

ANNEX 1

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

This document contains a full and unredacted record of all the responses received in the second consultation exercise which ran from 21st April to 20th June 2026.

Full list of respondents

Id #	Respondent	Organisation	Links to process*
	Woodland owners		
A1	Jim Colchester	Buccleuch**	
A2	Lord Hamilton	Baronscourt Estate	
	Environmental organisations		
B1	Chris Lynch & Kristin Waeber	National Trust (E,W&NI)	
B2	Sonia Lorenzo Martin	Woodland Trust**	SG
	Representative organisations		
C1	Richard Hunter	Confor	SG
C2	Graham Clark	CLA	SG
C3	Martin Edwards	British Association for Shooting and Conservation (BASC)	SG, TE

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

** Denotes respondents who only responded to the second consultation round.

KEY:

GREEN – supports revised text

YELLOW – does not support revised text

WOODLAND OWNERS

A1 Buccleuch (Jim Colchester)

As a forester representing a landowner with a significant area of certified forest holding significant amounts of game shooting within it I wish to respond to the 2nd round of consultation.

The revised wording released on the 21st of April has prevented us from immediately withdrawing from certification. Although the changes are far from popular and appear to have come from a particular viewpoint within the UKWAS steering group, there now appears to be enough change in the tone and detail to allow us to continue with certification. We have followed the industry guidance (GWCT) for a considerable length of time and there has never been any issues raised at audit (and pens have featured several times) so there has clearly not been a significant issue. Our owners take their responsibilities to the environment very seriously and as such the rather narrow-minded approach version 5.0 took has done much to damage the reputation of certification in the owners' eyes.

As such we welcome the changes suggested in the consultation.

A2 Baronscourt Estate (Lord Hamilton)

This submission follows my initial response dated 11 February 2026. While we acknowledge the Working Group's attempt to introduce a degree of "flexibility" in the second draft, Baronscourt Estate maintains its fundamental objection to the inclusion of game-rearing and release pen management within the scope of UKWAS.

Our position remains unchanged: **Section 4.10 should be removed in its entirety.**

The proposed amendment is wholly inadequate. It amounts to little more than the deletion of a single word and the addition of the following text:

"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)."

This minimal revision demonstrates that our earlier comments have not been meaningfully considered. The consultation process, therefore, appears ineffective, which may explain the very limited engagement from affected businesses—particularly woodland owners.

From a practical standpoint, the business model of diversified rural estates depends on the economic viability of all enterprises, including driven shoots. These activities have coexisted with sustainable woodland management for generations. The current proposals represent a further and unwarranted challenge to that balance. It is particularly concerning that estates are required to fund UKWAS certification while simultaneously being subjected to measures that undermine their operations.

This proposal constitutes an attempt to regulate sporting activities indirectly and represents unjustified “mission creep,” extending UKWAS beyond its intended role in woodland assurance into areas already governed by statutory authorities and established industry codes of practice.

Despite minor revisions, several elements of the draft remain disproportionate and impractical:

- **Fixed Deadline (30 November 2028):**

The requirement to remove long-established release pens by a fixed date is arbitrary and unsupported by evidence. Many such pens have operated for decades without demonstrable harm to woodland health. UKWAS should provide a clear evidence base for this position.

- **Stocking Density Limits:**

The imposition of a maximum density of 1,000 birds per hectare is an overreach. This is a matter for game management professionals and existing guidance (e.g. BASC and GWCT), not a woodland certification scheme.

- **Restriction on Pen Area (Requirement 4.10.1f):**

Preventing any increase in pen area is counterproductive. It limits the ability of game managers to improve bird welfare or reduce stocking densities through adaptive management.

- **Monitoring of Former Pen Sites:**

Continued monitoring of sites after pens have been relocated offers little practical benefit and creates unnecessary administrative burden, increasing the risk of non-compliance during audits.

If UKWAS continues to impose requirements where costs outweigh benefits, it risks losing the very estates and woodland businesses that form the foundation of the scheme. Participation will decline as stakeholders withdraw from certification. Our industry should be finding positive ways to work together collectively, in my opinion UKWAS is doing the reverse, finding new handcuffs and way to make good, hardworking foresters feel that we are doing wrong. I would strongly encourage the Working Group to review the paper: *“The PR battle forestry never fought: How we lost public opinion while*

perfecting sustainability” by Peter Hasulyó. It is food for thought. Source:-
https://www.fordaq.com/news/The_PR_battle_forestry_never_111884.html

More broadly, it is time to critically assess the real-world value of certification schemes such as FSC and UKWAS. Since FSC’s establishment in 1994, global deforestation has continued at a significant scale. Estimates suggest that between 44 million and 88 million hectares of rainforest have been lost during this period.

By comparison, if FSC revenues were hypothetically directed toward direct land acquisition for conservation, the impact could be substantial. For example, using 2024 revenue figures of approximately \$80 million and estimated land values of \$500–\$1,000 per hectare, this could equate to 160,000 hectares of rainforest protected annually at the lower bound. Over 30 years, this would represent millions of hectares. This raises a legitimate question: do current certification systems deliver meaningful conservation outcomes relative to their cost?

In conclusion, Baronscourt Estate reiterates its strong opposition to Section 4.10 and urges its complete removal from the UKWAS standard.

I hope that you can infer from this response that as a forestry owner and operator who does their level best to be “sustainable” and do the right thing, I am sick to death with yet more regulation which are choking and strangling my livelihood. It is high time for a major change with certification in this country.

ENVIRONMENTAL ORGANISATIONS

B1 National Trust (E, W & NI) (Chris Lynch & Kristin Waeber)

With our staff, members, volunteers and supporters, the National Trust is the biggest conservation charity in Europe. We protect and care for places so people and nature can thrive. Many millions share the belief that nature, beauty and history are for everyone. So we look after the nation’s coastline, historic sites, countryside and green spaces, ensuring everyone benefits. For everyone, for ever.

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 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. It is important to ensure that woodland management supports biodiversity, climate resilience, and long-term ecological health.

3. In line with the consultation instructions, this submission focuses solely on the changes presented in the revised draft. References to our first consultation response are included only where they directly relate to the proposed amendments.

Removal of “not normally” from paragraph 1

4. The National Trust supports the removal of the phrase “not normally” from the guidance text.

5. In our first consultation response, we highlighted that this wording risked weakening protection for high conservation value areas by introducing ambiguity. Its removal therefore represents a positive and necessary clarification. The revised text provides a clearer expectation that areas identified under sections 4.1–4.4 and 4.9 should not be used for gamebird release unless the specific exceptions in 4.10.1(d) or (e) apply.

6. This amendment strengthens consistency of interpretation and better reflects the precautionary approach required in sensitive habitats.

Addition of references to BASC and GWCT codes of practice

7. We note and support the proposal to include explicit references to the BASC Code of Good Shooting Practice and the GWCT Guidelines for Sustainable Gamebird Releasing within the guidance. This addition provides useful clarity for land managers and aligns UKWAS with established sector standards.

8. In our first consultation response, we emphasised the importance of recognising the ecological risks associated with release pens and ensuring that siting and management practices minimise impacts on soils, ground flora and priority species. The inclusion of recognised codes of practice helps reinforce this principle and supports more consistent implementation across woodland management units.

Retention of release-pen management plans and stocking density guidance

9. We welcome the confirmation that a release-pen management plan remains a requirement. This aligns with our earlier position that structured planning is essential for transparency, accountability and ecological protection.

10. The decision to retain the stocking densities cited in the guidance is noted. While we previously recommended a more precautionary universal limit, we recognise that stocking density thresholds themselves are not being revised in this consultation. Our

comments here are therefore limited to acknowledging that the proposed text maintains alignment with existing codes of practice.

Scope of issues to be carried forward to the next full UKWAS revision

11. We appreciate the working group's confirmation that issues raised but deemed out of scope for this targeted revision will be considered during the next full review. Several points from our first consultation response fall into this category, and we welcome the commitment to revisit them at the appropriate stage.

Conclusion

12. The National Trust considers the proposed changes in the second consultation to be constructive refinements that improve clarity and strengthen alignment with recognised best practice. In particular, the removal of ambiguous wording and the explicit reference to established codes of practice address key concerns we raised in the first consultation.

13. We look forward to engaging further during the next full UKWAS revision to ensure that the standard continues to support the long-term protection and enhancement of woodland habitats.

B2 Woodland Trust (Sonia Lorenzo Martin)

With reference to the second consultation on the amended UKWAS 5 text on game-release pens, the Woodland Trust is supportive, reflecting its close collaboration with the working and steering group in the preparation of the final draft. We strongly endorse the intention to safeguard areas identified under Sections 4.1–4.4 and 4.9 as priority conservation zones and support the principle that game bird management should be compatible with sustainable woodland stewardship. In the interest of continuing progress, the Woodland Trust has no further comments.

We look forward to the finalisation of the document and the next steps towards implementation.

REPRESENTATIVE ORGANISATIONS

C1 Confor (Richard Hunter)

Confor accepts the revised wording to ensure the guidance is as clear as possible to woodland managers and auditors alike.

Confor does not see the need for any further changes.

Confor would like to thank and acknowledge the hard work of the working group to reach this point.

C2 CLA (Graham Clark)

I write on behalf of CLA, in response to the 2nd consultation on the amended UKWAS 5 text on game release pens – specifically section 4.10.1 (consultation details below).

CLA made a full response to the 1st consultation on this subject in February 2026. This summarised our views on the issues, explaining our conclusion that the proposed revised text of section 4.10.1 addressed the key concerns which CLA had with the original wording and that the revised text achieved a far better balance of relevant interests than had previously been the case.

Several months on, CLA now notes the further small changes proposed to the text, arising from comments made by respondents to the first consultation. CLA appreciates the opportunity to comment on this second draft amendment to the UKWAS 5 requirements on game release pens.

Having considered the most recent text, we confirm that CLA is content with the revised wording now proposed.

We have no further comments to make, other than to urge that the revised wording of section 4.10.1 be adopted as soon as is possible so that the protracted issue of game release pen requirements under UKWAS 5 is resolved and certificate holders get long overdue clarity on the issue.

C3 British Association for Shooting and Conservation (Martin Edwards)

The British Association for Shooting and Conservation (BASC) welcomes the opportunity to comment on the second draft amendment to UKWAS requirement 4.10.1 relating to gamebird release pens.

BASC is the UK's largest shooting and conservation organisation, representing around 150,000 members. We support the sustainable management of gamebird shoots and the important role they play in funding woodland management, habitat conservation and rural employment.

1. General Position

BASC welcomes the significant improvements that have been made since the publication of UKWAS 5.0 and the willingness of UKWAS to engage with woodland owners, managers and shooting organisations. The revised draft represents a more proportionate and pragmatic approach than the previous requirement, particularly through its recognition that decisions should be based on site-specific circumstances rather than the blanket exclusion of game release from all high conservation value woodlands.

We therefore welcome the adoption of a more nuanced and risk-based approach that seeks to identify and address actual environmental impacts rather than relying solely on the designation status of a woodland.

2. Importance of Sustainable Gamebird Management

Throughout the draft there is a strong emphasis on the potential negative impacts of gamebird release, but little recognition of the significant conservation, environmental and economic benefits delivered through sustainable game management.

Many woodlands managed for shooting provide important habitat for a range of woodland birds, invertebrates and mammals. Revenue generated from shooting frequently underpins investment in woodland management, ride maintenance, deer management, predator control, invasive species control and habitat enhancement.

BASC recommends that the guidance accompanying Requirement 4.10.1 should explicitly recognise that sustainable gamebird management can make a positive contribution to woodland conservation objectives and biodiversity outcomes.

3. Support for Outcome-Based Assessment

BASC supports an approach that focuses on measurable impacts rather than assumptions based on location alone.

The ecological effects associated with gamebird release are influenced by numerous factors including release density, woodland size, habitat type, management practices, soil conditions and the sensitivity of conservation features. Consequently, the presence of a release pen within or adjacent to an HCV area should not automatically be regarded as incompatible with certification.

We are therefore pleased to see that the certification assessment does now consider:

- The condition of relevant conservation features.
- Evidence of actual adverse impacts.
- The scale and significance of any impacts.
- Mitigation measures that have been implemented.
- Adaptive management undertaken by the woodland manager.

This approach is more consistent with modern principles of sustainable land management and environmental regulation.

4. Proportionality of Monitoring Requirements

BASC supports monitoring as part of good woodland management. However, the requirement for:

- Baseline habitat condition assessments;
- Priority species assessments;
- Ongoing monitoring regimes;
- Recovery monitoring of former pen sites;

may create a significant burden for smaller woodland owners and managers.

The standard should make clear that monitoring requirements should be proportionate to the scale of the operation, the sensitivity of the site and the level of identified risk.

BASC would support the development of a simple, practical monitoring framework that can be implemented without requiring specialist ecological consultancy in all circumstances.

5. Existing Pens in High Conservation Value Woodland

BASC welcomes the recognition that existing pens may remain where no suitable alternative locations are available and where impacts are appropriately managed. This is a significant improvement on the previous requirement.

However, BASC believes the wording still places a disproportionate burden on woodland owners to justify the continued use of long-established pens, irrespective of whether there is evidence of environmental damage.

Where monitoring demonstrates that conservation objectives are being maintained and no significant adverse impacts are occurring, continued use should be considered acceptable without creating unnecessary administrative requirements.

6. Relocation and Woodland Creation

BASC supports consideration of alternative locations where appropriate. However, the guidance suggesting that woodland owners assess opportunities for creating new woodland specifically to relocate release pens may not be realistic in many situations due to land ownership constraints, planning considerations, agricultural land use and economic viability.

This element should remain advisory rather than forming an expectation of compliance.

7. Recovery of Former Pen Sites

BASC supports the restoration of former pen sites where impacts have occurred. However, the requirement that monitoring should continue until recovery is demonstrated to be equivalent to surrounding woodland may be difficult to assess objectively and could create uncertainty for woodland managers.

Clear guidance should be developed regarding what constitutes recovery and the evidence required to demonstrate it.

8. Avoiding Duplication of Existing Regulatory Controls

Gamebird release is already subject to a range of legal and regulatory controls. In England, releases on or near designated sites are subject to specific licensing arrangements and regulatory oversight. In addition, recognised industry codes of practice provide detailed guidance on sustainable release management.

UKWAS should complement these existing mechanisms rather than create parallel or conflicting requirements.

9. Recommendations

BASC recommends that the final amended requirement:

1. Retains the move away from blanket restrictions based solely on HCV designation.
2. Focuses on demonstrable environmental outcomes and evidence of impact.
3. Recognises sustainable gamebird management as a legitimate woodland management activity.
4. Provides clear guidance and objective criteria for assessment.
5. Encourages adaptive management and mitigation where impacts are identified.
6. Avoids unnecessary duplication of existing legal and licensing frameworks.

10. Conclusion

BASC welcomes the substantial progress made between UKWAS 5.0 and this second consultation draft. The revised approach is more balanced and more likely to secure positive conservation outcomes while maintaining the economic viability of woodland enterprises.

We encourage UKWAS to further refine the requirement to ensure that it remains evidence-based, proportionate and capable of consistent application across the diverse range of woodland and shooting systems found throughout the United Kingdom.