

# A Consultation on the UK Forestry Standard: Analysis of Responses

Why Research, September 2021

## **Acknowledgments**

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# Executive Summary

The UK Forestry Standard (UKFS) was first published in 1998 and has subsequently been revised in 2004, 2011 and 2017. It is the reference standard for sustainable forestry practice in England, Wales, Scotland and Northern Ireland. It applies to the entire forest environment and to all UK forest types and management systems, including woodland cover in urban areas.

Work has recently begun on reviewing the current UKFS; the aim is to update and publish the next version by the end of 2022. To inform this review, an initial assessment of the Standard's current technical content was undertaken by specialists from the countries' forestry authorities and administrations, Forest Research and external reviewers. This initial stage noted that once the Standard has been updated to reflect improvements in scientific knowledge, developments in international approaches and new or amended legislation, the majority of the content will still be relevant. This assessment also identified six cross-cutting themes that are relevant across the Standard and the UK and for which further developments should be considered.

A consultation was launched at the end of June 2021 and closed on 10 August 2021. This was aimed at organisations familiar with the UKFS, rather than the general public.

## Respondent Profile

In total, there were 39 responses to the consultation, of which 36 were from organisations and 3 from individuals.

**Table 1: Respondent Groups**

	Number
Commentator / Advocacy	18
Forestry Practitioner	15
Regulator / Certification	3
Individual	3
<b>Total respondents</b>	<b>39</b>

## Key Themes

A number of key themes were evident across questions as well as across respondent groups, and these are summarised below.

- There was general support for the six cross-cutting themes that are relevant across the Standard and the UK and for which further developments should

be considered. There were some references to the need for stronger recognition of the interlinked nature of these and the need for the UKFS to consider them in a holistic way rather than in isolation.

- Accessibility to the Standard is clearly important, with comments that the UKFS should use language that is user-friendly and relevant to all potential stakeholders and users; and that it needs to be easy to navigate and search.
- Greater clarity in the use of language is important for respondents. Examples provided were to replace '*should*' with '*must*' to ensure that users are aware of what measures are mandatory; or to reinforce instructions to emphasise that addressing a specified issue is a statutory rather than a voluntary requirement.
- Linked to this, there were also some calls for more clarity over compliance and the enforcement of guidance.
- The structure of the UKFS was an issue for some respondents, with references to the need to shorten it, particularly as it is perceived to contain a lot of duplication. Additionally, while there was support for inclusion of the six cross-cutting themes, there were some concerns this could make the UKFS more lengthy and difficult to use. Suggested ways in which this could be solved included the removal of duplication, or the inclusion of appendices containing non-essential information which can be accessed when required.
- While there is support for the UKFS, there were some references to the need to ensure this is not too prescriptive and allows for local adjustments or changes in approach; or takes into consideration the context of each of the UK countries. For example, to allow for a choice of tree species within woodlands.
- While there is support for increased stakeholder engagement and public involvement, forestry practitioners were less positive about this than other sub-groups, and felt increased stakeholder engagement could become a barrier to forest operations. There were some requests for an approach that supports foresters in carrying out their job combined with a need to think about resourcing and practicality before implementing new guidance that could increase the burden on woodland managers and owners.
- A few respondents felt that other planning consultation processes are more advanced and offer a greater level of transparency than the current UKFS.
- There were requests for reference throughout the UKFS to the latest research, legislation and policy context.
- A need to ensure the UKFS interacts with other regulatory and legislative agendas.

## Question Summary

The following paragraphs provide a summary of the key themes emerging at each consultation question.

**(Q1) Almost all respondents agreed that references to the need to consider forest resilience and climate change adaptation be strengthened through the UKFS,** with many reiterating the importance of this cross-cutting theme. Key themes were:

- Requests for the UKFS to allow for a choice of tree species within woodlands to ensure forest resilience and climate change adaptation.
- The need to consider forest health.
- A need to consider the contribution to improving resilience made by commercial forestry organisations.
- UKFS should allow for stronger recognition of the interlinked nature of forest resilience and climate emergencies and for strategic planning to deliver on biodiversity and climate adaptation at a wider landscape scale.
- Reference throughout the UKFS to the latest research, legislation and policy context.
- Guidance that acknowledges that different locations, woodland types and desired outputs need different types of forest systems and that challenges vary between species types.
- The need to strengthen the wording used in the UKFS.

**(Q2) Almost all respondents who answered this question agreed the UKFS should further consider its approach to managing carbon in forests and woodlands and through the whole forest planning, managing and harvesting cycle.** Key themes were:

- UKFS should not be too prescriptive as science is still emerging and the understanding of carbon within the forest environment is still limited.
- UKFS needs to adopt a holistic approach that allows for a more robust assessment to be applied to the whole system.
- Stronger recognition of UK grown timber rather than imports or other materials such as concrete.
- A need to use species that can sequester carbon quickly.
- Consideration of the impacts of woodland and forestry on adjacent open habitats and carbon rich habitats.

**(Q3) Most respondents felt that a more systematic approach to biosecurity should be taken in the UKFS across the entire forest planning and management cycle,** with many noting the importance of having a systematic approach to biosecurity. Key themes were:

- Plant imports can lead to the introduction of tree pests and diseases and Brexit offers opportunities to plant locally sourced and grown trees.
- The forest sector already demonstrates best practice in biosecurity.

- A need to think about resourcing and practicality before implementing new guidance that could increase the burden on woodland managers and owners.
- UKFS should highlight the benefits of natural regeneration, local provenance and native species, and biosecurity risks.
- A need for greater reference to biosecurity throughout the UKFS.
- The UKFS should promote regular monitoring and reporting on disease and pests and regular biosecurity risk assessments.
- Biosecurity is a national issue and UKFS should not seek to replace the roles and responsibilities of national policy and biosecurity, which should be done through governing bodies.

**(Q4) Almost all respondents felt the UKFS needs to develop its approach for stakeholder and public involvement**, with some focusing on the importance of engagement. Respondents also referred to a wide range of different stakeholders who should be involved. Key themes emerging included:

- A degree of opposition, primarily from forest practitioners, who felt increased stakeholder engagement could become a barrier to forest operations and there is a need for an approach that supports foresters in carrying out their job.
- UKFS needs to strengthen its approach to stakeholder and public involvement by strengthening requirements and guidelines.
- UKFS should be accessible to all.
- Other planning consultation processes were felt to be more advanced and offer a greater level of transparency than the current UKFS.

**(Q5) Most respondents felt the UKFS approach to forest-level planning and management should consider wider land use objectives and promote complementary action between the two.** Most opposition came from forestry practitioners. Key themes included:

- A need to better integrate different sectors such as deer management, water and agriculture.
- A need for cross-boundary co-operation.
- Concerns this could create additional barriers in woodland management, with requests for the UKFS to support, capitalise and develop actions that allow foresters to integrate their plans with others while also retaining the freedom to manage their forests professionally.

**(Q6) Most respondents agreed the UKFS should strengthen its approach to minimising and managing manufactured waste generated by all aspects of woodland management and operations.** The small number who disagreed were forestry practitioners. Key themes included:

- The UKFS already has a strong approach but if there is evidence that levels of waste are increasing, it would be beneficial to strengthen its approach.

- Preferences for the UKFS to identify best practice and guidance rather than introducing any new regulation.
- A need for the UKFS to avoid using prescriptive language.
- Some sectors already have their own best practice and administering organisations, and the UKFS should complement these rather than replace them.
- Concerns over plastic tree guards and requests for guidance as to when and where alternatives should be employed.
- The need to reduce manufactured waste associated with deer fencing.

**(Q7) When asked whether there are any other significant cross-cutting themes that should be integrated throughout the UKFS, relatively few respondents cited any additional cross-cutting themes** but chose to expand upon and discuss themes they felt needed increased coverage or guidance. Key themes respondents focused on were:

- Climate change.
- Biodiversity.
- Growing or creating new woodland or forests.
- The Interlinkage and connectivity of native woodland and other types of forest with other habitats.
- Measures to improve the conditions of existing woodland or habitat.
- The encouragement of natural regeneration or colonisation.
- Woodland restoration guidance.
- Guidance or management approaches with regard to novel species introductions.
- An increased focus on better management.
- A need to promote the economic value of forestry activities.
- Strengthening the people section.
- Ensuring the UKFS interacts with other regulatory and legislative agendas.
- Issues with the compliance, monitoring and enforcement of the Standard.

**(Q8) When asked to say if the information in the UKFS is arranged and presented in the most useful way to enable the people who regularly use the Standard to do their job, more respondents agreed than disagreed.** Key themes were:

- Repetition or duplication of the same information in different sections / chapters.
- Simplification of the UKFS.

- Improve clarity and firm up guidance requirements by changes to the language used; for example, so as to demonstrate which requirements are mandatory.
- Suggestions for a web-based approach so as to enable information to be kept up-to-date.
- Making the UKFS easier to navigate and more easily searchable.
- Providing background information in an annex so as to shorten the length of the document.

**(Q9) Whether there were any other significant changes respondents would suggest to improve the usability of the UKFS.** Key suggestions included:

- Greater clarity over whether elements of the guidance are legal requirements or good practice expectations. However, there were also requests for flexibility in the guidance to allow for local adjustments or changes in approach; or to take into consideration the context of the UK countries.
- Language needs to be aimed at all users, not just forestry practitioners.
- The need to monitor compliance with the UKFS.

# Introduction

## Background

1. The UK Forestry Standard (UKFS) was first published in 1998 and has subsequently been revised in 2004, 2011 and 2017. It is the reference standard for sustainable forestry practice in Scotland, England, Wales and Northern Ireland. It was developed specifically for forestry across the UK and it underpins the delivery of forestry practices; it is important that its contents apply across all four countries.
2. The UKFS approach is based on applying criteria agreed at the international and European levels to forest management in the UK. However, given there are many ways in which the history of forestry and the nature of woodlands in the UK is different to that in other European countries, a key purpose of the UKFS is to demonstrate that these agreements are applied in an appropriate way to the management of UK forests and woodlands.
3. The UKFS has been developed by the forestry authorities across the UK and in conjunction with key stakeholders. The UKFS is the basis for forestry practice for the independent UK Woodland Assurance Standard (UKWAS), which is used for voluntary independent certification; this can also be used for assessing compliance as part of an environmental management system such as ISO 14001. The UKFS applies to the entire forest environment and to all UK forest types and management systems, including woodland cover in urban areas. It does not apply to the management of individual trees, orchards, ornamental and garden trees, tree nurseries or the management of Christmas trees.
4. Regular 5 yearly reviews of the UKFS have been undertaken and work has now begun on reviewing the current UKFS, which is being co-ordinated by Scottish Forestry; the aim is to update and publish the next version by the end of 2022. A UK stakeholder reference group has been established to support the countries in development of an updated, relevant and appropriate Standard. To inform the review, an initial assessment of the Standard's current technical content was undertaken by specialists from the countries' forestry authorities and administrations, Forest Research and external reviewers. This initial stage noted that once the Standard has been updated to reflect improvements in scientific knowledge, developments in international approaches and new or amended legislation, the majority of the content will still be relevant. This assessment also identified a number of cross-cutting themes that are relevant across the Standard and the UK and for which further developments should be considered. These cross-cutting themes are:
  - Forest resilience and climate change adaptation.
  - Managing carbon.

- A systematic approach to biosecurity.
  - Stakeholder and public involvement.
  - Complementary action between woodlands and wider land use objectives.
  - Minimising and managing manufactured waste.
5. An initial technical consultation was launched at the end of June 2021, aimed at organisations familiar with the UKFS, rather than the general public. This closed on 10 August 2021.
  6. It is intended that a second consultation will seek stakeholder views on the updated detailed content of a draft Standard.

## Respondent Profile

7. In total, there were 39 responses to the consultation, of which 36 were from organisations and 3 from individuals. Respondents were assigned to respondent groupings in order to enable analysis of any differences or commonalities across or within the various different types of organisations and individuals that responded. Table 2 below shows the number of respondents in each organisational category.

**Table 2: Respondent Groups**

	Number
Commentator / Advocacy	18
Forestry Practitioner	15
Regulator / Certification	3
Individual	3
<b>Total respondents</b>	<b>39</b>

8. A list of all those organisations that submitted a response to the consultation and agreed to have their name published is included in Appendix 1. References or suggested changes to text provided by respondents have been provided in a separate document.

## Methodology

9. Responses to the consultation were submitted using the Scottish Government consultation platform Citizen Space or by email.
10. It should be borne in mind that the number responding at each question is not always the same as the number presented in the respondent group table. This is because not all respondents addressed all questions.

This report indicates the number of respondents who commented at each question.

11. Some of the consultation questions were closed with specific options to choose from. Where respondents did not follow the questions but mentioned clearly within their text that they supported one of the options, these have been included in the relevant counts.
12. The researchers examined all comments made by respondents and noted the range of issues mentioned in responses, including reasons for opinions, specific examples or explanations, alternative suggestions or other comments. Grouping these issues together into similar themes allowed the researchers to identify whether any particular theme was specific to any particular respondent group or groups.
13. When considering group differences however, it must also be recognised that where a specific opinion has been identified in relation to a particular group or groups, this does not indicate that other groups did not share this opinion, but rather that they simply did not comment on that particular point.
14. While the consultation gave all who wished to comment an opportunity to do so, given the self-selecting nature of this type of exercise, any figures quoted here cannot be extrapolated to a wider population outside the respondent sample.

# The Cross-cutting Themes

15. The consultation document outlined six cross-cutting themes to be considered by respondents who were asked to say whether they agreed or disagreed with each theme. If they agreed, they were then asked to specify the potential areas they thought should be covered, including robust evidence in support of their comments. If they disagreed with the theme, they were asked to state robust evidence to support their comments. Not all respondents opted to provide evidence in support of their comments but where this has been provided, it is referred to either in footnotes or in a separate document. Evidence provided included general comment, scientific advice and / or policy statements.

16. Question 1 asked,

**Q1: ‘Should references to the need to consider forest resilience and climate change adaptation be strengthened throughout the UKFS?’**

17. **Almost all respondents agreed that references to the need to consider forest resilience and climate change adaptation should be strengthened throughout the UKFS.** The following table provides a profile of those responding to this question.

Table 3: Q1

	Number		
	Yes	No	Not answered
Commentator / Advocacy (18)	18	-	-
Forestry Practitioner (15)	14	-	1
Regulator / Certification (3)	3	-	-
Individual (3)	2	1	-
<b>Total respondents (39)</b>	<b>37</b>	<b>1</b>	<b>1</b>

18. Respondents were then invited to provide additional commentary in support of their initial response; and 33 opted to do so. The following paragraphs outline the key issues emerging in response to this question.

19. Many of these respondents reiterated the importance of this cross-cutting theme, with comments that forests play a key role in adaptation, the need for it to be reflected in all land management planning standards and the role this will play in helping to reach climate change targets.

20. Many respondents noted **the need for the UKFS to allow for a choice of tree species within woodlands to ensure forest resilience and**

**climate change adaptation.** Furthermore, flexibility in tree species would allow forests to adapt when needed, for example, to sudden changes in climate or the local / national economy. As noted by a commentator / advocate;

*“It is important that sites are planted with the right species and in sufficient density to ensure both financial stability and resilience to all potential threats, those we know about now and those that may develop in years to come.”*

21. There were some calls for **guidance to reflect that different locations, woodland types and desired outputs need different approaches and that guidance needs to discriminate between different types of forest systems and that challenges vary between species types**; therefore resilience cannot be addressed in a generic way. A commentator / advocate noted;

*“There is an overall need to take a more holistic approach to structuring the standard which guides forest managers to capture all relevant natural capital and ecosystem services from the earliest planning stages and throughout the lifecycle of the woodland. The guidance should reflect best practice for resilience and adaptation in the context of managing woodlands for multiple benefits.”*

22. Allied to the need for flexibility in tree species, a number of respondents commented on the **need to consider forest health** and gave the example of broadleaf species being more at risk in comparison to conifers. These respondents requested a review of the requirement that a maximum of 75% may be allocated to a single species and the requirement for a minimum of 5% of native broadleaves; suggestions were to reduce the 75% to 50% and change the 5% to 20% so as to increase resilience and help biodiversity to adapt to climate change. Linked to this, there were also a few calls for native woodlands to be restored to help increase biosecurity and genetic diversity of planting stock.
23. Some commentators and forestry practitioners noted the importance of **UKFS allowing for stronger recognition of the interlinked nature of forest resilience and climate emergencies and for strategic planning to deliver on biodiversity and climate adaptation at a wider landscape scale; or that climate change and biodiversity decline are interlinked and need to be addressed together.** For example, a commentator / advocacy respondent noted the need to take into account the Scottish Government’s Climate Change Action Plan, while another noted the need to introduce references to the climate change emergency throughout the UKFS.
24. A few respondents requested **reference throughout the UKFS to the latest research, legislation and policy context**, with requests for a clear statement on objectives that will reflect net zero targets, international climate commitments made at COP26 and so on. A few respondents made specific

reference to Forest Research which is seen as a provider of up-to-date research and data<sup>1</sup>.

25. There were some calls for the UKFS to consider the **contribution to improving resilience made by commercial forestry organisations**, although it was acknowledged that adaptation is more challenging for commercial forestry which relies on a limited selection of non-native species. A small number of respondents noted *‘One hectare of oak planted at 1.2m spacing and growing at yield class 4 will sequester 54m<sup>3</sup> of timber over those 30 years. One hectare of Sitka spruce planted at 2.0m spacing and growing at yield class’ 20 will sequester 443 m<sup>3</sup> of timber over the same 30 year period.*
26. There were some specific references that the **current guidance is too vague, particularly in reference to adaptation**; with some suggestions of a need to **strengthen current wording**, provide clarity in line with objectives and highlight best practice examples. There were a few suggestions that more of the guidance should be ‘requirements’ or ‘should have’ rather than ‘nice to have’; and that the UKFS should consider translating references into requirements and be considered as the minimum requirement.
27. We have already noted that a number of respondents referred to Forest Research and the research they undertake. Some respondents also made specific reference to other publications; a few respondents referred to the recent Welsh Government Trees and Timber deep dive recommendations, which refer to climate change directly in numbers 13 and 14; and there were a small number of references to the Woodknowledge Wales report. There were also a few references to Lord Goldsmith and his comment *“To put it simply: there is no pathway to tackling climate change that does not involve protecting and conserving nature on a massive scale”*.

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<sup>1</sup> Topics specifically mentioned in relation to Forest Research included:  
Species suitability models under varying climate change scenarios

Forest health scenarios

NFI Woodland Ecological Condition

Beauchamp, K. 2016. Measuring forest tree species diversity

Pretzsch, H., del Rio, M., Ammer Ch., Avdagic, A., Barbeito, I., Bielak, K., Brazaitis, G., Coll, L., Dirnberger, G., Grossler, L., Fabrika, M., Forrester, D.I., Godvod, K., Heym, M., Hurt, V., Kurylyak, V., Lof, M., Lombardi, F., Matovic, B., Mohren, F., Motta, R., den Ouden, J., Pach, M., Ponette, Q., Schutze, G., Schweig, J., Skrzyszewski, J., Sramek, V., Sterba, H., Stojanovic, D., Svoboda, M., Vanhellefont, M., Verheyen, K., Wellhausen, K., Zlatanov, T. and Bravo-Oviedo, A. 2015. Growth and yield of mixed versus pure stands of Scots pine (*Pinus sylvestris* L.) and European beech (*Fagus sylvatica* L.) analysed along a productivity gradient through Europe. *European Journal of Forest Research*, 134: 927–947. doi: 10.1007/s10342-015-0900-4

Peter Buckley (2020) Coppice restoration and conservation: a European perspective, *Journal of Forest Research*, 25:3, 125-133, DOI: 10.1080/13416979.2020.1763554 Accessed 10.8.21

28. In summing up the importance of forest resilience and climate change adaptation, a forest practitioner commented;

*“At a point where the UK has seen a proliferation of forest pests and diseases, it is right to consider forest resilience in the face of climate change. As with all things in forestry, this single consideration needs to be balanced against a range of objectives but critically, silvicultural and economic aspects such as nursery production, speed and ease of establishment, growth rates, rotation length, risk from existing/known pests and diseases, carbon sequestration capacity, end product suitability and diversity of applications as well as overall economics.”*

29. Finally, only one respondent – an individual – disagreed with this question; their comment was that carbon management is a key issue and should have priority over other cross-cutting themes.

30. Question 2 then asked,

**Q2: ‘Should the UKFS further consider its approach to managing carbon in forests and woodlands and through the whole forest planning, managing and harvesting cycle?’**

31. As shown in the following table, of those who responded to this question, **almost all agreed the UKFS should further consider its approach to managing carbon in forests and woodlands and through the whole forest planning, managing and harvesting cycle.** The profile of those responding to this question is shown below.

**Table 4: Q2**

	Number		
	Yes	No	Not answered
Commentator / Advocacy (18)	14	-	4
Forestry Practitioner (15)	12	-	3
Regulator / Certification (3)	2	-	1
Individual (3)	2	1	-
<b>Total respondents (39)</b>	<b>30</b>	<b>1</b>	<b>8</b>

32. A number of respondents across all sub-groups noted their support for further consideration to the approach to managing carbon in forests and woodlands and through the whole forest planning, managing and harvesting cycle. That said, some respondents commented that the **UKFS should not be too prescriptive** as science is still emerging and the understanding of carbon within the forest environment is still limited. Linked to this, there were also some comments that carbon should not be given too much significance

within UKFS such that it eclipses other valid management objectives. There were also some calls to ensure that this is balanced against other considerations such as timber for market, ecosystem services or biodiversity as well as a need for additional consideration of climate change mitigation for the short term as well as the long term<sup>2</sup>.

33. A number of respondents outlined suggestions for changes to the UKFS guidance and these included:

- Clearer regulation on which sites are suitable for afforestation.
- Clearer guidance on management approaches and the comparative carbon cycle impacts of different approaches to harvesting.
- Guidance for forest management to contribute to climate change mitigation should include the promotion of restoration of carbon rich ecosystems from forestry.

34. There were a number of comments of the **need for a more robust assessment to be applied to the whole system**, with suggestions for conducting a full life-cycle assessment or the use of a carbon foot-printing tool. It was felt that this holistic approach would allow for consideration of all other ecosystem services and promote woodland management across a range of benefits; for example, reflecting the multiple impacts of clear-felling on carbon, soil, landscape, access and community.

35. A few respondents outlined a need to consider whole life cycle carbon accounting in forestry and requested a stronger recognition of UK-grown timber as opposed to imports or the use of other products such as concrete; and to give consideration to wider economic impacts.

36. There were also some comments that the targets for Net Zero are less than a forestry cycle away and there were suggestions to use species that can sequester carbon quickly and that can also be used in long life projects to store carbon past the point of felling, such as construction. To support this, there were some references to the policy briefing note that newly planted commercial forest can achieve 269%<sup>3</sup> greater climate change mitigation than semi-natural alternatives.

37. There were some references to a need to improve the consideration of the impacts of woodland and forestry on adjacent open habitats and carbon rich habitats such as peatlands. Some respondents commented that peatlands should be a top priority for protection and restoration, with some

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<sup>2</sup> <https://rfs.org.uk/insights-publications/rfs-reports/bringing-woodland-into-management/>

<sup>3</sup> Policy briefing note

requests that Deep Peat should be redefined to less than the current level of 50cm<sup>45</sup>.

38. There were a few requests for explicit recognition that the UKFS only considers the tree growing part of the cycle and does not guide what happens after harvesting.
39. Only one respondent – an individual – disagreed with this cross-cutting theme and felt that emissions should be stopped at source, rather than trying to remove carbon later in the cycle. Their key concern was that targeting carbon might drive woodland creation down a route that does not balance good principles and practice, but rather would be driven by the economics of carbon delivered through planting higher yield class trees and lead to inappropriate planting.
40. Question 3 then went onto ask,

**Q3: ‘Do you think that a more systematic approach to biosecurity should be taken in the UKFS across the entire forest planning and management cycle?’**

41. As shown in the following table, of those who responded to this question, **many agreed that a more systematic approach to biosecurity should be taken in the UKFS across the entire forest planning and management cycle.** A small number of respondents (5) disagreed with this proposal. The following table provides a profile of those responding to this question.

**Table 5: Q3**

	Number		
	Yes	No	Not answered
Commentator / Advocacy (18)	12	1	5
Forestry Practitioner (15)	9	3	3
Regulator / Certification (3)	2	-	1
Individual (3)	1	1	1
<b>Total respondents (39)</b>	<b>24</b>	<b>5</b>	<b>10</b>

42. Many of these respondents reiterated their agreement with this proposal, noting that it is imperative to maintain good biosecurity, that there needs to be a systematic approach to biosecurity across the forest planning

<sup>4</sup> <https://forestry.gov.scot/publications/1032-cultivation-for-upland-productive-woodland-creation-sites-applicant-s-guidance/viewdocument/1032>

<sup>5</sup> FC-NE interim framework for peatland and afforestation

and management cycle or that imported plants pose a high risk for the introduction of new pests and diseases.

43. A key issue emerging at this question, primarily from respondents in the commentator / advocacy sub-group, was that the **UKFS should highlight the benefits of natural regeneration, local provenance and native species and biosecurity risks**. A few respondents noted that all trees planted should be grown in the UK, with some suggesting that The Woodland Trust's UK and Irish Sourced and Grown (UKISG) scheme provides a model for this. One regulator suggested there should be consideration of linking assurance schemes such as UKISG to UKFS.

44. A few respondents noted that there needs to be greater reference to biosecurity throughout the UKFS, with one respondent in the commentator / advocacy sub-group noting,

*"In summary, biosecurity understanding, and awareness needs to be built in throughout the forest cycle. The current UKFS alludes to this biosecurity, but it is relatively light touch given the importance of this topic for the commercial forestry sector and also for anyone planting trees and creating woods throughout the UK. In order to ensure resilience of the sector to pests and diseases biosecurity needs to be taken much more seriously than it is now."*

45. Perhaps not surprisingly some respondents, mainly forest practitioners, commented that **the forestry sector already demonstrates best practice in biosecurity** and gave examples such as compliance with SPHNs (Statutory Plants Health Notice) or nurseries signing up to Plant Healthy.

46. A few respondents felt that EU trade rules on plant imports have helped to lead to the introduction of many serious tree pests and diseases and that a cultural shift towards growing plants in the UK would help to address this issue. Linked to this, some respondents commented that Brexit has helped to create opportunities for this cultural shift and a reduction in imported diseases and pests.

47. Linked to this last point, there were some suggestions that the UKFS should be promoting locally sourced and grown trees or specify plants that are grown in the UK and Ireland. A few respondents also felt that the UKFS should promote regular monitoring and reporting on disease and pests, regular biosecurity risk assessments, encouraging suitable mitigation procedures within normal forest planning or promoting a sustainability certification process.

48. While many of those responding to this question were supportive of this proposal, some (a mixture of those who agreed and disagreed with this proposal) felt that there is a **need to think about resourcing and practicality before implementing any new guidance as this could increase the burden on woodland managers or owners**. There was also

a comment that the forestry authorities in each of the four nations need to be adequately resourced to support forest managers and owners to address biosecurity measures.

49. Some respondents, primarily those who disagreed with this proposal, commented that **this is a national issue and that the UKFS should not seek to replace the roles and responsibilities of national policy and biosecurity and that this should be done through governing bodies.** Some noted,

*“.... the UKFS should not (be) seeking to replace the role or responsibilities of national policy and biosecurity is one of these areas. This is a national issue, and the best form of defence against potentially damaging biosecurity agents is to prevent initial introduction in whatever format that may be; timber, food, or horticultural imports. Once potentially harmful biosecurity organisms are identified the resourcing and protocols need to be in place for rapid response plans to isolate and neutralise these threats. These actions require, state-backed policies and procedures backed by compulsory authorisations (such as SPHNs) and as such it is not the role of the UKFS to confuse these roles or responsibilities.”*

50. Question 4 went onto ask,

**Q4: ‘Does the UKFS need to develop its approach for stakeholder and public involvement?’**

51. As table 6 demonstrates, of those answering this question, almost all agreed that the UKFS needs to develop its approach for stakeholder and public involvement. Only one respondent – a forestry practitioner – disagreed.

**Table 6: Q4**

	Number		
	Yes	No	Not answered
Commentator / Advocacy (18)	16	-	2
Forestry Practitioner (15)	11	1	3
Regulator / Certification (3)	3	-	-
Individual (3)	2	-	1
<b>Total respondents (39)</b>	<b>32</b>	<b>1</b>	<b>6</b>

52. In general, **most respondents were supportive of the UKFS developing its approach for stakeholder and public involvement**, with respondents referring to a wide range of stakeholders who should be involved, including local communities, woodland managers and owners and

the general public. Respondents commented that **stakeholder and public involvement should be a central element of UKFS**, that involvement is vital or that engagement is needed to improve understanding of the role of the UKFS. There were also a few comments that woodlands play a vital role, both in supporting mental and physical health and wellbeing, and in landscape and habitat enhancements. As one forestry practitioner noted,

*“A better public understanding and appreciation of forestry (its value to the economy, the environment, society etc.) would add to the political strength of the sector, which would help when it comes to areas of conflict with other interests and perhaps attract more people to the sector.”*

53. However, a degree of caution was noted by a number of forest practitioners who outlined a downside to increased public and stakeholder engagement, with the **perception that this is increasingly becoming a barrier to forest operations**. Moreover, a number of respondents – primarily forest practitioners – felt that the UKFS needs to develop an approach that supports foresters in carrying out their job and recognises their professionalism and expertise. There were also some comments that the UKFS should develop its approach to public involvement to support the forester when they are following industry best practice. A forestry practitioner noted that the UKFS should be designed for those directly responsible for forestry, including foresters, forest managers, owners and practitioners; and those with a wider interest in forestry such as NGOs and consultants, but not for the wider general public. They felt the UKFS is basically a technical document and should not be changed in order to cater to the general public.
54. A number of respondents commented on ways in which the UKFS should be improved and two key themes emerged. The first was of a **need to strengthen the UKFS approach to stakeholder and public involvement by strengthening the requirements and guidelines**; for example, by providing more explicit requirements on scoping out stakeholder engagement and opportunities for involvement, to set out what is expected of responsible woodland managers or to provide information on how the public can take steps in the event of poor practice on the part of a woodland manager.
55. The second key theme was of a **need for the UKFS to be accessible to all** in terms of being user-friendly and the language used.
56. There were a few suggestions from respondents within the commentator / advocacy sub-group that the UKFS should be compliant with tools such as Quality Assurance in Consultation by the Consultation Institute.
57. Some respondents made comparisons with **other planning consultation processes which were felt to be more advanced and offer a greater level of transparency than the current UKFS**. For example, it was felt that currently there is not complete and consistent access to support

information or a presumption of transparency in support documentation. A small number of respondents noted that all interested parties should be able to access Phase 1 Habitat Survey Reports or responses from statutory and non-statutory consultees.

58. In relation to the consultation process specifically, there were comments that consultation periods should be clear and adhered to by all consultees, and that consultees need to operate with objective and professional conduct in relation to the timing, nature, proportionality and substance of responses and engagement. Again, there were suggestions for guidelines on the role and responsibilities of consultees, together with a clear requirement on forest managers to demonstrate they have fully considered and addressed comments from stakeholders and the public.

59. A small number of respondents noted that the public should have a greater say, particularly when funding is from the public purse; for example, that forests using public funds should include recreational paths and viewpoints.

60. The importance of stakeholder and public involvement was noted by a respondent in the commentator / advocacy sub-group who commented,

*“Forestry has a major and long-term impact on both landscapes and the lives of those living nearby or people who visit the woodlands for enjoyment, education, or recreation. It is therefore imperative that consultation and engagement with those who will be impacted is carried out. Communities, both of place and of interest, can contribute their own expertise and knowledge which will improve the process of forestry planning and management and achieve better outcomes, both for the land manager and the communities. For example, many people have knowledge of biodiversity, cultural heritage and outdoor recreation needs, as well as the potential future use of a woodland for community or educational purposes, which they can contribute to guide the forestry planning process.”*

61. The one respondent who disagreed with this proposal felt that the UKFS should avoid being too prescriptive in promoting a requirement for stakeholder and public involvement in the planning and management process of individual forests. While they were supportive of the consultation process, they felt that forests should be treated in the same way as other land holdings, and noted concerns that greater levels of stakeholder and public involvement could lead to additional financial barriers on landowners.

62. Question 5 then went onto ask,

**Q5: ‘Should the UKFS approach to forest-level planning and management consider wider land use objectives and promote complementary action between the two?’**

63. As table 7 demonstrates, of those answering this question, **most agreed that the UKFS approach to forest-level planning and management should consider wider land use objectives and promote complementary action between the two.** Of the five respondents who disagreed with this, most opposition came from forestry practitioners.

Table 7: Q5

	Number		
	Yes	No	Not answered
Commentator / Advocacy (18)	13	-	5
Forestry Practitioner (15)	10	4	1
Regulator / Certification (3)	2	-	1
Individual (3)	2	1	-
<b>Total respondents (39)</b>	<b>27</b>	<b>5</b>	<b>7</b>

64. The key issue emerging, albeit only mentioned by a minority of respondents, was that there is a **need to better integrate different sectors;** of sectors cited, deer management, water and agriculture were most widely mentioned. Some of these respondents also noted that wider land use objectives such as water flow, habitat corridors and deer management will need cross-boundary co-operation and that forestry practitioners will need to be supported to achieve these aims<sup>6</sup>.

65. Allied to this point, some respondents – mostly forestry practitioners noted there will be a need to deal with issues where land ownership changes at woodland boundaries.

66. Furthermore, some respondents also noted concerns that this could create additional barriers in woodland management<sup>7</sup>. For example, one forestry practitioner who was supportive of this proposal asked for a presumption in favour of woodland creation rather than setting out barriers that serve to prevent woodland creation. There were some comments of a need for the UKFS to support, capitalise and develop actions that allow foresters to integrate their plans with others while also retaining the freedom to manage their forests professionally. As one respondent in the commentator / advocacy sub-group noted,

*“UKFS should not be adding further burden to woodland management but should be supporting wider land management in such ways that it benefits all involved.”*

<sup>6</sup> See research published by Forest Research, JHI, Climate Exchange, etc.

<sup>7</sup> <https://rfs.org.uk/insights-publications/rfs-reports/bringing-woodland-into-management/>

67. A wide range of other comments were made by small numbers of respondents; those mentioned by more than one respondent included:

- The need for a holistic approach to enhancing natural capital so that the UKFS reflects a range of important elements including the health and wellbeing of forest users as an element of an ecosystem service as well as the need to safeguard water quality and water availability at a whole landscape level. The whole landscape approach should apply throughout the UKFS and include carbon storage sections.
- The whole landscape approach should be complemented by coverage of a whole range of woodland uses, including public use of woodlands for recreation and exercise.
- The UKFS has a role to play in achieving an increase in public access to greenspace.
- The UKFS should require forestry and management to be planned as part of wider landscape objectives and ecosystem services.
- The UKFS should take into account the statutory purposes of designated landscapes.

68. Question 6 went onto ask,

**Q6: ‘Do you think the UKFS should strengthen its approach to minimising and managing manufactured waste generated by all aspects of woodland management and operations?’**

69. As the following table demonstrates, of those answering this question, **most agreed that the UKFS should strengthen its approach to minimising and managing manufactured waste generated by all aspects of woodland management and operations.** Only three respondents – all forestry practitioners – disagreed with this.

**Table 8: Q6**

	Number		
	Yes	No	Not answered
Commentator / Advocacy (18)	12	-	6
Forestry Practitioner (15)	9	3	3
Regulator / Certification (3)	1	-	2
Individual (3)	3	-	-
<b>Total respondents (39)</b>	<b>25</b>	<b>3</b>	<b>11</b>

70. Across most respondents, **there was broad support for this proposal**, regardless of whether they answered ‘yes’ or ‘no’ to the question.

That said, a key issue emerging was that **the UKFS already has a strong approach but if there is evidence that levels of waste are increasing, it would be beneficial to strengthen its approach.** These respondents also suggested it would be **preferable for the UKFS to identify best practice and guidance rather than introducing any new regulation.**

71. Another key issue was that **some sectors** – such as the game sector – **already have their own best practice and administering organisations, and the UKFS should complement these rather than replace them.**
72. A number of respondents made suggestions for changes that would help to strengthen its approach to minimising and managing manufactured waste generated by all aspects of woodland management and operations; three key themes emerged.
73. The first theme was in reference to **plastic tree guards and requests for guidance as to when and where alternatives to these should be employed**; one respondent in the commentator / advocacy sub-group suggested there is a need for a timetable for improvements to drive innovation in improved biodegradable tubes by manufacturers. Two respondents in the commentator / advocacy sub-group suggested that the removal of plastic tree tubes and deer fencing once woodland is established should be built into woodland creation planning. That said, a forestry practitioner noted the need to ensure that alternatives are available as there will be an ongoing need for protection of young trees.
74. The second key theme was of the **need to reduce manufactured waste associated with deer fencing**, although some respondents referred to Scotland where it was felt that longer term deer numbers and impacts should be reduced through the implementation of the Deer Working Group recommendations that allow for woodland creation schemes without fences where appropriate.
75. The other key theme was of a need for the **UKFS to avoid using prescriptive language** to allow foresters to use the latest techniques and practices.
76. Other requests from smaller numbers of respondents were for;
- Guidance on deer and squirrel control.
  - Guidance on how to reduce pesticide use in nurseries.
  - Waste measures extending to other forms of pollutants, such as changing to non-toxic ammunition.
77. The consultation paper then asked respondents whether there were other cross-cutting themes which should be integrated throughout the UKFS. The question was again divided into two parts, with those agreeing given the opportunity to specify the potential areas desired to be covered, and those

disagreeing being asked to provide robust evidence to support their comments.

**Q7: ‘Are there any other significant cross-cutting themes that should be integrated throughout the UKFS?’**

78. Almost all respondents who made comments did so at the ‘yes’ part of the question rather than at the ‘no’ part, as shown in the table below. The analysis below includes both the ‘yes’ and ‘no’ respondents.

**Table 9: Q7**

	Number		
	Yes	No	Not answered
Commentator / Advocacy (18)	12	1	5
Forestry Practitioner (15)	9	2	4
Regulator / Certification (3)	2	-	1
Individual (3)	3	-	-
<b>Total respondents (39)</b>	<b>26</b>	<b>3</b>	<b>10</b>

79. The majority of respondents chose to expand on and discuss themes that they thought should get increased coverage or more focus or guidance about, including those referred to in earlier questions. Relatively few respondents focused on themes which are not currently integrated in at least some way into the UKFS. Very few referred to evidence sources to support their comments. Answers at the ‘No’ part of the question are analysed here together with those at the ‘Yes’ part of the question. Six ‘Yes’ respondents overtly stated ‘yes’ in their answer; one ‘No’ respondent stated ‘no’ without further comment.

80. The greatest numbers of respondents – a very large minority – desired the **climate emergency** to be addressed more fully; particular aspects to be covered included the link to biodiversity, carbon storage and opportunities for nature-based solutions. Smaller but still significant numbers of respondents wished to strengthen or enhance the **biodiversity** theme within the UKFS, with explicit requests made for more guidance on protecting and enhancing biodiversity. As one respondent commented;

*“We can expect to see significant growth in new woodland grown for climate and nature offsetting purposes, including woodland created as part of the Biodiversity Net Gain and Biodiversity Credits scheme (included in the Environment Bill). Up to date guidance, based on best practice, should be issued to cover the planning of*

*such new woodland and to ensure it contributes to both climate and biodiversity objectives.” Commentator / Advocacy*

81. **Growing or creating new woodland or forests** was the focus of a large minority of respondents. There was a desire for more guidance on management and best practice, with varied objectives mentioned including climate change mitigation, carbon offsetting, and increasing wood and fibre reserves to match forecast increases in demand.
82. Other specific aspects of woodland management and restoration were frequently mentioned; in particular the **interlinkage and connectivity of native woodland and other types of forest with other habitats**, e.g. peatland, ride and riparian edges, land of archaeological or landscape importance, and scrubland. Impacts such as drainage issues affecting water quality and the perceived high biodiversity of woodland edges were felt to require more attention in the UKFS.
83. Other areas relating to woodland management which should be given a higher profile within the UKFS were also pinpointed by significant numbers of respondents, including the following:
- Measures to improve the conditions of existing woodland or habitat; a very few respondents noted that low proportions of woodland areas are currently in good ecological condition.<sup>8</sup>
  - The encouragement of natural regeneration or colonisation as a means of nature recovery, highlighting biodiversity and climate benefits.
  - Woodland restoration guidance (e.g. rewilding<sup>9</sup>, creating mixed forests, restoring those damaged by conifer planting and greater provisioning of deadwood).
  - Guidance or management approaches with regard to novel species introductions.
84. An increased focus on better management was cited by a large minority of respondents. The majority of these remarks revolved around a wish for **more holistic or integrated woodland or forestry management practices** with areas such as land use, farming and public access. With regards to the latter, two commentators / advocates specifically requested that the legal requirements of land management and access rights in Scotland be fully taken into account.
85. Respondents (again, a large minority) also desired to promote the **economic value of forestry activities**, particularly to the public. Various areas were put forward as being worthy of highlighting such as recreation,

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<sup>8</sup> The National Forest Inventory (NFI) has made clear that only a small percentage (7%) of native woodland is in good ecological condition.

<sup>9</sup> E.g. projects at Carrifran and the Knepp Estate

tourism, employment<sup>10</sup> and the 'green' economy, the latter citing the value of sustainable resources. Other respondents were keen to more overtly promote the positives of planned woodland and forestry activities within the UKFS, citing as examples the delivery of public goods (e.g. water) and low density cattle grazing.

86. Slightly smaller numbers of respondents thought that the **people section should be strengthened or highlighted** with suggestions to enhance coverage of people working in the woodland / forestry supply chain, and more focus given to communities. Similarly a significant minority of respondents wished for greater account to be taken of public interests in terms of woodland users, with more reference made to health and wellbeing, recreational opportunities and social aspects.

87. A significant minority of respondents chose to focus their comments on the interaction of the Standard with other regulatory and legislative agendas, thus querying the Standard's scope. Other processes with which clarity was required about the Standard's compatibility included the following:

- Scottish Forestry Strategy.
- Well-Being of Future Generations (Wales) Act.
- International agreements on climate / biodiversity (COP26/COP15).
- UKWAS audit standard.
- Deer management.
- Grouse moors<sup>11</sup>.
- (proposed) National Minimum Standards for Agriculture.

88. Similar numbers of respondents chose to voice concerns over compliance, monitoring and enforcement of the Standard. A number of perceived problem areas were mooted; these included issues with implementation of improvements, the lack of use of access plans, ambiguity of the language used in the UKFS, a lack of monitoring and a need for measurability with regards to compliance.

89. A number of other specific issues were raised, each by very small numbers of respondents, as follows:

- Guidance and compliance procedures for the use of herbicides and pesticides<sup>12</sup>.
- Perceived lack of usability of the UKFS by the public (lack of engagement, etc.).

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<sup>10</sup> <https://forestry.gov.scot/forestry-business/economic-contribution-of-forestry>

<sup>11</sup> The Grouse Moor Management Review Group Report to the Scottish Government (November 2019) has recommended that a Code of Practice be introduced

<sup>12</sup> Currently UKFS only mentions herbicides in Appendix 1, the pan European operational guidelines.

- Recognition of impacts from atmospheric reactive nitrogen (e.g. ammonia) on forests and woodland.

90. Finally, at this question, a very small number of respondents were against the introduction of cross-cutting themes, as they felt the resulting length and detail of the document would make it difficult and confusing to use, interpret and comply with.

## Information in the UKFS

91. It is important that information provided in the UKFS is arranged and presented in a useful way for users; the consultation paper included a question on this. Question 8 asked,

**Q8: ‘Is the information in the UKFS arranged and presented in the most useful way to enable the people who regularly use the Standard in your organisation (or the people that your organisation represents) to do their job?’**

92. Views were more polarised in response to this question than at earlier questions, with slightly larger numbers of respondents making comments at the ‘yes’ part of the question than at the ‘no’ part, as shown in the table below. The figures do not add up exactly as one respondent commented at both parts of the question.

**Table 10: Q8**

	Number		
	Yes	No	Not answered
Commentator / Advocacy (18)	8	7	4
Forestry Practitioner (15)	7	4	4
Regulator / Certification (3)	-	-	3
Individual (3)	2	-	1
<b>Total respondents (39)</b>	<b>17</b>	<b>11</b>	<b>12</b>

93. Although 17 respondents made comments at the first (‘Yes’) part of the question, almost all (15) of these were equivocal in nature or noted various caveats. Only 4 respondents explicitly stated ‘Yes’ as part of their response. The 11 respondents who commented at the ‘No’ part of the question (5 of whom overtly stated ‘No’ within their answer) made largely similar points to respondents at the ‘Yes’ part and so are included in this analysis, with comments given where the responses diverge. Almost all comments were expressed as opinions without stating any evidence for them.

94. A majority of respondents overall focused on the **same information being repeated in different sections or chapters**; it was pointed out that removing these duplications would be beneficial, as exemplified below.

*“For example, General Forestry Practice number 24 is repeated in climate change 15, water 57 and soil 5. And while the statement is important and can*

*sit under all four headings it makes the document more difficult to navigate especially for non-professionals or those that use it infrequently. It also then makes the document longer than it needs to be.”* (Commentator / Advocacy)

95. A large minority of respondents thought a **web-based approach** was needed amid concerns about keeping information up to date, given the large amount of scientific research going on in the field and to reflect evolving practice. There were suggestions about making the UKFS a ‘live’ working document rather than wait for full scale reviews.

96. A large minority of respondents wished for the Standard to be **easier to navigate or more easily searchable**, saying that finding appropriate sections could be daunting.

97. Similar numbers of respondents, particularly forestry practitioners, thought **too much background information** was provided, overloading the document; one forestry practitioner suggested alleviating this by moving background information to document annexes.

98. A variety of other **usability improvements** were suggested, each by a significant minority of respondents; these included the following:

- Creating a shortened version of the Standard for use in the field<sup>13</sup>.
- Creating a version containing solely legal and good practice requirements.
- Mapping points to allow easy cross-checking.
- Clear signposting to individual country approaches where these exist (e.g. policy regimes, grant processes, implementation specifications).
- Embedding links / hyperlinking to other documents in the text or additional guidance / reference material rather than at the end<sup>14</sup>.
- Instigating a greater variety of document formats (e.g. pdfs or other digital formats, or having a version of the Standard which loads onto phones more easily).
- Setting out the evidence which needs to be presented to prove that guidance has been properly considered (e.g. table with all metrics, compliance checklist).

99. As summed up by one respondent;

*“The means by which we read has changed. Full electronic version with embedded links, mobile friendly, shortened “field use” version and diagrammatic process flows that link / cross link different sections depending on activity (akin to a Tube Map) would be helpful and current with modern GUIs. Improving the interface (and*

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<sup>13</sup> Such guides are available in Canada (in the British Columbia forestry sector).

<sup>14</sup> Suggestions included: Woodland Pollinator Sheet, Reptile Habitat Management Handbook, UK BAP Priority Species List, Woodland wildlife toolkit (web based tool)

*getting specific expertise in this area) would likely increase its use if it is well executed.” (Forestry Practitioner)*

100. A majority of ‘Yes’ respondents (but no ‘No’ respondents) cited the need to **simplify the UKFS** or commented that it was too complex, particularly for non-forestry practitioners, with concerns expressed that further revision or introduction of cross-cutting themes may make matters worse.

101. Suggestions were also made by a large minority of respondents about how to **improve clarity or firm up guidance requirements via language improvements**. Particular examples given by several respondents were to replace ‘*should*’ with ‘*must*’ for the avoidance of doubt that certain measures were mandatory; and to reinforce ‘to consider’ instructions to emphasise that addressing a specified issue is a statutory rather than voluntary requirement. Similar points were made about clarifying legal requirements vs guidance only, and raising expectations of good practice being carried out. An example was given by a forestry practitioner below:

*“E.g. UKFS 4 “On plantations on ancient woodland sites, ensure that features of ancient woodland remnants are protected and consider progressive restoration to native woodland.” - we would suggest this becomes “On plantations on ancient woodland sites, ancient woodland remnant features must be protected, and native woodland restoration must be the priority for management”.* (Forestry Practitioner)

102. Clarity was also required, again by means of less ambiguous language use, as to whether or not enforcement action would be taken or not in cases where guidance was not followed.

103. A few respondents suggested changes to how the UKFS document is organised as follows:

- Mentions of further information perceived as needing to be incorporated (e.g. best practice for designing woodland access, planting distances from paths, range of woodland habitats, forest systems).
- Organise guidance according to different stages of the forest cycle (e.g. establishment, felling, restocking).
- Clearer summary page (e.g. linking to important themes, ESG, UN sustainability goals, statement of how the Standard should be used and interpreted).
- Other formatting changes, such as more use of graphics, diagrams and tables of metrics. A layout similar to that of UKWAS documents, helping to increase UKWAS certification rates, was recommended by a commentator / advocate<sup>15</sup>, as well as separate versions for foresters and non-foresters.

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<sup>15</sup> UKWAS certification rates, at around 40 – 45% of total woodland cover in the UK, decreased slightly in the last year of record (Forestry Statistics, 2020)

104. However, positive comments about the Standard were made by a large minority of respondents (mostly answering the ‘Yes’ section), as detailed below:

- The chapters / books set out works well.
- Finding relevant information is easy (e.g. symbols / colours make navigation easier).
- The standard is sufficiently complex.
- The UKFS works well for regular users.
- The UKFS is reasonably presented.
- Good cross-referencing.

105. Finally, the consultation asked respondents whether they would like to suggest changes which might improve the usability of the Standard. Those specifying potential areas for improvement were asked to provide robust evidence to support these suggestions.

**Q9: ‘Are there any other significant changes you would suggest to improve the usability of the UKFS?’**

106. All 26 respondents who made comments at Q9 did so in the ‘yes’ part of the question, as shown in the table below.

**Table 11: Q9**

	Number		
	Yes	No	Not answered
Commentator / Advocacy (18)	12	-	6
Forestry Practitioner (15)	11	-	4
Regulator / Certification (3)	1	-	2
Individual (3)	2	-	1
<b>Total respondents (39)</b>	<b>26</b>	<b>-</b>	<b>13</b>

107. 25 of the respondents at Q9 made suggestions for changes to the UKFS; one respondent stated ‘none’ without elaborating. Suggested changes largely mirrored the caveats mentioned at Q8, but with much more focus around language clarity issues and the desire for more clarity concerning compliance and enforcement of guidance. No evidence was referenced to back up any of the respondents’ views.

108. A large minority of respondents requested language improvements in the form of **providing clarity about whether guidance areas are legal**

**requirements of stakeholders or merely good practice expectations.**

Concerns were expressed regarding how to interpret guidance with requests to reduce flexibility or subjectivity regarding decision-making in this context.

**Interpretation issues** were at the heart of this as a commentator / advocacy respondent summed up;

*“Currently the UKFS is not an independently audited standard, and it is often unclear on the difference between legal requirements and guidance. We feel that many areas could be strengthened to promote better practice and make clear which activities could be subject to enforcement action.”* Commentator / Advocacy

109. There were also a small number of suggestions that language within the UKFS tended to be aimed at the forestry sector with the ensuing risk of misinterpretation by other stakeholders.
110. Conversely, smaller but still significant numbers of respondents had concerns about a **perceived lack of flexibility of guidance**, with specific complaints about ‘must’ and ‘have’ terminology leaving no room for local adjustments or differences in approach. These respondents were in favour of a more positive use of language, suggesting the use of wording such as ‘aspire to’ or ‘endeavour’.
111. **Clarity over compliance** with guidance was cited by a large minority of respondents. More prominence as to how to achieve compliance was desired; in particular, respondents requested details regarding how compliance might be assessed, including suggestions that indicators were needed or that a compliance checklist should be made available. Clarity in determination over whether or not requirements had been breached was also needed by these respondents, along with better or more consistent enforcement procedures.
112. Similar numbers of respondents commented on the **monitoring of Standard compliance**. Again clarity was the main issue, with these respondents requesting details about how compliance was to be policed and who was responsible. Other points were made recommending that improvements be made, greater focus be placed on supporting and maintaining standards, checks continue beyond management plan periods, and justifications for remedial action be recorded.
113. The last main focus for remarks, again made by a large minority of respondents, was centred on the need for more heed to be taken of **country context in the UKFS**. Scotland in particular was pinpointed in this respect, due to legal and cultural differences regarding recreational access to land; one commentator / advocate was disappointed that the Scottish Outdoor

Access Code is not identified amongst good practice requirements or guidance.<sup>16</sup>

114. A few respondents wanted proper coverage for specified topics, as delineated below;

- Peatland protection.
- Forestry drainage.
- Recognition and support for all woodland types.
- ASNW protection.
- PAWS restoration.
- Targets for woodland colonisation / regeneration around ancient woodland.
- Deer management.
- Restricted use of neonicotinoids in forestry.
- A stance on energy crops.

115. The need to keep the Standard simple was mentioned by a few respondents, with one suggestion of producing a simplified hard copy; other respondents desired an electronic version or web-based approach to be taken. Other suggestions made by single respondents included creating a shortened version with just the legal and good practice requirements for use in the field, mapping points to allow easy cross-checking and having web links to additional guidance, reference materials and further reading.

116. A small number of respondents cited a need to avoid duplicating or causing confusion with existing legislation outwith the UKFS which regulates the forestry profession.

117. Other potential improvements to the structure and content of the Standard were suggested by single respondents as follows;

- An overt explanation of how to use the UKFS.
- Provision of details about perceived gaps in the existing evidence base for some guidelines.
- Separating (a) the negatives to avoid (including the specific legal/regulatory requirements to achieve the minimum acceptable level of forest condition/management) from (b) the additional components of management that can be implemented to achieve the positive outcomes of improved forest condition/delivery of ecosystem services.
- Doing an impact assessment of the contribution the UKFS has made to delivering sustainable management of forests and woodland.

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<sup>16</sup> Key guidance recommended in Part 4 of the Scottish Outdoor Access Code

- Ensuring service deliverers and the private sector within woodland and forestry are listened to adequately when developing the standard.

## APPENDIX 1: Respondent Organisations

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Bangor University

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Bidwells

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Chartered Institute of Ecology and Environmental Management

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Chartered Institute for Archaeologists

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Clwyd-Powys Archaeological Trust

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Community Woodlands Association

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Confederation of Forest Industries UK

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Continuous Cover Forestry Group

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Dwr Cymru Welsh Water

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Forest Policy Group

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Forest Stewardship Council (FSC) UK

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Gresham House

---

Institute of Chartered Foresters

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National Coppice Federation

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Natural England

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Northern Ireland Environment Link

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Pryor & Rickett Silviculture

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Reforestation Scotland

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Royal Forestry Society

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RSPB

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Scottish Environment Link

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Scottish Wildlife Trust, Stirling & Clackmannanshire

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South West Heritage Trust

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Spotta

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The National Trust for Scotland

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The Ramblers (GB)

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The Scottish Outdoor Recreation Alliance

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Tilhill Forestry Limited

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Wales Environment Link

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Wild Resources Limited

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Wildlife & Countryside Link

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Woodland Trust

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These do not add to 36 organisation names as a small number submitted more than one response.

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