

UKWAS 5: Proposed Amendment to 4.10.1

Consultation Report & Working Group Responses on Second Revision Draft

5 August 2026

The Working Group response reflects final discussion as follows:

- UKWAS Working Group meeting – 5 August (by correspondence)

OFFICE

22 Forth Street
Edinburgh EH1 3LH

CONTACT

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

WEB

ukwas.org.uk

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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 2026.
- The working group met on 24th March 2026 to discuss the comments received and prepare a revised draft 4.10.1 text with further input made by WG members until 2nd April 2026.
- A second two-month public consultation to generate feedback on an amended text for 4.10.1 ran from 21st April to 20th June 2026 (see consultation paper in Appendix 1).

1.2 Responses received

Seven individuals or organisations responded to the second consultation round. Five of the seven respondents had also responded to the first consultation round. There were 14 respondents to the first consultation round.

All the comments were from individuals or organisations based in the UK and can be characterised as follows:

- Woodland owners (2)
- Environmental organisations (2)
- Representative organisations (3)

Six of the seven responses were positive, and one was negative.

Both the National Trust and BASC had provided suggestions to be considered at the next revision.

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

1.3 Presentation of consultation responses

The full text of all comments received is provided in the separate Annex 1 document.

General comments are summarised in Part 2 of this report and comments specific to section 4.10.1 are summarised in Part 3.

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

Individual respondents are identified using numbers in square brackets which correspond to the identification numbers in the list of respondents in the table in section 1.2 of this document.

2. General and overarching comments (summary)

General or overarching comments were provided by several respondents with some in detail. Some of these comments were beyond the scope of 4.10.1 and this consultation.

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

The text extracts below are chosen to reflect the respondent's opinions. The full text of all responses received is set out in Annex 1.

Woodland owners

A woodland owner respondent, **Buccleuch**, with an economic perspective welcomed the changes noting that the revised wording 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'*.

A woodland owner respondent, **Baronscourt Estate**, with an economic perspective reiterated concerns raised in the first consultation round and expressed 'strong opposition':

- *section 4.10 should be removed in its entirety*
- *the proposed amendment is wholly inadequate*
- *the minimal revision demonstrates that our earlier comments have not been meaningfully considered*
- *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*
- *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

- *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.*

Environmental organisations

A respondent with an environmental and social perspective, **National Trust**, was supportive of the changes and had previously highlighted issues where they felt the draft standard might go further in future:

'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.'

'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.'

'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.'

A respondent with an environmental and social perspective, **Woodland Trust**, said:

'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.'

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

Representative organisations

A respondent with an economic perspective, **Confor**, said:

'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'.

A respondent with an economic perspective, **CLA**, said:

‘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.’

A respondent with a gamebird management perspective, **BASC**, welcomed the changes and helpfully highlighted issues for consideration at the next revision:

‘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.’

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.’

3: Specific comments

3.1 Requirement-specific comments

This section lists requirement-specific issues raised by respondents.

Removal of section 4.10

- Section 4.10 should be removed in its entirety. [A2]

4.10 Guidance

- 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. [A2]

4.10.1 d) Requirement

- 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. [A2]

4.10.1 e) Requirement

- 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. [A2]

4.10.1 f) Requirement

- Restriction on Pen Area Requirement: 4.10.1(f): 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. [A2]

3.2 Working group comments on specific comments

Removal of section 4.10

A requirement on game management has been included in UKWAS since the first edition in 1999 (section 6.2.3) and the basic approach has been the same ever since albeit in rather more detail of late. This is the original UKWAS 1 text:

- **Requirement:** Game management is not sufficiently intense to cause long-term or widespread negative impacts on the woodland/forest ecosystem.
- **Means of verification:**
 - Management plans and specific game management plans.
 - Field inspection.
- **Guidance:** Feeding and rearing areas are located in areas where there will be low impact on ground flora.

Predator control is:

- Carefully planned
- Species specific
- Only carried out where strictly necessary
- Carried out with minimal suffering.
- Reducing rather than eradicating natural predator populations

Stocking density limits (Guidance)

The limits are drawn from and aligned with the BASC code and GWCT guidance.

Fixed deadline (4.10.1d)

The working group views this as the most practical approach to avoid confusion. However, the deadline for removal of pens is not absolute. There are circumstances set out in 4.10.1 that, if applicable, could extend the use of pens beyond 30 Nov 2028.

Monitoring of former pen sites (4.10.1e)

Where release pens are relocated within the WMU in accordance with 4.10.1e), the working group considers ongoing monitoring is important to track recovery of conservation values on former pen sites.

Restriction on pen area (4.10.1f)

The working group considers this necessary to preserve the integrity of areas with high conservation values outwith existing pens.

4: Working Group decisions

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

The working group is grateful to those who responded to this second consultation.

Group members have worked hard to develop a compromise solution that carefully balances the issues and challenges that stakeholders have raised.

Some of these issues were beyond the immediate scope of the consultation but were nevertheless noted.

Certification is about balancing the needs of the environment with social and economic considerations. The working group recognises that game bird management is an important woodland activity for many estates and it generates revenues that can be used on forestry operations that can maintain and enhance conservation objectives. However, game release pens are a potential threat to conservation values on sensitive sites, and the working group was focussed on striking an appropriate balance.

The working group was therefore pleased that most respondents welcomed the revised draft as a positive step forward. It notes that land use organisations, BASC, CLA and Confor, were content with the second draft as were environmental organisations, National Trust and Woodland Trust. This would seem to indicate that the revised 4.10.1 text has struck a better balance. Therefore, no further changes to 4.10.1 have been made.

Respondents' suggested changes for future editions were particularly welcome and all issues raised will be carefully considered at the next full UKWAS revision.

The full revised 4.10.1 text is provided in the separate Annex 2 document.

APPENDICES

Appendix 1 – Consultation paper for Second Consultation

ANNEXES (in separate documents)

Annex 1 – UKWAS 5: Second Consultation Responses on Proposed Amendment to 4.10.1 (June 2026)

Annex 2 – UKWAS 4.10.1 (Final)

Appendix 1 – Proposed UKWAS 4.10.1 Amendment: Second consultation paper (21.04.26)

Consultation Paper Sections:

- 1. Background**
- 2. The review, revision and consultation process**
- 3. Summary of changes**
- 4. Revision of the standard**
- 5. 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 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 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 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.
- 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 16th December 2025 with a closing date of 16th 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

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.