

UKWAS 5: Proposed Amendment to 4.10.1

Consultation Report & Working Group Responses on Initial Revision Draft (21 April 2026)

The Working Group responses reflect discussions as follows:

- UKWAS Working Group meeting – 24 March 2026

OFFICE

22 Forth Street
Edinburgh EH1 3LH

CONTACT

M +44 [0]131 240 1419
E ukwas@ukwas.org.uk

WEB

ukwas.org.uk

Contents

1. Introduction	3
1.1 Background	3
1.2 Characteristics of respondents	3
1.3 Presentation of consultation responses	4
2. General comments.....	4
3. Specific comments	5
4: Working Group decisions.....	11
UKWAS section 4: Natural, historical and cultural environment.....	11
Sub-section 4.10: Game, shooting and fisheries management	11

1. Introduction

1.1 Background

The fifth edition of the UK Woodland Assurance Standard (UKWAS 5.0) was endorsed by PEFC as being fully compliant with their Sustainable Forest Management Requirements and came into effect for PEFC certificate holders on 1st December 2024. FSC certificate holders continue using UKWAS 4 pending the conclusion of the FSC approval process.

The UKWAS 5.0 standard includes changes to requirement 4.10.1 (previously 4.9.1) which addressed game rearing and release. The rationale for the changes was to safeguard ground flora and fauna on high conservation value (HCV) and other protected sites. Both FSC and PEFC standards require that conservation values are identified and maintained or enhanced.

- The amended requirement was for all new game release pens to be located outside areas of high conservation value and for existing game release pens within areas of high conservation value to be taken out of use within 24 months of the effective date of the revised standard i.e. by 30th November 2026.
- A number of owners, managers and representative associations raised concerns at the implications of the amended requirement 4.10.1 (previously 4.9.1). This is a particular issue for lowland and more traditional woodlands where game shooting often provides a significant income over and above timber receipts.
- These concerns were debated at length and in detail by the UKWAS steering group.
- At their May 2025 meeting, the steering group charged the UKWAS revision working group to review and, if thought fit, amend Requirement 4.10.1. <https://ukwas.org.uk/ukwas-responds-to-concerns-over-new-game-release-pen-requirement/>
- The working group plus technical experts met on three occasions including a field visit and developed a revised draft 4.10.1.
- At their November 2025 meeting, the UKWAS steering group considered and approved the working group's draft and initiated a formal amendment process. A public announcement to that effect was made on 17th November 2025. <https://ukwas.org.uk/ukwas-game-release-pen-requirements-to-be-revised/>
- A two-month public consultation to generate feedback on the text for 4.10.1 ran from 16th December 2025 to 16th February (see consultation paper in Appendix 2).
- The working group met on 24th March 2026 to discuss a revised draft 4.10.1 text with further input made by WG members until 2nd April 2026.

1.2 Characteristics of respondents

Fourteen 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 (2)

- Forestry and land management (7)
- Country forestry authorities and forestry enterprises (1)
- Environmental organisations (1)
- Representative organisations (3)

A full list of respondents is given in Appendix 1 at the end of this document.

1.3 Presentation of consultation responses

General comments are summarised in Part 2 of this report and the full texts are provided in the separate [Annex 1 document](#).

Comments specific to section 4.10.1 are summarised in Part 3 of this Report and the full texts are provided in full in the separate [Annex 1 document](#).

Part 4 summarises the UKWAS Working Group's responses to the main points in stakeholder feedback.

In all cases, individual respondents are identified using numbers in square brackets which correspond to the identification numbers in the list of respondents in Appendix 1 of this document, along with either an organisational or personal name.

2. General comments

General comments were not specifically sought but were provided by a number of respondents with some in detail. Many of these comments were beyond the scope of 4.10.1.

Most respondents expressed support for the revised wording in 4.10.1 as drafted with some respondents expressing support and making suggestions for improvement.

The main thrust of other comments was the question of balance: does the revised wording achieve an appropriate balance between economic, environmental and social aspects?

Some respondents with an economic perspective emphasised several points:

- the balance had tilted too far towards environmental objectives thereby impacting negatively on woodland on the viability of some woodlands managed in accordance with UKWAS and reducing the flexibility afforded to woodland owners / managers
- non-timber receipts such as shooting often provide the financial wherewithal to manage woodlands
- the scope of the UKWAS standard is extending beyond core 'forestry management' matters and encroaching onto territory covered by other organisations or government
- the UKWAS standard needs to remain accessible to woodland owners so as to avoid owners withdrawing from certification.

A respondent with an environmental perspective was supportive in principle and highlighted issues where they felt the draft Standard might go further.

3. Specific comments

Consultation responses are provided in full in the separate Annex 1.

3.1 Positive responses

Eight positive responses were received [A01, B01, B03, B05, B06, E01, E02, E03] and three qualified positive responses with further revisions or additions suggested [B02, B07, D01].

One response offered no opinion [C01].

3.2 Negative responses

Two negative responses were received [A02, B04] with further revisions or additions suggested to improve the 4.10.1 text.

3.3 Overarching comments

This section offers a summary of the main points raised by respondents who raised overarching issues.

Baronscourt Estate [A02]

- The regulation of game-rearing and release pens represents an unjustified expansion of UKWAS's role beyond woodland assurance. 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. [A02]
- 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). [A02]
- 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. [A02]

- 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. [A02]

- 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. [A02]
- 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. [A02]

- 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. [A02]
- 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. [A02]

- 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. [A02]
- 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. [A02]

Bronwin & Abbey [B02]

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

Gavin Howe [B04]

- 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. [B04]

National Trust E&W [D01]

- 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. [D01]
- We strongly support the intention to safeguard areas identified under sections 4.1–4.4 and 4.9 as priority conservation zones. [D01]
- Collaboration and Continuous Improvement: 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. [D01]

3.4 Requirement-specific comments

This section offers a summary of the main points raised by respondents who raised requirement-specific issues.

4.10.1 a)

- No comments.

4.10.1 b)

- 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. [A02]

4.10.1 c)

- No comments.

4.10.1 d)

- 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. [A02]
- 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. [A02]

- 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. [A02]
- 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. [A02]
- Acknowledging Landowner Concerns and Supporting Transition: 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. [D01]
- Release Pen Management Plans and Relocation: 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. [D01]
- Monitoring and Recovery: 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”.

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. [D01]

4.10.1 e)

- 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 in line 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 enterprise driving a deeper wedge between forestry and shooting on the traditional landed estate which is not in the spirit of UKWAS or UKFS. [B02]

4.10.1 f)

- 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. [A02]

4.10.1 Example verifiers

- 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. [B02]

4.10.1 Guidance

- 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. [A02]
- Stocking density: 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. [D01]
- 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. {D01}
- Protecting High Conservation Value Areas: We strongly support the intention to safeguard areas identified under sections 4.1–4.4 and 4.9 as priority conservation zones.

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.

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. [D01]

4: Working Group decisions

UKWAS section 4: Natural, historical and cultural environment

Sub-section 4.10: Game, shooting and fisheries management

This section provides a summary of how the UKWAS Working Group has responded to consultation comments received on Requirement 4.10.1.

- The working group acknowledges the wide range of issues raised by respondents and notes:
 - Many issues raised were beyond the scope of the consultation on the 4.10.1 text.
 - All in-scope suggestions were discussed at length, but some were thought to impose a potential extra burden on certificate holders so not adopted.
 - All issues raised will be considered at the next full UKWAS revision.
- The working group concludes that the amended 4.10.1 requirements achieve a reasonable balance. Issues of stakeholder concern are addressed by introducing greater flexibility through a number of exceptions, as outlined in section 4.1 of this document, whilst safeguarding ground flora and fauna in high conservation value sites.
- The working group accepts suggestions to include two changes to guidance:
 - In para 1, the ‘not normally’ phraseology is deleted. It was considered unhelpful as it is difficult for certificate holders and auditors to define in practice.

The revised text therefore reads:

- *‘The conservation value of areas within the WMU, identified in sections 4.1 to 4.4 and 4.9, should be maintained and wherever possible enhanced, and those areas should not [~~normally~~] be used for game release unless requirement 4.10.1d) or e) is met.’*

- Several respondents expressed concern at the release pen stocking densities cited in the guidance column and questioned the need for a release-pen management plan, whilst urging the working group to follow existing codes.

For clarity, in para 2, additional text is proposed citing codes of practice produced by ‘relevant organisations’ (BASC and GWCT). The UKWAS text is already aligned with

these codes, so a release-pen management plan is required, and the same stocking densities are cited in 4.10.1 guidance.

The revised text therefore reads:

- *'Relevant codes of practice include those produced by the British Association for Shooting and Conservation (BASC) (Code of good shooting practice) and the Game and Wildlife Conservation Trust (GWCT) (Guidelines for sustainable game bird releasing).'*

The full revised 4.10.1 text, with deleted and additional text highlighted, lets you see what has changed. (See [UKWAS 4.10.1 Second Consultation Draft](#))

APPENDICES

Appendix 1 – Full list of respondents

Appendix 2 – Consultation paper for Initial Consultation

Appendix 1 – 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 (E&W)	
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.

KEY:

GREEN – supports revised text

YELLOW – amendments suggested

GREY – no opinion

Appendix 2 – Proposed UKWAS 4.10.1 Amendment: Initial consultation paper (16.12.25)

1. Introduction
2. The review, revision and consultation process
3. Summary of the issues
4. Revision of the standard
5. How should I respond and what is the deadline for making my input?

Consultation Paper Sections:

1. Introduction

The fifth edition of the UK Woodland Assurance Standard (UKWAS 5.0) has been endorsed by PEFC as being fully compliant with their Sustainable Forest Management Requirements. The 'Effective Date' for PEFC certificate holders was 1st December 2024.

The revised standard included changes to requirement 4.10.1 (previously 4.9.1) which addressed game rearing and release. The rationale for the changes was to safeguard ground flora and fauna on high conservation value (HCV) and other protected sites. Both FSC and PEFC standards require that conservation values are identified and maintained or enhanced.

- The amended requirement was for all new game release pens to be located outside areas of high conservation value and for existing game release pens within areas of high conservation value to be taken out of use within 24 months of the effective date of the revised standard i.e. by 30th November 2026.
- A number of owners, managers and representative associations raised concerns at the implications of the amended requirement 4.10.1 (previously 4.9.1). This is a particular issue for lowland and more traditional woodlands where game shooting often provides a significant income over and above timber receipts.
- These concerns were debated at length and in detail by the UKWAS steering group.
- At their May 2025 meeting, the steering group charged the UKWAS revision working group to review and, if thought fit, amend Requirement 4.10.1. <https://ukwas.org.uk/ukwas-responds-to-concerns-over-new-game-release-pen-requirement/>
- At its recent meeting (11th November 2025), the UKWAS steering group considered and approved the recommendation of its revision working group that requirement 4.10.1 on game release pens should be revised through a formal amendment process. A public announcement to that effect was made on 17th November 2025. <https://ukwas.org.uk/ukwas-game-release-pen-requirements-to-be-revised/>

2. The review, revision and consultation process

The formal UKWAS standard-setting process as set out in the document: *UKWAS Standard-setting Process (Version 3.1)*, applies to this proposed amendment to UKWAS 5.0.

The revision process is based on evidence-gathering and thorough consultation with stakeholders.

An independent revision working group comprising an independent chair and a balance of economic, environmental and social stakeholders appointed by the UKWAS steering group has prepared an initial revision draft of requirement 4.10.1.

The revision and consultation processes are being taken forward in five phases including two stakeholder consultation phases. Indicative timings are as follows:

- **Phase 1** (November/December 2025): working group to prepare Initial Revision Draft
- **Phase 2** (December/February 2026): stakeholder consultation 1 (60 days)
- **Phase 3** (February/March 2026): working group to analyse stakeholder feedback and prepare Second Revision Draft
- **Phase 4** (March/April 2026): stakeholder consultation 2 (60 days)
- **Phase 5** (May 2026): working group to analyse stakeholder feedback and prepare Pre-approval Draft and remit to steering group.

Key document

- UKWAS Standard-setting process (Version 3.1): <https://ukwas.org.uk/wp-content/uploads/2024/12/UKWAS-Standard-Setting-Process-Version-3.1-13.09.23-FINAL.pdf>

3. Revision of the Standard

The revision working group was supported by technical experts during a series of meetings which included a field visit to the Duchy of Cornwall woodlands in Herefordshire to view and discuss the concerns of all parties.

The revision working group has now prepared an initial revision draft of 4.10.1. The amended text sets out to achieve an appropriate balance of interests. The steering group has discussed the draft and fully supports the proposed text. The revision working group is now seeking stakeholders' views on their draft.

Two versions of the Initial Revision Draft 4.10.1 are available:

- One version shows the proposed text with all changes accepted <https://ukwas.org.uk/wp-content/uploads/2025/12/UKWAS-4.10.1-DRAFT-v.4.3-clean-copy-16.12.25.pdf>
- The second version shows deleted and additional text so you can see what has changed <https://ukwas.org.uk/wp-content/uploads/2025/12/UKWAS-4.10.1-DRAFT-v.4.3-highlighted-changes-16.12.25.pdf>.

4. Summary of changes

The following changes are proposed:

4.1 Requirements (normative)

- 4.10.1b) An additional requirement to map release pen locations, area and stocking density. This provides a baseline for auditing.
- 4.10.1c) (formerly b) The scope of the requirement is changed from 'areas of high conservation value' to 'areas identified in sections 4.1 to 4.4 and 4.9' of the standard. This is because:
 - Section 4.6, 'Watershed management and erosion control', is dropped as it was considered to be a landscape-level requirement not readily applicable to the small scale of game release pens.
 - Section 4.9, 'Protection of cultural and historic environment sites' is added in line with the more comprehensive coverage of the protection of historic environment values throughout UKWAS 5.0.
- The revised scope of 4.10.1 is therefore:
 - 4.1 Statutory nature conservation sites (No change)
 - 4.2 Conservation of ancient semi-natural woodland (ASNW) (No change)
 - 4.3 Management of plantations on ancient woodland sites (PAWS) (No change)
 - 4.4 Other priority habitats (No change)
 - 4.9 Protection of cultural and historic environment sites (NEW REQUIREMENT)
- 4.10.1d) (formerly c): An exception applies to the requirement to remove existing game-release pens in areas identified in sections 4.1 to 4.4 and 4.9 when no other suitable locations are available. A list of conditions that must be met sets out the good practice required to protect conservation values.
- 4.10.1d) (formerly c): The deadline to meet this requirement is changed from 'within 24 months of the effective date of this standard' to a fixed date of 30 November 2028. This provides a longer transition period for certificate holders and, it is hoped, an opportunity to bring FSC and PEFC versions of UKWAS 5 into alignment.
- 4.10.1e): An exception applies whereby existing release pens within areas identified in sections 4.1 to 4.4 and 4.9 can be relocated within such areas subject to justified circumstances and adherence to a list of conditions to protect conservation values.
- 4.10.1f): A requirement that there is no increase in the area currently occupied by release pens within areas identified in sections 4.1 to 4.4 and 4.9.

4.2 Example verifiers (non-normative)

Three potential verifiers and one adapted verifier were added to support the requirements.

4.3 Guidance (non-normative)

Expanded guidance seeks to provide advice on implementation and good game-rearing and release practices to protect conservation values.

5. How should I respond and what is the deadline for making my input?

5.1 What do I need to read?

This Consultation Paper reviews the revision process and summarises the changes proposed.

You will also need to refer to the following documents:

UKWAS 4.10.1 Consultation Drafts:

- Version showing the proposed 4.10.1 text with all changes accepted
<https://ukwas.org.uk/wp-content/uploads/2025/12/UKWAS-4.10.1-DRAFT-v.4.3-clean-copy-16.12.25.pdf>
- Version showing deleted and additional text so you can see what has changed
<https://ukwas.org.uk/wp-content/uploads/2025/12/UKWAS-4.10.1-DRAFT-v.4.3-highlighted-changes-16.12.25.pdf>.

5.2 How do I respond?

Please send all your responses to ukwas@ukwas.org.uk

This is a 60-day consultation. Your feedback is required by 16th February 2026.

Notes:

- This consultation is in line with PEFC requirements for amendment of an endorsed standard (i.e. UKWAS 5.0) as defined in *PEFC-ST-1001: 2017 - Standard-setting – Requirements*.
- Every effort will be made to ensure that any agreed revision of UKWAS 5.0 (requirement 4.10.1) developed through this PEFC-endorsed process will also be reflected within the final FSC-conformant UKWAS 5 to retain equivalent requirements for both FSC and PEFC certificate holders.