

## UKWAS Revision 2020-23 Second Revision Draft (October 2021)

Consultation Report & Working Group Responses  
V1-0, 26 July 2022

The Working Group responses reflect discussions as follows:

- UKWAS Working Group meeting – 14/02/22
- UKWAS Working Group meeting – 21-22/02/22
- UKWAS Working Group meeting – 24/02/22
- UKWAS Working Group meeting – 28/02/22
- UKWAS Working Group meeting – 02/03/22
- UKWAS Working Group meeting – 07/03/22
- UKWAS Working Group meeting – 14/03/22
- UKWAS Working Group meeting – 16/03/22
- UKWAS Working Group meeting – 22/03/22
- UKWAS Working Group meeting – 07/04/22
- UKWAS Working Group meeting – 13/04/22
- UKWAS Working Group meeting – 04/05/22
- UKWAS Steering Group meeting – 30/06/22
- UKWAS Working Group meeting – 21/07/22

**OFFICE**

59 George Street  
Edinburgh EH2 2JG

**CONTACT**

M +44 [0]131 240 1419  
E [ukwas@ukwas.org.uk](mailto:ukwas@ukwas.org.uk)

**WEB**

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

## Contents

1. Introduction .....	4
1.1 Background .....	4
1.2 Characteristics of respondents .....	4
1.3 Presentation of consultation responses .....	5
2. General comments.....	6
3. Specific comments .....	7
Contents section .....	7
Introduction section.....	7
Sub-section 1: Background and purpose .....	7
Sub-section 2: Procedures for use of the certification standard .....	7
Sub-section 3: Interpretation of the certification standard .....	8
Using the certification standard .....	8
Section 1: Legal compliance and UKWAS conformance .....	9
Sub-section 1.1: Compliance and conformance .....	9
Sub-section 1.2: Protection from illegal activities .....	9
Sub-section 1.3: Genetically modified organisms.....	9
Section 2: Management planning.....	10
Sub-section 2.1: Policy and objectives.....	10
Sub-section 2.2: Documentation .....	10
Sub-section 2.3: Consultation and co-operation .....	11
Sub-section 2.4: Productive potential of the woodland management unit (WMU) .....	12
Sub-section 2.5: Assessment of environmental impacts in existing woodland.....	13
Sub-section 2.6: Woodland creation .....	13
Sub-section 2.7: Woodland restructuring.....	14
Sub-section 2.8: Tree species selection .....	14
Sub-section 2.9: Introduction of non-native species .....	15
Sub-section 2.10: Silvicultural systems .....	15
Sub-section 2.11: Conservation .....	16
Sub-section 2.12: Protection.....	16
Sub-section 2.13: Conversion .....	17
Sub-section 2.14: Implementation, amendment and revision of the plan.....	17
Sub-section 2.15: Monitoring .....	17

Section 3: Woodland operations .....	19
Sub-section 3.1: General.....	19
Sub-section 3.2: Harvesting and restocking.....	19
Sub-section 3.3: Forest infrastructure .....	20
Sub-section 3.4: Integrated pest management .....	20
Sub-section 3.5: Fertilisers.....	21
Sub-section 3.6: Fencing .....	21
Sub-section 3.7: Waste .....	21
Sub-section 3.8: Pollution .....	22
Section 4: Natural, historical and cultural environment.....	23
Sub-section 4.1: Statutory nature conservation sites.....	23
Sub-section 4.2: Conservation of ancient semi-natural woodlands (ASNW) .....	23
Sub-section 4.3: Management of plantations on ancient woodland sites (PAWS) .....	24
Sub-section 4.4: Protection of conservation values in other woodlands and semi-natural habitats .....	24
Sub-section 4.5: Watershed management and erosion control.....	25
Sub-section 4.6: Maintenance of biodiversity and ecological functions .....	25
Sub-section 4.7: Maintenance of local native seed sources.....	26
Sub-section 4.8: Protection of cultural and historic environment sites .....	26
Sub-section 4.9: Game, shooting and fisheries management .....	26
Section 5: People, communities and workers.....	28
Sub-section 5.1: Public access rights, permissive uses, traditional rights, and the health and wellbeing of local people, visitors and communities.....	28
Sub-section 5.2: Minimising adverse impacts.....	28
Sub-section 5.3: Local economy .....	28
Sub-section 5.4: Health and safety .....	29
Sub-section 5.5: Training and continuing development.....	29
Sub-section 5.6: Workers' rights.....	29
Sub-section 5.7: Insurance.....	29
Glossary of terms .....	30
Appendix – Full list of respondents by UKWAS constituency .....	32

# 1. Introduction

## 1.1 Background

A public consultation to generate feedback on the Second Revision Draft of the UK Woodland Assurance Standard was carried out for 60 days between 1 October 2021 and 30 November 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 Second 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 Second Revision Draft plus boxes for stakeholder feedback.

The responses were analysed in December 2021 and January 2022.

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

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

The Consultation Paper requested specific feedback on the issues set out below:

1. Sub-sections 3.4 on Integrated pest management and 3.5 on Fertilisers.
2. Sub-section 4.3.1 on Management of PAWS requiring that the primary management objective for PAWS is restoration to native woodland.
3. Sub-section 4.8 Protection of cultural and historic environment sites – has the working group adopted right terminology to describe cultural and historic environment aspects? See also Glossary definitions of ‘Cultural features’, ‘Heritage assets’ and ‘Historic environment’.
4. Glossary – Lower-impact silvicultural systems (LISS) and Lower intensity forest management approaches – the working group seeks views on replacing the term ‘LISS’ with ‘Lower intensity forest management approaches’ as defined in the glossary.

## 1.2 Characteristics of respondents

51 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 (6, including two responses from individuals at the same organisation)
- Forestry practitioners (24, including 14 responses from individuals at the same organisation)
- Country forestry authorities and forestry enterprises (3)
- Environmental organisations (5)
- Wood processing industry (2)
- UK countryside, environment and heritage agencies (3)
- Forestry standard setting (2)
- Forest user organisations (1)
- Education, research and training (1)

- Wood products trade (1)
- Other (3)

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

A full list of respondents is given in the Appendix at the end of this document.

### **1.3 Presentation of consultation responses**

The report on the consultation on the Initial Revision Draft of the Standard followed the same format as consultation reports for UKWAS 4, giving a more or less blow-by-blow account of comments and UKWAS Working Group responses. This approach proved to be unwieldy given the volume of comments received. With an even greater number of respondents to the consultation on the Second Revision Draft of the Standard (up from 38 to 51), it was considered necessary in this report to summarise comments and responses, although stakeholder comments are provided in full in the separate Annex.

General comments are summarised in Part 2 of this report, and are provided in full in the separate Annex.

Comments on specific sections of the Standard are summarised in Part 3 of this Report, and are provided in full in the separate Annex. Part 3 also summarises the UKWAS Working Group responses to the main points of stakeholder feedback on each section.

As the questions in the Consultation Paper apply to specific sections of the Standard, stakeholder responses are included in the separate Annex.

In all cases, individual respondents are identified using numbers in square brackets which correspond to the identification numbers in the Appendix at the end of this document, along with either an organisational or personal name. For details of how similar responses have been brigaded, see the explanatory notes in the separate Annex.

## 2. General comments

This section was provided so that respondents could make overarching comments about the draft Standard. Inevitably, many respondents included more detailed comments in addition.

The main thrust of the overarching comments was the question of balance: does the Second Revision Draft achieve an appropriate balance between economic, environmental and social aspects?

Respondents from the economic sector often expressed concern that the balance had tilted too far away from timber production towards environmental objectives and that this would impact negatively on woodland viability and reduce the flexibility afforded woodland owners / managers.

They made the point that timber receipts provide the financial wherewithal to manage woodlands and suggested it was irresponsible to offshore the UK's domestic timber needs. There was also concern that the scope of the Standard was extending beyond 'forestry management' and that the Standard needs to remain accessible for the majority of woodland owners to avoid areas withdrawing from certification.

On the other hand, many respondents from across the spectrum welcomed the greater focus on issues such as forest resilience, climate mitigation and the historic environment.

Those with an environmental or social perspective often highlighted issues where they felt the draft Standard needed to go further. In particular, respondents suggested ways in which the Standard could be further adapted so that woodland management would play a greater role in tackling the biodiversity crisis.

The more contentious issues in the draft Standard included the proposals for the use of non-toxic ammunition, the management of statutory nature conservation sites and Plantations on Ancient Woodland Sites (PAWS), and woodland creation.

Several respondents commented that the additional guidance was sometimes unnecessarily wordy with a tendency towards being prescriptive rather than simply guidance.

### **3. Specific comments**

Comments on specific sections of the Standard are provided in full in the separate Annex. The following sections offer a summary of the main points raised and how the UKWAS Working Group has responded.

#### **Contents section**

Stakeholder comments included calls for the clarification of the term 'local' in sub-section 5.3, renamed from 'Rural economy' to 'Local economy'; a request for cross-referencing within the Standard; and a suggestion that, in addition to sub-section 2.9 'Introduction of non-native species', there should be a section on management of non-native species.

Regarding the term 'local', the Working Group noted that, although the sub-section 5.3 heading had been changed, this was only to align it with the wording of the requirement, which has referred to the 'local economy' since the first edition of UKWAS. On the basis that this is long-standing wording which is not known to have caused issues at audit, the Working Group did not consider it necessary (or feasible) to define the term 'local'.

Regarding cross-referencing, the Working Group agreed to bear this in mind during when finalising requirement and guidance text.

Regarding non-native species, see comments on sub-section 2.9, below.

#### **Introduction section**

##### **Sub-section 1: Background and purpose**

Stakeholder comments included a request to refer explicitly to a 'greater focus on lower intensity management approaches such as CCF', and a call to clarify the relationship between UKWAS and UKFS.

Regarding lower intensity management approaches, the Working Group did not feel that it was appropriate to go into such detail in the introduction, and that it was better to address this issue elsewhere in the Standard.

Introductory text has been expanded to clarify the relationship between UKWAS and UKFS, and also to note good practice and research inputs to the Standard and the ethos of continuous improvement.

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

Some stakeholders questioned the change from research benefitting 'long-term management' to 'future management', but the Working Group felt that the new wording encompassed research benefitting both short- and long-term management. One respondent questioned how support for research would be evidenced, but the Working Group noted that this was a recommendation, not a requirement, and not subject to audit.

Stakeholder concerns around wayleaves related specifically to thresholds in the FSC Policy on Excision. The Working Group agreed a small clarification of the text relating to situations where the owner/manager does not have full management control, with FSC UK to take forward discussions on national thresholds.

Regarding the clarification of processes for raising complaints, and explaining the consequences of non-compliance, the Working Group agreed to revisit previous suggestions for text and/or an infographic. Signposting text has been added to the Standard, with a fuller explanation and links to contact information added to the UKWAS website.

### **Sub-section 3: Interpretation of the certification standard**

No comments received.

#### **Using the certification standard**

In response to stakeholder comments, the Working Group agreed to replace the reference to a 'felling licence' with a reference to 'felling permission', defined to include both felling permissions in Scotland and felling licences elsewhere in the UK.

For clarification, in response to stakeholder concerns, the Group agreed to change 'relevant requirements' to 'applicable requirements'.

Having received some positive and some negative feedback on the rewording of requirements to remove the word 'shall', the Working Group agreed that the draft wording would be retained. However, the Group did discuss how best to reinforce the status of requirements, verifiers and guidance throughout the Standard, including colour coding, re-ordering, and reminder text.

The explanation of guidance notes was updated to include the term 'can' and to explain the difference between 'can' and 'may'. Guidance throughout the Standard was updated to use the terms 'should', 'may' and 'can' as defined here.

## **Section 1: Legal compliance and UKWAS conformance**

### **Sub-section 1.1: Compliance and conformance**

In response to feedback from a regulator on the wording of UKWAS 1.1.2, the Working Group carefully considered the wording of UKWAS 1.1.1 and 1.1.2 but ultimately concluded that UKWAS 1.1.1 was clear in terms of compliance with legal requirements, while the wording of UKWAS 1.1.2 was appropriate to the status of codes of practice.

The Working Group agreed to add 'peat-cutting rights' to examples in UKWAS 1.1.4 guidance, as suggested by a stakeholder, but felt that the wording 'water supplies' was sufficiently generic in this context and did not require clarification, as suggested by another stakeholder.

In response to stakeholder feedback, the Working Group agreed to refer to 'ecological integrity in the short and long term' in UKWAS 1.1.5(a).

Discussing stakeholder feedback on UKWAS 1.1.7 guidance, the Working Group agreed that guidance on planting stock was not relevant as it did not relate to compliance with legislation as per the requirement, and that this issue was better addressed in section 2. Based on feedback from FSC UK, the Working Group agreed to replace guidance on regulatory requirements relating to foodstuffs with a new requirement 1.1.8.

The Working Group agreed to include a number of Scottish Land Commission references in the UKWAS Appendix for this sub-section.

### **Sub-section 1.2: Protection from illegal activities**

No comments received.

### **Sub-section 1.3: Genetically modified organisms**

Some stakeholders expressed concern that the definition of genetically modified organisms would preclude the use of gene editing for grey squirrel control. Advice was sought from FSC and PEFC; both schemes confirmed that they would consider gene edited organisms to be genetically modified organisms, and the definition was clarified on this basis.

## **Section 2: Management planning**

### **Sub-section 2.1: Policy and objectives**

A number of stakeholders suggested that UKWAS 2.1.1 should include quantitative requirements for sustainable production of timber or other products. While many members of the Working Group were sympathetic, others pointed to alternative means of economic viability, and all felt that the proposed mechanism was unworkable in practice. It was felt that this issue was better addressed in sub-section 2.4 (productive potential) or 5.3 (local economy).

In response to stakeholder feedback, the Working Group agreed to refine wording around forest resilience in UKWAS 2.1.1(a). The Group also agreed to change 'environmentally sound' to 'environmentally positive' to provide better balance in the wording of environmental, social and economic considerations.

There was a stakeholder proposal to add a requirement to UKWAS 2.1.1 to consider adopting a lower intensity management approach such as CCF as a means of achieving an appropriate balance of objectives and of developing forest resilience. The Working Group felt that this was better addressed under sub-section 2.10.

Regarding stakeholder feedback on expanding UKWAS 2.1.1 guidance on forest resilience to include consideration of climate change, the Working Group noted that consideration of climate change is already included in the Glossary definition of 'forest resilience'.

In relation to feedback on UKWAS 2.1.2 guidance, the Group agreed to add a reference to carbon in wood-based products. Regarding concerns about invasive commercial conifer species, the Group felt these were better addressed under UKWAS 2.2.1. The Group agreed to change UKWAS 2.1.2 requirement wording to refer explicitly to both short- and long-term impacts.

Some stakeholders expressed concern that the focus of UKWAS 2.1.3 was too narrowly economic, but the Working Group observed that many other requirements focussed solely on environmental or social issues, and that it was important to demonstrate that all management, regardless of its objectives, was economically viable. While noting existing guidance on the potential bases for economic viability both here and under UKWAS 2.1.1, the Group agreed to clarify UKWAS 2.1.3 guidance, adding an explicit reference to ecosystem services.

The Group noted stakeholder feedback on natural capital, but did not see how it could be incorporated into this requirement. The Group also noted feedback regarding consideration of climate change, but felt that the issue of forest resilience was already adequately addressed in other parts of the Standard.

In response to stakeholder feedback on UKWAS 2.1.3(b), the Working Group agreed to remove the wording 'all the requirements of', on the basis that, while it did add emphasis, it did not add meaning, and could actually be incorrect in that some Standard requirements might not be applicable in a given management unit, e.g. UKWAS 4.3.1 in management units without PAWS.

In response to feedback on UKWAS 2.1.3 guidance, the Group agreed that guidance on continual improvement was not particularly relevant here, and moved it to UKWAS 2.1.1.

The Working Group agreed to include a number of Scottish Land Commission references in the UKWAS Appendix for this sub-section.

### **Sub-section 2.2: Documentation**

One stakeholder suggested that, where a woodland is being managed purely for ecosystem services, there should be an assessment of what those are, and how the level of service is to be permanently sustained. The Group felt that this was broadly covered by UKWAS 2.2.1(b), but agreed to add explicit guidance.

The Working Group noted stakeholder comments on UKWAS 2.2.1(c), which acknowledged the benefits of assessing positive impacts but also the increased workload, but felt that it was still important to include this element.

Regarding concerns about invasive commercial conifer species carried over from UKWAS 2.1.2, the Group agreed to include an invasive non-native species control plan in the examples of other documents in UKWAS 2.2.1 guidance, with the specific issues of invasive conifer species addressed under other requirements, including in UKWAS 2.3.2, 2.3.3 and 2.5.2 guidance. The Group also agreed to assess the references to invasive species throughout the Standard to try to address this issue in a coordinated way. Also in regard to the examples of documentation, the Working Group did not consider it necessary to expand references to veteran tree and deadwood documents in line with new requirements, as suggested by one stakeholder, but did agree to refer consistently to plans, rather than a mix of plans and strategies, in this context. The Group decided it was not necessary to add a reference to environmental management plans, on the basis that the contents were already addressed in various management planning requirements.

Regarding planning requirements for hunting suggested by FSC, the Group agreed to revisit the issue under UKWAS 2.4.3.

There was considerably Working Group discussion around making management plan summaries publicly available, with both FSC UK and PEFC UK feeling that more could be done to fulfil scheme requirements. The Group agreed to add a new UKWAS 2.2.2(a) regarding a public contact point, along with guidance on meeting this requirement in a proportionate manner, and also agreed changes to existing requirement text, now UKWAS 2.2.2(b), to remove the reference to 'on request'.

In UKWAS 2.2.2 guidance, a stakeholder had questioned the wording in relation to sites of special cultural and historical importance in the examples of confidential information. On balance, the Working Group decided this example was unnecessary in the context of the others provided, and agreed to delete it.

On the basis of positive stakeholder feedback, no further changes were made to UKWAS 2.2.3, except that the reference to 'invasive non-native species' in guidance was changed to 'spread of invasive non-native species' for consistency with references elsewhere in the Standard.

The Working Group agreed to include a number of Scottish Land Commission references in the UKWAS Appendix for this sub-section.

### **Sub-section 2.3: Consultation and co-operation**

The Working Group noted stakeholder concerns about open-ended consultation, but felt that these were more relevant to consultees holding up statutory consultation processes, an issue beyond the control of UKWAS.

A stakeholder had suggested changing 'issues' to 'reasonable issues' in UKWAS 2.3.1(f). The Group felt that managers needed to respond to issues whether or not they were reasonable, but that the response should vary accordingly; guidance was added to this effect.

Regarding FSC requirements on involving experts in the monitoring of High Conservation Values, the Group agreed to address this in the monitoring section. In response to FSC requirements on identifying and avoiding negative impacts on local communities, the Group agreed to replace the second half of UKWAS 2.3.1(f) with a new requirement to engage with local people and take action to identify, avoid and mitigate significant negative social, environmental and economic impacts of management planning. The Group eventually decided not to include guidance on addressing this requirement in a proportionate manner, on the basis that introductory guidance on the application of the Standard was sufficient.

Regarding stakeholder feedback on engagement with the forestry workforce, UKWAS 2.3.1 guidance was changed to recommend consulting workers on all issues, not just economic and social issues.

Various changes were made to UKWAS 2.3.1 guidance to refine terminology around transport, biodiversity and historic environment issues. Local authorities or other inspectorates were added to the list of consultees for water supply issues.

In response to stakeholder feedback on expected timeframes for consultation, the Working Group felt that the realities of long-term forest management planning meant that consultation would generally be well in advance of changes in management, and would exceed the recommendations of the Scottish Land Commission. However, the Group agreed an addition to UKWAS 2.3.1 guidance noting that it was good practice to inform consultees how their comments had been taken into account.

In response to some concerns about the wording of UKWAS 2.3.2, the Working Group noted that the requirement was formulated in such a way that the owner/manager should be audited for seeking to engage with neighbours and for seeking to ensure complementary management, recognising that neighbouring landowners will not always choose to cooperate. The Group did, however, agree to some refinements to the requirement wording, and to refer consistently to 'neighbouring woodland' rather than 'adjoining woodland'.

The Group agreed to add a reference to spread of invasive non-native species to the bulleted list of impacts in UKWAS 2.3.2 guidance in response to a stakeholder comment. The Group noted stakeholder comments about regulatory requirements in relation to changes in hydrology, but noted that these were addressed under UKWAS 3.1.2.

Regarding the stakeholder proposal to replace the wording 'wider conservation initiatives' in UKWAS 2.3.3 with 'wider forest management initiatives, timber harvesting, integrated pest management', the Working Group agreed to add these elements, rather than removing the reference to conservation initiatives. As this would result in a very long requirement, the Group agreed to refer only to 'wider forestry and conservation initiatives' in the requirement itself, and to move the examples of potential initiatives to guidance.

The issue of invasive conifer species was felt to be adequately addressed in existing UKWAS 2.3.3 guidance. Similarly, the current list of examples of invasive non-native species was felt to be adequate, and the Group did not consider it necessary to add giant hogweed as suggested by one respondent. The Group did, however, agree to reframe the guidance so that it was better aligned with the positive message of co-operation in the requirement, rather than being focussed solely on negative impacts.

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

In response to stakeholder concerns about how UKWAS 2.4.1 would be audited, the Working Group agreed to change both requirement and guidance text to clarify that it was the adoption of appropriate practices which would be audited.

One stakeholder suggested that the Standard should include a requirement on understanding soil types. The Group agreed that understanding of soil types was fundamental to good forestry practice, but did not feel that a specific requirement was justified.

In response to the stakeholder suggestion that UKWAS 2.4.1 should explicitly refer to soil and hydrological functions in the short term, as well as in the long term, the Group acknowledged the need to avoid short-term impacts but also noted that it was almost impossible to carry out any management in the forest without some negative short-term effects on carbon, for example. The Group did, however, agree to add a reference to ecological functions.

Some stakeholders expressed the view that UKWAS 2.4.2 should be stronger to encourage productive functions of woodlands, but the Group felt that the current wording was appropriate to the potential range of circumstances and objectives of certificate holders, and also noted the existing guidance on under-cutting. However, inspired by a stakeholder comment on UKWAS 2.11.1, the Group agreed to add a new 2.4.2(d) requiring that management planning identify opportunities where sustainable harvesting of timber can be achieved alongside other objectives

In UKWAS 2.4.3, the Working Group agreed to add a requirement 2.4.3(b) and associated guidance to address FSC recommendations in relation to venison and wild boar/feral pig meat.

The Group concluded that it was not feasible to fulfil FSC's recommendations in relation to honey, and so agreed to remove it from the list of products in scope in UKWAS 2.4.3 guidance, while noting that the advice to owners/managers would still potentially allow for PEFC-certified honey.

In UKWAS 2.4.3 guidance, the Working Group agreed to add a reference to Christmas trees in line with their classification by FSC as non-timber forest products. The Group also agreed to change the advice to owners/managers to contact certification schemes directly to refer instead to certification bodies, in line with similar advice in the Standard.

With only a supportive comment received in relation to UKWAS 2.4.4, no further changes were made.

The Working Group agreed to include a number of Scottish Land Commission references in the UKWAS Appendix for this sub-section.

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

In response to stakeholder concerns about the quality of pre-felling raptor surveys, the Working Group agreed to add an explicit reference in UKWAS 2.5.1 guidance. The Group also agreed with the FSC UK suggestion to reword UKWAS 2.5.1(b) to emphasise avoidance of impacts in the first instance.

The Group agreed to add a specific reference to the potential spread of tree species onto priority habitats to UKWAS 2.5.2 guidance, in response to stakeholder concerns.

With only a supportive comment received in relation to UKWAS 2.5.3, no further changes were made.

The Working Group agreed to include a number of Scottish Land Commission references in the UKWAS Appendix for this sub-section.

#### **Sub-section 2.6: Woodland creation**

The Working Group agreed to the PEFC UK suggestion to add social benefits to UKWAS 2.6.1(b).

Regarding the stakeholder suggestion that UKWAS 2.6.1 include consideration of agricultural land class and integrated land use decision making, the Group felt that it was the role of forestry regulators to make judgements on this, but noted that it might become more significant in future versions of the Standard.

While standing by the factual accuracy of the statement in UKWAS 2.6.1 guidance that 'In some cases afforestation may not be appropriate on either the whole or part of the land', the Working Group agreed to remove it in response to significant negative stakeholder feedback. The Group noted that assessing the appropriateness of planting was implicit in guidance on protecting and enhancing priority habitats and species. Some stakeholders expressed concern about guidance which referred to adjoining land, noting that this was beyond the control of the owner/manager, but the Group felt that it was possible for owners/managers, through actions on their own land, to have positive effects on adjoining areas, for example through habitat buffering or careful consideration of hydrological effects.

The Group agreed to add woodlands and waders sensitivity mapping and other associated guidance to the UKWAS Appendix for this sub-section.

In response to stakeholder concerns about the wording of UKWAS 2.6.2, the Working Group agreed to add text to the requirement to acknowledge the goal of ground preparation and drainage works 'to achieve effective tree establishment'. Guidance was also refined.

Regarding stakeholder concerns about soil compaction, the Group noted that the purpose of much ground preparation was to relieve compaction. The Group felt that roading and extraction issues were better addressed in sub-section 3.3, given the focus of UKWAS 2.6.2 on ground preparation for woodland creation. In response to the stakeholder suggestion that explicit reference should be made to reducing carbon emissions to air/water, the Group felt that carbon losses were already adequately addressed in the UKWAS 2.6.2 requirement text.

### **Sub-section 2.7: Woodland restructuring**

The Working Group felt that the term 'in-stand structure' in UKWAS 2.7.1 was causing some differences in interpretation, and agreed to refer instead to 'stand structure'.

Regarding alignment with FSC Criterion 6.8, the Group agreed to reword UKWAS 2.7.1 to apply to all woodlands, but chose to rely on existing requirements on resilience rather than introducing an explicit reference here.

In response to the stakeholder suggestion that specific limits should be imposed on clearfelling, the Group did not feel that this was feasible for upland forests.

Two respondents suggested adding guidance to UKWAS 2.7.1 on species diversity, to complement existing guidance on structural diversity, but on balance the Group did not feel that this would add anything to the Standard.

Regarding the provision of open space, one stakeholder expressed concerns in relation to FSC excision requirements, but FSC UK did not believe that this would be an issue for small scale open ground created in line with management objectives.

In response to the suggestion that guidance should be added on establishing a natural shrub layer, the Group saw some difficulties with this, and felt that it was better addressed under UKWAS 4.4.2. Similarly, regarding the provision of suitable trees to provide nesting sites/habitat for raptors, the Group noted existing requirements for long-term retentions and natural reserves and agreed that this issue was better addressed in section 4.

On reflection, the Working Group felt that draft guidance on drainage was not relevant to UKWAS 2.7.1, and that this issue was better addressed under 3.2.5. It was replaced with guidance on the restoration of watercourses and wetlands.

### **Sub-section 2.8: Tree species selection**

The Working Group agreed to the stakeholder proposal to switch the order of UKWAS 2.8.1(b) and (c), to emphasise the preference for native species. The Group also agreed to clarify a reference to non-native species in guidance, changing the wording to 'non-native tree species'.

While one stakeholder welcomed the clear steer on species choice in High Conservation Value woodlands in the new UKWAS 2.8.1(d), many other stakeholders raised concerns. The Group agreed to limit the application of 2.8.1(d) to woodlands identified in sub-sections 4.1-4.2 but, given this narrower focus, also strengthened the second bullet point to refer to removal rather than management of natural regeneration of non-native trees. In line with the agreed position on plantations on ancient woodland sites in sub-section 4.3, the Group also agreed to add a new 2.8.1(e), addressing management regeneration of non-native trees on these sites to avoid threats to remnants and conservation features and to allow for an increasing native woodland component.

The Group did not agree with a stakeholder proposal to allow for assisted migration in High Conservation Value woodlands, pointing to Forest Research findings on existing genetic diversity in UK native tree species. Similarly, the Group did not agree to introduce concepts such as 'advancing and honorary native species', which they did not consider to be widely accepted.

Ongoing FSC UK concerns about how UKWAS addresses FSC Criterion 10.2 were discussed at length, but ultimately the Group concluded that these could not be resolved in the time available for Working Group meetings.

#### **Sub-section 2.9: Introduction of non-native species**

Having considered the stakeholder suggestion that there should be an additional section on management of non-native species, the Working Group concluded that this was addressed by many existing requirements on impacts on management and the status of conservation features; indeed, there were so many references in the Standard to the impacts of non-native species that it was not considered feasible to signpost them.

While noting that there might be relevant requirements, such as plant health notices, the Group agreed with the stakeholder proposal to remove the reference to regulatory requirements from UKWAS 2.9.1(a).

While one stakeholder welcomed the new UKWAS 2.9.1(b), others questioned the inclusion of PAWS. After much discussion, the Group agreed to limit the application of 2.9.1(b) to woodlands identified in sub-sections 4.1-4.2, and to introduce a new 2.9.1(c) dealing with woodlands identified in sub-section 4.3. The new requirement allows for the introduction of non-native species to PAWS under certain circumstances, where they replace non-native species already present, will bring additional biodiversity benefits and will not degrade the potential for restoration to site-native species. A cross-reference to UKWAS 4.3.1 was also added to guidance.

The Group did not agree with stakeholder proposals to make specific provisions for 'advancing native species' or 'honorary natives', on the basis that use of 'advancing native species' was already possible while 'honorary natives' was not a widely recognised term. The Group also chose not to refer specifically to 'tree' species in guidance, on the basis that part of the UKWAS 2.9.1 requirement explicitly refers to non-tree species.

#### **Sub-section 2.10: Silvicultural systems**

The Group did not feel it was necessary to include consideration of growing timber and fibre in UKWAS 2.10.1 in the context of choosing silvicultural systems, on the basis that demonstrating the productive functions of woods was addressed elsewhere in the Standard.

The Group remained of the view that it was more appropriate to refer to lower-impact silvicultural systems rather than continuous cover forestry.

As with a similar stakeholder comment on UKWAS 2.7.1, the Group did not feel that it was feasible to impose specific limits on clearfelling, but did agree to add a cross-reference to sub-section 2.7 in UKWAS 2.10.1 guidance.

On the basis of the inconclusive discussions about FSC Criterion 10.2 in relation to UKWAS 2.8.1, FSC UK asked only that their ongoing concerns about how UKWAS addresses Criterion 10.5 be noted at this stage.

Regarding UKWAS 2.10.2 guidance on coupe sizes, the Group accepted that the current wording was not necessarily the best summary of published good practice, and agreed to remove the reference to specific coupe sizes. The Group also agreed to remove the long-standing but now rather dated reference to Forestry Commission Practice Guides from 2.10.2(a), and to refer instead to good practice guidance relevant to the type of woodland.

While noting stakeholder concerns about low impact felling methods, the Group felt that these were operational issues better addressed in section 3.

The Working Group agreed to include a Scottish Land Commission reference in the UKWAS Appendix for this sub-section.

### **Sub-section 2.11: Conservation**

In response to stakeholder concerns about the interpretation of UKWAS 2.11.1(a) and (b), specifically in situations where areas and features identified in (b) exceeding the 15 % minimum in (a), the Working Group agreed to refine the wording of (b) and to add guidance. The Group also agreed that the wording of 2.11.1(b) was confusing in isolation, and agreed to merge (a) and (b).

Some stakeholders expressed doubts about the list of areas and features included in UKWAS 2.11.1(b). The Group agreed to remove areas and features of critical importance for watershed management or erosion control (sub-section 4.5) and areas managed under lower-impact silvicultural systems (sub-section 4.6.2).

One respondent proposed expanding the scope of the new UKWAS 2.11.1(c) to include consideration of opportunities for timber production and recreation. The Working Group felt that this was not appropriate in a section on conservation, but did agree to add a similar requirement about opportunities for sustainable timber production to 2.4.2.

The Working Group again considered stakeholder feedback that the 15 % minimum area to be managed for conservation and enhancement of biodiversity as the primary objective was insufficiently ambitious and should be increased to 30 % within a specified timescale, but as in the previous round of drafting was unable to reach consensus. As a compromise, the Group agreed to specify 'additional opportunities' for conservation throughout the management unit in UKWAS 2.11.1(c) to demonstrate ambition beyond the 15 %.

The Group agreed various refinements to UKWAS 2.11.1 guidance based on stakeholder feedback.

In relation to UKWAS 2.11.2(a), some stakeholders suggested that areas and features identified in sub-section 4.5 should be removed, consistent with changes agreed to 2.11.1. However, FSC UK noted that these were High Conservation Value areas and if not addressed here would have to be addressed elsewhere. The Group agreed to add guidance to explain the apparent discrepancy between features included in 2.11.1 and 2.11.2. The Group also agreed a change in the wording of 2.11.2(a), from 'enhance the status' to 'improve the condition' to better reflect the understanding of the terms 'status' and 'condition' in the UK context.

One stakeholder suggested that it was unduly burdensome to engage with experts in the context of 2.11.2(b), but the Group noted that this was an explicit FSC requirement and not especially burdensome in reality. Some proposed additions in terms of verifying engagement with (particular groups of) experts were not considered necessary in light of existing requirement and verifier text.

To meet FSC requirements for recording the location and condition of High Conservation Values, without undue duplication in section 4, the Working Group agreed to add a new UKWAS 2.11.2(c). Guidance on recording on an ongoing basis was added, consistent with existing guidance in section 4.

References to other sections in UKWAS 2.11.1(a) and 2.11.2(a) were updated to reflect changes made to section 4.

### **Sub-section 2.12: Protection**

The Working Group acknowledged the volume of stakeholder comments received both in support of and opposing the requirement for the use of non-toxic ammunition for deer management in UKWAS 2.12.1(b). The Group noted that game dealers intended to introduce a voluntary ban on lead shot venison from summer 2022. Overall, the Group remained of the view that the 2.12.1(b) requirement

was justified and necessary in order to make progress away from lead ammunition. Regarding terminology, the Group noted the stakeholder comment about 'lead free bullets' but felt that the current Glossary definition of 'non-toxic ammunition' was unambiguous.

With only a supportive comment received in relation to UKWAS 2.12.2, no changes were made, except that the reference to 'invasive species' in guidance was changed to 'spread of invasive non-native species' for consistency with references elsewhere in the Standard.

In line with stakeholder feedback and agreed changes to UKWAS 2.6.2, the Working Group agreed to add wording on achieving effective woodland establishment to 2.12.3.

The Working Group recognised the extensive stakeholder feedback questioning the contents of draft guidance for UKWAS 2.12.3. The Group agreed to remove guidance on waste to avoid any potential misrepresentation of the regulatory situation. The Group also accepted feedback that the pros and cons of various alternative tree shelter materials were not yet clear, and changed guidance on 'preference' for alternatives to 'consideration'.

Regarding stakeholder feedback on inconsistent biosecurity policy/plan terminology in UKWAS 2.12.4, the Group felt that a plan was a viable verifier for a biosecurity policy. The Group agreed to add guidance on planting stock previously removed from 1.1.7, with some edits; to avoid confusion around terms such as 'accredited' and 'assurance', an explicit reference was instead made to the Plant Health Management Standard.

### **Sub-section 2.13: Conversion**

In UKWAS 2.13.1, the Group agreed that it was appropriate to retain the reference to plantations on ancient woodland sites because, although they could not be converted to plantations, they could be converted to non-forested land.

The Group agreed that it was more appropriate and consistent to advise contact with certification bodies, rather than directly with certification schemes, in UKWAS 2.13.2 guidance. Concerns about how the requirement would be applied in practice were felt to be addressed by the guidance to liaise with certification bodies. In line with changes made elsewhere in the Standard to reflect the common understanding of the terms 'status' and 'condition', references to 'status and condition' in 2.13.2(b) were changed to 'condition' only.

References to other sections in UKWAS 2.13.1(a) and 2.13.2(b) were updated to reflect changes made to section 4.

In response to including fertilisers in guidance on UKWAS 2.13.3, the Working Group agreed that this was consistent with the reference to sub-section 3.4 in UKWAS 4. Text was changed to refer to the 'integrated pest management and fertiliser regime', and a reference to sub-section 3.5 was added. This guidance was also expanded to apply also to short rotation coppice, in line with a stakeholder comment on the lack of relevant guidance. Guidance was presented in a more logical order, and the term 'horticultural' was removed here and from the Glossary.

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

No comments received.

### **Sub-section 2.15: Monitoring**

The Working Group agreed to change UKWAS 2.15.1(d) to reflect the explicit requirements of FSC Criterion 9.4 This involved doing away with the term 'special features' and associated guidance; to ensure they were still considered in monitoring, a reference to rights of way was added to guidance on social impacts.

In response to various stakeholder feedback, the Working Group agreed to update the reference to water guidelines and to add a reference to integrated pest management in UKWAS 2.15.1 guidance. The Group also agreed to add a reference to worker welfare as suggested by PEFC UK. The Group did not agree that it was necessary to refer explicitly to encouraging consent to access for surveys (on the basis that this was already addressed in 2.3.1(c)) or to include raptors as examples of priority species or Scheduled Monument Condition Monitoring as an example of statutory monitoring (on the basis that the existing generic guidance was sound without examples).

References to other sections in UKWAS 2.15.1 were updated to reflect changes made to section 4.

The Working Group agreed to add a new UKWAS 2.15.2(b) to address the requirements of FSC Criterion 9.4.

Stakeholder concerns in relation to raptor nest locations and UKWAS 2.15.3 were considered to be adequately addressed by guidance on confidential information. The Group discussed the FSC UK suggestion of more proactively advertising the availability of monitoring findings, but agreed that the changes to 2.2.2 regarding a contact point for management plan enquiries were adequate to address this.

The Working Group agreed to include a number of Scottish Land Commission references in the UKWAS Appendix for this sub-section, as well as a reference to the National Biodiversity Network.

## **Section 3: Woodland operations**

### **Sub-section 3.1: General**

No changes were made to UKWAS 3.1.1. In response to the stakeholder request for a link to forestry best practice, the Working Group noted that there was already a reference to the UKWAS Appendix.

UKWAS 3.1.2 requirement bullet points were edited slightly for consistent wording. The Working Group acknowledged the cumulative effect of guidance on pesticides, fertilisers etc. which might seem unduly negative, and reframed and simplified guidance accordingly. In response to stakeholder feedback, the Group agreed to add a reference to published guidance on roles and responsibilities for environmental protection. The Group noted stakeholder feedback about management decisions which reduced timber production potentially leading to increased use of high embedded carbon products, but did not feel that a requirement on operations was the right place to address the issue. The Group did agree to add a verifier on pollution prevention plans.

The Working Group agreed to the stakeholder suggestion to include a reference to priority species in UKWAS 3.1.3. The Group noted the stakeholder comment about communicating plans to site supervisors, but observed that supervisors were included in the Glossary definition of 'workers'.

In response to the stakeholder suggestion to include a reference to species in UKWAS 3.1.4, the Working Group noted that priority species were already included in guidance. The Group felt that a reference to raptor nest sites, proposed by one stakeholder, would be too specific in the context of this requirement. The Group agreed to a stakeholder proposal to re-arrange the requirement into an (a) and a (b).

References to other sections in UKWAS 3.1.4 requirement and guidance text were updated to reflect changes made to section 4.

With only supportive comments received in relation to UKWAS 3.1.5, no changes were made, except that the references to 'invasive species' in guidance were changed to 'invasive non-native species' in line with changes to the defined term in the Glossary.

### **Sub-section 3.2: Harvesting and restocking**

The Working Group agreed to add explicit references to extraction and High Conservation Values to UKWAS 3.2.1(a) to meet FSC Criterion 10.11. Rather than changing the wording of the requirement to 'conserve' environmental values and HCVs as proposed by FSC UK, the Group agreed to remove the reference to 'loss' of values. The Group felt that a reference to raptors, as proposed by one stakeholder, would be too specific.

Regarding the stakeholder request for guidance on loss of soil carbon to air or water, the Group agreed that it was not clear what the new bullet point in UKWAS 3.2.1(b) was intended to achieve, and chose to combine the first and fourth bullet points.

In the context of UKWAS 3.2.1(b), there was a discussion of various definitions of root zones and root buffer zones. The Group felt that the definition currently used in the Glossary was appropriate in a forestry context, but agreed to add 'at least' to ensure consideration was given to providing greater protection to veteran trees where necessary. In response to stakeholder feedback on soil compaction roading, the Group felt that compaction was adequately addressed by 3.2.1(b) and that roading issues were better addressed in sub-section 3.3.

Some stakeholders felt that sub-section 3.2 was framed in terms of clearfell and restock, and tended to reinforce a presumption of this management approach at the expense of alternatives. The Group did not necessarily agree, but did agree to add guidance clarifying that UKWAS 3.2.1 applied equally to all forms of silvicultural management.

With only a supportive comment received in relation to UKWAS 3.2.2, no changes were made.

Regarding the stakeholder suggestion that UKWAS 2.4.1 was adequate to regulate stump removal, the Working Group felt that the additional controls in UKWAS 3.2.3 were necessary. As for the suggestion that the wording 'There is no stump-harvesting' should be removed, this was already the case. The Group agreed to expand guidance to include extraction tracks and drains. The Group also agreed to a stakeholder request to include damage to habitat features and priority species in the list of impacts in guidance.

With only a supportive comment received in relation to UKWAS 3.2.4, no changes were made.

In UKWAS 3.2.5, in response to a number of stakeholder comments, the Working Group agreed to a significant simplification of requirement and guidance text, reflecting the key concerns of minimising soil disturbance while achieving successful establishment. However, the Group did add guidance on the realignment and/or disconnection of poorly designed land drainage systems, on the basis that the issue was better addressed here than under 2.7.1 as previously.

### **Sub-section 3.3: Forest infrastructure**

There was lengthy discussion of stakeholder feedback on terminology around quarries in UKWAS 3.3.1. The Working Group eventually agreed to revert to the previous generic wording on mineral extraction sites. The Group agreed to the stakeholder suggestion to include notifications in the requirement, and exemptions and notifications to verifiers and guidance.

The Group considered the stakeholder recommendation for infrastructure to avoid areas managed for conservation, and concluded that this was better addressed under UKWAS 3.3.2; guidance was added to 3.3.2 accordingly.

Also in UKWAS 3.3.2 guidance, one respondent asked the Working Group to reconsider the wording 'access for sporting purposes'. The Group agreed to add wording consistent with sub-section 4.9, 'shooting and fisheries', to the requirement, and to simplify guidance accordingly. Equivalent changes were made to 3.3.1 guidance for consistency. Regarding the recommendation for a 'documented evaluation' for infrastructure, the Group felt that this would be excessive in some contexts, and agreed to delete 'documented' (but the recommendation for a documented evaluation for new roads was retained). In response to other stakeholder comments on 3.3.2 guidance, the Group felt that the wording on 'unnecessary damage to root zones' and on brash mats was appropriate to the context.

### **Sub-section 3.4: Integrated pest management**

One stakeholder had raised concerns about the use of neonicotinoids under UKWAS requirements 3.4.1 to 3.4.4, and suggested that they should be the last option for pest control, or better still not used at all. However, the Working Group felt that currently available research evidence on the use of acetamiprid in forestry was insufficient to justify such a position in the current iteration of the Standard.

A number of stakeholders questioned the statement in UKWAS 3.4.1 guidance 'that a reduction in the use of pesticides reduces the embedded-carbon budget of forestry operations'; the Working Group agreed to defer to the opinion of Forest Research, and to delete the text. The Group also felt that guidance on justifying pesticide use when alternatives were available was an odd statement for a standard, and agreed to delete it.

One respondent suggested that some of the example verifiers for UKWAS 3.4.1 were overly burdensome for small woodland owners, but the Working Group noted that these were only examples and that small and community woodland owners/managers generally avoided pesticide use.

Some stakeholder proposals for additional requirements and guidance under UKWAS 3.4.1 were considered too specific.

In response to the stakeholder suggestion that there should be clearer links between UKWAS 3.4.2, 2.2.1 and 2.3.1, the Working Group felt that the current guidance on the possibility of aligning the timing of engagement on risk assessments with that on management planning review was sufficient.

The Working Group agreed to add a reference to biological control agents to UKWAS 3.4.2(a), rather than addressing them separately in 3.4.6(a). The Group acknowledged the Forest Research suggestion to remove the text 'at WMU level' from 3.4.2(a), but noted that the current wording was consistent with the requirements of both FSC and PEFC.

The Working Group agreed to change 'damage' to 'impact' in UKWAS 3.4.2(b).

The Working Group considered stakeholder feedback on research requirements in UKWAS 3.4.3(b), but felt that anything beyond a reference to scheme requirements might be unduly burdensome for users of less hazardous pesticides.

In response to stakeholder feedback on UKWAS 3.5.2 guidance on buffers, this guidance was replicated under 3.4.4.

No comments were received on UKWAS 3.4.5.

As noted previously, the Working Group agreed to delete UKWAS 3.4.6(a), and to address environmental and social risk assessment for biological control agents in 3.4.2(a). In response to Forest Research feedback on terminology, the Group agreed to significantly simplify 3.4.6 guidance to make it clear that the requirement applied only to biological control agents as defined in the Glossary.

A number of example verifiers were added to UKWAS 3.4.4 and 3.4.6 based on verifiers from the superseded version of 3.4.3.

### **Sub-section 3.5: Fertilisers**

The Working Group did not consider it necessary to add proposed guidance on leaving poor soils unplanted to UKWAS 3.5.1.

The Working Group noted the strength of feedback on UKWAS 3.5.2(c) and associated guidance on aerial application of fertiliser. Rather than a blanket ban, the Group agreed to change 3.5.2(c) to require demonstration of management benefit and consideration of impacts along similar lines to 3.2.3(a) and 3.2.4. Guidance was qualified.

As noted previously, in response to stakeholder feedback on UKWAS 3.5.2 guidance on buffers, this guidance was replicated under 3.4.4.

With only a supportive comment received in relation to UKWAS 3.5.3, no changes were made.

### **Sub-section 3.6: Fencing**

The Working Group agreed to add a number of references to the UKWAS Appendix for this sub-section. Apart from this, no changes were made to UKWAS 3.6.1. Minor editorial changes were made to 3.6.2 requirement text, but the Working Group felt that stakeholder proposals for additional guidance were unnecessarily detailed.

### **Sub-section 3.7: Waste**

The Working Group agreed to stakeholder proposals to reference production, storage and transport of waste in addition to disposal in UKWAS 3.7.1. The Group agreed related changes to example verifiers. Guidance was refined on the basis of stakeholder feedback.

The Working Group considered the stakeholder proposal to simplify UKWAS 3.7.2(a) to refer to resource efficiency, but did not feel that all Standard users would understand the intent. The Group

instead agreed to shorten and refine the existing wording, and to address some of the detail in guidance. In response to stakeholder feedback, the Group also agreed to refer to and define 'circular economy'.

The Working Group agreed to the stakeholder proposal to delete 'prioritised' and 'progressively' from UKWAS 3.7.2(b), and adjusted guidance accordingly.

Taking into account all of the discussion on this sub-section, the Working Group agreed to reverse the order of UKWAS 3.7.1 and 3.7.2, and to rename the sub-section 'Materials and waste'.

### **Sub-section 3.8: Pollution**

The Working Group acknowledged feedback on UKWAS 3.8.1 which suggested that pollution was given insufficient attention in the Standard, but also noted the absence of stakeholder proposals for further requirements or guidance. The current division between diffuse pollution in 3.8.1 and point pollution in 3.8.2 was felt to be appropriate; it was considered important to give specific attention to diffuse pollution. The Group accepted a new verifier on pre-commencement meetings under 3.8.1, and a refinement of guidance on drains. The Group also agreed new guidance on practices to prevent pollution.

Regarding stakeholder feedback on the reference to 'relevant workers' in UKWAS 3.8.2, the Working Group felt that the current wording was necessary to reflect the realities of large organisations with, for example, large numbers of administrative staff. The Group agreed new guidance on appropriate equipment.

## **Section 4: Natural, historical and cultural environment**

### **Sub-section 4.1: Statutory nature conservation sites**

The Working Group noted feedback that the title of this sub-section did not reflect the full range of issues covered in the Second Revision Draft, but subsequent agreed changes to address priority habitats in a new sub-section 4.4 and to move priority species requirements to sub-section 4.6 (renumbered 4.7) meant that the focus on statutory nature conservation sites was appropriate.

The Working Group acknowledged the range of stakeholder feedback on the text on 'good condition' in UKWAS 4.1.1(b). The Group agreed to combine 4.1.1(b) and (d) in a new requirement, in which agreeing plans with statutory nature conservation agencies was felt to address the issue of condition. The Group noted stakeholder concerns about the inclusion of biological records centres in 4.1.1(b), but felt that the requirement was adequately caveated. The Group also noted stakeholder concerns about priority habitats outside designated sites; these were addressed in changes to 4.1.2, including the creation of a new sub-section focussed on other priority habitats. Guidance on priority habitats and species was removed from 4.1.1 and addressed elsewhere. Proposed new verifiers were felt to be excessive, especially if adapted for the devolved nations.

To address the requirements of FSC Criterion 9.1, the Working Group agreed to add a reference to establishing the condition of areas in UKWAS 4.1.1(a), and to add guidance. Rather than addressing mapping of areas and recording condition here, the Group agreed to a new 2.11.2(c).

To avoid any ambiguity about the status of priority habitats in the Standard and to ensure they received the protections appropriate to them as High Conservation Values, they were removed from UKWAS 4.1.2 and given their own new sub-section 4.4 (with the current sub-section 4.4 and subsequent sub-sections renumbered accordingly). The new requirement 4.4.1 was based on 4.1.1, but without reference to engagement with statutory bodies, as befitted the different status of statutory nature conservation sites and priority habitats. Changes were made to sub-section references elsewhere in the Standard to reflect the new structure of section 4, including in 2.11, 2.13, 2.15 and 3.1.

UKWAS 4.1.2, now focussed on priority species, was moved to sub-section 4.6, renumbered 4.7, as 4.7.1. To meet FSC requirements, a reference to their habitats was added. In response to stakeholder comments, the Working Group agreed to remove guidance on afforestation, and to add guidance on roosting sites. Guidance on priority species removed from 4.1.1 was moved here.

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

The Working Group acknowledged the stakeholder comment on the wording of UKWAS 4.2.1(d) and the limited impetus it gave to improvement in condition of ancient semi-natural woodlands, but felt that the current wording was appropriate to a wide range of situations, and that an emphasis on enhancement was more important in the context of plantations on ancient woodland sites (sub-section 4.3).

Rather than addressing FSC record keeping requirements in UKWAS 4.2.1, they were addressed in the new 2.11.2(c). The Working Group considered requirements for engagement to be addressed by 2.3.1, but guidance was added on seeking advice from experts where necessary.

In response to a stakeholder comment on the term 'old trees', the Working Group agreed to remove this from UKWAS 4.2.1 guidance and to refer consistently to veteran trees. The Group accepted the stakeholder proposal for a more generic reference to semi-natural woodland guidance from forestry authorities and nature conservation agencies. The Group also agreed to consistent wording on the spread of invasive non-native species in the list of potential threats in guidance.

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

While some stakeholders supported the proposed new UKWAS 4.3.1(g), which stated that ‘The primary management objective for PAWS is restoration to native woodland of a type appropriate to the site’, many stakeholders argued for its removal. This requirement was subject to a great deal of discussion by the Working Group to establish an appropriate balance between restoration and other objectives. Ultimately the Group agreed to remove 4.3.1(g) and to replace (f) with a requirement to demonstrate a continued reduction in the level of threat to remnant and conservation features and an increasing site-native canopy. Given this compromise agreement, the Group did not agree to a stakeholder proposals to require continuing timber production or to require restoration of wood pasture or enclosed parkland.

To meet FSC requirements, and in keeping with the agreed UKWAS 4.3.1(f), a new (g) was added to explicitly address mapping and recording the condition of remnant and conservation features, in addition to the more general recording requirement in the new 2.11.2(c). The Working Group considered requirements for engagement to be addressed by 2.3.1, but guidance was added on seeking advice from experts where necessary.

The Working Group noted the stakeholder feedback on identifying ancient woodland sites, but felt that the explanation in the Glossary definition of ‘Woodland’ was clear. Regarding UKWAS 4.3.1 guidance on establishing the validity of a site’s status, the Group considered it appropriate that this could work either way, either identifying sites which had not been picked up in ancient woodland inventories or discounting sites incorrectly included in inventories. The wording of this guidance was refined. In relation to the stakeholder suggestion that the definition of PAWS should be linked to survey data and identification of remnant features, the Group felt that this was effectively covered by existing guidance and verifiers.

The Working Group noted stakeholder concerns about the potential burden of mapping remnant and conservation features, but observed that this was only an example verifier.

The Working Group agreed with the stakeholder suggestion that the use of lower intensity management approaches including continuous cover forestry would fit with existing guidance on active management, and added a reference to LISS.

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

Following the insertion of a new sub-section 4.4 on ‘Other priority habitats’, this sub-section was renumbered 4.5.

The Working Group acknowledged the stakeholder comment on the wording of UKWAS 4.4.1(b) and the limited impetus it gave to improvement in condition of conservation values, but felt that the current wording was appropriate to the status of the features covered by 4.4.1, relative to sub-sections 4.1, 4.2 and 4.3.

The first line of guidance for UKWAS 4.4.1 was updated to clarify its application in the context of the new sub-section 4.4.

The Working Group acknowledged that the reference to ‘site-native broadleaves’ in UKWAS 4.4.1 guidance was made in error, and corrected it to ‘site-native species’. In response to stakeholder feedback on the conservation value non-native species, the Group noted that many of the example of positive management were equally applicable to native and non-native species. The reference to ‘Colonisation by invasive non-native species’ in guidance was changed to ‘Spread of invasive non-native species’ for consistency with references elsewhere in the Standard.

Stakeholder comments about priority habitats and referring to open habitats in UKWAS 4.4.1 guidance were withdrawn on the basis that they were addressed elsewhere.

The Working Group felt that stakeholder proposals regarding raptors and specialist input were too specific for this requirement.

With only a supportive comment received in relation to UKWAS 4.4.2, no changes were made, except that the reference to 'Colonisation by invasive species' in guidance was changed to 'Spread of invasive non-native species' for consistency with references elsewhere in the Standard.

The Working Group noted stakeholder feedback on the 10 % requirement for semi-natural habitat in UKWAS 4.4.3, with some arguing for the percentage to be higher but most arguing for it to be lower. The Group acknowledged that the requirement might be challenging for some woods, but felt that it was consistent with the proportions of open habitat and native tree species found in most woods.

The Working Group sympathised with the stakeholder request to strengthen the preference for restoring semi-natural woodland under UKWAS 4.4.3, but did not see how this could be achieved through requirement or guidance wording. The Group noted that the wording of some guidance was inconsistent with the wording of the requirement, and changed references to restoring/restoration to converting/conversion, as well as adding a cross-reference to sub-section 2.13.

#### **Sub-section 4.5: Watershed management and erosion control**

Following the insertion of a new sub-section 4.4 on 'Other priority habitats', this sub-section was renumbered 4.6.

To meet FSC requirements, a reference to establishing condition was added to UKWAS 4.5.1(a). Rather than addressing FSC record keeping requirements here, they were addressed in the new 2.11.2(c).

#### **Sub-section 4.6: Maintenance of biodiversity and ecological functions**

Following the insertion of a new sub-section 4.4 on 'Other priority habitats', this sub-section was renumbered 4.7. As noted under sub-section 4.1, UKWAS 4.1.2 was refocused on priority species and their habitats and moved to 4.7.1, and other requirements in this sub-section were renumbered accordingly.

A number of stakeholder observed that UKWAS 4.6.1 was confusing and open to different interpretations. The Working Group agreed to simplify the requirement significantly to require natural reserves to constitute at least 1 % of the management unit. The Group accepted that the implications of wording around 'favourable condition' were unclear in the context of this requirement, and further that it was potentially at odds with the presumption of minimum intervention management of natural reserves; the Group agreed to reword the requirement and add guidance to address this.

In response to the stakeholder suggestion that selecting the best locations for natural reserves under UKWAS 4.6.1 should be carried out in liaison with specialist raptor workers and/or raptor study groups, the Working Group felt that the existing generic guidance on delivering greatest biodiversity benefit was adequate.

Regarding UKWAS 4.6.2, the Working Group noted stakeholder feedback on the 'disappointing' threshold for LISS, but also observed, as did the stakeholder, that the primary mechanism for driving uptake of LISS was sub-section 2.10. The Group felt that the 'impracticable' caveat remained appropriate in the context of this requirement.

As with UKWAS 4.6.1, the Working Group noted the stakeholder suggestion that selecting the best locations for long-term retentions under UKWAS 4.6.2 should be carried out in liaison with specialist raptor workers and/or raptor study groups, but again felt that the existing generic guidance was adequate.

Some stakeholders questioned the use of the term 'recruitment' in UKWAS 4.6.3 verifiers, and felt that 'replacement' would be more appropriate, but the Working Group felt that recruitment better reflected the aspirations of the requirement and the need to consider future cohorts of veteran trees long before current veterans required replacement.

The Working Group noted stakeholder concerns regarding pests and diseases in relation to deadwood requirements under UKWAS 4.6.4 but felt that, with the exception of bark beetles, these concerns were largely groundless, and were adequately addressed by the guidance and example verifier on woodland health. The Group accepted that the term 'decaying wood' was unnecessary and agreed to refer consistently to 'deadwood'. Regarding the stakeholder proposal to increase the general recommendation of 20 m<sup>3</sup> per hectare, the Group did not feel that this would be impactful, but did agree to add 'or more' and to add wording explaining the value of deadwood for a functional woodland ecosystem. The Group acknowledged stakeholder feedback on the aspirational deadwood target of 150 m<sup>3</sup> or more per ha in guidance, and agreed to reframe it to give context to the 20 m<sup>3</sup> recommendation.

#### **Sub-section 4.7: Maintenance of local native seed sources**

Following the insertion of a new sub-section 4.4 on 'Other priority habitats', this sub-section was renumbered 4.8. Section references in UKWAS 4.7.1(a) were also updated.

In response to the stakeholder comment on climate change and assisted migration, the Working Group noted the limitations of the evidence on assisted migration and the research on genetic variation in UK native populations. The Group agreed that the current wording of UKWAS 4.7.1 was appropriate.

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

Following the insertion of a new sub-section 4.4 on 'Other priority habitats', this sub-section was renumbered 4.9.

The Working Group noted feedback on the list of stakeholders in UKWAS 4.8.1, but also noted that only one addition had been made, and agreed that the list was appropriate. The Group also noted feedback on 'significant heritage features' and concerns that less significant features would be overlooked, but felt that the wording was appropriate to the focus of the requirement on the most significant features.

The Working Group felt that current guidance on sources of advice was sufficiently broad to allow for flexibility in practice but, in response to a stakeholder comment, did agree to change 'walkover survey' to 'survey or consultation', recognising the wide variety of survey tools now available.

#### **Sub-section 4.9: Game, shooting and fisheries management**

Following the insertion of a new sub-section 4.4 on 'Other priority habitats', this sub-section was renumbered 4.10.

Stakeholders raised many issues in relation to UKWAS 4.9.1(b). Despite some stakeholder criticism of the term, the Working Group felt that High Conservation Values were clearly defined in the Standard. The Group noted that not all HCV areas were SSSIs, and that therefore not all release pens would require consent, so this did not seem to be a reasonable basis to remove (b). However, while remaining of the view that release pens were not consistent with the management of HCV areas, the Group acknowledged existing practices in certified woods and recognised that it would be reasonable to allow a transition period. As such, the Group agreed to change (b) to apply only to new game release pens, and to add a new (c) requiring the cessation of the use of existing game release pens in HCV areas by the end of 2025. A cross-reference to 3.7.1 regarding redundant materials was added to guidance (and a reference to game release pens was added to 3.7.1 guidance).

The Working Group noted the FSC recommendation on monitoring of releases, and saw value in it, but felt that it would be excessive at this stage.

The Working Group agreed to include the Game Wildlife & Conservation Trust 'Guidelines for sustainable gamebird releasing' in the UKWAS Appendix for this sub-section.

In UKWAS 4.9.2 guidance, the Working Group agreed to the stakeholder proposal to change 'predator control' to 'pest and predator control'.

While there were stakeholder comments in support of UKWAS 4.9.3, there was also a great deal of negative feedback. The Working Group considered the key points in turn, but did not see any grounds for removing the requirement. The Group did not agree to limit the requirement to game and to leave options open for vermin control, on the basis that lead entering the environment was as serious an issue as lead entering the human food chain. The Group noted the comment that sporting rights might be held by third parties, but felt that this was covered by existing provisions for factors beyond the control of the manager. However, concerns were raised within the UKWAS Steering Group about the current availability and efficacy of small calibre non-toxic ammunition for grey squirrel control. After further discussion, the Working Group agreed to allow the use of lead-based .22 subsonic ammunition and air rifle pellets until the end of 2025 (a deadline consistent with the revised requirement for existing game release pens), and this was reflected in a new (b).

In response to a stakeholder comment, the Working Group agreed to add a reference to 'fisheries management practice' to UKWAS 4.9.4 guidance on biosecurity.

## **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, visitors and communities**

With only a supportive comment received in relation to UKWAS 5.1.1, no further changes were made.

In response to stakeholder feedback and to meet FSC requirements, UKWAS 5.1.2(b) and associated guidance on private water supplies was removed and replaced with a new 5.1.4. The new requirement and guidance were based on the new 4.4.1, but substantially simplified. To address stakeholder feedback on the scope of 5.1.2(b), clarification was added to guidance, noting that public water supplies are addressed elsewhere.

The Working Group acknowledged stakeholder feedback on the removal of UKWAS 5.1.2 guidance on maintaining the status of permissive routes. This had been removed as being potentially inaccurate, but the removal of this guidance did not, of course, in any way affect the legal scope for owners/managers to control permissive access.

The Working Group noted stakeholder concerns regarding the reference to community use in UKWAS 5.1.3, but remained of the view that this addition was positive and appropriate, particularly given the wording of the requirement in terms of 'reasonable efforts'.

### **Sub-section 5.2: Minimising adverse impacts**

In relation to stakeholder feedback on the UKWAS 5.2.1 verifier 'Tree safety policy', the Working Group noted that this was an example, and therefore optional. The Group agreed to add a verifier on a timber transport management plan.

The Working Group noted the stakeholder suggest to review the legal implications of UKWAS 5.2.1 guidance on natural hazards, but did not perceive any issues. The Group agreed to add National Tree Safety Group guidance to the UKWAS Appendix.

The Working Group did not consider it necessary to explicitly address proportionality of actions to mitigate risk or the extent of responsibility for mitigation in UKWAS 5.2.1, as suggested by FSC UK.

The Working Group acknowledged stakeholder feedback on UKWAS 5.2.2 regarding vexatious complaints, but felt that the wording of the requirement worked in practice.

### **Sub-section 5.3: Local economy**

A number of stakeholder mentioned the need for clarity around the term 'local', presumably in response to the change in the sub-section heading from 'Rural economy' to 'Local economy'. The Working Group noted that the heading had been changed only to bring it in line with the long-standing wording of the requirement, and that it was not possible to define 'local' precisely.

In response to suggestions for closer alignment with FSC Criterion 5.1, the Working Group agreed to split UKWAS 5.3.1 into an (a), (b) and (c), with (a) addressing the existing element of best use of potential products and services, (b) addressing a new element of being receptive to approaches from local people and communities to make use of potential products and services, and (c) addressing the existing element of equitable opportunities for employment etc. Guidance was reframed in terms of strengthening and diversifying the local economy, and a specific example of 'agreements with local people or communities' was added to guidance and verifiers based on feedback from the Scottish Land Commission.

Regarding the stakeholder proposal that UKWAS 5.3.1 should be subject to 'environmental sustainability tests', the Working Group noted that the sustainability of product and service use was

addressed in sub-section 2.4. In response to concerns about evidencing carbon storage beyond the forest gate, the Working Group noted that this was guidance and would not be subject to audit.

#### **Sub-section 5.4: Health and safety**

With only a supportive comment received in relation to UKWAS 5.4.1, no further changes were made.

#### **Sub-section 5.5: Training and continuing development**

The Working Group acknowledged stakeholder feedback on the term 'commensurately' in UKWAS 5.5.1 guidance; the scope of the guidance was clarified, and 'commensurately' was changed to 'equitably'. Given that this requirement is very broad in scope, the Group did not consider it appropriate to specify specialist training of staff carrying out pre-felling or protected species surveys.

In response to stakeholder feedback on UKWAS 5.5.2 guidance on equality, the Working Group agreed that this was out of place in the context of this requirement, and that the intent was addressed by 5.6.1(b).

#### **Sub-section 5.6: Workers' rights**

The Working Group disagreed with stakeholder feedback on UKWAS 5.6.1(b), believing that it was both necessary and auditable. The Group acknowledged feedback on the auditability of the encouragement to pay wages that are higher than the statutory national living wage, but observed that, as this was guidance, it would not be subject to audit.

#### **Sub-section 5.7: Insurance**

The Working Group noted stakeholder feedback on the term 'adequate' in UKWAS 5.7.1, but observed that this was long-standing wording which has been successfully audited for many years. The Group revisited draft guidance on insurance for events, and agreed that this was a separate issue which merited its own requirement, duly added as 5.7.2.

## Glossary of terms

The Working Group chose not to add a definition of 'Ancient tree', preferring to refer consistently to veteran trees.

In response to stakeholder feedback on the definition of 'Buffer', the Group agreed to add 'social', and to refer to 'values'.

In response to comments on the definition of 'Carbon balance', the Working Group felt that it was appropriate, in the context of the Standard, for this definition to focus on the management unit rather than taking account of off-site implications.

The Working Group agreed to use a definition of 'Circular economy' from the European Parliament website.

The Working Group agreed to change 'Felling licence' to 'Felling permission' and to update the definition accordingly.

The Working Group noted stakeholder feedback on different formulations of references to 'resilience' in the Standard, and agreed to refer consistently to 'Forest resilience' rather than changing the defined term.

The Working Group noted stakeholder concerns that the definition of 'Genetically modified organisms (GMOs)' would exclude gene edited organisms, but noted that the definition was consistent with certification scheme requirements. An explicit reference to gene edited was added.

The definition of 'High conservation value' was updated to reflect changes to section 4. Explicit references were added to woodland and non-woodland areas to accommodate the PEFC term 'ecologically important forest areas' without limiting the scope of the definition. Stakeholder feedback on species such as Schedule 1 birds was noted, but these species are addressed in the Standard through the definition of 'Priority species'.

The Working Group chose not to add a definition of 'integrated land use', as the concept is not addressed explicitly in the Standard.

The Working Group agreed to change the term 'Invasive (species)' to 'Invasive non-native (species)' in line with common usage, and to use this term consistently throughout the Standard.

The Working Group agreed that it was not possible to define 'Local'.

In the absence of a clear consensus around terminology such as lower-impact silvicultural systems, lower intensity forest management approaches, and continuous cover forestry, the Working Group agreed to retain the existing definition of 'Lower-impact silvicultural systems'.

The Working Group agreed to add a definition of 'Mineral extraction site(s)' to ensure consistent interpretation of UKWAS 3.3.1.

Regarding stakeholder feedback on the definition of 'Native (species)', the Working Group felt that it should remain in line with that used by forestry authorities.

The Working Group noted the stakeholder suggestion to refer to 'Lead-free ammunition', but agreed to retain the term 'Non-toxic ammunition'.

The Working Group also agreed to retain 'Non-wood forest products (NWFP)' rather than reverting to 'Non-timber woodland products (NTWP)'.

The Working Group did not agree to the stakeholder suggestion for a separate definition of 'Parkland', but did agree to explicitly include parkland in the definition of 'Wood pasture'.

While acknowledging stakeholder feedback, the Working Group agreed to retain the currently drafted definitions of 'Peatland' and 'Pest'; in the latter case, it was considered important to be consistent with scheme definitions.

The reference to 'European law' in the definition of 'Priority species' was replaced with a generic reference to 'habitat regulations'.

The Working Group considered the stakeholder suggestion to replace 'Root zone(s)' with 'Root buffer zone', but felt that the current definition was the most useful in practice in a woodland setting. The Group did not agree to add a definition of 'Tree buffer zone'.

The Working Group accepted a definition of 'Significantly high carbon stock' proposed by PEFC UK.

The Working Group did not consider the Scottish Land Commission to be relevant to the definition of 'Statutory body(ies)', given the way the term is used in the Standard.

The wording taken from UKFS in the definition of 'Water course' was amended to refer to 'directly connected' channels.

A number of other minor updates and corrections were made to the Glossary.

## Appendix – Full list of respondents by UKWAS constituency

Id #	Respondent	Organisation	Links to process*
	<b>Woodland owners</b>		
A01	Richard White	Individual	
A02	Will Anderson	Seafield & Strathspey Estates	
A03	Richard Hunter	Confederation of Forest Industries (Confor)	WG
A04	David Nicholson	Buccleuch Estates	
A05	Jim Colchester		
A06	Ben Clinch	Moray Estates	
	<b>Forestry practitioners</b>		
B01	Rebecca Haskell	Individual	
B02	Stuart Wilkie	Individual	
B03	Simon Jeffreys	Individual	
B04	Andrew Sowerby	Pryor & Rickett Silviculture Ltd	
B05	Adam McLean	Gresham House	
B06	Graham Carter		
B07	Jason Sinden		
B08	Richard van Romunde		
B09	Matthew Green		
B10	Edward Latter		
B11	Stephen Ramage		
B12	Tom Black		
B13	Henrietta Russell		
B14	Joshua Phillips		
B15	Simon Amor		
B16	Ciaran Walsh		
B17	Luke Hyatt		
B18	Matthew Giles		
B19	Julian Hollingdale	Tilhill Forestry Ltd	
B20	Jemima Cooper	Institute of Chartered Foresters (ICF)	WG, SF
B21	Steve Conolly	Cawdor Forestry Ltd	
B22	Stuart Wilkie	Scottish Woodlands Ltd	

<b>Id #</b>	<b>Respondent</b>	<b>Organisation</b>	<b>Links to process*</b>
B23	Andrew Heald	Individual	
B24	Bill Mason	Continuous Cover Forestry Group (CCFG)	SF, EP
<b>Country forestry authorities and forestry enterprises</b>			
C01	Michael Fairgrieve	DAERA Forest Service	
C02	Neville Geddes	Forestry England	
C03	Roland Stiven	Scottish Forestry	
<b>Environmental organisations</b>			
D01	Clive Thomas	Soil Association	WG, SF
D02	Tim Hill	Ancient Tree Forum	SF
D03	Stuart Housden	Royal Society for the Protection of Birds (RSPB)	WG
D04	Clive R. McKay	Scottish Raptor Study Group	
D05	Andrew Sharkey	Woodland Trust	WG, SF
<b>Wood processing industry</b>			
E01	Stephen Craig	James Jones & Sons Ltd	
E02	Bev Arthur	BSW Timber Ltd	
<b>UK countryside, environment and heritage agencies</b>			
F01	John Gorman	SEPA	EP
F02	Richard Heawood	Historic Environment Scotland	SF
F03	Duncan Stone	NatureScot	EP
<b>Forestry standard setting</b>			
G01	Owen Davies	Forest Stewardship Council (FSC) UK	EP
G02	Alun Watkins	Programme for the Endorsement of Forest Certification (PEFC) UK	EP
<b>Forest user organisations</b>			
H01	Martin Edwards	British Association for Shooting and Conservation (BASC)	EP
<b>Forest workforce</b>			
No responses			
<b>Education, research and training</b>			
J01	Ian Willoughby	Forest Research	
<b>Wood products trade</b>			
K01	Helen Bentley-Fox	Grown in Britain	

<b>Id #</b>	<b>Respondent</b>	<b>Organisation</b>	<b>Links to process*</b>
	<b>Local government and National Park Authorities</b>		
	No responses		
	<b>Other</b>		
M01	Graham Gill	UKWAS Interpretation Panel	
M02	Robert Fryers	Spotta Ltd	
M03	Karen Grant	Scottish Land Commission	

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