

## Consultation Paper Sections:

1. Background
2. The review, revision and consultation process
3. Summary of changes
4. How should I respond and what is the deadline for making my input?

### 1. Background

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 1<sup>st</sup> 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 revised 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 30<sup>th</sup> 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.
- To address these concerns in May 2025, a revision working group was appointed by the UKWAS steering group to undertake further revision. Significant changes were made and a revised draft of 4.10.1 was released for an initial stakeholder consultation on 16<sup>th</sup> December 2025 with a closing date of 16<sup>th</sup> February 2026.
- Fourteen individuals or organisations responded to the initial consultation. Of these, eleven were broadly positive including three qualified responses suggesting further revisions or additions. Two respondents were negative and one offered no opinion. (See the [Consultation Report & Working Group Responses on Initial Revision Draft](#))
- To address concerns, the revision working group reviewed the initial draft text and made further amendments to develop a second consultation draft.
- A second stakeholder consultation is now open.

### 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.

The work is undertaken by an independent revision working group comprising an independent chair and a balance of economic, environmental and social stakeholders appointed by the UKWAS steering group.

The revision and consultation process is being taken forward in five phases including two stakeholder consultation phases. The process is at the Phase 4 stage: the revision working group has prepared a second revision draft of 4.10.1 to address stakeholder issues raised in the initial consultation. The revision working group is now seeking stakeholders' views on their draft.

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

Once the text of revised requirement 4.10.1 has been approved by the UKWAS steering group, it will be submitted to PEFC International for endorsement.

#### **Key document**

- [UKWAS Standard-setting process \(Version 3.1\)](#)

### **3. Summary of changes**

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 revised 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 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](#))

The following changes are proposed:

#### **3.1 Requirements (normative)**

- The working group concluded that the amendments to the 4.10.1 requirements made in the initial revision draft achieved a reasonable balance: issues of stakeholder concern had been adequately addressed by introducing greater flexibility through a number of exceptions whilst safeguarding ground flora and fauna in high conservation value sites.
- No change.

### 3.2 Example verifiers (non-normative)

- No change.

### 3.3 Guidance (non-normative)

- The working group accepts suggestions to include two changes to guidance.

#### Firstly:

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.'*

#### Secondly:

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 revised requirement 4.10.1 text was formulated to align with these codes, so a release-pen management plan is required, and the same stocking densities are cited in the guidance.

The revised 4.10.1 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).'*

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

Stakeholders are invited to comment on the changes proposed in the revised draft.

Please send all your responses to [ukwas@ukwas.org.uk](mailto:ukwas@ukwas.org.uk)

**This is a 60-day consultation. Your feedback is required by 20 June 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.