each respondent's full comments given in Annex 1 since these often contain important elaboration on the summary point.

As the questions in the Consultation Paper apply to specific sections of the Standard, answers are included in Annex 1.

In all cases, respondents are identified using numbers in square brackets which correspond to the identification numbers in Appendix 1.

2. General comments

Some respondents provided general comments at the beginning of the Consultation Template, while others provided feedback in different formats. All such responses are provided in full in Appendix 2. Some of these comments can be assigned to specific sections of the Standard; these are indicated in Appendix 2, and are addressed through Part 3 of this report and the separate Annex 1. The remaining general comments are summarised below. No attempt has been made to suggest any order of significance in these comments; they are presented largely in respondent identification number order, but grouped thematically where possible.

2.1 High level feedback

One respondent [1] expressed a plea not to ‘overegg the requirements’ and scepticism of the value of certification.

One respondent [2] felt that the good intentions of UKWAS were not reflected in operational practice in certified forests, and that some requirements should be tightened ‘if the standard is to actually enhance sustainability rather than rubberstamp current practice’. Another [16] supported the principle of ‘effective regulation’ providing ‘minimum safeguards for nature and the public interest’, and certification ‘designed to ‘go beyond compliance’’, but was not convinced that this balance had been achieved in all cases and felt that ‘UKWAS is in danger of awarding accreditation to those that merely meet regulatory requirements’. Another [24] believed that it would ‘be good to see the UKWAS standard encourage land management that goes beyond compliance and to better support achievement Government and societal ambitions to restore and enhance nature and ensure new woodland establishment happens at no detriment to existing habitat and species interest’. Yet another respondent [26] felt that proposed changes to the Standard would already ‘enable forestry practitioners to meet extant environmental legislation and... go beyond guidance where possible’.

In contrast, another respondent [3a] stated that the ‘UK has a strong legal system’ and that UKWAS ‘should be wary of adding additional requirements’, particularly if onerous standard requirements create a barrier to certification, citing the example of the south of England.

The same respondent [3a] noted the importance of achieving balance between environmental, social and economic aspects of the Standard, suggesting that the ‘role of commercial woodland in carbon capture and producing a carbon storage product cannot be under emphasized’.

2.2 Deer management

One respondent [6] provided background to their specific comments on section 2.12.1 regarding ammunition used for deer management.

2.3 Silviculture and species

One respondent [8] reiterated comments submitted at the review stage regarding the use of the terms continuous cover forestry (CCF) and lower-impact silvicultural systems (LISS). These general comments were largely replicated in specific comments included in Annex 1, but the Working Group might find it useful to refer to the rationale submitted in August 2020.

The same respondent [8] suggested that ‘the current draft largely ignores the creation and greater use of mixed species stands as an important way to foster resilience to climate change and other hazards’, and often ‘seems to imply that the continuation of single species stands managed by clear felling is an acceptable default option’.

2.4 Positive feedback

One respondent [9] praised the new emphasis on carbon and felt that there ‘could be more reference to climate change and the need for resilience’.

One respondent [14a] expressed their strong support for ‘the aims and objectives of the FSC certification scheme’.

Another respondent [17] welcomed many of the proposed changes to the Standard.

Several respondents [22a, 22b, 23, 32] welcomed the historic environment provisions in the Standard.

One respondent [24] stated that they were ‘very supportive of the code, the requirements in it and the compliance checking regime’ because they ‘believe that all woodlands should be managed sustainably and with nature recovery in mind’.

One respondent [26] congratulated ‘the UKWAS Working Group in producing a much improved version which incorporates the priorities in sustainable forest management to compliment Scotland’s Forestry Strategy & Implementation Plan; associated forestry operational guidance updates and the political direction on climate change’. They supported ‘the inclusion of new and stronger references to biodiversity, soils and carbon management; national flood management and the emphasis on site compliance and standards conformity’ and believed that the ‘simplification and clarification of Guidance coupled with a stronger sense of focus and purpose, will enable forestry practitioners to meet extant environmental legislation and encouraged to go beyond guidance where possible’.

2.5 Nature

One respondent [14a] expressed frustration that ‘Wood Pastures and Parklands are not fully recognised as a woodland habitat although this is where the vast majority of Britain’s ancient and veteran trees reside’. A respondent from the same organisation [14b] asked for ‘a consistent use of the overarching term High Conservation Value (HCV), with a clear definition in the Glossary of the features and landscape types it covers’. They also asked for various additions or changes to the glossary (Ancient Tree, Veteran Tree, Buffer Zone, Parkland, and Wood Pasture) which they felt would require more detailed discussion than was possible via the Consultation Template.

Another respondent [27] called for the Standard, or, at least, the UKWAS Appendix, to include an explicit reference to the FSC National HCV Framework.

One respondent [15] provided extensive notes on rewilding in the context of calls ‘for 30% of land to be restored for nature by 2030’, which they felt should include the ‘creation of core rewilding areas across at least 5% of Britain’ and the ‘establishment of nature-enhancing land and marine uses across at least 25% of Britain’. They drew links between ‘the principles of rewilding..., the spectrum of rewilding approaches, the FSC principles and criteria and the UKWAS standards’, in particular in relation to ‘restoring ecosystems services and environmental values’, ‘ensuring the high conservation values [of] our woodlands’ and ‘implementing management practices which restore and work with natural processes to the maximum extent’. They called for ‘an on-going discussion about the synergy and shared purpose between rewilding and woodland management’. For considerable additional detail see Appendix 2.

Another respondent [16] stated that UKWAS must ‘fully address the nature crisis, as well as the climate crisis’, again in the context of commitments to manage 30% of land for nature. They noted

the importance of this ‘if forest cover is to be increased across the UK without detriment to nature’. In particular, they called for forest expansion and management ‘to protect existing native woodland, and seek to expand this by low intervention methods wherever possible’, and for ‘important open ground habitats which are of high conservation value’ to be ‘protected from inappropriate new forestry... and positively managed’.

In a similar vein, another respondent [24] observed that ‘Woodland creation and management can do much to help address the joint imperatives of climate change and nature loss’ and that it ‘would therefore be good to see the UKWAS standard encourage land management that goes beyond compliance and to better support achievement Government and societal ambitions to restore and enhance nature and ensure new woodland establishment happens at no detriment to existing habitat and species interest’.

One respondent [18] noted that ‘woodlands support important populations of many birds which are red or amber listed as species of conservation concern and which require appropriate habitat management and freedom from disturbance, particularly during the nesting season’. They called for ‘appropriate long-term management of... habitat’ and for nest sites to ‘be safeguarded during forestry operations’, with ‘regular monitoring by skilled ornithologists and good communications with forest managers’. The same respondent noted that ‘there are no provisions within the standard regarding the possible harassment of birds of prey by shooting interests using the woodland’, which they felt could be addressed in section 3 or 4.

2.6 Historic environment

One respondent [22a] suggested that ‘it would be useful if the terminology for cultural and historic features and sites, were revised to more standard terminology, such as ‘Historic Environment’ and ‘heritage assets’, ‘historic or archaeological sites and features’’. Another respondent from the same organisation [22b] suggested that requirements could be more definite, for example requiring ‘consultation with... national statutory historic advisory agencies to agree the definition of what is ‘appropriate to scale’ or ‘proportionate’ in relation to planning and operation where designated heritage assets are involved or local authority historic environment departments for undesignated heritage assets’. They also proposed including ‘guidance about how and when management plans for heritage assets should be devised/revised/reviewed’, suggesting that they ‘should be devised in consultation with national statutory historic advisory agencies or local authority historic environment departments and reviewed quinquennially’.

2.7 Scale, intensity and risk

One respondent [27] noted the decision of the UKWAS Working Group to retain the ‘size neutral’ approach of UKWAS 4 and, while respecting this decision, asked the UKWAS company to justify its general approach to scale, intensity and risk, perhaps in a policy on accessibility to certification.

2.8 Workers’ rights

One respondent [27] welcomed changes in relation to workers’ rights, but noted that ‘it remains to be seen whether the approach... will be considered adequate by FSC International’.

2.9 Standard scope

One respondent [27] noted that there had been some clarification of the scope of the Standard in terms of vegetation types, particularly short rotation coppice, but that ‘no explicit statement has been made as to how the standard might relate to agroforestry’. They also noted the clarification

regarding non-wood products considered to be in scope, but observed that requirements are focussed on harvesting levels and impacts and that there may be a 'need for further requirements or guidance relating to non-wood products, for example in relation to legality (UKWAS 1.1) or health and safety (UKWAS 5.4)'.

2.10 Landscape-scale considerations

One respondent [33] identified a need for woodland creation to 'take a wider view of what already exists in the larger landscape area', considering 'the wider biodiversity, environmental and social impacts created by mass afforestation'. They suggested that 'a limit should be considered per community area on high percentage conifer woodland creation and new woodlands above this limit must contain more broadleaf or open ground (managed for maximum biodiversity) or they should have a higher degree of conservation value or commitment to more environmentally sympathetic practices'.

2.11 Summary of general comments

This is a summary of the comments in the preceding sections, provided as the basis for showing how the UKWAS Working Group has responded to the issues raised. Comments which do not require a Working Group response, such as positive feedback on various aspects of the Standard or the request for the UKWAS company to justify its approach to scale, intensity and risk, are not included. Individual respondents are not identified.

- Avoid requirements that go too far/Tighten requirements to enhance sustainability/Tighten requirements to go beyond regulatory compliance/Avoid requirements that go beyond regulatory compliance/Aim for balance between environmental, social and economic aspects, recognising the role of commercial woodland.
Working Group response: For each review, the Working Group aims to achieve an appropriate balance, taking account of scientific and cultural understanding and technological advances.
- Use the term CCF, and abandon the term LISS.
Working Group response: The Working Group remains of the view that LISS is a more appropriate umbrella term than CCF; however, the Working Group will consider an alternative definition of 'low intensity management approaches' during the next public consultation.
- Recognise the role of mixed species stands as a means of enhancing forest resilience.
Working Group response: Agreed. Reference to species-diverse stands added to UKWAS 2.8.1 guidance.
- Recognise wood pastures and parklands as woodland habitats.
Working Group response: Agreed. Wood pasture and parkland now included in UKWAS 4.4.1 guidance.
- Revisit definitions of 'buffer zone', 'veteran tree' and 'wood pasture', and add definitions of 'ancient tree' and 'parkland'.
Working Group response: The Working Group felt that current definitions of 'veteran tree' and 'wood pasture' were appropriate. The Group felt that 'parkland' did not require a definition, and chose not to use the term 'ancient tree'. A more generic definition of 'buffer zone' was adopted.
- Make consistent use of HCV terminology.
Working Group response: The Working Group has chosen not to make changes to the use of HCV terminology at this stage.

- Refer to the FSC National HCV Framework.
Working Group response: The FSC National HCV Framework will be consulted on in parallel with the next draft of UKWAS, after which a decision will be taken on whether and how to reference it in the Standard.
- Recognise synergies between rewilding and woodland management.
Working Group response: The Working Group felt that rewilding was already an option under UKWAS 2.3.3, but that explicit references were complicated by the difficulty of defining the term.
- Ensure that forest expansion and management protect native woodland and expand it by low intervention methods wherever possible.
Working Group response: Addressed in general terms under UKWAS 2.5.1, 2.5.2, 2.6.1, 4.1.1, 4.2.1, 4.3.1 and 4.4.1. Guidance on afforestation added to UKWAS 2.6.1 and 4.1.2.
- Ensure that open ground habitats of high conservation value are protected from inappropriate forest expansion and positively managed.
Working Group response: Guidance on afforestation added to UKWAS 2.6.1 and 4.1.2.
- Ensure appropriate long-term management of bird habitat.
Working Group response: A number of requirements address this in general terms. In addition, requirement UKWAS 2.11.1(c) has been added to ensure that management planning identifies opportunities where conservation and the enhancement of biodiversity may be achieved alongside other objectives, and examples in guidance include protection and management of black grouse lekking areas and management of ride edges and alongside forest roads to promote bird interest.
- Ensure that nest sites are safeguarded during forest operations.
Working Group response: This is expected to be achieved through existing requirements, particularly UKWAS 3.1.2.
- Address the possible harassment of birds of prey by shooting interests using the woodland.
Working Group response: The Working Group felt that this was adequately covered by requirements for legal compliance (UKWAS 1.1.1) and for adherence to codes of practice (UKWAS 4.9.1).
- Use standard terminology for cultural and historic features and sites, such as 'Historic Environment', 'heritage assets', and 'historic or archaeological sites and features'.
Working Group response: The Working Group has reviewed terminology relating to the historic environment to take account of the suggestions from stakeholders. Further stakeholder input on this subject would be welcome.
- Tighten historic environment requirements, including consultation with statutory historic advisory agencies or local authority historic environment departments.
Working Group response: Explicit references added to UKWAS 2.3.1 guidance, and 4.8.1 requirement and guidance.
- Provide guidance on historic environment management planning.
Working Group response: The Working Group did not consider it appropriate to give detailed guidance.
- Clarify the scope of the standard regarding agroforestry.
Working Group response: The Working Group will consider this point in the next round of drafting.
- Consider the need for further requirements or guidance relating to non-wood products.
Working Group response: Explicit references added to UKWAS 1.1.3(c) requirement, 1.1.5 guidance, 2.2.1(b) requirement, 2.5.1 guidance, and 2.15.1 guidance.

- Consider the landscape context for (new) woodlands and the possibility of higher requirements for broadleaves/open ground/conservation values/environmentally sympathetic practices in more intensively afforested areas.

Working Group response: The scope to address this issue within the Standard is limited, but UKWAS 2.6.1 guidance now explicitly recognises that there are circumstances under which afforestation may not be appropriate.

3. Specific comments

Comments on specific sections of the Standard are provided in full in the separate Annex 1 alongside the text of the Initial Revision Draft, with individual respondents identified as per Appendix 1. The following sections offer a summary of these comments as the basis for showing how the UKWAS Working Group has responded to the issues raised. Comments which do not require a Working Group response, such as positive feedback on various aspects of the Standard, are not included. Individual respondents are not identified.

Contents section

- Change sub-section 4.9 title so elements are in the same order as in the requirements.
Working Group response: Agreed. Title changed to 'Game-rearing, shooting and fisheries management', and requirements placed in a more logical order: game-rearing, shooting, non-toxic ammunition, fisheries.
- Change sub-section 4.8 title to refer to 'cultural features and heritage assets' and define heritage assets.
Working Group response: Title changed to 'Protection of cultural and historic environment sites'.

Introduction section

Sub-section 1: Background and purpose

- Do not reduce the ability of a woodland to be productive, particularly in terms of timber.
Working Group response: Standard development decisions are balanced to include economic, environmental and social interests, and recognise productive functions of forests as well as societal benefits.
- Avoid requirements that increase pressure on small woodlands.
Working Group response: The Working Group is very conscious of the challenges facing small woodland owners. There have been many attempts over the years to address the issue of accessibility to certification for small woods. The Group has taken a decision to keep the standard size neutral. The Group includes two members who work with small woods, whose views are taken into account in all decisions on individual requirements, and who are investigating collaborative approaches to meeting standards.
- Adapt FSC and PEFC requirements to the UK context, particularly in relation to the restoration of open ground habitats.
Working Group response: It is a central objective of UKWAS to meet the requirements of both certification schemes. Where these have proved challenging we have often found pragmatic solutions, and we hope this will prove to be the case in relation to restoration of open ground habitats.

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

- Strengthen wording ('should consider') regarding research.
Working Group response: This wording is appropriate for a recommendation.
- Clarify wording regarding research to include species studies that may inform management.
Working Group response: Wording clarified.
- Add a diagram outlining the audit process and showing how non-conformities are addressed.

Working Group response: This point will be considered further, but is likely to be addressed via the UKWAS website rather than in the Standard itself.

- Add text explaining the consequences of continual non-conformance.

Working Group response: This point will be considered further, but is likely to be addressed via the UKWAS website rather than in the Standard itself.

Sub-section 3: Interpretation of the certification standard

- Add text explaining how stakeholders can raise concerns about the performance of a certified woodland manager.

Working Group response: Agreed to add text signposting to the UKWAS website, with material to be added linking to FSC UK and PEFC UK websites.

- Add text explaining the membership and work of the Interpretation Panel.

Working Group response: Agreed to add explanatory text and a direct link to the UKWAS website.

Using the certification standard

- Throughout the standard, clarify whether a given list is given in order of priority or is all inclusive.

Working Group response: The clarification provided in this section applies consistently throughout the Standard.

- Recognise the importance of consulting and seeking advice from appropriate interested bodies.

Working Group response: A number of changes have been made to guidance on consultation and seeking advice, most obviously under UKWAS 2.3.1.

- Throughout the standard, remove any instances of the term 'should'.

Working Group response: The term 'should' is used deliberately in guidance to indicate recommendations, rather than mandatory requirements.

- Clarify the status of requirements.

Working Group response: All requirements are mandatory, as explained in this section.

Section 1: Legal compliance and UKWAS conformance

Sub-section 1.1: Compliance and conformance

- 1.1.1 Requirement/Guidance: Recognise the importance of consultation in avoiding impacts on protected species.

Working Group response: The Working Group decided to address this issue later in the Standard, including in revised UKWAS 2.3.1 guidance.

- 1.1.3 Example verifiers: Remove 'Long-term unchallenged use'.

Working Group response: The Working Group decided to retain the verifier, on the basis that it is one example and other example verifiers will generally be able to resolve the sort of issue the respondent described.

- 1.1.3 Requirement: Add glossary definition of 'document'/'documented'.

Working Group response: The Working Group decided to address this by expanding the explanation of example verifiers in 'Using the certification standard'.

- 1.1.5(a) Requirement: Add reference to short term protection of ecological integrity.

Working Group response: The Working Group felt that short term protection was implicit in the requirement to protect ecological integrity in the long term.

- 1.1.7 Guidance: Remove commercial viability and management objective loopholes to avoid using UK-grown planting stock.
Working Group response: The Working Group observed that this is guidance, so represents a recommendation rather than a requirement.
- 1.1.7 Guidance: Consider whether planting stock is already adequately addressed in sub-section 4.7.
Working Group response: Section 4.7 addresses planting stock for high conservation value woodlands. The guidance here is more general.
- 1.1.7 Guidance: Consider addressing appropriate nurseries in sub-section 4.7.
Working Group response: Section 4.7 addresses planting stock for high conservation value woodlands. The guidance here is more general.
- 1.1.7 Guidance: Remove 'preferably from seed of UK origin'.
Working Group response: The Working Group felt that this wording was appropriate, allowing some flexibility within an overall precautionary approach, recognising that published advice is constantly evolving.
- 1.1.7 Requirement: Remove as unnecessary in the context of UKWAS 1.1.1.
Working Group response: This is an explicit FSC requirement.
- 1.1.7 Requirement: Consider moving some or all of the guidance on UK-grown planting stock, biosecure nurseries, quarantine periods for imported stock, and plant passporting to the requirement.
Working Group response: At this stage, the Working Group felt that this was appropriate as guidance.
- 1.1.7 Guidance: Refer to certificated biosecure nursery practices, and specify which certification schemes are recognised.
Working Group response: At this stage, the Working Group did not consider it appropriate to refer to specific schemes.

Sub-section 1.2: Protection from illegal activities

No issues.

Sub-section 1.3: Genetically modified organisms

- 1.3.1 Requirement: Consider whether gene edited organisms are permitted.
Working Group response: Glossary definition of GMO added, consistent with FSC, PEFC and UK regulatory definitions; these definitions exclude gene editing.

Section 2: Management planning

Sub-section 2.1: Policy and objectives

- 2.1.1 Guidance: Clarify the definition and use of 'carbon balance', recognising that in some circumstances sustainable management will incur a negative carbon balance.
Working Group response: Reference to carbon balance removed to avoid any implied need to measure carbon, and replaced with a reference to the effects of various woodland management practices on carbon sequestration and storage in trees and soils.
- 2.1.1 Guidance: Recognise the potential range of understandings of economic viability.
Working Group response: The Working Group felt that existing guidance on economic viability gave sufficient steer on the potential range of understandings.

- 2.1.1 Requirement: Clarify what is meant by ‘forest resilience’ before including it in a requirement.
Working Group response: ‘Forest resilience’ is defined in the Glossary.
- 2.1.1 Guidance: Clarify what is meant by ‘carbon balance’ before including it in guidance; take account of carbon storage in harvested products.
Working Group response: As noted above, reference to carbon balance removed.
- 2.1.1 Guidance: Clarify how carbon balance should be measured.
Working Group response: As noted above, reference to carbon balance removed.
- 2.1.1 Guidance: Add reference to a plan to protect and where possible enhance the value of the WMU for biodiversity.
Working Group response: Requirements for management planning for the conservation and enhancement of biodiversity have been expanded in UKWAS 2.11.1.
- 2.1.1 Guidance: Provide separate carbon balance guidance for soil and in-forest biomass/harvested wood product.
Working Group response: As noted above, reference to carbon balance removed.
- 2.1.1 Guidance: Consider whether policy level guidance on carbon balance is necessary in the context of other changes in the draft Standard; if it is, clarify how it can be assessed and met.
Working Group response: As noted above, reference to carbon balance removed.
- 2.1.1 Guidance: Make consideration of carbon balance mandatory.
Working Group response: As noted above, reference to carbon balance removed.
- 2.1.1 Guidance: Add guidance on consulting local authority historic and natural environment special advisors to ensure management objectives are environmentally sound.
Working Group response: Guidance on consultation has been expanded under UKWAS 2.3.1.
- 2.1.2 Guidance: Consider impact of guidance on small woodland owners.
Working Group response: The Working Group did not feel that this guidance increased pressure on small woodland owners.
- 2.1.2 Guidance: Clarify what is meant by ‘practicable and sustainable’.
Working Group response: As with similar instances in the Standard, these terms should be understood in the context of the owner’s/manager’s circumstances and published best practice.
- 2.1.2 Requirement: Consider benefits as well as impacts.
Working Group response: Positive and negative impacts are addressed in the requirement.
- 2.1.2 Guidance: Add guidance on considering opportunities for enhancing biodiversity as an integrated part of the management of the WMU over time.
Working Group response: A requirement for management planning for the conservation and enhancement of biodiversity throughout the WMU has been added in UKWAS 2.11.1.
- 2.1.2 Guidance: Provide separate carbon balance guidance for soil and in-forest biomass/harvested wood product.
Working Group response: Reference to carbon balance removed to avoid any implied need to measure carbon.
- 2.1.2 Guidance: Clarify guidance on wetland and peatlands to refer to ‘potential for’ restoration.
Working Group response: Agreed.

- 2.1.2 Guidance: Make consideration of carbon balance and restoration of peatlands or wetlands mandatory.
Working Group response: As noted above, reference to carbon balance removed.
- 2.1.2 Guidance: Add guidance on consulting local authority advisors to identify potential negative environmental impacts.
Working Group response: Guidance on consultation has been expanded under UKWAS 2.3.1.
- 2.1.3 Guidance: Reconsider new guidance, in particular in terms of timescales covered.
Working Group response: New guidance removed, and a minor addition made to address PEFC requirements.
- 2.1.3 Guidance: Add reference to taking account of changing climate models in species choice.
Working Group response: Explicit reference to climate change added to UKWAS 2.8.1 requirement.
- 2.1.3 Guidance: Reconsider new guidance, in particular in terms of indicating sufficient resource for larger, risk averse organisations; change to refer to consideration of longer term resourcing of essential woodland operations.
Working Group response: As noted above, new guidance removed.
- 2.1.3 Guidance: Add reference to planning for managing browsing levels in woodlands, seeking appropriate advice.
Working Group response: Browsing is addressed in guidance under UKWAS 2.3.3, 2.15.1, 3.6.1, 4.2.1, 4.3.1, 4.4.1 and 4.4.2. Section 2.12 on protection is also relevant.
- 2.1.3 Guidance: Clarify wording of new guidance.
Working Group response: As noted above, new guidance removed.
- 2.1.3(b) Requirement: Address social and environmental factors on equal terms with economic viability.
Working Group response: Wording added to clarify that investment must be in place to implement all requirements of the standard.
- 2.1.3 Guidance: Make guidance mandatory.
Working Group response: The Working Group decided to retain guidance as a recommendation.
- 2.1.3 Requirement/Guidance: Add reference to natural capital.
Working Group response: The Working Group felt that taking a natural capital approach should be at the discretion of the owner/manager.

Sub-section 2.2: Documentation

- 2.2.1 Requirement/Guidance: Add reference to an ancient and veteran tree management plan.
Working Group response: Reference added to a veteran tree management strategy. (Reference also added to a deadwood conservation plan.)
- 2.2.1(c) Requirement/Example verifiers: Add verifier regarding resolution of any impacts outside the WMU.
Working Group response: Already addressed in UKWAS 2.3.3.
- 2.2.1(c) Requirement/Guidance: Ensure impacts outside the WMU are appropriately considered.
Working Group response: The Working Group felt that impacts outside the WMU were

adequately addressed between this and other requirements including UKWAS 2.1.2 and 2.3.3.

- 2.2.1(c): Also address positive impacts.
Working Group response: Agreed.
- 2.2.1 Guidance: Add reference to an environmental management plan.
Working Group response: The Working Group felt that these were core considerations which should be integrated into the management plan.
- 2.2.1 Guidance: Clarify the level of detail needed in a research policy, project plans etc.
Working Group response: The Working Group did not feel that this would be an appropriate level of detail for guidance.
- 2.2.1 Guidance: Consider scope for greater involvement of local authority heritage advisors in management planning.
Working Group response: Consultation is addressed in other requirements including UKWAS 2.3.1 and 4.8.1.
- 2.2.2 Requirement: Make management plans publicly available as a matter of course, subject only to redaction of confidential information.
Working Group response: The Working Group felt that this requirement was proportionate, in the context of the proactive engagement required under UKWAS 2.3.1.
- 2.2.2 Requirement: Add requirement to make information on woodland ownership publicly available.
Working Group response: The Working Group felt that it was primarily for the certification schemes to address this issue; this feedback will be passed on to FSC and PEFC.
- 2.2.2 Requirement: Remove requirement to release management plan.
Working Group response: The Working Group acknowledged potential issues with GDPR, but believed that personal information in the management plan could be redacted in line with provisions for removing confidential information. The Group also acknowledged issues with holding and sharing consultee contact information in a manner consistent with GDPR. New guidance added.
- 2.2.2 Requirement/Guidance: Add reference to proactively sharing plans with parish or community councils and providing opportunities to discuss.
Working Group response: The Working Group felt that this requirement was proportionate, in the context of the proactive engagement required under UKWAS 2.3.1.
- 2.2.3 Requirement: Restore previous wording; draft wording is too open to interpretation.
Working Group response: The Working Group felt that the new wording reflected an important distinction between keeping a plan up to date and formally reviewing it at least every ten years, and would be subject to reasonable interpretation.
- 2.2.3 Guidance: Add reference to invasive non-native species.
Working Group response: Reference added.
- 2.2.3 Guidance: Add reference to post-fire or -disease planning.
Working Group response: The Working Group felt that this was implicit in the wording of the requirement.

Sub-section 2.3: Consultation and co-operation

- 2.3 Title: Change to 'Consultation and engagement'.
Working Group response: While UKWAS 2.3.1 deals with consultation and engagement, UKWAS 2.3.2 and 2.3.3 deal with co-operation with neighbours etc.; as such, the title was felt to be appropriate.

- 2.3.1(f) Requirement/Guidance: Clarify that consultation is deemed to be complete if no responses are received within 30 days.
Working Group response: The Working Group did not feel that it would be appropriate to suggest a hard cut-off for consultation, given that statutory consultees might have longer response times and their silence cannot be taken as agreement/consent.
- 2.3.1(a) Requirement/Guidance: Add guidance to clarify whether requirement regarding evaluations applies to annual surveillance or only to main or re-assessments.
Working Group response: Following feedback from certification body auditors, the Working Group considered removing the text 'The woodland is being evaluated for certification' on the basis that it duplicated consultation carried out by the certification bodies themselves at the time of audit. However, on balance the Group agreed that it was useful for owners/managers at least to inform stakeholders that they were seeking certification, and wording was clarified accordingly.
- 2.3.1 Requirement: Tighten requirement to ensure a balanced approach, with at least one social stakeholder, one environmental stakeholder, and other interested parties and local interests identified and included in any consultation.
Working Group response: The Working Group felt that this was best addressed through additions to existing guidance on appropriate consultees; see below.
- 2.3.1 Guidance: Add 'or natural history significance' to 'sites or features of special cultural or historical significance'.
Working Group response: The Working Group felt that including natural history here might actually undermine subsequent guidance on consultation on biodiversity issues.
- 2.3.1 Guidance: For biodiversity issues, add reference to Wildlife Trusts, Raptor Groups, RSPB, and local experts and natural history groups.
Working Group response: Guidance added regarding 'local experts and nature groups'.
- 2.3.1 Guidance: For water/drainage issues, add reference to EA/SEPA/NRW/NIEA.
Working Group response: Agreed.
- 2.3.1(f) Requirement/Guidance: Clarify that field visits should take place after consultation so as to take account of any information received.
Working Group response: Example verifier and guidance added to ensure consultation responses are acted on. (f) moved to (e) and reworded.
- 2.3.1 Guidance: Add section 'For cultural or historical issues' or 'For historic environment issues'.
Working Group response: Agreed.
- 2.3.1 Guidance: Consider source area when identifying private water supply issues.
Working Group response: Addressed in UKWAS 5.1.2 guidance.
- 2.3.1 Guidance: Remove 'Examples of' from first paragraph.
Working Group response: The Working Group decided to retain the current wording on the basis that the list is neither mandatory nor exhaustive.
- 2.3.2 Requirement: Ensure that owners/managers are not penalised if neighbours do not respond.
Working Group response: Wording changed to ensure that it is the attempt to engage which is recognised.
- 2.3.2 Requirement: Ensure that landscape level discussions do not prevent individual land owners managing their own crop.
Working Group response: The Working Group felt that changes to wording to recognise attempts to engage adequately addressed this.

- 2.3.2 Requirement: Require a ‘reasonable’ level of attempted contact.
Working Group response: The Working Group felt that changes to wording to recognise attempts to engage adequately addressed this.
- 2.3.2 Requirement: Consider potential impacts on environmental values outside the WMU.
Working Group response: Addressed in UKWAS 2.2.1.
- 2.3.2 Guidance: Add guidance on work undertaken at short notice.
Working Group response: Agreed.
- 2.3.3 Requirement: Ensure that landscape level discussions do not prevent individual land owners managing their own crop.
Working Group response: The Working Group felt that changes to wording to recognise attempts to engage adequately addressed this.
- 2.3.3 Requirement: Change ‘opportunities’ to ‘reasonable opportunities’.
Working Group response: The Working Group felt that changes to wording to recognise attempts to engage adequately addressed this.
- 2.3.3 Example verifiers: Add reference to ‘description of appropriate contributory action to be undertaken’.
Working Group response: Verifier wording aligned with UKWAS 2.3.2 example verifiers.
- 2.3.3 Guidance: Add reference to North American Signal Crayfish.
Working Group response: Agreed. The Working Group felt that this should also be addressed as a biosecurity issue under UKWAS 3.1.5, where a generic reference to invasive species was added.
- 2.3.3 Guidance: Recognise potential impacts of invasive species and hydrological change on heritage assets.
Working Group response: The Working Group felt that this was adequately addressed under 4.8.1.

Sub-section 2.4: Productive potential of the woodland management unit (WMU)

- 2.4.1 Requirement: Consider what impact this requirement has in practice.
Working Group response: The Working Group felt that this requirement has an important impact in practice, as auditors consider whether relevant guidance on protecting soil functions etc. is being followed.
- 2.4.1 Requirement: Recognise that it might be necessary to consider soil carbon over a longer timescale than the management plan.
Working Group response: The Working Group felt that this was already encompassed in the wording of the requirement.
- 2.4.1 Requirement: Add protection of soil/carbon and hydrological functions in the short term.
Working Group response: Suitable protections for soil, soil carbon and water have been considered in the revision of section 3.
- 2.4.1 Guidance: Add guidance on how compliance with carbon requirements might be demonstrated.
Working Group response: The Working Group felt that, following discussions regarding UKWAS 2.1.2, the need to avoid implying requirements for (soil) carbon monitoring was understood.
- 2.4.2(b) Requirement: Clarify wording.
Working Group response: Wording clarified.

- 2.4.2 Requirement: Recognise potential issues of under cutting.
Working Group response: Guidance added.
- 2.4.2 Guidance: Replace guidance on irregular stands with a more practical approach based on harvest outturn and monitoring plots.
Working Group response: Guidance changed as suggested.
- 2.4.2(b) Requirement: Change wording to recognise that significant restructuring is a justification, not an 'unless'.
Working Group response: The clarification of wording avoided this issue.
- 2.4.2 Guidance: Add 'Landscape remediation' to guidance on restructuring.
Working Group response: The Working Group felt that restored UKWAS 4 guidance on situations in which harvesting in excess of increment was justified covered the most likely scenarios while also leaving the door open to others.
- 2.4.2 Guidance: Add biodiversity restoration to guidance on harvesting in excess of increment.
Working Group response: UKWAS 4 guidance restored.
- 2.4.2 Requirement/Guidance: Reconsider wording to ensure requirement is workable while still ensuring that harvesting is sustainable.
Working Group response: Guidance added to clarify the application of the requirement, particularly in smaller woods.
- 2.4.3 Guidance: Note that the two lists are different.
Working Group response: Guidance clarified.
- 2.4.3 Requirement/Guidance: Ensure that auditors are able to apply the requirement if a non-listed product is harvested.
Working Group response: Advisory note added to address the potential for other products to be included in scope, certification scheme requirements permitting.
- 2.4.3 Guidance: Consider adding foliage to list(s).
Working Group response: Excluded on the basis that there is no relevant published best practice.
- 2.4.3 Guidance: Clarify that only venison/wild boar meat shot using non-lead ammunition may be sold with a certification claim.
Working Group response: This will be the case by default given UKWAS 2.12.1(b) and 4.9.4 requirements.
- 2.4.3 Guidance: Add wild botanicals for distilling or brewing to list(s).
Working Group response: Excluded on the basis that there is no relevant published best practice.
- 2.4.3 Guidance: Emphasise the precautionary approach when information on sustainable harvesting levels is not available.
Working Group response: Agreed.
- 2.4.3 Guidance: Consider adding livestock meat to list(s).
Working Group response: The Working Group felt that this would require a clear demonstration of demand and concrete proposals for addressing specific issues, such as the period which livestock must spend in the forest; this will be fed back to the respondent.
- 2.4.3 Example verifiers: Add verifier regarding conformance to best practice.
Working Group response: Agreed.
- 2.4.3 Guidance: Clarify guidance regarding reducing deer populations, and add reference to wild boar.
Working Group response: Agreed.

- 2.4.4 Guidance: Change ‘appropriate General Licences’ to ‘or appropriate General Licences’.
Working Group response: The Working Group felt that the current wording was appropriate.

Sub-section 2.5: Assessment of environmental impacts in existing woodland

- 2.5.1 Example verifiers: Change ‘Appropriate Assessment’ to ‘Habitat Regulations Assessment’.
Working Group response: Glossary definition revised to make clear that Appropriate Assessment is a stage in the process associated with the statutory requirement to undertake a Habitats Regulations Assessment (HRA) under the applicable Habitats Regulations.
- 2.5.1 Guidance: Change ‘Designated sites’ to ‘Statutory designated sites’.
Working Group response: Agreed.
- 2.5.1 Requirement/Guidance: Make consistent use of High Conservation Value terminology.
Working Group response: The Working Group has chosen not to make changes to the use of HCV terminology at this stage.
- 2.5.1(a) Requirement: Clarify to ensure that woodland managers undertake assessments even if they are not required to undertake a formal EIA.
Working Group response: Clarification added to guidance.
- 2.5.1(b) Requirement: Change emphasis to avoid adverse environmental impacts wherever possible, and to minimise and mitigate these only where such impacts cannot be avoided.
Working Group response: The Working Group felt that the current wording was appropriate.
- 2.5.1 Guidance: Add reference to the potential impact of timing of operations on species.
Working Group response: The Working Group felt that the wording of UKWAS 3.1.2 gave sufficient steer on this issue in general terms.
- 2.5.1 Guidance: Change ‘sites recognised for their cultural, landscape’ to ‘sites recognised for their cultural, heritage, landscape’.
Working Group response: Wording changed to use the defined term ‘cultural features’.
- 2.5.1 Requirement/Guidance: Add reference to positive impacts.
Working Group response: Agreed.
- 2.5.1 Guidance: Add reference to seeking advice from local authority heritage advisors.
Working Group response: Addressed in UKWAS 2.3.1 guidance.
- 2.5.1 Guidance: Add guidance on consultees if a formal EIA is required.
Working Group response: The Working Group did not feel that this would be appropriate.
- 2.5.1 Guidance: Add links to EIA legal requirements, contact lists for designated sites, and contact lists for undesignated sites.
Working Group response: The Working Group did not feel that this would be appropriate.
- 2.5.2 Guidance: Add reference to the desirability of restoring PAWS sites back to semi-natural woodland.
Working Group response: The Working Group felt that PAWS restoration was best addressed under UKWAS 4.3.1.
- 2.5.2 Guidance: Add reference to browsing impacts, overgrazing and undergrazing.
Working Group response: Cross reference added to UKWAS 2.3.3 and 2.12.1.
- 2.5.2 Guidance: Add reference to creating open space to conserve and enhance heritage assets.
Working Group response: The Working Group felt that this was too specific, and adequately covered in general terms by existing guidance.

- 2.5.2 Guidance: Add reference to seeking advice from local authority heritage advisors.
Working Group response: Addressed in UKWAS 2.3.1 guidance.
- 2.5.3 Guidance: Add reference to the management of priority open ground habitats within the WMU in order to maintain them in good ecological condition.
Working Group response: The Working Group felt that this was best addressed under UKWAS 4.4.

Sub-section 2.6: Woodland creation

- 2.6.1(a) Requirement/Guidance: Provide guidance on what is ‘appropriate to their scale and the sensitivity of the site’.
Working Group response: The Working Group did not feel that it was appropriate to provide detailed guidance.
- 2.6.1 Requirement: Clarify separation of management and operational planning and level of detail required.
Working Group response: The Working Group felt that this management planning requirement was clear.
- 2.6.1(b) Requirement: Remove ‘and’ from end of second item in bulleted list.
Working Group response: Agreed.
- 2.6.1 Guidance: Change guidance beginning ‘New woodlands should...’ to explicitly address situations in which afforestation is not appropriate.
Working Group response: Guidance added to note that afforestation might not always be appropriate.
- 2.6.1 Guidance: Consider adding guidance on new fencing.
Working Group response: Already addressed under UKWAS 3.5.2.
- 2.6.1 Guidance: Recognise that woodland creation with native trees and peaty soils are not mutually exclusive.
Working Group response: The Working Group felt that the current wording encompassed this.
- 2.6.1 Guidance: Change ‘Historical and cultural features’ to ‘Historical and archaeological features’.
Working Group response: Changed to ‘Historical, archaeological and cultural features’.
- 2.6.1(b) Requirement: Change ‘visual, cultural and environmental values’ to ‘visual, cultural, historic and environmental values’.
Working Group response: Changed to ‘visual, cultural and environmental values and character of the wider landscape’. This bullet point is about weighting values (as defined in the Glossary) at landscape level.
- 2.6.1 Guidance: Change ‘Historic environment features should be identified and protected’ to ‘Historic environment features should be identified, protected and, where possible, enhanced’.
Working Group response: The Working Group did not feel that this was appropriate in the context of this requirement, and was best addressed under UKWAS 4.8.1.
- 2.6.1 Guidance: Change ‘Field Surveys and relevant data sources should be used’ to ‘Field Surveys of an appropriate standard as defined by relevant professional bodies should be used’.
Working Group response: The Working Group did not feel that it was appropriate to specify this, although appropriate qualifications etc. are addressed under UKWAS 5.5.1.

- 2.6.1 Requirement: Note that this requirement is not aligned with species percentage limits in UKFS.
Working Group response: A deliberate decision was made in the development of UKWAS 4 to remove percentage limits on the grounds that they led to perverse, target driven outcomes, rather than being based on site conditions.
- 2.6.1 Guidance: Add reference to water supplies.
Working Group response: Agreed.
- 2.6.1 Example verifiers: Add reference to available chemistry, ecology and fisheries data.
Working Group response: The Working Group felt that this was more appropriate as guidance.
- 2.6.1(b) Requirement: Add reference to woodland resilience regarding pests and diseases and climate change.
Working Group response: Reference to resilience added.
- 2.6.1 Guidance: Add reference to Local Authority heritage service and local community groups regarding field surveys.
Working Group response: Addressed in UKWAS 2.3.1 guidance.
- 2.6.2 Requirement: Note that further research into forest soils and carbon needs to be carried out.
Working Group response: The Working Group noted this observation.
- 2.6.2 Requirement: Clarify separation of management and operational planning and level of detail required.
Working Group response: The Working Group felt that this management planning requirement was clear.
- 2.6.2 Requirement: Add 'consistent with the need to establish trees effectively'.
Working Group response: The Working Group decided to address this in guidance.
- 2.6.2 Requirement: Change requirement to minimise or avoid drainage works altogether.
Working Group response: Agreed.
- 2.6.2 Example verifiers: Add reference to consultation with EA/SEPA/NRW/NIEA.
Working Group response: Addressed in UKWAS 2.3.1 guidance.
- 2.6.2 Guidance: Add reference to significant riparian buffer zones and effective silt traps.
Working Group response: Addressed in general terms in UKWAS 3.1.1 et seq., and there are specific references to protection of water and buffer/riparian zones throughout the Standard.
- 2.6.2 Guidance: Recognise that woodland creation with native trees and peaty soils are not mutually exclusive.
Working Group response: The Working Group felt that the current wording encompassed this.
- 2.6.2 Requirement: Add reference to public and private water supplies.
Working Group response: The Working Group decided to address this in guidance.

Sub-section 2.7: Woodland restructuring

- 2.7.1 Requirement: Recognise that small woods might have to be restructured in a single operation.
Working Group response: The Working Group noted that small woodland owners often have a different understanding of economic viability, and will often prefer gradual change.
- 2.7.1 Guidance: Recognise that larger coupes might be needed by some sensitive species, and more generally that range of species benefit from clearfell silviculture.

Working Group response: The Working Group felt that the currenting wording of guidance allowed for larger coupes where these were necessary to create wildlife habitat.

- 2.7.1 Requirement: Add reference to structure.
Working Group response: Added reference to 'in-stand structure'.
- 2.7.1 Guidance: Change 'In larger even-aged plantations, the age structure may be improved through' to 'In larger even-aged plantations, the diversity of the plantation may be improved through' and add 'adopting an alternative silvicultural approach such as continuous cover forestry' to bulleted list.
Working Group response: Changed 'age structure' to 'structural diversity'. Bullet point on LISS moved here.
- 2.7.1 Guidance: Clarify how larger coupes are compatible with the use of lower-impact silvicultural systems.
Working Group response: This point moved to bulleted list on restructuring of plantations.
- 2.7.1 Requirement: Recognise that there must be scope to reduce existing diversity, e.g. in response to disease.
Working Group response: Guidance added.
- 2.7.1 Requirement: Ensure that a proportion of open-grown trees are retained to become future veteran trees.
Working Group response: Addressed in UKWAS 4.6.3, but see also guidance added as per response below.
- 2.7.1 Guidance: Add 'Leaving areas to develop as veteran trees and standing dead timber' to first bulleted list.
Working Group response: Point added.
- 2.7.1 Guidance: Change 'Where appropriate, woodland restructuring can provide opportunities' to 'Woodland restructuring can provide opportunities'.
Working Group response: The Working Group felt that the currenting wording of guidance was appropriate.
- 2.7.1 Guidance: Recognise that all WMUs have the potential to be improved as part of continuous improvement.
Working Group response: Reference added to guidance.
- 2.7.1 Requirement: Change 'gradually' to 'systematically' and require restructuring to be expressed in a plan.
Working Group response: The Working Group did not feel that this change would fulfil the aims of this requirement, and did not feel that it was appropriate to require a plan for all scales of management. However, the Group agreed to remove 'gradually' to allow for more proactive restructuring.
- 2.7.1 Requirement/Guidance: Change guidance on smaller coupe sizes to a requirement.
Working Group response: The Working Group felt that the requirement would by default lead to smaller coupe sizes.
- 2.7.1 Guidance: Reconsider guidance on larger coupe sizes.
Working Group response: The Working Group considered the current guidance to be appropriate, particularly with regard to wildlife habitat.
- 2.7.1 Guidance: Add 'improving forest resilience and biodiversity practice' to first paragraph.
Working Group response: Agreed.
- 2.7.1 Guidance: Add 'Creation of open spaces and views to protect, support or enhance heritage assets' to third bulleted list.
Working Group response: Agreed.

- 2.7.1 Guidance: Add reference to leaving mature trees in situ to become veteran trees and providing standing dead timber to support dead wood species specialists.
Working Group response: Addressed in UKWAS 4.6.3, but see also guidance added as per response above.
- 2.7.1 Guidance: Consider reference to ‘veteranisation’ of existing mature trees.
Working Group response: Addressed in UKWAS 4.6.3, but see also guidance added as per response above.
- 2.7.1 Guidance: Add reference to opportunities to correct poorly designed land drainage during restructuring.
Working Group response: Agreed.

Sub-section 2.8: Tree species selection

- 2.8.1 Requirement: Consider requiring incremental change towards future climate suitable species.
Working Group response: Reference to climate change added.
- 2.8.1 Requirement: Consider setting minimum requirements for species diversity.
Working Group response: The Working Group did not feel that it was appropriate to be prescriptive; note that specific percentage requirements were removed at the last revision.
- 2.8.1 Requirement/Guidance: Emphasise the importance of diversity for reducing pest/disease risk.
Working Group response: The Working Group did not feel that it was necessary to make this point explicitly, given that the Glossary definition of forest resilience includes pests/diseases, and UKWAS 2.8.1 guidance promotes species diversification.
- 2.8.1 Requirement/Guidance: Add ‘including greater use of species mixtures’ to first sentence [of requirement or guidance?].
Working Group response: Guidance added.
- 2.8.1 Requirement: Recognise that there must be scope to reduce existing diversity, e.g. in response to disease.
Working Group response: Guidance added to UKWAS 2.7.1.
- 2.8.1 Guidance: Recognise that encouraging a greater range of tree species on ASNW sites might be damaging, and that conservation of such sites should take primacy.
Working Group response: The Working Group felt that this was adequately addressed in UKWAS 4.2.1.
- 2.8.1 Requirement/Guidance: Consider restoration of PAWS to semi-natural woodland over a maximum of two harvesting cycles.
Working Group response: Requirement added to UKWAS 4.3.1 for restoration to be the primary management objective for PAWS.
- 2.8.1(c) Requirement: Ensure that this does not encourage the introduction of non-native tree species on ASNW sites.
Working Group response: Requirement 2.8.1(d) and associated guidance added to give a clearer steer on using native species for regeneration on statutory designated sites, ASNW and PAWS.
- 2.8.1 Requirement: Consider how successfully this addresses the FSC requirement to use ‘ecologically well adapted’ species and the preference for the use of native species and local genotypes (Criterion 10.2), and in particular whether there is too much scope for species choice to be determined by management objectives, rather than by what is ecologically

appropriate.

Working Group response: This issue will be discussed by the UKWAS Steering Group.

Sub-section 2.9: Non-native species

- 2.9.1 Requirement/Guidance: Recognise the impact of species currently present, such as Sitka Spruce and Western Hemlock.

Working Group response: The feasibility of addressing species currently present was considered during the development of UKWAS 4, and it was concluded that requirements for co-operative control of invasive species in UKWAS 2.3.2(b) (UKWAS 2.3.3 in the present draft) went as far as they reasonably could. However, the wording of UKWAS 2.9.1(a) and guidance was changed to focus on individual woodlands, rather than WMUs which can be very large and include many woods. In addition, UKWAS 2.8.1(d) was added to avoid the deliberate introduction of non-native tree species in high conservation value woods.

- 2.9.1 Requirement: Move reference to regulatory requirements to part (a).

Working Group response: Reference added to (a).

- 2.9.1 Requirement: Expand to address the removal of invasive non-native species where these are causing an issue.

Working Group response: See previous response regarding UKWAS 2.3.2(b)/2.3.3. The new UKWAS 2.8.1(d) requires the management of regeneration of non-native trees species in high conservation value woods to avoid threats to those values. Adverse impacts of invasive species are also addressed under UKWAS 4.2.1, 4.4.1 and 4.4.2 (in general terms in requirements, and specifically in guidance).

- 2.9.1 Guidance: Remove first paragraph.

Working Group response: See previous response regarding the feasibility of addressing species currently present.

Sub-section 2.10: Silvicultural systems

- 2.10.1 Requirement: Specify that ploughing is only to be used in exceptional circumstances where it can be shown there is no alternative.

Working Group response: Addressed in UKWAS 2.6.2 guidance.

- 2.10.1(b) Requirement: Change 'Where species, sites, windthrow risk, tree health risk and management objectives allow, a range of silvicultural approaches, and in particular lower-impact silvicultural systems, are adopted' to 'Wherever species, sites, windthrow risk, tree health risk and management objectives allow, a range of silvicultural approaches, and in particular continuous cover forestry, are adopted'.

Working Group response: 'Where' is a standard form of wording in UKWAS. The Working Group remains of the view that LISS is a more appropriate umbrella term than CCF; however, the Working Group will consider an alternative definition of 'low intensity management approaches' during the next public consultation.

- 2.10.1 Guidance: Change 'The carbon impacts of the operational requirements of differing silvicultural systems such as a reduction in scale of clear-fells or extended fallow periods' to 'The carbon impacts of less intensive management approaches, such as continuous cover forestry'.

Working Group response: Agreed to remove 'such as a reduction in scale of clear-fells or extended fallow periods' but not to add reference to CCF.

- 2.10.1 Requirement: Consider a specific requirement including either a presumption for, or a minimum target for, lower impact silvicultural systems.
Working Group response: This issue will be discussed by the UKWAS Steering Group.
- 2.10.1 Guidance: Provide separate carbon balance guidance for soil and in-forest biomass/harvested wood product.
Working Group response: Reference to carbon balance removed to avoid any implied need to measure carbon, and replaced with a more generic reference to carbon sequestration and storage in trees and soils.
- 2.10.1 Guidance: Highlight the benefits of thinning.
Working Group response: The Working Group felt that it was sufficient to steer owners/managers to have soundly-based thinning plans.
- 2.10.1 Requirement: Consider how successfully this addresses the FSC requirement to use 'ecologically appropriate' silvicultural practices (Criterion 10.5), and in particular whether there is too much scope for silviculture to be determined by management objectives, rather than by what is ecologically appropriate.
Working Group response: This issue will be discussed by the UKWAS Steering Group.
- 2.10.2 Guidance: Clarify the role of coppicing.
Working Group response: Coppicing is included in the glossary definition of lower-impact silvicultural systems.
- 2.10.2 Guidance: Clarify that small coupe fellings are not appropriate for Scots Pine managed on a shelterwood system.
Working Group response: The Working Group felt that the guidance was sufficiently general, and that crucially the relevant Forestry Commission Practice Guide addresses appropriate silvicultural systems for native pinewoods.

Sub-section 2.11: Conservation

- 2.11.1 Requirement/Guidance: Replace 'lower-impact silvicultural systems' with 'continuous cover forestry'.
Working Group response: The Working Group remains of the view that LISS is a more appropriate umbrella term than CCF; however, the Working Group will consider an alternative definition of 'low intensity management approaches' during the next public consultation.
- 2.11.1 Requirement/Guidance: Add reference to wood pasture, parkland, and ancient and veteran trees.
Working Group response: Wood pasture is addressed in UKWAS 4.4.2 guidance. Added to UKWAS 4.4.1 guidance.
- 2.11.1(a) Requirement: Change 15% to 30%, with 10% strictly protected, planned and implemented over a 20-year period for plantation WMUs established prior to 2023.
Working Group response: Rather than increasing the percentage of the WMU where conservation was the primary objective, the Working Group felt that more would be gained by adding a requirement 2.11.1(c) to identify opportunities where conservation and the enhancement of biodiversity may be achieved alongside other objectives throughout the remainder of the WMU, and by providing additional guidance.
- 2.11.1(b) Requirement: Ensure natural reserves and other valuable semi-natural habitats are managed.
Working Group response: Addressed under UKWAS 4.4.1, 4.4.2, 4.4.3 and 4.6.1.

- 2.11.1(a) Requirement: Change 15% to 30%, to be achieved particularly through restoration of priority open habitats.
Working Group response: As noted above, the 15% requirement has been retained but supplemented with a requirement 2.11.1(c) to identify opportunities where conservation and the enhancement of biodiversity may be achieved alongside other objectives throughout the remainder of the WMU.
- 2.11.1(b) Requirement: Ensure important open habitats are managed.
Working Group response: Addressed under UKWAS 4.1.1 and 4.4.2.
- 2.11.1(a) Requirement: Change 15% to 30%, to be implemented over time, e.g. at restocking.
Working Group response: As noted above, the 15% requirement has been retained but supplemented with a requirement 2.11.1(c) to identify opportunities where conservation and the enhancement of biodiversity may be achieved alongside other objectives throughout the remainder of the WMU.
- 2.11.2(a) Requirement: Reconsider the logic of enhancing areas (extent) of HCVs such as ASNW or PAWS.
Working Group response: Wording clarified.
- 2.11.2 Guidance: Clarify that surveys must be undertaken at appropriate seasons, and would benefit from taking advice from Wildlife Trusts, RSPB, Raptor groups and others.
Working Group response: Wording clarified regarding timing of surveys.

Sub-section 2.12: Protection

- 2.12.1(b) Requirement: Remove.
Working Group response: Having sought additional advice from wildlife management professionals, Working Group remains convinced that this requirement is appropriate.
- 2.12.1 Example verifiers: Change 'Awareness of potential problems' to 'Awareness of potential problems – through use of appropriate herbivore population and risk assessment' and 'Awareness of actual damage' to 'Awareness of actual damage – through use of appropriate impact surveys'.
Working Group response: Agreed.
- 2.12.1(b) Requirement: Replace with requirement to follow best practice defined by the Deer Initiative Partnership or NatureScot.
Working Group response: Best practice to be added to the UKWAS Appendix.
- 2.12.3 Requirement/Guidance: Recognise the intention of the manager if products do not act in the way intended.
Working Group response: The Working Group felt that the wording of the requirement would allow it to be audited in this way.
- 2.12.3 Requirement: Clarify separation of management and operational planning; consider moving requirement to section 3.
Working Group response: Decisions on protection methods might be relatively high level, while decisions on specific products might be more operational. At this stage, the Working Group felt that the location of this requirement was appropriate, although it could conceivably fit into section 3.5.
- 2.12.3 Guidance: Note that fences must be marked where woodland grouse and other bird species that collide with fences are present.
Working Group response: Best practice to be added to the UKWAS Appendix.

- 2.12.3 Guidance: Note that fences might prevent beneficial browsing.
Working Group response: The Working Group felt that this was best addressed under UKWAS 3.5.1.
- 2.12.3 Guidance: Change ‘Wildlife management and/or fencing may be a more suitable option than individual tree protection for larger areas and densely-planted smaller areas’ to ‘Wildlife management and/or fencing may be a more suitable option than individual tree protection for larger areas and dense planting may also provide a more suitable option for smaller areas’.
Working Group response: Agreed.
- 2.12.3 Example verifiers: Add ‘Evidence that recyclable products have been placed into a suitable recycling system’.
Working Group response: Agreed.
- 2.12.3 Guidance: Change ‘should’ to ‘must’ in fifth paragraph, as removal of waste materials is a legal requirement.
Working Group response: Guidance clarified.
- 2.12.4 Requirement: Consider moving requirement to section 3.
Working Group response: The Working Group felt that this requirement for a biosecurity policy was most appropriate under management planning.
- 2.12.4 Example verifiers: Add reference to discussion with any sporting leaseholders to ensure e.g. fishing activity follows biosecurity protocols to prevent the introduction of invasive non-native species.
Working Group response: Guidance added.
- 2.12.4 Guidance: Note that good forestry practices must be followed to reduce the risk of spread of the species listed.
Working Group response: Addressed under UKWAS 3.1.5.
- 2.12.4 Guidance: Consider the plant health management standard from Plant Healthy and the potential to spread, as well as import, pests and diseases.
Working Group response: Best practice to be added to the UKWAS Appendix.

Sub-section 2.13: Conversion

- 2.13.1(b) Requirement: Change requirement to specify that such areas will not qualify unless a management plan is in place to restore greater than 75% by area of the WMU by planting locally native species.
Working Group response: The Working Group felt that situations in which semi-natural woodland was converted to plantation (rather than e.g. lost to development) after 1994 were sufficiently rare as to be adequately covered by the existing guidance allowing for certification the owner/manager is not responsible directly or indirectly for such conversion.
- 2.13.1(b) Requirement: Recognise that this might preclude opportunities for restoration for biodiversity of more recent plantations.
Working Group response: See previous response.
- 2.13.2(b) Requirement: Reconsider 5% limit, particularly in the context of small woods achieving 15% for conservation.
Working Group response: The 5% limit is a PEFC requirement and must be included in the standard. With assistance from PEFC UK and PEFC International, the Working Group has discussed and agreed an approach to meeting this requirement at the national level with individual conversions greater than 5% of a WMU agreed on a case by case basis by the certification scheme. Requirement and guidance wording have been updated accordingly.

- 2.13.2(b) Requirement: Reconsider high carbon stock condition, particularly given the challenges of determining carbon stocks.
Working Group response: The high carbon stock condition is a PEFC requirement and must be included in the standard. Requirement wording has been refined, and guidance on soil carbon has been added. The Working Group will work on defining ‘significantly high carbon stocks’ during the next public consultation.
- 2.13.2(b) Requirement: Reconsider 5% limit, particularly where woodland removal is for restoration of a critical natural capital resource.
Working Group response: See response above regarding the 5% limit.
- 2.13.2(b) Requirement: Consider allowing carbon loss to be matched by the creation of a new carbon resource.
Working Group response: As this might require action outside certified areas, it was considered to be beyond the scope of UKWAS.
- 2.13.2(b) Requirement: Reconsider 5% limit, and clarify timescale.
Working Group response: See response above regarding the 5% limit.
- 2.13.2 Requirement: Reconsider (a) and (b) split.
Working Group response: The Working Group considered the split between (a) and (b) to be appropriate, but agreed to place the 5% limit in a separate (c).
- 2.13.2(b) Requirement: Reconsider 5% limit, particularly in the context of large scale peatland restoration.
Working Group response: See response above regarding the 5% limit.
- 2.13.2(b) Requirement: Reconsider 5% limit, particularly in the context of priority open ground habitat restoration.
Working Group response: See response above regarding the 5% limit.
- 2.13.2(b) Requirement/Guidance: Reconsider 5% limit, but if it must be retained consider providing guidance on situations where this limit may be exceeded.
Working Group response: See response above regarding the 5% limit.
- 2.13.2(b) Requirement: Add a caveat that excludes clearances undertaken for the conservation of designated historic and archaeological features or undesignated features of potential national significance.
Working Group response: See response above regarding the 5% limit.
- 2.13.2(b) Requirement: Add an ‘exceptional circumstances’ exemption to the 5% limit.
Working Group response: See response above regarding the 5% limit.

Sub-section 2.14: Implementation, amendment and revision of the plan

No issues.

Sub-section 2.15: Monitoring

- 2.15.1 Guidance: Add reference to the impact of successional changes on open space and open ground and action to remove self sown seedlings etc. to guidance on monitoring environmental impacts.
Working Group response: Agreed.
- 2.15.1 Guidance: Add ‘heritage assets’ to list of special features.
Working Group response: Agreed.
- 2.15.3 Requirement/Guidance: Note limitations imposed by GDPR.
Working Group response: Guidance added.

Section 3: Woodland operations

Sub-section 3.1: General

- 3.1.2 Guidance: Ensure that owners/managers are not vilified for justified use of fertilisers, pesticides and plastics.
Working Group response: The Working Group noted that owners/managers were only asked to carefully consider their choices.
- 3.1.2 Guidance: Note that the use of electric machinery will only help with the carbon issue if the charging point is also carbon neutral.
Working Group response: The Working Group noted this, but also that, as the electricity supply is progressively decarbonised, so the positive carbon impact of electric vehicles will increase.
- 3.1.2 Requirement/Guidance: Note that imposing greener options on contractors might affect the economic viability of small woodland management.
Working Group response: Added 'where practicable'.
- 3.1.2 Guidance: Reconsider guidance on low emission vehicles, as premature.
Working Group response: The Working Group noted that owners/managers were only asked to carefully consider their choices.
- 3.1.2 Guidance: Reconsider guidance on pesticides, particularly in terms of how it will be applied at audit.
Working Group response: The Working Group noted that owners/managers were only asked to carefully consider their choices.
- 3.1.2 Requirement: Add reference to tree buffer zones to list of 'measures to protect...'.
Working Group response: Addressed in UKWAS 4.6.3 guidance.
- 3.1.2 Requirement: Make consistent use of High Conservation Value terminology.
Working Group response: The Working Group has chosen not to make changes to the use of HCV terminology at this stage, but the FSC National HCV Framework will be consulted on in parallel with the next draft of UKWAS.
- 3.1.2 Requirement/Guidance: Add reference to taping off ancient and veteran tree buffer zones.
Working Group response: Protection of veteran trees is addressed under UKWAS 4.6.3.
- 3.1.2 Requirement: Consider requirement for consultation prior to works commencing.
Working Group response: Addressed for biodiversity issues in UKWAS 2.3.1 guidance, as are timber transport and a wide range of other issues.
- 3.1.2 Guidance: Add reference to timing operations to avoid nesting, lekking or other sensitive times for priority species.
Working Group response: The Working Group felt that the requirement wording gave sufficient steer in general terms.
- 3.1.2 Guidance: Reconsider 'should' as too passive to move owners/managers towards alternatives to plastics.
Working Group response: 'Should' indicates a recommendation, in this case supporting the requirement to reduce greenhouse gas emissions.
- 3.1.2 Requirement: Add reference to natural capital.
Working Group response: Agreed.
- 3.1.2 Guidance: Encourage innovation or technology to address air quality in transport.
Working Group response: The Working Group felt that it was most important to provide a general steer to certificate holders, and that it was not appropriate to promote innovation.

- 3.1.3 Requirement: Change 'historic sites' to 'heritage assets' and provide separate definition.
Working Group response: Agreed.
- 3.1.3 Requirement: Ensure that all operational plans are also communicated to site supervisors and managers, not just workers.
Working Group response: The Glossary definition of 'workers' is broad and includes owners/managers.
- 3.1.3 Requirement: Ensure that roles and responsibilities on site are defined and agreed.
Working Group response: Roles and responsibilities would be expected to be defined in line with current best practice guidance as per UKWAS 3.1.1.
- 3.1.4 Requirement: Clarify who decides whether to consult 'statutory bodies and/or local people'.
Working Group response: Guidance added to clarify what sites/features to consider under the second bullet point, how to identify them and who to consult in relation to their management through reference to other sections of the Standard.
- 3.1.4 Requirement: Add reference to checks for schedule 1 and 1A species.
Working Group response: Guidance added to clarify what sites/features to consider under the second bullet point, how to identify them and who to consult in relation to their management through reference to other sections of the Standard.
- 3.1.4 Requirement/Guidance: Add reference to consultation with local authority archaeology services, in addition to statutory bodies.
Working Group response: Guidance added to clarify what sites/features to consider under the second bullet point, how to identify them and who to consult in relation to their management through reference to other sections of the Standard.
- 3.1.4 Requirement: Clarify when statutory bodies should be consulted, rather than local people.
Working Group response: Guidance added to clarify what sites/features to consider under the second bullet point, how to identify them and who to consult in relation to their management through reference to other sections of the Standard.
- 3.1.5 Guidance: Change 'Forest machinery should be washed down' to 'It is recommended that forestry machinery is power washed'.
Working Group response: The word 'should' indicates a recommendation. Guidance clarified, recognising that a wide range of machinery might be used.

Sub-section 3.2: Harvesting and restocking

- 3.2.1(b) Requirement: Change 'Damage to standing trees' to 'Damage to standing trees and their root buffer zones'.
Working Group response: Agreed to refer to root zones specifically in relation to veteran trees.
- 3.2.1(b) Requirement: Add requirement, linked to UKWAS 3.2.4, to keep burning to a minimum and away from watercourses or features of conservation or environmental value.
Working Group response: The Working Group noted that burning required justification and avoidance of damage in UKWAS 3.2.1 and 3.2.4.
- 3.2.3 Requirement: Remove 'There is no stump-harvesting'.
Working Group response: 3.2.3(b) changed to address the limited circumstances under which stumps can be removed; whether stumps removed in line with this requirement were subsequently sold would be at the discretion of the owner/manager.

- 3.2.3 Guidance: Add reference to ‘heritage assets’ to guidance on ‘historical features and archaeological deposits’.
Working Group response: **Agreed.**
- 3.2.3 Guidance: Consider changing ‘catchments’ to ‘watercourses’, and clarify whether leaching applies to soil[?].
Working Group response: **Clarified wording adopted.**
- 3.2.3 Requirement/Guidance: Clarify the difference between ‘stump harvesting’ and ‘stump removal’, and whether stumps removed for permitted reasons may be harvested.
Working Group response: **See changes to 3.2.3(b) which avoid reference to stump harvesting.**
- 3.2.4 Guidance: Consider changing ‘catchments’ to ‘watercourses’, and clarify whether leaching applies to sooty particles.
Working Group response: **Added reference to smoke and sooty particles. Changed ‘catchments’ to ‘watercourses’.**
- 3.2.5 Requirement/Guidance: Note that further research into soil carbon losses via ground preparation is required.
Working Group response: **The Working Group noted that guidance evolves and that the latest best practice guidance should be considered.**
- 3.2.5 Requirement: Note that carbon storage within harvested timber products is beyond the control of the owner/manager.
Working Group response: **The Working Group considered it reasonable for the owner/manager to take into account the potential range of products; requirement wording clarified and guidance added.**
- 3.2.5 Guidance: Move guidance on whether peatland or wetland should be restocked to its own section.
Working Group response: **The Working Group felt it best to ensure that this guidance was considered in the context of this requirement.**
- 3.2.5 Requirement: Clarify separation of management and operational planning.
Working Group response: **While recognising that other separations were possible, the Working Group felt that the division between the management planning considerations in e.g. UKWAS 2.5, 2.6 and 2.7 and the operational planning considerations here was appropriate.**
- 3.2.5 Requirement/Guidance: Add reference to the desirability of considering a low-impact management approach such as CCF as a means of minimising soil disturbance and any consequent soil carbon losses, consistent with UKFS.
Working Group response: **The Working Group felt that the broad guidance in the second paragraph, clarified to refer to ‘appropriate silvicultural management’, was sufficient.**
- 3.2.5 Guidance: Add ‘New drains should be kept to a minimum as oxidation of wet soils can release soil carbon. Wet areas should be assessed for their potential to be restored to wetland or peatland.’
Working Group response: **Wetland restoration already covered in guidance. Reference to ‘new drains’ added.**
- 3.2.5 Guidance: Provide separate carbon balance guidance for soil and in-forest biomass/harvested wood product.
Working Group response: **Guidance clarified to avoid any implied need to measure carbon, and to give a general steer on the consideration of potential end-uses.**

- 3.2.5 Requirement: Replace with a requirement for minimal ground preparation on all soils and manual ground screening only on organo-mineral soils.
Working Group response: Requirement changed to 'minimise or reverse soil carbon losses' and guidance requires justification of chosen 'ground preparation techniques' and keeping cultivation to a minimum.
- 3.2.5 Guidance: Recognise that native trees and peaty soils/wetlands are not mutually exclusive.
Working Group response: Guidance added.
- 3.2.5 Requirement: Replace with a requirement for cultivation and any new drainage to be kept to a minimum, with consideration given first to the restoration potential of wet land to peatland or wetland as informed by field survey.
Working Group response: Guidance added.
- 3.2.5 Guidance: Ensure consistency with recently published guidance on deep ploughing.
Working Group response: The Working Group felt that the requirement and guidance were consistent with published guidance on ground preparation.
- 3.2.5 Guidance: Consider the potential impact of guidance on fallow periods on chemical usage.
Working Group response: Guidance added.
- 3.2.5 Guidance: Add reference to carbon and biodiversity benefits to guidance on restoration of peatland or wetland.
Working Group response: Guidance added.
- 3.2.5 Requirement: Address carbon storage in forest products in UKWAS 5.3.1 rather than here.
Working Group response: The Working Group considered it reasonable for the owner/manager to take into account the potential range of products here; requirement wording clarified and guidance added.

Sub-section 3.3: Forest infrastructure

- 3.3.1 Requirement: Remove as unnecessary in the context of UKWAS 1.1.1.
Working Group response: The Working Group considered it important to ensure that these specific regulatory requirements were met.
- 3.3.1 Requirement: Add reference to forest quarries and mineral extraction here or elsewhere in section 3.
Working Group response: Covered by 'mineral extraction sites' in the requirement but a specific reference to quarries for roadstone added for clarity.
- 3.3.2 Guidance: Add reference to protection of root buffer zones.
Working Group response: Guidance added.
- 3.3.2 Guidance: Clarify guidance on using pipes or logs to cross watercourses and on using locally sourced materials.
Working Group response: Guidance clarified.
- 3.3.2 Guidance: Change 'Avoiding direct impacts on features of historic environment, biological, geological or cultural value' to 'Avoiding direct impacts on features of historic environment, ecological, geological or cultural value'.
Working Group response: Agreed.

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

Working Group comment: This sub-section has been subject to significant revision and reorganisation, and now forms two sub-sections, '3.4 Integrated pest management' and '3.5 Fertilisers'.

- 3.4.1(b) Requirement: Ensure that biological control agents remain an option for pest control.
Working Group response: This is the Working Group's intention.
- 3.4.1 Guidance: Consider the contradiction with UKWAS 3.2.5 guidance on fallow periods.
Working Group response: Guidance addresses the embedded carbon cost of pesticides.
- 3.4.1(c) Requirement: Emphasise avoidance of pesticide damage, which cannot be repaired or mitigated; consider separating out pesticide requirement.
Working Group response: Environmental damage is now addressed in UKWAS 3.4.4(d), which emphasises avoidance.
- 3.4.1 Guidance: Consider reinforcing guidance with quantitative evidence.
Working Group response: It is not normal UKWAS policy to incorporate evidence within the Standard.
- 3.4.2(d) Requirement: The term 'pesticides' appears to be used in relation to Hylobius control when the reference should be to 'insecticides'.
Working Group response: The umbrella term 'pesticide' is used throughout the Standard.
- 3.4.2(d) Requirement: Clarify to ensure consistent interpretation.
Working Group response: Requirement text amended to 'broadly demonstrates' to signify that an exact calculation of weighting is not required but a reasoned outcome is achieved.
- 3.4.2 Guidance: Add reference to wood pasture and historic parkland.
Working Group response: Agreed; now addressed under UKWAS 3.4.1.
- 3.4.2 Guidance: Add 'or regularly used roost or resting sites' to 'including breeding sites and feeding areas'.
Working Group response: Agreed; now addressed under UKWAS 3.4.1.
- 3.4.3 Requirement/Guidance: Add statement that aerial application of pesticides will not usually be permitted.
Working Group response: New requirement UKWAS 3.4.4(c) was considered to provide adequate control of pesticide application methods. However, the Working Group felt that there were no circumstances under which aerial application of fertilisers was acceptable, and requirement 3.5.2(c) was added accordingly.
- 3.4.3 Example verifiers: Move operator training and competence to top of list.
Working Group response: Given the extensive changes made to this section, example verifiers will be subject to further work in the next round of drafting.
- 3.4.4(b) Requirement: Ensure research requirement is proportionate to the amount of pesticide used and the size of the WMU.
Working Group response: This requirement (now UKWAS 3.4.3(b)) refers outward to certification scheme mechanisms, and it will be for the schemes to ensure that research requirements are proportionate.
- 3.4.4(b) Requirement: Note that no Type 1A or 1B pesticides have been available for use in the UK for some decades, so no legal use can be permitted.
Working Group response: Reference removed.
- 3.4.4 Guidance: Add reference to wood pasture and historic parkland.
Working Group response: Now addressed in UKWAS 3.4.1 guidance.

- 3.4.5 Guidance: Change ‘the appropriate choice of species’ to ‘the appropriate choice of species and of mixtures of species’.
Working Group response: Reference added.
- 3.4.5(c) Requirement: Add ‘Within 20m of any watercourse or water body’.
Working Group response: Compliance with legal requirements and non-legislative guidance now addressed in general terms under UKWAS 3.5.2(a) requirement, and in guidance regarding buffer zones.
- 3.4.5(c) Requirement: Add reference to restrictions around watercourses in line with Good Agricultural and Environmental Conditions rules.
Working Group response: Guidance regarding buffer zones added to new requirement UKWAS 3.5.2.
- 3.4.5 Example verifiers: Add reference to consultation with EA/SEPA/NRW/NIEA where applications might affect drinking water supply sites.
Working Group response: As noted previously, given the extensive changes made to this section, example verifiers will be subject to further work in the next round of drafting; a reference to consultation with statutory environment protection agencies might also be relevant in relation to pesticides.

Sub-section 3.5: Fencing

- 3.5.1 Requirement: Note that fences are still an effective way to reduce pest damage.
Working Group response: The Working Group considered additional text unnecessary.
- 3.5.1 Requirement: Clarify separation of management and operational planning and level of detail required.
Working Group response: The Working Group considered the separation to be appropriate in this case.
- 3.5.1 Guidance: Add reference to marking fences in woodland grouse areas in line with FC guidelines.
Working Group response: Addressed in UKWAS 3.5.2 guidance.
- 3.5.2 Requirement: Clarify to ensure consistent interpretation.
Working Group response: The Working Group considered additional text unnecessary to clarify this requirement.
- 3.5.2 Requirement: Add reference to removing redundant fences, or refreshing those with marking where they are within woodland grouse ranges.
Working Group response: Reference added. Also addressed in UKWAS 3.6.2.
- 3.5.2 Guidance: Add reference to minimising watercourse crossings and using watergates.
Working Group response: Reference added.

Sub-section 3.6: Waste

- 3.6.1 Guidance: Add reference to general waste/refuse and old/abandoned machinery/parts.
Working Group response: Reference added.
- 3.6.1 Guidance: Add guidance on wooden packaging.
Working Group response: Reference added.
- 3.6.1 Guidance: Add guidance on disposal of tree ‘waste’, e.g. lop and top or trees felled for plant health reasons.
Working Group response: The Working Group did not consider it appropriate to mention lop and top in this context, as it is not classified as waste.

- 3.6.2 Requirement: Clarify separation of management and operational planning and level of detail required.
Working Group response: The Working Group considered the separation to be appropriate in this case.
- 3.6.2(b) Requirement: Remove 'and progressively remove'; note that the owner/manager must prepare and implement a Site Waste Management plan for the removal of all waste materials.
Working Group response: The focus of UKWAS 3.6.2(b) is deliberately on redundant materials before they become waste. The Working Group did not consider it appropriate to refer to a site waste management plan in this context.
- 3.6.2 Guidance: Change 'redundant' to 'waste', and add old equipment/parts, fuel/oil containers, and general refuse to list.
Working Group response: The focus of UKWAS 3.6.2(b) is deliberately on redundant materials before they become waste. Old equipment/parts added to UKWAS 3.6.1 guidance.

Sub-section 3.7: Pollution

- 3.7.1 Example verifiers: Add 'Incident reporting' and 'Good site supervision to minimise pollution risks'.
Working Group response: The Working Group felt this it was more appropriate to address incident reporting under UKWAS 3.7.2, and to address site supervision in UKWAS 3.7.1 guidance.
- 3.7.2 Example verifiers: Note that all workers must be aware of site pollution plans and response procedures regardless of their site roles.
Working Group response: Verifier added.

Section 4: Natural, historical and cultural environment

Sub-section 4.1: Statutory nature conservation sites

- 4.1.1 Guidance: Reconsider including definition of UK red lists.
Working Group response: Text deleted as already in glossary.
- 4.1.1(c) Requirement/Guidance: Provide guidance on what constitutes 'ongoing communication and/or consultation'.
Working Group response: Requirement text amended. The Working Group did not feel that any guidance could be provided which would meaningfully cover the potential range of circumstances.
- 4.1.1 Guidance: Add a generic statement that some important priority species and habitats depend on continuing appropriate management.
Working Group response: The Working Group felt that the existing guidance was appropriate for what is a high level requirement.
- 4.1.1 Guidance: Change 'country Biodiversity Action Plans' to 'county Biodiversity Action Plans'.
Working Group response: Guidance text removed to avoid any duplication of or confusion with Glossary definitions.
- 4.1.1 Guidance: Check guidance on legal protection of red or amber status species.
Working Group response: Guidance text removed to avoid any duplication of or confusion with Glossary definitions.

- 4.1.1 Guidance: Consider adding reference to nature recovery networks.
Working Group response: The Working Group considered it premature to refer to nature recovery networks.
- 4.1.1 Guidance: Add reference to Local Nature Conservation sites, or local wildlife sites that are recognised in structure plans.
Working Group response: Local Nature Conservation sites were not included on the basis that this is a non-statutory designation.
- 4.1.1 Requirement: Add a requirement for consultation with county/local biological records centres.
Working Group response: Reference added.
- 4.1.1(b) Requirement: Reframe to require areas of high conservation value to be brought into good condition.
Working Group response: Agreed.
- 4.1.1 Guidance: Reconsider including definition of priority species.
Working Group response: Text deleted as already in glossary; priority species definition refined.
- 4.1.2 Guidance: Clarify what guidance regarding display sites means in practice.
Working Group response: The Working Group considered this guidance to be widely understood in practice, e.g. regulatory protections afforded to lekking sites.
- 4.1.2 Requirement: Add a requirement for consultation with county/local biological records centres.
Working Group response: Reference added to 4.1.1(c).
- 4.1.2 Requirement/Guidance: Clarify that this requirement might mean that woodland establishment might not be appropriate in some locations.
Working Group response: UKWAS 2.6.1 guidance replicated here.

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

- 4.2.1 Guidance: Add reference to MAGIC website for mapping of wood pasture/parkland and ASNW.
Working Group response: It is normal UKWAS policy not to refer to specific tools within the standard, but a reference to MAGIC will be added to the UKWAS Appendix.
- 4.2.1 Guidance: Define 'old trees', or use 'veteran'.
Working Group response: Reference changed to 'Old or veteran trees'.
- 4.2.1(d) Requirement: Add a requirement that any approach from a statutory conservation body requesting management to maintain a site's interest and address any problems or loss of favourable status is followed.
Working Group response: It is already a requirement of the Standard that management strategies for ASNW be developed in consultation with statutory bodies, interested parties and experts (UKWAS 2.11.2(b)).
- 4.2.1 Guidance: Change 'Historical and archaeological features and landscape implications' to 'Historical and archaeological features and heritage assets'.
Working Group response: Agreed.

Sub-section 4.3: Management of plantations on ancient woodland sites (PAWS)

- 4.3.1 Requirement: Restore previous wording.
Working Group response: The Working Group considered the revised format and wording to be clearer for users and a similar approach is adopted throughout section 4.

- 4.3.1 Requirement: Clarify separation of management and operational planning and level of detail required.
Working Group response: Given the extensive changes made to this section, this issue will be subject to further consideration in the next round of drafting.
- 4.3.1 Guidance: Add a statement that management such as coppicing in the absence of effective protection from deer can cause irremedial damage to ancient woodland.
Working Group response: Deer browsing is included in guidance as a 'potential threat' to be addressed.
- 4.3.1 Guidance: Add reference to using a CCF approach [in the context of 'Active management in support of PAWS restoration'?].
Working Group response: This is a list of possible actions rather than management systems/approaches.
- 4.3.1 Guidance: Clarify what is meant by 'Opportunities to enhance edges and topographic features'.
Working Group response: 'Edges' changed to 'edge habitat'.
- 4.3.1 Guidance: Add reference to MAGIC website for mapping of wood pasture/parkland and PAWS.
Working Group response: There is an existing reference to 'published maps' in 4.3.1(a). It is normal UKWAS policy not to refer to specific tools within the standard, but a reference to MAGIC will be added to the UKWAS Appendix.
- 4.3.1 Guidance: Add reference to remedial work such as halo thinning ideally being carried out by VETCert accredited contractors.
Working Group response: The Working Group considered this to be adequately addressed in general terms under UKWAS 5.5.1; it is not normal UKWAS policy to refer to specific qualifications.
- 4.3.1 Guidance: Add reference to planning continuity of open-grown or veteran tree habitat into operations.
Working Group response: Wood pasture/parklands are addressed under UKWAS 4.4.1/4.4.2, and veteran trees are addressed under UKWAS 4.6.3.
- 4.3.1 Requirement: Reframe requirement to encourage conversion back to native woodland for PAWS sites, and to ensure all PAWS have an increasing amount of suitable native tree cover established on them, with 30% as a minimum target.
Working Group response: 4.3.1(g) added; see below.
- 4.3.1 Example verifiers: Add 'Mapping all remnants and conservation features and recording their condition'.
Working Group response: Agreed.
- 4.3.1 Requirement: Add (g) 'The primary management objective for PAWS should be to restore to native woodland of a type appropriate to the site'.
Working Group response: Agreed.
- 4.3.1 Guidance: Add wood pasture to 'The protection and widening of existing and historical open spaces such as rides, glades and riparian habitats'.
Working Group response: Agreed.
- 4.3.1 Requirement/Guidance: Add reference to and encourage native woodland restoration.
Working Group response: New requirement UKWAS 4.3.1(g) added explicitly requiring restoration to be the primary management objective for PAWS.

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

- 4.4.1 Guidance: Add reference to greater use of continuous cover forestry.
Working Group response: The list is of positive management operations or interventions rather than silvicultural approaches or systems.
- 4.4.1 Guidance: Add reference to MAGIC website for identification of wood pasture/parkland within or adjacent to ASNW or PAWS.
Working Group response: There is an existing reference to 'historical maps' in verifiers. It is normal UKWAS policy not to refer to specific tools within the standard, but a reference to MAGIC will be added to the UKWAS Appendix.
- 4.4.1 Guidance: Add 'Open ground habitats such as herb rich grassland, wetlands and peatlands' to the first bulleted list.
Working Group response: These habitats are addressed under UKWAS 4.1.2.
- 4.4.1 Guidance: Change 'Linking of open spaces with those on adjoining land' to 'Extending open spaces and linking with those elsewhere in the WMU or on adjoining land'.
Working Group response: Reference added to extending open spaces.
- 4.4.1 Guidance: Add 'Wood pastures and parklands' and 'Priority open habitats such as wetlands, grasslands and heathlands' [to the first bulleted list?].
Working Group response: Priority habitats are addressed in UKWAS 4.1.2. Other open habitats are addressed under UKWAS 4.4.2.
- 4.4.2 Requirement/Guidance: Clarify what is meant by semi-natural habitat.
Working Group response: Glossary definition added.
- 4.4.2 Requirement: Require restoration of lapsed wood pasture.
Working Group response: The current wording of UKWAS 4.4.2 was considered appropriate to the conservation value of habitats not addressed in sub-sections 4.1, 4.2 and 4.3. Note that wood pasture has also been added to guidance for 4.4.1.
- 4.4.2 Requirement: Reconsider 'small-scale'.
Working Group response: This requirement is distinct from large-scale restoration of open habitats, which would be addressed through conversion requirements in section 2.13.
- 4.4.3 Requirement/Guidance: Clarify what is meant by semi-natural habitat.
Working Group response: Glossary definition added.
- 4.4.3 Requirement: Reconsider increase from 5 to 10%, given 15% total area for conservation.
Working Group response: The Working Group considered the 10% target to be appropriate.
- 4.4.3 Guidance: Clarify what is meant by 'the spirit of continual improvement' and where this is stated in the Standard.
Working Group response: The concept of continual improvement was introduced to UKWAS 2.1.3 guidance on management planning. The Working Group felt that the meaning was clear.
- 4.4.3 Requirement: Change 10% to 30%, to be achieved as soon as practicable after 2030.
Working Group response: The Working Group considered the 10% target to be appropriate.
- 4.4.3 Requirement/Guidance: Note that semi-natural habitats must be managed to keep them in good condition.
Working Group response: Management is explicitly addressed in the first paragraph of guidance.
- 4.4.3 Requirement: Consider whether a low requirement constrains the restoration of important open priority habitat in line with Local Nature Recovery Strategies.
Working Group response: The stated thresholds are minimums, and guidance addresses

keeping opportunities under constant review. This requirement should also be seen alongside the potential for large-scale restoration of open habitats, addressed through conversion requirements in section 2.13.

Sub-section 4.5: Watershed management and erosion control

No issues.

Sub-section 4.6: Maintenance of biodiversity and ecological functions

- 4.6.1 Guidance: Reconsider/clarify guidance on the location of natural reserves in WMUs made up of more than one woodland (also applies to 4.6.2 guidance on the location of long-term retentions).
Working Group response: The Working Group felt that the existing guidance to 'locate natural reserves where they will deliver greatest biodiversity benefit' was appropriate.
- 4.6.1 Requirement: Clarify that natural reserve area is 1% in productive plantations and 5% in semi-natural woodlands.
Working Group response: The intent of this requirement is that the total area of natural reserves is equivalent to at least 1% of the plantation area and 5% of the semi-natural woodland area, but that, as per the guidance, the reserves are located where they will deliver greatest biodiversity benefit, e.g. they might all be in semi-natural woodland areas.
- 4.6.1 Requirement/Guidance: Note that natural reserves must be maintained in a favourable state to deliver conservation objectives, and should contribute to a 30% target.
Working Group response: Reference to maintaining natural reserves in favourable condition added to requirement. Regarding a 30% target, see comments on UKWAS 2.11.1.
- 4.6.2 Requirement: Reconsider the use of the term lower-impact silvicultural systems, and consider whether referring to silvicultural approaches for both forest management reasons (in UKWAS 2.10) and biodiversity reasons might cause confusion.
Working Group response: The Working Group remains of the view that LISS is an appropriate term; however, the Working Group will consider an alternative definition of 'low intensity management approaches' during the next public consultation.
- 4.6.2 Guidance: Note that long-term retentions should contribute to a 30% target, with a transition period.
Working Group response: See comments on 2.11.1.
- 4.6.2 Requirement: Change 1% to 5% and remove 'impracticable' caveat.
Working Group response: The Working Group felt that this requirement was worded appropriately within the context of UKWAS 2.11.1 and other conservation requirements; there were concerns that a higher target here would limit the area available for other actions with higher conservation benefits, such as habitat restoration.
- 4.6.2 Requirement: Consider more ambitious targets.
Working Group response: See previous response.
- 4.6.3 Requirement/Guidance: Add reference to CCF as an approach suited to promoting future veteran trees.
Working Group response: Reference added in guidance.
- 4.6.3 Requirement: Reconsider the logic of the requirement to replace veteran trees.
Working Group response: The primary intent of this requirement is to retain existing veteran trees, but it is also important to nurture younger trees which might become veterans in the future.

- 4.6.3 Guidance: Add reference to management of public access to avoid negative impacts.
Working Group response: Reference added in guidance to protect root zones in areas with high visitor numbers.
- 4.6.3 Guidance: Add reference to appropriate competence of those working on veteran trees.
Working Group response: Reference added in guidance.
- 4.6.3 Requirement: Change 'Keeping' to 'Protecting and caring for'.
Working Group response: 'Protecting' added.
- 4.6.3 Guidance: Add reference to planning and seeking specialist advice to guidance on 'Managing or establishing suitable trees to eventually take the place of existing veterans'.
Working Group response: Reference added in guidance.
- 4.6.3 Guidance: Change 'lopping' to 'pruning' and add reference to specialist advice.
Working Group response: Agreed.
- 4.6.3 Example verifiers: Change 'If there is a conflict with safety, the issues have been documented' to 'Safety issues are assessed and managed in accordance with current guidance'.
Working Group response: Agreed.
- 4.6.3 Guidance: Change 'lopping older trees' to 'careful, phased restoration of lapsed pollards'.
Working Group response: Guidance changed.
- 4.6.3 Guidance: Add separate definition of 'root zone': 'Root zones include the area below the drip line/extent of the crown. No digging, ditching, spraying or creation of new tracks or machinery access routes should take place within this zone.'
Working Group response: Glossary definition added.
- 4.6.3 Requirement/Example verifiers/Guidance: Add 'and promoting future veteran trees across all WMU' to bulleted list, and adjust example verifiers and guidance accordingly (specific suggestions made).
Working Group response: Guidance strengthened to 'should' i.e. a recommendation, and other suggestions implemented.
- 4.6.4 Requirement/Guidance: Ensure that all deadwood is retained.
Working Group response: The Working Group considered this unnecessary; the focus of the requirement, on accumulating deadwood throughout the WMU with particular concentrations in areas of greatest nature conservation benefit, was considered appropriate.
- 4.6.4 Guidance: Add reference to incremental increase over time to guidance on 20 m³ per hectare average deadwood volume.
Working Group response: References in guidance to 'accumulate' and 'accumulation... throughout a rotation' are considered to be equivalent to 'incremental increase'.
- 4.6.4 Requirement/Guidance: Ensure that deadwood is retained in situ and as close as possible to the tree from which it fell.
Working Group response: Reference added in guidance.
- 4.6.4 Requirement/Guidance: Emphasise importance of deadwood as part of 30% target for conservation.
Working Group response: Deadwood might be more appropriately viewed as contributing to conservation and enhancement of biodiversity throughout the WMU, as per new requirement UKWAS 2.11.1(c).

- 4.6.4 Guidance: Change '20 m³ per hectare' to '40 m³ per hectare'.
Working Group response: The Working Group felt it was more important to include guidance on greater accumulations; see below.
- 4.6.4 Guidance: Change 'Actions may include' to 'It is vital that decaying wood comprises a wide range of forms and decay states, therefore actions may include all or a number of'.
Working Group response: Reference added in guidance.
- 4.6.4 Guidance: Add 'Where feasible areas of accumulations of deadwood of 150 m³ or more per ha should be developed within these existing valuable deadwood habitats' after second bulleted list.
Working Group response: Agreed.

Sub-section 4.7: Maintenance of local native seed sources

- 4.7.1 Requirement/Guidance: Recognise that natural regeneration and seed from native seed zones that might not achieve commercial timber objectives, and allow for seed to be sourced from suitable timber parent native trees that may be outside the native seed zone.
Working Group response: The Working Group felt that the current requirement wording was appropriate, but the scope has been narrowed to woodlands identified in sections 4.1-4.3, i.e. high conservation value woodlands.
- 4.7.1 Requirement/Guidance: Emphasise the potential of natural regeneration.
Working Group response: The Working Group felt that the current requirement wording was appropriate.
- 4.7.1 Requirement: Reconsider local native seed zones in the context of climate change.
Working Group response: The Working Group felt that the current requirement wording was appropriate.

Sub-section 4.8: Protection of cultural and historic environment sites

- 4.8.1 Requirement/Guidance: Recognise that responsibility for maintaining ongoing communications should be jointly held by both the owner/manager and the relevant organisations.
Working Group response: This wording was added for consistency with UKWAS 4.1.1 requirements for statutory nature conservation sites, where it is longstanding; the Working Group was not aware of any issues arising from this wording in practice.
- 4.8.1 Guidance: Provide guidance on what is meant by 'ongoing communication and/or consultation'.
Working Group response: See previous response. As with UKWAS 4.1.1(c), the Working Group did not feel that any guidance could be provided which would meaningfully cover the potential range of circumstances
- 4.8.1(b) Requirement: Change to 'Where appropriate, statutory designated sites should be managed in accordance with plans agreed with and funded by historic environment agencies and are marked on maps'.
Working Group response: Agreed to move to guidance ('should be'), with modifications.
- 4.8.1(b) Guidance: Add reference to developing or reviewing management plans in consultation with the local historic environment agency team in advance of operations, and to reviewing plans quinquennially.
Working Group response: The Working Group felt that this was an excessive level of detail given the wording of the requirement and other operational protections in section 3. The Group noted that timeframes for review are usually specified in agreed plans.

- 4.8.1 Example verifiers: Change ‘Any known features mapped and/or documented’ to ‘Any known features mapped and/or documented (consult local HER for map of all known features)’.
Working Group response: The Working Group felt that consultation on the identification of features was adequately addressed by the requirement text.
- 4.8.1 Guidance: Change ‘should be reported to the relevant statutory historic environment agencies’ to ‘should be reported to the relevant statutory and local authority historic environment agencies’.
Working Group response: Agreed.
- 4.8.1(b) Requirement: Change ‘Statutory designated sites are managed’ to ‘Statutory designated sites are regularly managed’.
Working Group response: The Working Group did not feel that this language reflected the full potential range of circumstances.
- 4.8.1 Requirement/Guidance: Add reference to consultation with local authority archaeology services.
Working Group response: Agreed.
- 4.8.1 Guidance: Add more detailed information on how to contact the relevant authorities.
Working Group response:
- 4.8.1(a) Requirement: Change ‘relevant statutory historic environment agencies, local people’ to ‘relevant statutory historic environment agencies, local authorities, local people’.
Working Group response: The Working Group has reviewed terminology relating to the historic environment in this section and elsewhere in the Standard to take account of the suggestions from stakeholders. Further stakeholder input on this subject would be welcome.

Sub-section 4.9: Game, shooting and fisheries management

- 4.9.1 Requirement: Clarify how ‘sustainably’ is defined.
Working Group response: Sustainable practices are set out in codes of practice.
- 4.9.1 Requirement: Restore previous wording, rather than having separate sub-sections.
Working Group response: The Working Group felt that these issues merited their own sub-sections.
- 4.9.1 Requirement/Guidance: Consider recognising specific organisation(s) and their guidance in the same way as FISA for H&S.
Working Group response: The reference to FISA is exceptional; it is not normal UKWAS policy to refer to specific organisations within the standard.
- 4.9.1 Guidance: Remove ‘where necessary’.
Working Group response: The Working Group felt that this wording was appropriate to reflect a range of circumstances, including situations where predator control is not necessary.
- 4.9.1 Requirement/Guidance: Add explicit reference to the Code of Good Shooting Practice.
Working Group response: References to specific documents are exceptional; it is not normal UKWAS policy to refer to specific documents within the standard. The code of practice will be added to the UKWAS Appendix.
- 4.9.2 Requirement: Clarify how ‘sustainably’ is defined.
Working Group response: Sustainable practices are set out in codes of practice.
- 4.9.2(b) Requirement: Remove.
Working Group response: The Working Group felt that this requirement reflected a reasonable balance of interests.

- 4.9.2(b) Requirement: Allow release pens to be located in priority habitats subject to impact assessment and monitoring.
Working Group response: The Working Group felt that this requirement reflected a reasonable balance of interests.
- 4.9.2(b) Requirement: Change to 'Game release pens are located well outside areas of high conservation value'.
Working Group response: The Working Group felt that this requirement reflected a reasonable balance of interests, particularly given the verifier 'Permissions from statutory bodies where these are required'.
- 4.9.2 Requirement/Guidance: Add specific reference to stocking rates within pens.
Working Group response: The Working Group was concerned that recommendations are subject to change, and felt that it was more appropriate to reference relevant codes of practice in the UKWAS Appendix.
- 4.9.2 Requirement/Guidance: Add explicit reference to the Game Wildlife & Conservation Trust's 'Guidelines for sustainable gamebird releasing'.
Working Group response: References to specific documents are exceptional; it is not normal UKWAS policy to refer to specific documents within the standard. The code of practice will be added to the UKWAS Appendix.
- 4.9.3 Guidance: Add cross-reference to the need to avoid the introduction of invasive non-native species, and ensuring fishing tackle is cleaned and follows the latest biosecurity guidance from appropriate agencies [UKWAS 2.12.4 guidance?].
Working Group response: Reference added.
- 4.9.4 Requirement: Remove.
Working Group response: The Working Group remained convinced that this requirement was appropriate. Specific concerns about air rifles and rim fire rifles were noted, but the Group felt that transition to non-toxic ammunition was feasible before the revised standard became effective.

Section 5: People, communities and workers

Sub-section 5.1: Public access rights, permissive uses, traditional rights, and the health and wellbeing of local people and communities

- 5.1 Title: Change 'local people and communities' to 'visitors and local communities'.
Working Group response: 'Visitors' added to title.
- 5.1.1 Guidance: Add explanations of land with open access and common land.
Working Group response: The Working Group decided not to cover common land as there are very specific rights in each case. The 'Right to Roam' in Scotland and CROW voluntary dedication in England and Wales are already covered in guidance.
- 5.1.1 Guidance: Add references to accessibility of paths for the disabled and people with push chairs, compliance of access structures with BS 5709 (2018), and accessibility of landowner owned bridges.
Working Group response: Reference to 'specific types of access provision' added to UKWAS 5.1.3 requirement.
- 5.1.1 Guidance: Add text to guidance for Scotland stating that 'people must not be obstructed from using their access rights responsibly' in line with UKFS.
Working Group response: This is covered by the UKWAS 5.1.1 requirement to comply with

public access legislation. In addition, the Scottish Outdoor Access Code, which addresses this issue explicitly and in detail, is cited in guidance.

- 5.1.1 Guidance: Clarify that public rights of way are also relevant in Scotland.
Working Group response: Guidance and Glossary definition clarified.
- 5.1.2 Guidance: Provide separate carbon balance guidance for soil and in-forest biomass/harvested wood product.
Working Group response: The Working Group did not feel that guidance was necessary here; the reference to carbon balance was simply intended to justify the maintenance of traditional scales of use.
- 5.1.2 Guidance: Clarify guidance on water supplies to refer to significant operations 'which have been identified as having a potential to impact those water supplies'.
Working Group response: Agreed, with modifications to incorporate a precautionary approach, and guidance moved to UKWAS 4.5.1.
- 5.1.2 Requirement: Create separate sections on permissive access, traditions, and rights such as estovers, pannage and turbarry.
Working Group response: The Working Group felt that this was an excessive sub-division of requirements. Estovers etc. are rights in law, therefore covered by section 1.
- 5.1.2 Guidance: Note that the annual closing of a permissive path is not sufficient to maintain its permissive status.
Working Group response: Guidance deleted.
- 5.1.2 Requirement/Guidance: Move reference to water supplies and contacting owners to section 3 as a pre-commencement requirement.
Working Group response: Reference added to UKWAS 3.1.2 requirement, and some guidance moved to 4.5.1.
- 5.1.2 Guidance: Add reference to provision of appropriate facilities in line with UKFS.
Working Group response: Guidance added.
- 5.1.2 Guidance: Clarify that traditional and customary access includes more than statutory paths and should be facilitated, including in new plantings.
Working Group response: The Working Group felt that the distinction between statutory access rights and permissive/traditional access was made clear by the separation of UKWAS 5.1.1 and 5.1.2.
- 5.1.3 Requirement: Ensure that public access is permitted by default, with only limited and specific exemptions which must be justified by the owner/manager.
Working Group response: This is the Working Group's intention.
- 5.1.3(a) Requirement: Recognise the owner's/manager's duty to protect the woodland, including by excluding the public if necessary.
Working Group response: The scope for restricting access is addressed in guidance.
- 5.1.3(b) Requirement: Restore previous wording; draft wording is too open to interpretation.
Working Group response: The Working Group felt that the inclusion of 'special demand' and 'reasonable efforts' was sufficient to make any risks manageable; overall, the effect was expected to be positive.
- 5.1.3 Requirement/Guidance: Recognise that access might need to be managed, and appropriate advice sought, to protect some species.
Working Group response: The Working Group felt that current guidance was adequate, but a reference to avoiding wildlife disturbance was added to verifiers.
- 5.1.3 Guidance: Explain the reduction in liability that arises from the dedication of access rights compared to permissive access.

Working Group response: The Working Group felt that current generic guidance on seeking advice on insurance provisions was adequate.

- 5.1.3 Guidance: Add references to use of woodland by disabled people and people on bikes or horses.

Working Group response: Reference to 'specific types of access provision' added to requirement.

- 5.1.3 Guidance: Add historic environment sites [to the list of situations in which access may be restricted on a temporary basis?].

Working Group response: No changes made on the basis that it was not clear what was being requested by the respondent.

Sub-section 5.2: Minimising adverse impacts

- 5.2.1 Guidance: Reconsider explicit reference to Ash dieback.

Working Group response: Reference retained but modified.

- 5.2.1 Guidance: Recognise that the owner/manager should assess and manage risks from trees, and that management is necessary only where trees pose unacceptable risk (regardless of the cause).

Working Group response: Reference to 'Tree Safety Policy' added to verifiers.

- 5.2.1 Guidance: Clarify guidance on natural hazards to refer specifically to those 'identified as posing risks'.

Working Group response: Agreed.

- 5.2.1 Requirement: Ensure that health and safety risks are mitigated for all people, not just locals.

Working Group response: Reference to 'visitors' added to requirement, and guidance refocussed on local people and visitors rather than workers (worker health and safety being addressed under UKWAS 5.4.1).

Sub-section 5.3: Local economy

- 5.3.1 Requirement: Consider what impact this requirement has in practice.

Working Group response: The Working Group felt that requirement did have some impact in practice.

- 5.3.1 Requirement/Guidance: Clarify what is meant by 'local', and how the requirement applies to appointing contractors.

Working Group response: The Working Group was not aware of the wording of this requirement having caused any issues of interpretation at audit.

- 5.3.1 Requirement: Address carbon storage in forest products here rather than in UKWAS 3.2.5.

Working Group response: Guidance added to UKWAS 2.2.1 and 5.3.1.

Sub-section 5.4: Health and safety

- 5.4.1 Requirement: Do not add further requirements.

Working Group response: The Working Group noted this perspective. No health and safety requirements have been added during this revision.

- 5.4.1 Guidance: Clarify that guidance applies to all parts – (a), (b) and (c) – of the requirement.

Working Group response: This is the Working Group's intention, on the understanding that 'This requirement' refers to UKWAS 5.4.1 as a whole.

- 5.4.1 Guidance: Consider consistency in referring to or quoting glossary definitions.
Working Group response: Agreed; reference deleted and guidance clarified.
- 5.4.1 Guidance: Add 'owners' to the list of 'anyone on the work site'.
Working Group response: Guidance clarified.
- 5.4.1 Example verifiers: Clarify intent in referring to 'welfare provisions'.
Working Group response: Reference deleted as potentially confusing.
- 5.4.1 Requirement/Guidance: Recognise revised FISA Guidance on Managing Health and Safety in Forestry, in particular regarding roles and responsibilities.
Working Group response: Legislation and guidance are addressed in general terms in UKWAS 5.4.1(a); the Working Group did not feel that it was appropriate to include specific issues in requirements or guidance, particularly given that legislation and guidance can and do change.
- 5.4.1 Requirement/Example verifiers/Guidance: Recognise that evidence of training might not be sufficient to evidence competence of chainsaw users.
Working Group response: See previous response.
- 5.4.1 Requirement/Example verifiers/Guidance: Recognise legal requirement to provide welfare facilities.
Working Group response: See previous response.
- 5.4.1 Requirement/Example verifiers/Guidance: Consider appropriate evidence of competence for Forestry Works Managers and other roles identified in FISA guidance.
Working Group response: See previous response.
- 5.4.1 Guidance: Recognise that the owner/manager should assess and manage risks from trees, and that management is necessary only where trees pose unacceptable risk.
Working Group response: Addressed under UKWAS 5.2.1.
- 5.4.1 Requirement/Guidance: In addition to FISA, refer to the Visitor Safety Group (VSG) and the National Tree Safety Group.
Working Group response: References to be added to the UKWAS Appendix.

Sub-section 5.5: Training and continuing development

- 5.5.1 Requirement/Guidance: Clarify what is required regarding volunteers, and in particular what 'treated commensurately with employees' means, recognising the potential range of volunteers.
Working Group response: The Working Group felt that the meaning was clear in the context of the requirement.
- 5.5.1 Requirement/Guidance: Reconsider how this requirement applies to volunteers.
Working Group response: The Working Group remained comfortable with including volunteers in the scope of this requirement, and with treating them commensurately with employees.
- 5.5.1 Guidance: Consider reproducing the statement regarding volunteers in 5.4.1 Guidance.
Working Group response: The Working Group did not consider such guidance necessary.

Sub-section 5.6: Workers' rights

- 5.6.1 Requirement: Reconsider splitting compliance with workers' rights legislation into multiple requirements.
Working Group response: The Working Group remained comfortable with this division of requirements.

- 5.6.1 Guidance: Reconsider separate guidance on flexible working.
Working Group response: The Working Group felt that this guidance was appropriate.
- 5.6.1 Requirement: Add a separate requirement on positive promotion of equality.
Working Group response: Guidance on promotion of equality moved to new UKWAS 5.6.1(b).
- 5.6.1 Requirement/Guidance: Address living income rather than living wage, and consider whether even this is a good enough aspiration.
Working Group response: While recognising the issue and being supportive of the suggestion, the Working Group also noted the challenges in verification for contractors, the group where incomes are most likely to be marginal. As organisations are not in a position to demand wage information from contractors, it is difficult to set a more aspirational requirement. Guidance modified to encourage higher wage levels.

Sub-section 5.7: Insurance

- 5.7.1 Requirement/Guidance: Clarify application to e.g. licence holders, event organisers, tenants etc.
Working Group response: Guidance added.

Glossary of terms

- Buffer: Broaden definition.
Working Group response: Agreed.
- Carbon balance: Specify timescale.
Working Group response: The Working Group did not consider it appropriate to specify a timescale in the definition; it will be for owners/managers to consider changes over time when applying the concept in practice.
- Carbon balance: Provide separate guidance for soil and in-forest biomass/harvested wood product.
Working Group response: The Working Group did not feel that this was appropriate.
- Cultural features: Add single trees with cultural value to this definition.
Working Group response: 'Heritage assets' added.
- Cultural features: Add 'heritage assets' to this definition, and provide separate definition.
Working Group response: 'Heritage assets' added.
- Environmental and social risk assessment: Do not include terms without a definition.
Working Group response: Definition added.
- Historic environment: Add separate definitions of 'designated heritage assets' and 'non-designated heritage assets'.
Working Group response: UKFS definition of 'historic environment' adopted, modified to include reference to 'heritage assets'. Entry for 'heritage assets' added based on Historic England definition.
- Local people: Clarify what is meant by local.
Working Group response: This is a long-standing definition; the Working Group was not aware of any issues arising from its use in practice.
- Lower-impact silvicultural systems (LISS): Replace with 'low intensity management approaches'.
Working Group response: Definition of 'lower intensity forest management approaches' added; the Working Group will seek views on the use of this term during the next public consultation period.

- Lower-impact silvicultural systems (LISS): Add separate definition of continuous cover forestry.
Working Group response: See previous response.
- Non-Wood Forest Products (NWFP): Clarify that list is not exhaustive.
Working Group response: This is implied by 'include'.
- Priority species: Add Schedule 1 species to this definition.
Working Group response: The Working Group considered the Wildlife and Countryside Act to be adequately addressed.
- Public rights of way: Add reference to Scotland.
Working Group response: Reference added.
- Shelterwood: Add detail regarding spatial arrangement of fellings and number of seed tree fellings.
Working Group response: Agreed.
- Short rotation coppice (SRC): Clarify that cycle may vary or lapse.
Working Group response: Definition clarified.
- Short rotation coppice (SRC): Do not treat SRC as forestry.
Working Group response: Within the context of UKWAS, SRC is only permitted under limited circumstances within a wider woodland context.
- Small coupe felling: Consider separate definition of larger coupes.
Working Group response: The Working Group did not consider this necessary.
- Water course: Clarify that any forest drain directly connected to a stream or river is deemed to be a watercourse.
Working Group response: UKFS definition adopted.
- Woodland management plan: Add 'WMP' abbreviation.
Working Group response: Disagree.
- Workers: Treat workers and volunteers separately.
Working Group response: The Working Group remained convinced that it was appropriate to include volunteers within the definition of workers.
- Workers: Note that laws applying to owners are often quite different to those for employees.
Working Group response: The Working Group noted this, and expected references to 'workers' in the Standard to be understood in this way.

Appendix 1 – Full list of respondents by UKWAS constituency

Id #	Respondent	Organisation	Links to process*
Woodland owners			
1	Peter Henry	Individual	
2	Jon Hollingdale	Community Woodlands Association	
3a	Richard Hunter	Confederation of Forest Industries (Confor)	WG
3b	Colin Palmer		
Forestry practitioners			
4	Alison Bowman	Individual	
5	Rebecca Haskell	Individual	
6	Norman R. Healy	Individual	
7	Roderick Leslie	Individual	
8	Bill Mason	Continuous Cover Forestry Group (CCFG)	SF, EP
9	Matt Taylor	Forest and Land Ltd	
10	Alastair Sandels	Institute of Chartered Foresters (ICF) Safety Group	WG, SF
11	Harry Wilson	RTS Forestry	SF
12	Ewan McIntosh	Tilhill Forestry Ltd	
Country forestry authorities and forestry enterprises			
13	Angus Mackie	Forestry and Land Scotland	WG
Environmental organisations			
14a	Brian Muelaner	Ancient Tree Forum	SF
14b	Tim Hill		
15	Rebecca Wrigley	Rewilding Britain	
16	Stuart Housden	Royal Society for the Protection of Birds (RSPB)	WG
17	Clive Thomas	Soil Association	WG, SF
18	Anthony Holden, on behalf of Richard Cowser	Sussex Ornithological Society	
19	Richard Hearn	Wildfowl and Wetlands Trust	
20	Matt Browne	Wildlife and Countryside Link	
21	Gordon Pfetscher, on behalf of Andy Sharkey	Woodland Trust	WG, SF

Id #	Respondent	Organisation	Links to process*
UK countryside, environment and heritage agencies			
22a	Vince Holyoak	Historic England	
22b	Charlotte Russell		
23	Martin Brann	Historic Environment Scotland	SF
24	Adrian Jowitt	Natural England	
25	Duncan Stone	NatureScot	EP
26	John Gorman	SEPA	EP
Forestry standard setting			
27	Owen Davies	Forest Stewardship Council (FSC) UK	EP
Forest user organisations			
28	Martin Edwards	British Association for Shooting and Conservation (BASC)	EP
29	Davie Black	Mountaineering Scotland	
30	Mark Crichton Maitland	National Rifle Club of Scotland	
36	Eleisha Fahy	Scottish Rights of Way and Access Society (ScotWays)**	SF
Wood products trade			
31	Helen Bentley-Fox	Grown in Britain	
Local government and National Park Authorities			
32	Ruth Beckley	Association of Local Government Archaeological Officers (ALGAO) UK	
33	Joseph Seed	Corsock and Kirkpatrick Durham Community Council	
Other			
34	Duncan Pollard	Duncan Pollard & Associates	
35	Graham Gill	UKWAS Interpretation Panel	

* Identifying UKWAS Working Group (WG), stakeholder forum (SF) and expert panel (EP) members; note that this is based on organisations rather than individuals.

** Submission received June 2021, at which time ScotWays were added to the stakeholder forum.

Appendix 2 – Full text of general comments

As noted in the introduction to Part 2 of this report, some respondents provided general comments at the beginning of the Consultation Template, while others provided feedback in different formats. All such responses are included here. However, some of these comments can be assigned to specific sections of the Standard; in these cases, the text is given in italics and a reference in square brackets (e.g. [UKWAS 1.1.1]) shows where the comment has been included in Annex 1. In all cases, respondents are identified using numbers in square brackets which correspond to the identification numbers in Appendix 1.

[1] I see that five new criteria are proposed for the revision. *I cannot see the point about lead ammunition unless waterfowl are concerned [UKWAS 4.9.4], but agree on biodegradable tree shelters provided they can give the expected years of necessary shelter [UKWAS 2.12.3]. Forest resilience should come from good management [UKWAS 2.1.1]. Semi natural habitat is too vague and could lead to totally unacceptable requirements by the certifier [UKWAS 4.4.2, 4.4.3].* My plea as an old, long retired forester is don't overegg the requirements. Again, as one whose experiences been world wide (as a colonial service forester, forestry adviser and consultant), I would be decidedly sceptical of the value of certification from many areas.

[2] UKWAS is full of good intentions – but somehow the reality of operational practice in (certified) UK forests still leaves a lot to be desired, and there should be more focus on tightening up some of the vaguer criteria if the standard is to actually enhance sustainability rather than rubberstamp current practice.

[3a] UKWAS is there to support UK woodlands in achieving FSC certification. FSC has core values of biological diversity, benefits to local people and woodland economic viability. Each of these must be held in balance. The role of commercial woodland in carbon capture and producing a carbon storage product cannot be under emphasized. The changes made in this revision of UKWAS broadly support commercial timber production however there are elements of concern. These are commented by the appropriate requirement. The UK has a strong legal system which covers many elements within UKWAS, therefore the standard should be wary of adding additional requirements on top of our robust legislation. We are in a time of change, public perception of timber production is high and as such more woodlands should be seeking UKWAS certification, however if the standard is too onerous then the small woodland owner is unlikely to take it up, as is shown in the South of England.

[6] Prior to my retirement in 2020 I was Wildlife Management Officer for Forestry England (2010 – 2020) completing 36 years in professional wildlife management. In 2019 I was awarded the MBE for Services to Wildlife Management in England.

In 2014 I was the technical lead of the team that introduced the use of non-lead ammunition for all of Forestry England's deer and feral boar management.

The objective was to deliver lead free venison to the game meat market, thus emphasising the benefits of 'healthy venison' fully. At this time Forestry England were the only large land-owning organisation to fully commit to non-lead usage for deer management.

A full set of testing, trials and data collection were undertaken to establish the most suitable non-lead ammunition based on criteria meeting a number of points such as terminal performance, carcass damage, compatibility to the FE firearms systems and accuracy.

Following these extensive trials, several makes of bullet/cartridges met the above criteria, outperforming lead ammunition on a number of points.

In 2021 forestry England are removing lead ammunition (shotguns) from their game shooting leases.

In my professional view all deer management could be carried out using non-lead ammunition.

Further comments to section 2.12.1.

[8] While pleased to see the inclusion of continuous cover forestry (CCF) in the glossary (under the LISS term), we remain convinced that LISS is a confusing term that should be abandoned in favour of a term like 'Lower Impact Management Approaches' – see our previous submission of August 2020 for a detailed explanation of our reasoning. We also consider that CCF should be given a separate listing in the glossary, which would conform with what is found in UKFS.

We believe that the current draft largely ignores the creation and greater use of mixed species stands as an important way to foster resilience to climate change and other hazards. Too often the text seems to imply that the continuation of single species stands managed by clear felling is an acceptable default option when there are other silvicultural approaches such as CCF which will provide greater diversity, resilience, and provision of ecosystem services.

[9] Really like the new emphasis on Carbon – could be more reference to climate change and the need for resilience.

[14a] The ATF has strongly supports the aims and objectives of the FSC certification scheme, however we have been somewhat frustrated by the fact that Wood Pastures and Parklands are not fully recognised as a woodland habitat although this is where the vast majority of Britain's ancient and veteran trees reside.

Lapsed wood pastures which have reverted to secondary woodland are however recognised. Ideally the management objective for these ancient habitats should be to fully restore them back to their ecologically rich historic structure of grazed wood pasture with natural successional restocking to produce a sustainable habitat of exceptional biological diversity as well as providing valuable carbon capture. [UKWAS 4.4.2]

Public access should be encouraged but sensitively managed to avoid negative impact to ancient and veteran trees, either through soil compaction by excess footfall, damaging forestry activities within the trees' root protection zones or the need to undertake unnecessary tree safety management. Wherever possible the policy should be to move the access route away from the threat instead of carrying out damaging tree surgery. [UKWAS 4.6.3] It is vital that all deadwood is retained where it

stands or falls to provide habitat for a myriad of fungi and associated saproxylic species as well as for birds and bats utilising these niche habitats. [UKWAS 4.6.4]

When essential work is deemed necessary for the well being of the ancient and veteran trees then it should only be undertaken by specialist trained arboriculturists, who are knowledgeable regarding the correct management of ancient and veteran trees. The ATF or Arb Association can provide details of relevant training courses available. [UKWAS 4.6.3]

[14b] As you can see from more general comments, we would like to see a consistent use of the overarching term High Conservation Value (HCV), with a clear definition in the Glossary of the features and landscape types it covers. In addition, the Glossary definitions in relation to : Ancient Tree, Veteran Tree, Buffer Zone, Parkland, Wood Pasture require addition or revision. ATF would be happy to assist here, although not in the attached document, since it requires more detailed discussion within the steering group.

[15] We urgently need to see an expansion of nature's recovery across Britain's land and seas and a growing number of world leaders are now calling are calling for 30% of land to be restored for nature by 2030. Rewilding Britain's vision for achieving 30% by 2030 is to expand the scale, quality and connectivity of our native habitats through:

- The creation of core rewilding areas across at least 5% of Britain. These areas should focus on restoring and reinstating as wide a range of natural processes, habitats and missing species as possible. What will emerge is a diverse mosaic of native forest, peat bogs, heaths, species-rich grasslands wetlands, saltmarshes etc.
- The establishment of nature-enhancing land and marine uses across at least 25% of Britain. These will embed and connect up core rewilding areas within broader mosaic of land uses such as low-impact mixed forestry, harvesting of natural products, nature-based tourism and high-nature value grazing.

We feel that natural and semi-natural woodland habitats across a gradient of management activities can make a huge contribution to the achievement of this goal. There is clearly a lot of common ground between the principles of rewilding (see appendix 1 [not included in this report]), the spectrum of rewilding approaches, the FSC principles and criteria and the UKWAS standards. In particular this relates to 1) restoring ecosystems services and environmental values, 2) ensuring the high conservation values of our woodlands and 3) implementing management practices which restore and work with natural processes to the maximum extent. We describe these in more detail in the following sections but also welcome an on-going discussion about the synergy and shared purpose between rewilding and woodland management.

Principle 6: Environmental values and impacts and Principle 9: High Conservation Values

Rewilding Britain would like to see clear and ambitious targets for increasing woodland cover given the scale and pace of change required predominantly through natural and semi-natural forest and woodland regeneration. The potential environmental values and impacts of this could be to:

- Help absorb 10% of the UK's current greenhouse gas emissions annually – some 47 MtCO₂e – as demonstrated in our report '[Rewilding and Climate Breakdown](#)'.

- Increase biodiversity richness and start to restore the abundance of Britain’s wildlife and missing species
- Allow wildlife to move and habitats to adapt as climate zones shift north - saving a significant number of species from climate driven decline or extinction – as demonstrated in our report [‘Adapting to Climate Heating’](#)
- Support diversified economic opportunities through nature-based enterprises, production and employment
- Provide people with clean water, flood defences, healthy soils, breathable air, health and well-being.

While recognising the important role that commercial forestry has in the sustainable production of timber, the overlap between rewilding and woodland management practices lies more in the potential of natural and semi-natural forests and woodlands to deliver multiple economic, environmental and social benefits. We recognise that the boundaries between commercial and naturally regenerating forests are not distinct and many management units will have mixed objectives. For example, the harvesting and restructuring of 1970 and 80s-era plantations across Britain is creating significant areas of land (circa >10,000 Ha per annum) that is becoming suitable for natural regeneration. In turn, natural regeneration is being used in the creation and management of woodlands of all types – from productive broadleaves to complex conifer Continuous Cover Forestry. However, there can be many advantages to natural regeneration as compared to more active management including that it:

1. Supports a structural complexity and diversity of habitats with benefits for wildlife
2. Supports genetic mixing and the natural selection of trees best-adapted to local circumstances and a changing climate, as well as assisting the evolution of resistance to new diseases
3. Reduces the need to import tree saplings, and therefore the risk of introducing new pests and diseases
4. Requires less management and can be more cost effective than planting (although protection from grazing and browsing animals may be necessary in the establishment phase).
5. Could significantly increase net carbon gain in the longer term due to the potential higher carbon value of naturally restored forest, reduced soil carbon loss and other factors

Principle 10: Implementing management practices

The need for a rapid upscaling of woodland expansion raises the question of how this additional woodland area should be created. Evidence suggests that natural regeneration could make a significant contribution to woodland expansion in Britain particularly where the aim is to increase biological diversity, landscape scale habitat mosaics, critical ecosystem services like carbon sequestration, community and cultural value. This raises questions in relation to existing woodland and wider land management practices. Do we simply stand back and allow nature the space to work? Do we kick-start the process then stand back? Or do we get stuck in and act as nature’s guiding hand?

We support a 3-Step Natural Regeneration Hierarchy as a practical model for decision-making as part of a broader rewilding approach where a species-rich mosaics of woodland, scrub and grassland habitats are allowed to regenerate over large landscapes. This starts with natural regeneration as the default approach with tree planting as a support option where the natural regeneration of diverse habitats will not happen without it.

- Step 1 - Let Nature Lead: Allow natural regeneration as a default approach unless trees and shrubs are unable to establish or would take too long to arrive (e.g. due to distant seed sources, impenetrable sward, continued over-grazing).
- Step 2 - Give Nature a Hand: Kick-start the process by assisting natural regeneration, e.g. through ground preparation, direct seeding, grazing control etc.
- Step 3 - Plant Trees: Plant locally sourced tree saplings (“whips”) only where still considered necessary - particularly where this positively engages local people and communities.

There may well be landscapes where the use of all three approaches is appropriate. In some highly modified landscapes, the state of the ground vegetation and grazing at abandonment may mean that little further assistance is needed. In others using natural or assisted regeneration could simply lock in past damage, leading to the dominance of just a few pioneer species. In these circumstances planting missing species, while relying on natural regeneration for those already present, could lead to the faster establishment of more diverse, resilient forests. Over time some levels of grazing and other disturbance can be permitted, but for the first few years most regenerating woodlands will need strong protection from herbivores. Land managers will therefore need to make decisions about which approach, or mixture of approaches, is most appropriate for each site guided by the following questions:

1. Can all desired species get to the site without intervention in a ‘reasonable’ time frame?
2. Can the desired species germinate within the site?
3. Can the desired species establish themselves and grow on to become integral to the ecology of the site?

In the following table [not included in this report] we summarise some of the key considerations in this decision-making process for each of the 3 steps. It is recognised that these decisions cannot be made in isolation however and need to be part of a more integrated approach to land management. This in turn depends on a clear and well-enforced regulatory framework, well-coordinated funding mechanisms and straightforward administrative requirements. We feel that the UK Woodland Assurance Standard should help ensure that natural regeneration as well as natural and ‘naturalistic’ woodland management practices are explicitly supported as part of a broader approach to woodland management.

[16] The RSPB welcomes the opportunity to comment on the UKWAS standard. We support the principle of effective regulation underpinned by statute to provide minimum safeguards for nature and the public interest, and assurance which is designed to ‘go beyond compliance’ to encourage best practise which delivers more public benefit and allows the public the choice to select forest products they are confident that work for nature. We are not convinced this balance has been struck in all cases, and UKWAS is in danger of awarding accreditation to those that merely meet regulatory requirements that govern forestry alone.

UKWAS must meet the aspiration of continuous improvement through setting standards that fully address the nature crisis, as well as the climate crisis. This is especially important if forest cover is to be increased across the UK without detriment to nature, and meeting the Leaders pledge for the recovery of biodiversity signed by the Prime Minister to commit to 30% of land to be managed for nature, 10% strictly so [PM commits to protect 30% of UK land in boost for biodiversity - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/pm-commits-to-protect-30-of-uk-land-in-boost-for-biodiversity).

Forest expansion and management must commit to protect existing native woodland, and seek to expand this by low intervention methods wherever possible. New afforestation must ensure that important open ground habitats which are of high conservation value, are also protected from inappropriate new forestry. The nations lowland heaths, dunes, floristically rich grasslands, wetlands, peatlands and areas where rapidly declining species occur must be identified, protected and positively managed. UKWAS is an important vehicle for raising awareness of these issues and ensuring due weight is given to the critical needs of nature to ensure the current declines are reversed and recovery can commence [State of Nature 2019 Reports - National Biodiversity Network \(nbn.org.uk\)](https://nbn.org.uk).

[17] In general, we welcome the proposed changes intended for UKWAS V5, many of which align with our response to the initial consultation. However, we have few specific points that we wish to make regarding requirements and/or guidance against 2.1.1, 2.7.1, 2.10.1, 2.12.1, 3.2.5 and 4.6.2.

[18] *We welcome this opportunity to comment on the proposed revisions to the UKWAS standards, and would like to add our strong support to the proposed ban on the use of toxic lead ammunition in the control of wild deer (section 2.12.1 (b)) and in cases where game shooting is allowed (section 4.9.4) – both references are to the Initial Revision Draft Requirements-only version March 2021.*
[UKWAS 2.12.1, 4.9.4]

On a wider front, we would like to comment that woodlands support important populations of many birds which are red or amber listed as species of conservation concern and which require appropriate habitat management and freedom from disturbance, particularly during the nesting season. For instance, Sussex holds important populations of woodland dependent species such as Honey-buzzard, Goshawk, Nightjar, Marsh Tit and Woodlark. In other parts of the country, this species list would, naturally, vary. However, these birds require appropriate long-term management of their habitat. Nest sites of many of these species should be safeguarded during forestry operations and this requires regular monitoring by skilled ornithologists and good communications with forest managers.

Section 4 of the standard covers environmental matters. Sections 4.1.1 and 4.1.2 deal with the need to identify priority species and habitats and the protection of breeding sites. We suggest that consultation with county/local biological records centres should be an explicit requirement of management planning for forestry operations. [UKWAS 4.1.1, 4.1.2]

The standard mentions the need to avoid introducing invasive non-native tree species. We suggest that this could be expanded to encourage the removal of invasive non-native species where these are causing an issue. For example, invasive rhododendron is a major problem in some woodlands locally and elsewhere in the country. [UKWAS 2.9.1]

We also note that there are no provisions within the standard regarding the possible harassment of birds of prey by shooting interests using the woodland. We do appreciate that this could be considered as covered by other laws (section 1.1.1), but feel this could well merit a paragraph within section 3 or 4 as thought appropriate.

[22a] We welcome the inclusion of heritage within the standard – England’s woodlands represent an important repository of archaeological and historic features, in some cases these are the last examples of features which were once characteristic and commonplace within our landscapes, but which have subsequently been destroyed elsewhere through more intensive land use, principally agriculture. Together these features tell us about the history and development of our wider countryside, but also the history, management and use of our woodlands. Woodland heritage provides an opportunity for access, understanding and wellbeing. It represents key cultural and social capital, but also supports the delivery of the cultural, supporting and regulating elements of natural capital. New planting may provide opportunities for reinforcing historic landscape character, and timber and other forestry products can be fundamental to the conservation and repair of other key components of our heritage, notably historic buildings.

In general terms, it would be useful if the terminology for cultural and historic features and sites, were revised to more standard terminology, such as ‘Historic Environment’ and ‘heritage assets’, ‘historic or archaeological sites and features’.

[22b] In general the revisions are positive in terms of enhancing support for historic environment features and I welcome them.

Other than my detailed comments, one general point is that I would suggest the standard needs to be a little more definite or SMART, so for example, there could be a requirement for consultation with Historic England / national statutory historic advisory agencies to agree the definition of what is ‘appropriate to scale’ or ‘proportionate’ in relation to planning and operation where designated heritage assets are involved or local authority historic environment departments for undesignated heritage assets.

It would also be beneficial to include guidance about how and when management plans for heritage assets should be devised/revised/reviewed. These should be devised in consultation with national statutory historic advisory agencies or local authority historic environment departments and reviewed quinquennially.

[23] The new draft document incorporates many of the changes to the text of UKWAS 4 recommended in our letter of 27 August 2020 and we welcome the further highlighting and refinement of cultural heritage site management in the new draft standard.

Our only additional comment is the omission or reference to consultation with local authority archaeology services in the new draft at 3.1.4 Requirements and 4.8.1(a) first paragraph of the Requirements and last paragraph of the Guidance. In these two sections of the draft reference is only made to consultation with statutory historic environment agencies. The vast majority of historic environment sites in woodland have no statutory designation or protection and management advice on these sites is provided by local authority archaeology services, who maintain local Historic Environment Records, rather than the national statutory historic environment agencies. Mention of both the national agencies and local authority archaeologists at these points in the standard text is therefore suggested. [UKWAS 3.1.4, 4.8.1]

[24] We welcome the opportunity to comment on this consultation. We believe that all woodlands should be managed sustainably and with nature recovery in mind. To that end we are very supportive of the code, the requirements in it and the compliance checking regime. There are a few areas where we would like to see additions or slight changes these are detailed in our response.

Natural England is supportive of the UKWAS standard and the desire to be able to demonstrate sustainable management of woodlands. Woodland creation and management can do much to help address the joint imperatives of climate change and nature loss. It would therefore be good to see the UKWAS standard encourage land management that goes beyond compliance and to better support achievement Government and societal ambitions to restore and enhance nature and ensure new woodland establishment happens at no detriment to existing habitat and species interest.

[25] Our central concern with this revision of UKWAS is that it continues to allow a weak level of delivery on conservation objectives. Specifically, it keeps the phrasing which requires 'Areas and features of high conservation value' to be 'maintained and, where possible, enhanced' (4.1.1). This phrasing allows compliance whilst maintaining areas of high conservation value in poor condition. Our experience is that this approach leads to conservation woodlands being subjected to high grazing levels by deer, conifer regeneration onto open ground and the progressive loss of species richness to rank grasses. For UKWAS to be credited with good conservation management, we consider that this needs to be amended to require areas of high conservation value to be brought into good condition. Further discussion would be required to implement this requirement, but the foundations are already present, as managers are required to plan their woodland management (2.1, 2.2) including the identification of 'special characteristics and sensitivities of the woodland and appropriate treatments'. [UKWAS 4.1.1]

A further concern is that the revision continues with the assumption that a 15% allocation of WMU to conservation objectives is adequate. The Scottish and Westminster governments, as well as the EU have accepted the need for a 30% allocation of land towards conservation, and it seems out of step that UKWAS doesn't reflect this. The requirements under the current UKFS are 15%, but if UKWAS simply echoes the minimum standards required by the statutory UKFS, then it isn't clear what added value UKWAS provides. We recommend that UKWAS moves to an allocation of 30% to conservation objectives, to be implemented over time (for example at a restocking stage). [UKWAS 2.11.1]

Finally, we disagree with the new limit of 5% on conversion to non-forested land (2.13.2). We have examples of wholly inappropriate and unproductive plantings on peatlands where both climate and biodiversity requirements create a very strong case for transformation at a much higher level – up to complete removal. This is clearly not of general application, and isn't the thin end of a deforestation edge, but simply a recognition that at the margins we need more flexibility than a blanket 5% limit allows. We recommend that UKWAS allows at least an 'exceptional circumstances' exemption from this 5% limit. [UKWAS 2.13.2]

[26] Thank you for consulting with SEPA and allowing us the opportunity to provide comments on the draft UKWAS 5th edition. SEPA congratulates the UKWAS Working Group in producing a much improved version which incorporates the priorities in sustainable forest management to compliment Scotland's Forestry Strategy & Implementation Plan; associated forestry operational guidance updates and the political direction on climate change. SEPA supports the inclusion of new and stronger references to biodiversity, soils and carbon management; national flood management and

the emphasis on site compliance and standards conformity. These core messages flow through the document, linking chapters together and clarifying UKWAS aims and objectives to practitioners.

This simplification and clarification of Guidance coupled with a stronger sense of focus and purpose, will enable forestry practitioners to meet extant environmental legislation and encouraged to go beyond guidance where possible. This fits with SEPA's direction of travel contained within the Forestry & Wood Processing sector plan and our aims and objectives outlined within One Planet Prosperity.

[27] Issues arising from the FSC UK Risk Review, August 2020

We note that the UKWAS Working Group considered the various FSC UK inputs on scale, intensity and risk (SIR), including outputs from our Small Woods project, but elected to retain the 'size neutral' approach of UKWAS 4. While we respect this decision, and will continue to focus on our own efforts to improve access to certification for small and community woods, we ask the UKWAS company to justify its general approach to SIR, perhaps in a policy on accessibility to certification.

We note that the Working Group seemed comfortable with how High Conservation Values (HCVs) were defined in the UK context. The Group considered the status of the FSC National High Conservation Value Framework for the United Kingdom, and chose to maintain it as optional guidance rather than a set of mandatory requirements. This approach does seem to be taken in at least some other national standards, and we hope that it will remain acceptable to FSC International. However, standard users who only refer to the UKWAS version might not even be aware of this FSC guidance. Therefore, we recommend that an explicit reference be made in UKWAS, or, at the very least, in the UKWAS Appendix, to the FSC National HCV Framework.

Issues arising from the FSC Requirements Review, August 2020

We note with pleasure that many of the issues raised in the requirements review have been addressed by the UKWAS Working Group. We would remind the Group that it remains to be seen whether the approach we have suggested to workers' rights will be considered adequate by FSC International.

We note that the Working Group has introduced a number of references to carbon and carbon balance in requirements and guidance. While these are welcome, some might be construed as requiring direct monitoring of factors such as soil carbon in order to demonstrate compliance, for example UKWAS 2.4.1 or 2.6.2. Such monitoring is likely to be beyond the reach of all but the largest organisations, and might be seen as a barrier to certification. For the avoidance of confusion, we recommend providing guidance on how compliance with carbon requirements might be demonstrated, for example by adopting practices that are widely accepted as having positive impacts/avoiding negative impacts, or by using robust model-based estimates of changes in carbon balance. [UKWAS 2.4.1]

We also note that the Working Group has included the issue of carbon storage in forest products in UKWAS 3.2.5. This is an important point, but does not seem to fit with the consideration of soil carbon impacts in this requirement. We recommend addressing the issue of carbon storage in forest products in the requirement to make the best use of the woodland's potential products (UKWAS 5.3.1), and possibly also in species (UKWAS 2.8) and silviculture (UKWAS 2.10) requirements. [UKWAS 3.2.5, 5.3.1]

An explicit reference to equality legislation was introduced in UKWAS 4. This was an important step forward but, apart from a duty on public bodies, only really addressed the negative aspects of equality (avoiding discrimination etc. as per FSC Criterion 2.1) and not the positive aspects (actively promoting equality as per FSC Criterion 2.2). Positive steps towards equality in processes of engagement are arguably already addressed in UKWAS 2.3.1(d); what is not addressed is promotion of equality for workers. During discussions on the first consultation draft of UKWAS 5, a new equality requirement was briefly added, but was eventually replaced with guidance to ‘promote equality so that all workers are able to access and enjoy the same recruitment, training, development and promotional opportunities... [and] the same rewards, resources and opportunities’. While this guidance is welcome, we believe that this was a missed opportunity, and note that it might be considered inadequate to address Criterion 2.2. We would want any proposed solution to be concrete and auditable. Therefore, we recommend adding a requirement along the lines of ‘The owner/manager promotes equality, including through flexible working practices’ to UKWAS 5.6.1. [UKWAS 5.6.1]

While we recommended that wording around ‘annual allowable cut’ was included in the current draft of UKWAS 5, in line with the IGIs, we recognise that this concept might make little sense for small woods with infrequent harvesting, and the UKWAS Working Group has already noted that it is not how yield control works in practice in most larger forests. We suggest that modifications to current UKWAS 2.4.2 requirement and/or guidance wording might be necessary for the requirement to be workable while still ensuring that harvesting is sustainable. [UKWAS 2.4.2]

In the requirements review, we asked UKWAS to consider the need to clarify the scope of the standard, in terms of both vegetation types and non-timber forest products, and to develop specific requirements as appropriate. There has been some clarification in terms of vegetation types, specifically in relation to short rotation coppice, but no explicit statement has been made as to how the standard might relate to agroforestry. References to non-timber products have been changed, sensibly, to non-wood products, and clarification has been added about products considered to be in scope, but requirements are very much focussed on harvesting levels and impacts. We recommend reconsidering the specification of scope in terms of vegetation types, and the need for further requirements or guidance relating to non-wood products, for example in relation to legality (UKWAS 1.1) or health and safety (UKWAS 5.4).

Other issues

FSC requires ‘ecologically appropriate’ silvicultural practices (Criterion 10.5) and the use of ‘ecologically well adapted’ species (Criterion 10.2), and has a stated preference for the use of native species and local genotypes (also Criterion 10.2). We ask the UKWAS Working Group to consider how successfully the standard addresses these Criteria through silviculture (UKWAS 2.10) and species (UKWAS 2.8) requirements. In particular, is there too much scope for species choice and silviculture to be determined by management objectives, rather than by what is ecologically appropriate? [UKWAS 2.8.1, 2.10.1]

[30] *There is no doubt that phasing out lead is the direction of travel, but there is an enormous amount of work to be done first before we can be sure that the alternatives are humane, effective and safe. Some of what [is quoted in square brackets] below is, with my hat on as Captain of the National Rifle Club of Scotland, what we technically call twaddle when applied to the smaller calibres that many stalkers use. Because copper is lighter than lead you need more of it, but if you take the*

same calibre and just lengthen the round it becomes inherently less stable. What you need to do is to increase the diameter as well, hence moving up a calibre.

I would like to see proper trials using carcasses to check for shot placement and effectiveness before we even think about adopting it and research into what spent rounds do. Were you aware that no lead bullets are banned on National Rifle Association certified ranges in the UK because of ricochet concerns?

The whole concept of adopting untried technology to kill wild animals to satisfy a highly tenuous link between venison consumption and lead poisoning is simply unacceptable in my view. Presumably pushed by the same lobby who extol shooting hinds with calves at foot earlier in the season than is currently allowed!

[Thank you for your query. We began using unleaded ammunition for deer culling late in 2008, Since then I would estimate we have used in excess of 80,000 rounds of unleaded ammunition.

There are a lot of myths around unleaded ammunition. We have found the unleaded bullet to be a very accurate, humane, fast and safe killer across the deer species we cull in Scotland. (Fallow, Roe, Red and Sika). Our employees use .270w calibre rifles. We use unleaded bullet weights in the range of 110-130 grn. Because of copper being lighter than lead, the unleaded bullets tend to be longer. This helps with accuracy. We regularly go down in weight to 110 grn and hence the bullet is faster. Velocity contributes to making the bullet very efficient.] [UKWAS 2.12.1]

[32] ALGAO UK welcomes the continued inclusion and consideration of the historic environment in the revised UKWAS as an essential component of the landscape and part of the rich mosaic of habitats and natural places which contribute so much to our landscapes across the UK. As managers of extensive and detailed databases for the historic environment, ALGAO members are uniquely placed to provide expert and confidential advice to woodland managers responsible for compliance under the scheme. The historic environment consists of a collection of culturally, historically and archaeologically significant sites, features, artefacts and landscapes, of which only about 10% of which are protected in law. It is critical that the scheme recognises the significance of the whole historic environment in order to ensure full compliance under the scheme.

[33] We are just making a general comment, no notes in the document.

We would like to see woodland creation take a wider view of what already exists in the larger landscape area. We feel there is a need for consideration of the wider biodiversity, environmental and social impacts created by mass afforestation.

How can a new woodland be considered just on its own merit? For example some of our surrounding communities here in Dumfries and Galloway are reaching (or have exceeded) 75% of land suitable for commercial planting being covered in conifer option forestry. Any new woodland creations should take account of this, how can it be a sustainable or good for biodiversity/environment to allow a new woodland to be created without taking into consideration the existing Forest? Covering this much land in what is essentially a monoculture (of high intensity conifer) is not good for biodiversity.

We suggest a limit should be considered per community area on high percentage conifer woodland creation and new woodlands above this limit must contain more broadleaf or open ground

(managed for maximum biodiversity) or they should have a higher degree of conservation value or commitment to more environmentally sympathetic practices. The standards you are setting should be aiming much higher.

To really prove that further woodland creation is suitable in these areas in the current Climate and Biodiversity emergency an independent review should be carried out so UKWAS can consider what is truly sustainable. Joseph Seed, Chairman,

This opinion is supported by 17 Dumfries and Galloway Community Councils.