

ANNEX 1

UKWAS 5: Consultation Responses on Proposed Amendment to 4.10.1 (February 2026)

This document contains a full and unredacted record of all the responses received in the initial consultation exercise which ran from 16th December 2025 to 16th February 2026.

Full list of respondents

Id #	Respondent	Organisation	Links to process*
	Woodland owners		
A01	Hamish Robertson, Galbraith	Snaigow Estate and Edradynate Estate	
A02	Lord Hamilton	Baronscourt Estate	
	Forestry and land management		
B01	Kate Tuer	Tuer Forest + Land	
B02	Robert South	Bronwin & Abbey	
B03	Confidential	Confidential	
B04	Gavin Howe	Woodland manager	
B05	William Sleeman	Savills	
B06	Phil Webb	UKFCG	SG, TE
B07	Rick Vallis	Silva Woodland Management	
	Country forestry authorities and forestry enterprises		
C01	Matthew Park	Natural Resources Wales	SG
	Environmental organisations		
D01	Chris Lynch & Kristin Waeber	National Trust	
	Representative organisations		
E01	Richard Hunter	Confor	SG
E02	Graham Clark	CLA	SG
E03	Martin Edwards	British Association for Shooting and Conservation (BASC)	SG, TE

* Identifying UKWAS Steering Group (SG) and technical expert panel (TE) members.

WOODLAND OWNERS

A01 Snaigow Estate and Edradynate Estate (Hamish Robertson, Galbraith)

On behalf of Snaigow Estate and Edradynate Estate, (both certificated to UKWAS) I write in support of the proposed amendment to UKWAS 5, which will provide a more pragmatic approach to enable game bird release to continue in certified forests which have High Conservation Value status (SSSI, ASNW, PAWS).

I very much hope that this proposed amendment will be approved.

A02 Baronscourt Estate (Lord Hamilton)

1. Introduction

This response is submitted on behalf of Baronscourt Estate in Northern Ireland, a diversified rural estate that includes certified woodland managed under UKWAS. The Estate operates driven shoots alongside salmon and trout fishing, deer management, and other land-based enterprises. These activities are integral to the Estate's economic viability and have coexisted with woodland management for generations.

We welcome the opportunity to respond to this consultation. However, we have fundamental concerns about the direction of travel represented by the proposed changes to requirement 4.10.1, and about the broader trajectory of the UKWAS standard. Our concerns fall into three principal areas:

1. **Scope and remit:** The regulation of game-rearing and release pens represents an unjustified expansion of UKWAS's role beyond woodland assurance.
2. **Cost and complexity:** Audit fees continue to rise while the scope of auditing expands, imposing disproportionate costs on certificate holders with no corresponding benefit.
3. **Punitive approach and loss of purpose:** The original rationale for FSC certification has not been fulfilled, yet the burden on domestic woodland owners continues to grow.

2. Mission Creep: Game-Rearing and Release Pens Are Beyond UKWAS's Remit

UKWAS exists as a woodland assurance standard. Its stated purpose is to certify that woodlands are managed sustainably. The regulation of game-rearing, the location of release pens, stocking densities, and the management practices of shooting operations

is fundamentally **not a woodland assurance matter**. It is a land management and sporting activity issue that is already regulated through other means.

Game shooting and the sustainable release of game is already subject to extensive regulation and codes of practice, including those produced by BASC, the Countryside Alliance, the Game and Wildlife Conservation Trust, and relevant statutory bodies. Release pen management is covered by Defra's Code of Practice for the Welfare of Gamebirds Reared for Sporting Purposes, along with the poultry registration requirements now referenced in the draft itself. The idea that UKWAS needs to duplicate or override this existing regulatory framework is both unnecessary and presumptuous. In Northern Ireland, all bird keepers (including game shoots) must register with the Department of Agriculture, Environment and Rural Affairs (DAERA).

The proposed requirement 4.10.1(b) – requiring mapping, area quantification, and stocking density recording for every pen – is a level of micromanagement that has no place in a woodland certification audit. This is the domain of game management, not forestry assurance. Similarly, the detailed conditions in 4.10.1(d) regarding management plans, baseline habitat assessments, priority species assessments, and ongoing monitoring regimes create an entirely new and additional layer of bureaucracy that is disproportionate and unrelated to the core purpose of UKWAS.

The consultation paper states that the rationale for these changes is “to safeguard ground flora and fauna on high conservation value and other protected sites.” If there are genuine conservation concerns at specific sites, these should be dealt with through the existing statutory frameworks – through Natural England, NatureScot, Natural Resources Wales, or NIEA as appropriate – not through a voluntary woodland certification scheme that was never designed for this purpose.

We would ask the steering group directly: where does this end? If UKWAS can regulate game release pens in woodlands, what is the principled boundary that prevents it from regulating deer stalking practices, footpath management, camping, mountain biking, or any other activity that takes place in certified woodland? The absence of a clear limiting principle is deeply concerning and suggests a standard that will continue to expand its reach unchecked.

It is also unclear as to why the steering group have concluded that it is necessary to expand the scope of UKWAS in this way – the revision/steering group provides no evidence nor can demonstrate the need for these measures.

3. Rising Costs and Unjustified Fee Increases

The cost of UKWAS certification has risen significantly in recent years. Audit fees, scheme membership costs, and the administrative time required to prepare for and

respond to audits represent a substantial and growing financial burden on Estate and forestry operations.

These increases are not justified by any corresponding improvement in outcomes for woodland management. The proposed changes to 4.10.1 will **further increase costs** for certificate holders. Mapping every release pen, quantifying areas, recording stocking densities, producing release pen management plans, conducting baseline habitat assessments, carrying out priority species assessments, and maintaining ongoing monitoring regimes all require professional input and significant time. For many forestry owners and estates, particularly those in lowland England and across the devolved nations where shooting is economically integral to woodland management and conservation, these costs will be entirely disproportionate to any conservation benefit.

Rather than expanding the scope and complexity of the UKWAS audit, the steering group should be looking to **slim down the standard to the bare minimum required for certification**. The question should not be “what else can we regulate?” but “what is the minimum necessary to demonstrate sustainable woodland management?” The current trajectory suggests an organisation that has lost sight of its purpose and is instead seeking to justify its own existence through ever-expanding requirements.

We note that the consultation paper makes no reference whatsoever to the cost implications of these changes for certificate holders. No impact assessment has been presented. No cost-benefit analysis has been undertaken. This is a significant omission for changes that will impose real financial burdens on woodland businesses.

4. An Increasingly Punitive Standard That Has Failed to Deliver on Its Original Promise

Woodland owners in the UK were encouraged – in many cases told – that they must obtain FSC certification. The moral argument was compelling: by certifying our sustainably managed woodlands, we would create market mechanisms and standards that would help protect rainforests and threatened forests around the world from decimation.

This has manifestly not happened. Global deforestation continues at an alarming rate. Tropical forests continue to be cleared for agriculture, palm oil, soya, and cattle ranching. The FSC certification system, whatever its merits, has not delivered the transformative global impact that was promised to UK woodland owners when they were persuaded to sign up and bear the costs of compliance.

Meanwhile, UK woodland owners – who were already managing their woodlands to high standards long before certification existed – find themselves subject to an ever-more demanding and punitive auditing regime. With each revision, the standard becomes more complex, more prescriptive, and more burdensome. The proposed 4.10.1 is a case

in point: it introduces fixed deadlines (30 November 2028), detailed management plan requirements, ongoing monitoring obligations, and restrictions on relocating pens even within certified woodland – all for an activity that is already well-regulated.

The cumulative effect is that UK woodland owners are drowning in red tape with no evidence that this compliance delivers meaningful conservation outcomes nor any financial reward. We comply because we are told we must, not because we can see that it makes a difference. The goodwill and enthusiasm that once existed for certification is being steadily eroded by standards that treat woodland owners as problems to be managed rather than as the custodians of the resource they have been for generations.

5. Specific Concerns with the Draft Text

Without prejudice to our fundamental objection that game release pens should not fall within UKWAS's scope, we note the following specific concerns with the draft:

5.1 The 30 November 2028 Deadline

While extending the deadline from the original 24-month transition period is acknowledged, imposing a fixed date for removing existing pens from areas identified in sections 4.1–4.4 and 4.9 remains unreasonable. Many of these pens have been in situ for decades, operating without detriment to the surrounding woodland. Requiring their removal – or imposing extensive management planning as a condition of retention – is heavy-handed and fails to account for the reality on the ground.

5.2 The “No Other Suitable Locations” Test

Requirement 4.10.1(d) only permits retention of existing pens where “no other suitable locations are available.” This is an unreasonably high threshold. Game release pens are located where they are for sound practical reasons relating to topography, drive layout, access, and the overall design of the shoot. Relocating pens is not simply a matter of finding another patch of woodland – it can fundamentally compromise the viability of the shooting operation due to the significant cost of dismantling existing and building new pens. The standard fails to recognise this practical reality.

5.3 Stocking Density Prescriptions

The guidance prescribing maximum stocking densities (1,000 birds/ha generally, 700 birds/ha in conservation areas) amounts to UKWAS dictating game management practice. This is properly the domain of game management professionals, guided by GWCT research and existing codes of practice, not of a woodland certification body. Different pen designs, bird species, soil types, and management approaches mean that blanket density limits are overly simplistic and potentially counterproductive.

5.4 Monitoring and Management Plan Burden

The requirements for baseline habitat assessments, priority species assessments, and ongoing monitoring regimes within release pens represent a significant additional cost. Who is expected to carry out these assessments? Who pays for them? The standard is silent on these practical matters. For many forestry owners and Estates (with shoots), the cost of commissioning professional ecological surveys for release pen areas could easily exceed the income generated from that portion of the business/shoot, making the entire exercise economically irrational.

5.5 Restriction on Pen Area

Requirement 4.10.1(f), which prohibits any increase in the area occupied by release pens within identified areas, is unnecessarily rigid. There may be sound management reasons for adjusting pen configurations – for example, to improve bird welfare, to respond to forestry operations, or to reduce stocking density in accordance with the very best practice this standard claims to promote. A blanket prohibition on any increase in area is counterproductive.

6. Conclusion and Recommendations

Our position can be summarised as follows:

- **Game-rearing and release pen management should be removed entirely from the scope of UKWAS.** It is not a woodland assurance matter. It is already regulated through existing legislation and codes of practice. UKWAS's involvement represents unjustified mission creep.
- **Audit fees and scope should be reduced, not expanded.** The steering group should undertake a fundamental review aimed at streamlining the standard to the minimum necessary for sustainable woodland certification, with an evidence based and transparent cost-benefit analysis of any new or amended requirements.
- **The broader purpose of certification needs to be honestly reassessed.** If FSC/PEFC certification of UK woodlands was justified on the basis that it would help protect global forests, and that promise has not been delivered, then the ongoing burden imposed on UK woodland owners needs to be proportionate to the actual – rather than theoretical – benefits.
- **If these changes proceed regardless of objections, a full economic impact assessment must be published.** Certificate holders deserve to understand the cost implications before requirements are imposed.

It is becoming increasingly difficult to justify the cost and administrative burden of UKWAS certification when the standard continues to expand into areas beyond its

competence and original purpose. We urge the steering group and revision working group to listen carefully to the concerns of the Estates and woodland businesses that are the backbone of this scheme, and to recognise that there is a limit to what certificate holders will tolerate before they conclude that the costs of certification outweigh its benefits.

We look forward to seeing our concerns reflected in the next revision draft.

FORESTRY AND LAND MANAGEMENT

B01 Kate Tuer

The revised wording appears to be workable, reasonable and reflects the wider aims and spirit of UKWAS 5 coherently, although this is not an issue I deal with directly as a manager of certified woodland.

Please accept this message as support for the changed wording.

B02 Robert South, Bronwin & Abbey

I write to submit a response in relation to the above mentioned consultation.

I believe the amendments are a significant improvement on the current standard and offer much more flexibility and detail than the previous iteration.

However,

There are only 2 UK bodies covering '*Membership of a sporting and conservation organisation*' I believe that both GWCT and BASC should be referenced as there is a risk that anything could be presented to an auditor who may not know any better and undermine the point of the wording.

In relation to former pens - is there really a need to monitor the former locations? This seems like very simple way to trip up in an audit around something that has very little value, as if the shoot is run inline with best practice then there will be little to no change. So why create an unnecessary burden on all parties that appears that UKWAS is targeting a legitimate rural enterprises driving a deeper wedge between forestry and shooting on the traditional landed estate which is not in the spirit of UKWAS or UKFS.

B03 Confidential

I am an internal UKWAS auditor and have been aware of the ongoing debate about game release pens for some time. The previous changes from UKWAS 4 to UKWAS 5 relating to game release pens have been the source of conversation and debate during several audits that I have participated in, and it has been a source of concern to a considerable number of woodland owners and managers that I have interacted with.

In my personal view, the proposed wording that you are now consulting on (as per the consultation paper dated 16.12.25) is a significant improvement. It is important to a considerable cohort of owners and managers that the Standard gives sufficient flexibility for existing use of woodlands to continue where no suitable alternatives are available, subject to the application of good practice guidelines. I am therefore supportive of the proposed revised wording.

Please note that my views are my own and not necessarily representative of [my employer]. Whilst I am keen to respond to this consultation, I would appreciate my response being kept confidential.

B04 Gavin Howe, woodland manager

As a woodland manager considering certification under the UK Woodland Assurance Standard (UKWAS), I welcome the opportunity to comment on the proposed amendment to Requirement 4.10.1 concerning game-release pens.

I wish to be clear from the outset: the adoption of a balanced, proportionate and workable amendment to this requirement will be a determining factor in whether we proceed with UKWAS certification.

Our woodland is managed actively for timber production, biodiversity enhancement and sporting use. Income derived from a professionally managed shoot is not incidental; it is integral to the financial sustainability of the woodland enterprise. That revenue supports ride management, grey squirrel control, and broader conservation work. Without it, the level of active stewardship currently delivered would be significantly reduced.

A standard that imposes blanket restrictions, lacks clarity, or allows inconsistent interpretation would create unacceptable uncertainty for woodland businesses such as mine. In such circumstances, I would be unable to justify entering or maintaining certification.

By contrast, an amended requirement that recognises well-managed game release as compatible with sustainable forest management—provided impacts are properly

mitigated and monitored—would give confidence that UKWAS understands the practical realities of mixed-use woodland enterprises.

I strongly encourage the steering group to ensure that the final wording strikes a fair and workable balance between safeguarding conservation interests and protecting legitimate rural income streams. Certification must be both environmentally robust and commercially realistic if it is to retain and attract woodland owners.

B05 William Sleeman, Savills

I support the amendments to the UKWAS v5 relating to game release pens. Well managed pens do not cause environmental damage and the benefits of a game keeper managing predatory species and feeding during the winter increases all bird species in the wood.

B06 Phil Webb, UKFCG

Declaration of interest

I am a PEFC/FSC certification group manager, am one of the ConFor representatives on the UKWAS Steering Group and was involved with the UKWAS Working Group for development of the proposed changes to UKWAS v5 section 4.10.1

As a forest manager over the last 40 years, and volunteer assistant to gamekeepers on four syndicate shoots in England, Wales and Scotland:

The only woodlands I have witnessed with released bird game shoots that are either over stocked or poorly managed have been on sites that are not FSC or PEFC certified.

The proposed changes provide a route to enable shoot managers to provide verifiable evidence that management of their shoot on High Conservation Value certified sites is carried out to the highest standards described in applicable codes of practice.

The proposals will allow well managed shoots in HCV woodlands to remain in certification without being penalised for the bad practices witnessed elsewhere on non-certified sites.

As an auditor of FSC and PEFC certified forests:

Since 2006 I have been auditing certified forest in the UK in the role of a Certification Body auditor and since 2012 as a Group Scheme manager. I estimate that I have carried out at least 1000 site-based audits. On every occasion where game bird release has taken place, an assessment of the impacts has been undertaken as per the requirements defined in the current and previous versions of UKWAS. There has never

been the need to raise corrective actions in respect of overstocking or adverse impacts arising from the game bird release activities. Game bird release in certified forests seen in England, Wales and Scotland has never given cause for concern.

The proposed changes to UKWAS v5 section 4.10.1 provide a pragmatic approach to allow game bird release in HCV certified forests to continue with quantifiable verifiers which evidence best practice. Corrective action sanctions provide a mechanism to prevent any further adverse impacts which may be encountered.

B07 Rick Vallis, Silva Woodland Management

We represent a large multi-purpose lowland Estate in Kent situated near Sevenoaks.

The Estate owns 1000 acres of predominately ancient semi-natural or PAWS woodland located on the greensand ridge which is managed on a commercial basis and currently certified via UKFCG.

Sporting use is a major business stream for the Estate and the shoot operates within a number of the woodlands which lend themselves to commercial activity due to location, topography and environment.

The Estate adheres to best practice policies as recommended by both BASC and The Game and Wildlife Conservation Trust.

Without revision of the current UKWAS guidelines the Estate would be forced to leave its certifying body which is something it does not at this time want to do.

We believe that with the correct guidance and monitoring lowland woodlands should be able to operate a commercial shoot and still remain within the certification group.

Please do not hesitate to contact us if you wish to discuss the above in further detail.

Further clarification received:

Yes, this comment was made in mind of UKWAS 5.0 text.

The revised text meets our expectations in part but this would depend on the level of flexibility on an Estate which is predominately ASNW and a specification for woodland of high conservation value.

COUNTRY FORESTRY AUTHORITIES AND FORESTRY ENTERPRISES

C01 Matthew Park, Natural Resources Wales

Thank you for keeping NRW informed of the process and included in discussions resulting in the amended text that you are consulting on.

NRW have no Freehold shoots on the certified Welsh Government Woodland Estate (WGWE) and so for this reason do not have any comment on the proposed changes to the text in 4.10.1 UKWAS V5.0.

ENVIRONMENTAL ORGANISATIONS

D01 Chris Lynch & Kristin Waeber, National Trust

Introduction

1. The Trust is Europe's largest conservation charity, owning around 250,000 ha of land across England, Wales and Northern Ireland, including 896 miles of coastland. Over 100,000 ha is designated as an Area or Site of Special Scientific Interest, with 193,000 ha within either a National Park or Protected Landscape (Area of Outstanding Natural Beauty). Around 80% is farmland, of which approximately 140,000 ha is let to tenant farmers.

2. We welcome the opportunity to comment on the proposed revisions to UKWAS 5 relating to game bird release pens (Requirement 4.10.1). As a conservation charity responsible for the stewardship of significant woodland and priority habitats, we recognise the importance of ensuring that woodland management supports biodiversity, climate resilience, and long-term ecological health.

3. We support the principle that game bird management must be compatible with sustainable woodland stewardship. UK woodlands face increasing pressures from habitat fragmentation, invasive species, and climate change, and it is essential that all activities within or adjacent to these habitats contribute positively to their ecological integrity.

Protecting High Conservation Value Areas

4. We strongly support the intention to safeguard areas identified under sections 4.1–4.4 and 4.9 as priority conservation zones.

5. However, the proposed shift from a clear restriction on using high conservation value areas for game bird release, to wording that allows releases “not normally” and subject to exceptions, risks weakening protection for the most sensitive habitats. Introducing qualifiers and conditional clauses increases interpretive flexibility, reduces consistency across WMUs, and shifts the emphasis from avoiding ecological harm to attempting to mitigate it.

6. Given the well documented difficulty of reversing impacts – such as nutrient enrichment, soil compaction, and ground flora loss – firm limits remain essential to uphold the precautionary principle and maintain the conservation intent of the standard.

Acknowledging Landowner Concerns and Supporting Transition

7. We recognise that some landowners and managers have concerns about the operational implications of these changes, particularly where game shooting contributes to estate income. The proposed 24-month transition period is therefore important and appropriate. It provides a realistic timeframe for identifying alternative pen locations, redesigning infrastructure, integrating ecological mapping into shoot planning, and exploring diversified income streams. Many estates already demonstrate that well planned shoots can operate successfully outside high value habitats.

Scale, Location, and Stocking Density

8. The explicit recognition that game release pens can pose risks to conservation values is welcome and reflects a substantial body of ecological evidence. The emphasis on locating pens where impacts on soils, ground flora, lichens, reptiles, invertebrates, and priority species will be low is an important step toward ensuring compatibility with long-term woodland resilience.

9. While clearer guidance on release densities is helpful, we recommend adopting a precautionary approach by applying a 700 birds per hectare limit across all habitats. This would avoid misclassification risks and ensure consistent protection. Buffer zones around ancient woodland, riparian corridors, and designated sites would further strengthen ecological safeguards. We also note that alternative release sites on adjacent farmland may still influence nearby woodland habitats, particularly where feeding areas encourage bird movement into sensitive zones.

Release Pen Management Plans and Relocation

10. We strongly support the introduction of structured release pen management plans. Baseline habitat assessments, priority species assessments, monitoring requirements, and clear timetables for removal or relocation will improve transparency and accountability. We also support the principle that relocation sites must not have greater

conservation value than the areas being vacated, preventing displacement of ecological risk.

Monitoring and Recovery

11. Robust monitoring is essential, but the practical challenges should not be underestimated. Many woodland management units lack baseline ecological data, specialist expertise, or the capacity for repeated long-term surveys. Monitoring recovery after pen removal—while ecologically important—may create open-ended obligations without clearer metrics for determining “equivalence”.

12. We therefore recommend that UKWAS provide supporting guidance, standardised survey templates, and proportionate expectations for smaller estates to ensure that monitoring requirements are achievable and consistently applied.

Collaboration and Continuous Improvement

13. We welcome continued dialogue between forestry, conservation, and game management sectors. Many landowners already demonstrate high standards of practice, and a strengthened UKWAS can help ensure consistency across the sector. With appropriate support and clear guidance, the proposed changes offer a constructive pathway toward more sustainable woodland and game management.

REPRESENTATIVE ORGANISATIONS

E01 Richard Hunter, Confor

Confor welcomes this consultation on the changes to section 4.10.1. We appreciate the large amount of work undertaken by the Working Group to devise the new wording.

The proposed wording is a significant improvement on the V5 wording which effectively bans the use of game release pens in many woodlands across the UK, and we are prepared to accept it.

We would not accept any alternative wording that further restricts the use of game release pens. It is our belief that should an attempt be made now to change the proposed wording to once more prevent the use of game pens it will have serious repercussions for the sector and for UKWAS.

Game shooting for many landowners is a fundamental part of their estate’s income and should be recognised in UKWAS as part of the balance of sustainable forestry in the UK. If game release pens are causing damage, then UKWAS can be a means to promote

improvement or mitigation. If UKWAS forces those woodlands out of certification, then the opportunity to promote such improvements will be lost.

Looking to the future of UKWAS and version 6, we would highlight the need to learn lessons from this exercise. The change of wording in section 4.10.1 from V4 to V5 was based on a single published paper, and that paper was only shared widely after V5 was approved. In future, a working group should 'show its working' and share the evidence on which they propose to make fundamental changes to UKWAS at the time of the public consultation.

On this issue, many Confor members have voiced their unhappiness as they believe that UKWAS has gone beyond its remit and crossed a boundary into the territory and responsibilities of other organisations. Publishing the evidence that demonstrates the need for change would, in part, address those concerns, though it is likely that many will still be concerned that UKWAS is encroaching on areas that should more appropriately be left to others.

E02 Graham Clark, CLA

Introduction

1. The Country Land and Business Association (CLA) is the membership organisation for owners of land, property and businesses in rural England and Wales. We exist to champion, protect and enhance our rural economy, environment and way of life. Our aim is to unlock the potential of the rural economy so that our members can feed the country, create jobs and prosperity, invest in communities and protect the environment for future generations. Together, CLA members own and manage around half the rural land in England and Wales and more than 250 different types of businesses.

2. The CLA welcomes the opportunity to respond to this consultation on revised text on game release pens within version 5 of the UK Woodland Assurance Standard (UKWAS).

CLA, UKWAS and game release pens

3. Many CLA landowning members own and manage woodlands of varying sizes across England and Wales. A proportion of them voluntarily choose to certify their woodlands through UKWAS. Many rural estates also run shooting enterprises as part of their diversified activities. Alongside farming, forestry and other land uses, shooting can represent a significant income to some estates and usually involves the siting of game release pens in woodlands, which may be certified through UKWAS.

4. CLA have been long standing members of the UKWAS Steering Group and are one of the organisations which voiced concern regarding the impact and implications of the original UKWAS v.5 text (at section 4.10.1) relating to game release pens.

5. CLA wishes to respond to this consultation by firstly summarising our concerns with the relevant original wording and then stating our view on the new consultation draft wording. **CLA's overall view is that the new wording addresses our key concerns and that it balances the relevant interests far better than the original wording.**

CLA's key concerns with the original UKWAS v.5 text on game release pens

6. The CLA's view of the original text relating to game release pens at section 4.10.1 of UKWAS v.5 was that it was far too restrictive for those rural estates with certified woodlands who also operated shooting enterprises.

7. The original requirements – that all new game release pens be located outside areas of high conservation value; and for existing pens in areas of high conservation value to be taken out of use by November 2026 - would have been very problematic for some estates to comply with. Estates with high proportions of woodland deemed 'high conservation value' would face significant logistical difficulties in finding alternative release pen locations, with some finding it practically impossible.

8. The CLA was concerned that estates were effectively being forced to choose between their shooting enterprise and UKWAS certification. With premiums on certificated vs. non-certificated timber being marginal and annual estate shooting income often far greater than that from timber, the likely outcome would have been an exit from UKWAS of at least some shooting estate woodlands. UKWAS would then lose the positive influence it currently has over the management of these woodlands – which is to ensure a higher overall standard of woodland management than that required by the UK Forestry Standard (UKFS).

9. Private estates leaving UKWAS also risked repercussions for sawmills which are required to maintain prescribed levels of material from certificated sources to retain their chain of custody status. Small sawmills in particular, perhaps dependent on specific local estates for their certificated supply, would have been vulnerable if such estates decided to leave UKWAS. Alternative supplies of certified timber are not necessarily available locally, meaning material would have to be sourced from further away, eroding already fine margins.

10. CLA also felt that these increased risks and negative outcomes and were being needlessly created. The original UKWAS v.5 text on game release pens was, in our view, unnecessarily stringent in pursuing its aim of safeguarding ground flora and fauna on high conservation value sites. Enforcement of other UKWAS requirements including

4.10.1.a) that ‘game-rearing and release are carried out sustainably and in accordance with the spirit of codes of practice produced by relevant organisations’ could achieve the required outcomes without forcing landowners to choose between UKWAS certification and their shooting enterprise. Also, the onerous UKWAS requirements originally proposed for game release pens were mis-directed in that woodlands where any unsustainable game rearing and release practices may be taking place were unlikely to be certified through UKWAS in any case.

CLA’s views on the new consultation draft text on game release pens

11. The CLA commends the UKWAS Steering Group Chair and members for acknowledging the concerns of CLA and others on the steering group regarding the original UKWAS v.5 wording on game release pens. We are grateful to the revision working group for providing revised text for section 4.10.1. and to the Steering Group for re-considering the issues and supporting the revised text now being consulted on.

12. CLA does not offer comment on every change to the detail of the text in the consultation draft. Instead, we restrict our comments to the main substantive changes which address our key concerns with the original text (outlined above). In CLA’s view, the new text on game release pens achieves a far better balance of relevant interests.

13. The retention of requirement 4.10.1.a) ‘Game-rearing and release are carried out sustainably and in accordance with the spirit of codes of practice produced by relevant organisations’, is an important overall requirement ensuring that conservation of ground flora and fauna should receive appropriate protection where game rearing and release are being carried out.

14. New requirement 4.10.1.b) ‘The location of each game release pen within the Woodland Management Unit is mapped, its area quantified, and its stocking density recorded’ will provide baseline information for auditing compliance with the standard.

15. CLA welcomes the revised requirement at 4.10.1.d). This allows a new exception to the requirement to remove existing game-release pens in areas identified in sections 4.1 to 4.4 and 4.9 (previously ‘areas of high conservation value’) when no alternative suitable locations are available. This was one of the most problematic issues and this concession addresses a key CLA concern with the original text. The conditions that must now be met to rely upon this new exception make clear to woodland managers the good practices required to protect conservation values. Also, the new fixed deadline to meet this requirement - 30 November 2028 - provides a longer transition period for UKWAS certificate holders, better enabling them to plan changes to operations and act accordingly.

16. The expanded guidance (recommendations and explanations) for the requirements of section 4.10.1 on game release pens provides helpful clarifications to woodland managers on implementation and good game-rearing and release practices to protect conservation values. In particular, the clarification that shoot requirements should be taken into account when identifying suitable and unsuitable locations for game release pens is appropriate and welcome.

17. Overall, in CLA's view, the new UKWAS v.5 consultation draft text on game release pens addresses the key concerns which CLA had with the original wording and achieves a far better balance of relevant interests than the previous wording.

E03 Martin Edwards, British Association for Shooting and Conservation (BASC)

1. Introduction

The British Association for Shooting and Conservation (BASC) is the largest shooting organisation in the UK with approximately 150,000 members, many of whom are involved in the management of forests and woodlands, as these form one of the major habitats for gamebirds and other quarry species.

2. Conservation value of gamebirds in woodlands

Whilst BASC is aware that gamebirds in or around release pens can have a direct impact on certain potential woodland features, it is scientifically established that these impacts can be mitigated if the release follows best practices (Sage et al., 2020, 2021).

What is more, woodlands and species relying on woodlands benefit significantly from management activities related to gamebird release.

The positive impacts of gamebird release on woodlands are mainly a result of the management activities undertaken by game managers (Sage et al., 2020). Management activities for game woodlands such as ride creation, coppicing, sky-lighting and planting are not only beneficial for the quality of woodlands but also bring benefits to other wildlife, particularly bird species (Robertson et al., 1993; Robertson, Woodburn and Hill, 1993; Fuller et al., 2005; Amar et al., 2006).

A greater abundance of birds and a wider diversity of bird species were further observed in woodlands managed for game (The Game Conservancy Trust, 2005). Woodland rides have a more open canopy, more vehicle disturbance but less human disturbance and less horse erosion with less bare ground but more ruderal species and more scrub in woodlands managed for game (Capstick et al., 2019).

3. Proposed amendment to UKWAS 5 requirements for game-release pens.

BASC has worked alongside other members of the UKWAS steering and working groups to achieve a suitable compromise in the wording of 4.10.1 in the new standard. We therefore approve of the amendments that have been published on the UKWAS website.

Furthermore, we are happy to continue to work with UKWAS to ensure that sustainable shooting practices can be incorporated into the standard as it moves forward.

References:

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