

UK Forestry Standard Review: Analysis of consultation responses

Why Research, January 2023

### **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.

Regular reviews of the UKFS have been undertaken. In 2021, work began on reviewing the current UKFS. The aim was to ensure the Standard is up to date and that it can continue to safeguard and promote sustainable forestry practice in the UK while continuing to reflect the international context in which forestry operates. For this review cycle, a technical assessment identified that once the UKFS was updated to reflect improvements in scientific knowledge, developments in international approaches, and new or amended legislation, the majority of the current edition's content remains relevant. This was confirmed by the first stakeholder consultation, undertaken in summer 2021.

The second consultation sought stakeholder views (but not those of the general public) on the draft content of the next edition. This consultation closed on 8 December 2022. It was conducted through the Scottish Government's on-line platform called Citizen Space, and this report analyses the responses submitted there. Four other responses were sent to the UKFS review email address and they are included in this report too.

## Respondent Profile

In total, there were 57 responses to the consultation, which have been categorised for the purposes of this analysis.

**Table 1: Respondent Groups**

	Number
Forestry practitioners / companies	26
Regulator / certification	7
Representative / advocacy	22
Individual	2
<b>Total respondents</b>	<b>57</b>

## Scope of analysis

This report provides an analysis of the key themes raised by respondents' answers to the consultation questions, and identifies the main technical topics raised. An assessment of the detailed technical comments and evidence provided will be

carried out by the UKFS project and will be considered during the finalisation of the content of the next edition of the Standard.

## Key Themes

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

- A range of views were expressed in responses to this consultation, and the analysis shows there was little by way of consensus on changes to the new edition. In the main, forestry practitioners and the organisations representing them, thought the draft edition is too prescriptive and needs to place greater emphasis on land owners' approaches to forest management and their management objectives. There were some requests from these respondents for the Standard to allow for local adjustments, taking into account the land, soil and access, so that any woodland development is sustainable. Conversely, respondents in representative / advocacy organisations with a focus on the environment and conservation issues, would like the new edition to be more prescriptive in terms of forest management practices.
- While the majority of respondents across all sub-groups did not believe the right balance was being achieved between the economic, environmental and social principles of sustainable forest management, there was no consensus view on what the right balance should be. In general, forestry practitioners /companies and their representative / advocacy organisations felt there was too much focus on environmental and social principles to the detriment of the economic objectives. Conversely, respondents in the representative / advocacy sector who focused on conservation and environmental issues felt there needs to be a greater emphasis on environmental and social principles.
- There was some agreement that this edition is an improvement on the previous one in being more user-friendly and shorter, although there were some suggestions for further improvements. While there is an acceptance that this document needs to be relevant to forestry practitioners and other stakeholders within the sector, it was suggested by some that the main body of the Standard should set out the UK-wide position and have appendices which set out country-specific information. Some respondents felt that inclusion of country-specific text makes this edition less appropriate to a UK-wide audience.
- There were also requests for the cross-cutting themes to be better cross-referenced throughout the Standard for ease of access to the required information.
- Accessibility to the Standard clearly remains an important issue, with requests for the UKFS to use language that is user-friendly, relevant to all users and easy to navigate and search. There were some requests for an online version that can be constantly updated.

- As with the earlier technical consultation, there were requests for greater clarity in the use of language, with requests for differentiation between what are mandatory actions ('must') and those that are advisory ('consider'). There were also suggestions for this to be more strongly worded and ambitious in line with other government commitments to climate change. It was felt that some wording is still too vague or open to interpretation and relies too heavily on voluntary principles which can be ignored by forestry practitioners.
- Linked to this, there were some requests for an approach with clear compliance monitoring and enforcement.
- If any of the proposed changes, such as the change in single species cover, are introduced, there will need to be associated timeframes which will take into account existing woodland, any already planned changes and consideration of the timescales for forest planning and management.
- Throughout responses, there were references to a number of specific technical issues. These included comments on the proposal to reduce single species cover from 75% to 65%; a move which was supported by respondents in the representative / advocacy with a focus on the environment but not supported by forestry practitioners and their representative / advocacy organisations. A few respondents referred to peatlands in terms of the importance of their restoration and the value they offer to biodiversity. There were also some references to biosecurity and the need to minimise the risks associated with single species monocultures as well as calls for new or improved requirements in response to a rapid increase in pests and diseases.

# 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, so 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 reviews of the UKFS have been undertaken. In 2021, work began on reviewing the current UKFS. The aim was to ensure the Standard is up to date and that it can continue to safeguard and promote sustainable forestry practice in the UK while continuing to reflect the international context in which forestry operates. For this review cycle, a technical assessment identified that once the UKFS was updated to reflect improvements in scientific knowledge, developments in international approaches, and new or amended legislation, the majority of the current edition's content remains relevant. This was confirmed by the first stakeholder consultation, undertaken in summer 2021.
5. In 2022, work began on reviewing the current UKFS and this was co-ordinated by Scottish Forestry. The aim was to update and publish the next version by early 2023. The aim of the review was to ensure the Standard is up to date and that it can continue to safeguard and promote sustainable forestry practice in the UK while continuing to reflect the international context in which forestry operates. This review was overseen by a Project Board made up of representatives from the four UK administrations and was co-ordinated by Scottish Forestry. A UK stakeholder reference group was

established to support the countries in developing an updated Standard, ensuring it is relevant and appropriate across the UK. This consultation sought stakeholder views (not those of the general public) on the draft content of the next edition.

- The consultation was launched on 13 October 2022 and closed on 8 December 2022.

## Respondent Profile

- In total, there were 57 responses to the consultation. Respondents were assigned to respondent groupings 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
Forestry Practitioners / companies	26
Regulator / Certification	7
Representative / advocacy	22
Individual	2
<b>Total respondents</b>	<b>57</b>

- A list of all those organisations that submitted a response to the consultation is included in Appendix 1. Specific references and / or suggested changes to text provided by respondents have been reviewed and analysed separately.

## Methodology

- The consultation asked for responses to be submitted using the Scottish Government consultation platform Citizen Space. A further four responses were sent to the UKFS review email address and not submitted to Citizen Space.
- 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.
- 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. During the course of the analysis it became apparent that some responses were similar in content, often using the same phrases, although they were not identical. As such, much of the analysis has focused on whether interests that might be ascribed to different respondent groups such as 'forestry practitioners' or 'representative / advocacy' have influenced their responses to the draft content of the UKFS.
15. At each of the questions asked, respondents were given a yes / no option to choose. Respondents who answered with a 'no' were then invited to explain their answering, including any improvements they felt could be made to address the issues they had raised. In a small number of instances, respondents who provided a 'yes' response also chose to provide additional commentary. All comments provided have been included in the analysis.
16. 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.
17. The analysis presented in this report identifies general themes rather than evaluating detailed technical comments. These general themes will be assessed and fed into the country considerations in finalising the content of the next edition of the Standard. An assessment of the detailed technical comments and evidence provided will be carried out by the UKFS project and will be considered during the finalisation of the content of the next edition of the Standard.



# The Integration of Cross-cutting Themes

18. The initial technical consultation conducted in 2021 identified a range of significant cross-cutting themes that are relevant across the Standard and the UK and that could be further developed. These cross-cutting themes were:

- 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.

19. It was the intention in the draft UK Forestry Standard that these cross-cutting themes should be integrated, where relevant, throughout the Standard. The first question asked,

**Q1: 'Do you think that the draft content of the new edition of the UKFS has improved how cross-cutting themes, such as those explored in the 2021 consultation, are integrated throughout the Standard?'**

20. **As shown in table 3 overleaf, higher number of respondents felt that the draft content of the new edition of the UKFS has not improved how cross-cutting themes, such as those explored in the 2021 consultation, are integrated throughout the Standard** (31 disagreed while 15 agreed). Higher numbers of forestry practitioners and those in the representative / advocacy sub-group disagreed than agreed. Views of those in the regulator / certification sub-group were split, with the same number agreeing and disagreeing.

**Table 3: Q1**

	Number		
	Yes	No	Not answered
Forestry Practitioners / companies (26)	9	14	3
Regulator / Certification (7)	3	3	1
Representative / advocacy (22)	3	13	6
Individual (2)	-	1	1
<b>Total respondents (57)</b>	<b>15</b>	<b>31</b>	<b>11</b>

21. Respondents who answered no to this question were then asked to explain their answer, including any improvements they felt could be made to address the issues they had raised; 42 opted to do so. The following paragraphs outline the key issues emerging in response to this question.
22. While respondents appear in the main to be happy with the cross-cutting themes identified, there were a number of comments that while these themes are included in the Standard, they need to be better cross referenced. A few respondents – mostly forestry practitioners / companies – noted that it can be challenging to access the required information as it is distributed throughout the Standard. As such, there were a few comments that the draft Standard is not as user-friendly as it should be. To counteract these issues, there were some suggestions for an online version of the Standard to be provided in an app which would allow for ease of access while on site. The app could also be updated on a regular basis and the most current version would always be accessible to users. There were also some comments about the need for a good search function to enable users to quickly access the information they are seeking.
23. There were a few comments, primarily from respondents in the representative / advocacy sub-group, in relation to the cross-cutting theme of stakeholder and public involvement, with a number of suggestions for ways to improve upon this. These included:
- Calls for all stakeholders and community members to be contacted at an early stage of any consultation.
  - Forest agents should offer site visits at early stages of consultations as well as share Phase 1 Habitat Surveys and other survey information such as maps with consultees, as currently happens in wind farm applications and local authority planning applications.
  - The provision of feedback on final decisions.

- For forest agents and Scottish Forestry to work closely together to help the public understand issues in relation to forestry management.
24. A few respondents in the representative / advocacy sub-group called for references to the nature and climate emergency in all chapters to ensure this is established as a clear cross-cutting theme. These felt that there is a requirement to make more explicit reference to the globally recognised nature and climate emergency and the allied need to identify and implement nature-based solutions to counteract climate change and biodiversity loss. A respondent in the regulator / certification sub-group suggested that landscape should be included as a cross-cutting theme.
25. There was a view from some respondents about the need for **further links or synergies between cross-cutting themes so they are more explicitly linked throughout the Standard**. A small number of respondents referred specifically to the current nature and climate emergency. A few respondents in the representative / advocacy sub-group thought the draft Standard does not reflect a greater understanding of how climate change and biodiversity are linked and felt the Standard needs to make it clear that sustainable forest management in the UK means addressing the nature and climate emergency.
26. Biosecurity was an issue raised by a few respondents (mainly those in the representative / advocacy sub-group), with some comments that the maximum percentage species allocation is too high and needs to be lowered in order to minimise the risks associated with single species monocultures. There were also a small number of references that the Standard has not introduced many new or improved requirements in response to a rapid increase in pests and diseases. A small number also felt there could be contradiction in the Standard through the need for species diversity combined with the need to reduce threats from pests and diseases.
27. Other examples where more linkage should be provided were in relation to an integrated approach to land management where trees and other activities co-exist to provide multiple benefits, or in linking the cross-cutting themes in line with the current priorities for good forestry practice. There was also a suggestion from a forestry practitioner / company of the need to consider cross-cutting economic objectives for landowners and the general public, an issue considered to be in need of greater attention in the Standard.
28. The need for additional guidance was requested by a small number of respondents. Two respondents in the representative / advocacy sub-group wanted to see more guidance on biosecurity, including measures to mitigate the risks of importing trees for planting.
29. A few respondents – across most sub-groups – felt that there is little by way of changes in the draft report.

## The applicability and clarity of UKFS

30. As already noted, the UKFS is the reference standard for sustainable forestry practice in Scotland, England, Wales and Northern Ireland and it is important that its contents apply across all four countries. Question 2 asked,

**Q2: ‘Do you think that the draft content of the new edition of the UKFS remains applicable in all four countries of the United Kingdom?’**

31. As shown in the following table, of those who responded to this question, **views were relatively split**. Overall, more respondents agreed that the draft content of the new edition of the UKFS remains applicable in all four countries of the UK (26) than disagreed (20). When we examine sub-group information, a higher number of forestry practitioners / companies disagreed that the draft content of the new edition remains applicable in all four countries of the United Kingdom. This compares to respondents in the regulator / certification and presentative / advocacy sub-groups, where higher numbers of respondents agreed. The profile of those responding to this question is shown in table 4.

**Table 4: Q2**

	Number		
	Yes	No	Not answered
Forestry Practitioners / companies (26)	8	15	3
Regulator / Certification (7)	5	1	1
Representative / advocacy (22)	13	3	6
Individual (2)	-	1	1
<b>Total respondents (57)</b>	<b>26</b>	<b>20</b>	<b>11</b>

32. Respondents who answered no to this question were then asked to explain their answering, including any improvements they felt could be made to address the issues they had raised; 30 opted to do so. The following paragraphs outline the key issues emerging in response to this question.
33. The key theme in response to this question – and cited primarily by forest practitioners / companies – was that the **inclusion of country specific text makes this less appropriate as a UK-wide document**. An example provided by one forestry practitioner / company was the inclusion of LR3 and LR12, both of which apply only to Wales. In the light of this, there were some suggestions that the **main text should set out the UK position with**

**appendices setting out country specific information.** A small number of forestry practitioners / companies noted that there is growing disparity between the UK administrations and that it is becoming harder to have a single UK Standard.

34. In terms of country-specific information, a small number of respondents noted that there is a need for greater emphasis on access legislation in Scotland.
35. Given the differences between the four UK countries, there were some suggestions that the Standard should focus on specific subject areas. A few forestry practitioners / companies suggested the UKFS should focus on fundamental silviculture principles and the practical delivery of this on the ground. Another respondent in this sub-group commented that the Northern Ireland forestry sector is dwarfed by the Irish Republic and it effectively remains within the EU, so cross-border harmonisation may be needed. As noted by one of these respondents:

*“To remain relevant at the UK level, the UKFS needs to stay focused on the fundamental silvicultural principles and science of practical delivery/implementation at the Forest Management Unit level and allow national administrations’ support and regulation mechanisms to nuance regional policy variations and/or use national appendices to the Standard (although this could quickly become overly complicated) .... Forestry has an unprecedented importance in UK and global policy, through the multifaceted benefits it delivers across the socio-economic and ecosystem services spectrum. In order to help ensure the full magnitude of these benefits are largely delivered and realised it is critical that the guiding principles and standards at the heart of our sector stay focused on core silvicultural science and practical delivery.”*

36. There was also a suggestion from a small number of respondents in the representative / advocacy sub-group that the UKFS should focus on its Good Practice Requirements (GPRs) and Guidelines to raise the bar on the contribution that forests and woodlands can make to meeting the climate and nature emergency across the UK as a whole.
37. Linked to this, a small number of respondents in the representative / advocacy sub-group felt the draft content of the Standard is too cautious and that it needs to incorporate high standards in the GPRs and Guidelines for sustainable forest management.
38. Once again, there were some suggestions for the UKFS to be an online document that can be updated where relevant and also offer the appropriate links to access country-specific information.
39. There were also a small number of references to a perceived issue of short term politics impacting on the regulatory framework of what is a long term industry.

40. Question 3 then went onto ask,

**Q3: 'In your opinion, does the draft content of the new edition of the UKFS achieve the right balance between providing clear and consistent requirements and guidelines and the need for some degree of flexibility to accommodate national, regional and local differences and contexts?'**

41. As shown in the following table, of those who responded to this question, **many (37) disagreed that the draft content of the new edition of the UKFS achieves the right balance between providing clear and consistent requirements and guidelines and the need for some degree of flexibility to accommodate national, regional and local differences and contexts.** A small number of respondents (7) agreed with this. Higher numbers of respondents in the forestry practitioner / company and representative / advocacy sub-groups disagreed than agreed, and the views of those in the regulator / certification sub-group were equally split. The following table provides a profile of those responding to this question.

**Table 5: Q3**

	Number		
	Yes	No	Not answered
Forestry Practitioners / companies (26)	2	21	3
Regulator / Certification (7)	3	3	1
Representative / advocacy (22)	2	12	8
Individual (2)	-	1	1
<b>Total respondents (57)</b>	<b>7</b>	<b>37</b>	<b>13</b>

42. Respondents who answered no to this question were then asked to explain their answering, including any improvements they felt could be made to address the issues they had raised and 42 did so. A few respondents noted their support for the Standard and the need for flexibility to accommodate national, regional and local differences and contexts.

43. A key issue raised by some respondents, mostly within the representative / advocacy and forestry practitioners / companies sub-groups, was that while flexibility is important, there is a **need to consider the language used throughout the Standard.** However, the views of these two groups differed as to how the Standard should approach this issue. Forestry practitioners felt the Standard should avoid being too prescriptive and takes account of the many and varied interests that need to be balanced with the land owner's management objectives. Conversely, some representative / advocacy respondents felt the Standard should be more prescriptive and commented on the need to 'tighten up' the language used to make it more specific. For example, there is a perception that the use of the word

'consider' leaves guidelines open to interpretation and offers the opportunity for land owners not to act on matters. There is a preference from these respondents for the Standard to provide a clear mandate to users.

44. There were some preferences for the use of the word 'must' rather than 'should', 'consider' or 'encourage'. One respondent in the regulator / certification sub-group suggested that there needs to be differences in the wording used so as to distinguish between mandatory and advisory actions, with mandatory actions being left as numbered guidelines and advice provided in advice notes or recommendations. A respondent in the representative / advocacy sub-group felt that the Standard is relatively powerless in setting out guidelines that encourage good practice on issues that are not subject to legal requirements and that more should be done to require developers to provide evidence of their considerations.
45. Conversely however, a number of respondents – mostly forestry practitioners / companies and individuals noted that the **Standard needs to avoid being too prescriptive**, particularly in situations where issues such as carbon in forests or the impact of climate change are still evolving. As one forestry practitioner / company noted:

*“Where reasonable and informed professional opinions differ on what is appropriate under the UKFS in a given situation, this should be determined through on-site assessment and discussion with the landowner’s management objectives adequately factored and weighted into the assessment process. Regulators should be provided with guidance on how to manage conflict and differences in the assessment of “reasonableness” as well as having customer charter timescales for response. Lessons might be learned from Planning applications where NIMBY responses, unfounded on a policy basis can be rejected, and firm timescales set for consultee responses and regulator decisions, with a general presumption “in favour” of the proposal unless it can be demonstrated to the contrary. Regulators need to have the experience and confidence to take a more proactive approach to facilitating forestry operations and be confident this is supported by the UKFS and national government administrations.”*

46. It was felt by a few forestry practitioners / companies that the Standard covers too much policy ground and should have a tighter focus on practical forest delivery and a greater emphasis on the fact that it is intended to be applied at a Forest Management Unit level, with a clearer requirement that this should be applied and interpreted by professional and experienced foresters. Linked to this point, the same respondents commented that the Standard is used to dictate or frustrate forestry practice and operations and pointed out a need for the Standard to provide greater guidance on the roles and responsibilities of consultees and regulators.
47. A few respondents focused on the importance of engagement with consultations prior to undertaking work, with some suggestions that agreements made at site level should be able to override the UKFS when the

landscape level impact of work is considered. In this way, the varied interests and opinions can be balanced with the owner's management objectives. One respondent in the representative / advocacy sub-group provided an example of GL32 which they felt cannot be met without meaningful community engagement.

48. The issue of monitoring and enforcement was raised by a few respondents in the representative / advocacy sub-group. They felt there needs to be a clear compliance monitoring approach requiring forest managers to set out how they have considered compliance with the Standard, although they also noted there would be a need for greater resources for any monitoring and enforcement to be effective. One of these respondents noted:

*"In our view, the UKFS must be accompanied by a clear compliance monitoring approach. This should require forest managers to set out, in writing, how they have considered their compliance with the Standard. These rationales should be publicly available and a small sample of them should be scrutinised by country forestry authorities to encourage a culture of continuous improvement in sustainable forest management. The investment of time in this activity would pay itself back many times over in terms of the value of delivery on the ground. [We are] strongly supportive of increasing the funding available to the forestry authorities in order to deliver this monitoring."*

49. Question 4 then went onto ask,

**Q4: 'Do you think that the draft content of the new edition of the UKFS strikes an effective balance between the economic, environmental and social principles of sustainable forest management?'**

50. As table 6 demonstrates, of those answering this question, **almost all disagreed that the draft content of the new edition of the UKFS strikes an effective balance between the economic, environmental and social principles of sustainable forest management** (only five respondents agreed). Almost all respondents in the representative / advocacy and forestry practitioners / companies sub-groups disagreed, while the views of those in the regulator / certification sub-group were split.



Table 6: Q4

	Number		
	Yes	No	Not answered
Forestry Practitioners / companies (26)	1	24	1
Regulator / Certification (7)	3	3	1
Representative / advocacy (22)	1	15	6
Individual (2)	-	1	1
<b>Total respondents (57)</b>	<b>5</b>	<b>43</b>	<b>9</b>

51. Respondents who had given an answer of 'no' were then asked to explain their answer and given details of any improvements they thought could be made to address the issues they had raised. A total of 44 respondents provided comments in support of their initial response. A few of these respondents were positive about the new edition, with some comments that it is good to see greater consideration of the historic environment and climate change.
52. A key issue raised by respondents was that the principles of the Standard were not effectively balanced, although there was disagreement on which principles should be given more or less prominence. Responses tended to vary in line with the respondent sub-group.
53. Forestry practitioners / companies mainly considered that the new edition of the UKFS places too much emphasis on environmental and social objectives to the detriment of economic objectives and that timber production has become subsumed by other objectives. These respondents were keen for an acknowledgment of the importance of woodlands for the role they can play in terms of biodiversity and climate mitigation. Other comments from these respondents included reference to a number of other benefits created by the commercial forestry sector. These included carbon sequestration, with various examples provided of the level of carbon sequestration that is offered by different species; and providing biodiverse habitats.
54. A small number of these respondents noted:

*“There is a raft of wider benefits from commercial forestry that frequently appear to be downplayed, if not ignored, including the major contribution domestic timber production has in delivering the climate change agenda. We are in the midst of a climate change emergency and if we wish to meet the national climate change targets by 2050 (2040 in Scotland) then our actions, policy and implementation need to reflect this. It is incumbent therefore to recognise that productive conifers, and in particular upland spruce, have a vital role to play as they grow faster, sequester more carbon, with fewer inputs than the alternative species on the same site. If we have evidence of better solutions in 20 or 30 years' time, then policy will*

*equally be able to adjust over time to reflect any evidence-based need for further change.”*

55. Conversely, many respondents within representative / advocacy groups and particularly those with a focus on conservation and the environment, felt greater emphasis should be placed on environmental and social principles.
56. A number of forestry practitioners / companies noted **the UK imports a high level of timber and commented that the UK should be moving towards increased woodland areas to counteract this**. There were concerns that there could be future rising prices and timber shortages because of the UK's reliance on imported timber. A few of these respondents noted that the capacity for natural forests around the world to meet the rising demand for timber will be exceeded in 20-30 years' time. As such, they saw a need to scale up a sustainable and resilient timber sector so as to reduce the UK's reliance on timber imports and help to achieve wider nature recovery and biodiversity goals through woodland creation.
57. **Concerns over the percentage of a single species** were noted by a number of respondents, and, once again, views tended to differ depending on whether the respondent was a forestry practitioner or a representative organisation of forestry practitioners; or was a representative organisation / advocate of the broader environment.
58. Forestry practitioners and their representative organisations felt that the restriction to a maximum of 65% to a single species to promote greater species diversity is not appropriate for all sites. Some of these respondents considered that the proposal to reduce the current figure of 75% shows a lack of understanding of the silvicultural context for much of the existing forest resource and the importance and value which productive forestry offers to wider sustainability. Some forestry practitioners / companies felt that greater importance should be placed on Sitka plantations as they offer habitats for a wide range of wildlife, are needed for carbon sequestration and suit some sites much better than other species. Conversely, representative / advocacy organisations representing the environment were more supportive of a reduction from 75% to 65% for a single species.
59. Other issues raised by respondents included:
- Guidance needs to acknowledge that transitioning forests to increased species and percentage diversity can take longer than a single forest rotation.
  - In existing native woodland, natural regeneration and colonisation should be used where possible and felling should be limited to 10% of an area in a five year period and a maximum of 20% in a 20 year period.

- If habitats of conservation interest or rare priority species are present, there should be a presumption of No Net Biodiversity Loss.

60. There were a small number of suggestions for the percentages that should be applied to different species. This included one suggestion from a small number of respondents within the representative / advocacy and regulator / certification sub-groups for a reduced maximum from 65% to 50%, with a minimum of 15% native broad leaves, 10% open ground managed for conservation and 25% allocated to other species.

61. **Peatlands** were referred to by a few respondents – mostly representative / advocacy organisations – with comments that there should be a presumption that restocking on deep peat will not be undertaken and that peatland restoration should be a priority. It was also noted that the Standard should refer to the potential for peatland restoration for soils with peat from 30cm in depth; also that the new edition should not prohibit native woodland creation on peat soils in depths of 30-50cm but that it should prohibit commercial afforestation on these sites. There were also a small number of requests for the Standard to include reference to blanket peats as they are a globally rare habitat and shallow peatlands as they offer significant biodiversity value.

62. Once again, there were some comments – mainly from respondents in the representative / advocacy sub-group – on the language used in the new edition. It was felt that the language used does not translate into clear, strong requirements that must be followed. These respondents compared this to the Glasgow Leaders' Declaration which was felt to be much more strongly worded and ambitious and in line with other government commitments to climate change. One of these respondents noted:

*“The nature of the language used by the draft would ensure that a forest manager has the flexibility to reject following the 'lowest' common denominator, which in industrial forestry is economics. Contrast UKFS wording with that agreed by the UK Government at COP26 in the Glasgow Leaders' Declaration on Forests and Land Use, which called for strengthened efforts to 'Conserve forests and other terrestrial ecosystems and accelerate their restoration.' going far beyond the UKFS wording to “consider” PAWS restoration. We recommend the draft is reviewed in the context of the nature and climate emergency to determine whether it is fit for the purpose of ensuring the contribution of forestry to a nature positive, net zero future.”*

63. Finally, there were concerns expressed by a few respondents in the forestry practitioner / company sub-group that many individuals working for regulatory organisations have little or no practical operational experience and this can lead to a lack of understanding of the forestry sector.

64. Question 5 then went onto ask,

**Q5: ‘Do you think that the draft content of the new edition provides greater clarity than the current version on what is required of forest managers?’**

65. As table 7 demonstrates, of those answering this question, **many more disagreed than agreed that the draft version of the new edition provides greater clarity than the current version on what is required of forest managers** (33 disagreed compared to 13 who agreed). The highest levels of disagreement came from forestry practitioners / companies. The views of respondents in the representative / advocacy and regulator / certification sub-groups were equally split.

**Table 7: Q5**

	Number		
	Yes	No	Not answered
Forestry Practitioners / companies (26)	2	21	3
Regulator / Certification (7)	3	3	1
Representative / advocacy (22)	8	8	6
Individual (2)	-	1	1
<b>Total respondents (57)</b>	<b>13</b>	<b>33</b>	<b>11</b>

66. Respondents who had given an answer of ‘no’ were then asked to explain their answer and provide details of any improvements they thought could be made to address the issues they had raised. A total of 41 respondents gave comments in support of their initial response.

67. Some respondents – mostly in the presentative / advocacy sub-group – felt there were improvements to this edition. These included:

- Shorter than the current edition.
- A clearer structure to follow.
- Provision of what is guidance and what is a requirement.

68. A few respondents felt there to be little overall change and no greater clarity to this draft edition.

69. The key issue raised mostly by forestry practitioners / companies and those who represent forestry practitioners / companies was of the **need for UKFS to be applied at a Forest Management Unit (FMU) level**. This is because of concerns that if species percentages are implemented at compartment level, it can reduce the overall productivity of the site; whereas if this is applied at a FMU level, this will allow for site-specific issues to be considered and the professional judgement of the forester to be used. Linked

to this, there were a small number of calls for the document to make it clear that there should be a balanced assessment that takes into account the forest owner's management objectives as well as the guidance provided.

70. As with some previous questions, a number of respondents – mostly within the representative / advocacy and regulator / certification sub-groups – commented that **some wording is too vague or open to interpretation, relying primarily on voluntary principles** which can be ignored by forestry practitioners.

71. A few forestry practitioners / companies noted that some of the guidance is not specific to forestry as it relates to legislation applying to all people, businesses and land. As summarised by one of these respondents:

*“As the breadth of topics that the UKFS seeks to address has grown, some of the language has become vague or subjective in the guidance. The use of open phrases such as “consider the use of”, “use the most appropriate method”, and “ensure proposals are appropriate”, while allowing a degree of flexibility for decision making and interpretation, introduces ambiguity, as the most appropriate option may vary depending on the perspective or lack of experience of the individual assessing it. Some of the guidance does not seem specific to forestry (or even reference forestry) as it relates to legislation that applies to all people, businesses and land and as such adds no value to the document. It would also be useful to make the document clear that there should be a balanced assessment between potentially antagonistic elements of the guidance, that these are often subjective, and a major determinant will be the forest owner's management objectives. It should also be made very clear that these guidelines apply at the forest management unit level, as a common experience is that there is pressure to apply the guidelines of the UKFS at a coupe or felling phase level, often at the expense of sound silvicultural practice.”*

72. A number of respondents provided specific recommendations for the new version of the document. These included provision of:

- A downloadable compliance checklist of Legal Requirements (LRs), Good Practice Requirements (GPRs) and Guidelines; and a greater focus on principles and good practice.
- A list of Legal Requirements at the start of the document.
- Policy content to be provided in a dedicated chapter.
- The rewording and simplification of some content (examples given included GPR 12 and 21), so they can be easily understood and be interpreted correctly.
- A greater sense of ambition for the role that forests and woodlands can play in addressing nature recovery and climate change in the future.

73. Question 6 went onto ask,

**Q6: 'Do you have any other comments you would like to make about the draft content of the new edition of the UKFS?'**

74. Those respondents who answered yes were then asked that if suggested changes were made to technical content, to provide evidence that supports these changes. Almost all respondents (48) answered this question. Some respondents provided general commentary on the draft content of the new edition of the UKFS, while others provided details of specific changes they would like to see made to the text.
75. A small number of respondents provided background information on their organisation to help provide context for their comments. A number of comments reiterated points made at earlier questions.
76. A number of themes emerged in response to this question, albeit that each was only mentioned by relatively small numbers of respondents. The first theme, mentioned by forestry practitioners / companies and some of their representative / advocacy organisations, was of a **need for a timeframe to be applied where proposed changes are being suggested**. An example was provided by a forestry practitioner / company who noted that a timeframe would be needed for the proposed reduction in single species from 75% to 65% or for planting schemes that are already underway. Another respondent in the representative / advocacy sub-group felt any proposed changes need to consider the timescales for forest planning and management.
77. Linked to this, another theme referred to the **proposed change for single species from 75% to 65%**. Those who commented were forestry practitioners / companies or their representative organisations and did not support this proposed change. They wished to see the UKFS implemented at a Forest Management Unit level rather than at a compartmental level so that professional judgement and site-specific detail can be considered.
78. A respondent in the regulator / certification sub-group suggested the 65% figure should be changed in line with the proposed percentages in the UKWAS 5.
79. A small number of forestry practitioners / companies also noted that there can be landscape and site constraints in promoting species diversity and that these specific issues need to be taken into account.
80. Another theme – and cited by representative / advocacy organisations representing the forestry sector and forestry practitioners / companies themselves – was that this **new UKFS draft is overly negative of the commercial forestry and timber production sector**.
81. A number of respondents outlined topics they felt should be included in the revised edition of the Standard. These included:

- Extending the existing GPRs to cover more historic environment aspects so as to ensure they influence practice.
- Developers requiring to provide evidence of their considerations and provide clear reasons if they decide not to act on particular guidelines.
- Illustrative case studies to support understanding of the guidance in practice, either within the document or as a separate document.
- Making forest owners plant commercially utilisable and sustainable species where land, soil and access allow a development to be sustainable, particularly as this will help to support an increase in forest areas.
- Provision of a checklist for practitioners making an application.
- Clear references to the emerging Regional Land Use Partnership and Regional Land Use Frameworks in Scotland.
- Greater recognition of the role that natural regeneration can play in woodland expansion.
- More guidance on balancing the objectives to achieve more balance between the three principal objectives of the Standard.
- Consideration of the risk of invasiveness from novel tree plantations, with an additional GPR for a detailed assessment of the risk of invasiveness for any new species as well as conducting a risk assessment and checking the species will be fit for purpose.

82. A small number of respondents also referred specifically to the glossary provided in the revised edition of the Standard, with suggestions that this should be extended to include more terms and to match other government guidance documentation.

83. As noted at some previous questions, there were a small number of references to the UKFS being too prescriptive or trying to be relevant to too many different stakeholder audiences. Also, that some of the language used is too mild in tone which can mean that some users can avoid reaching the minimum standard.

84. The final question then asked:

**Q7: 'Are you aware of any evidence that has been published since 2017 on sustainable forest management that should be considered when finalising the content of the next edition of the UKFS?'**

85. Respondents were also offered the opportunity to upload any files of evidence.

86. A wide range of references were provided and these are outlined in the table below.

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National Tree Safety Group – Common Sense Risk Management of Trees is due to be released in 2023 and contains an excellent section on 'duty of care' (The UKFS should make reference to this doc rather than trying to cover duty of care itself)
Natural England has commissioned some recent research to review the stock of existing woodland strategies at local authority, protected landscapes and other scales (It provides case studies of how selected examples help to guide the integration of woodland into the landscape and is also intended to complement research and internal work undertaken by the FC in connection with the England Tree Action Plan). The research is yet to be published (contact <a href="mailto:chris.bolton@naturalengland.org.uk">chris.bolton@naturalengland.org.uk</a> )
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Southern Upland Partnership Position Statement on Forestry: <a href="https://sup.org.uk/wp-content/uploads/Position-Statement-on-Forestry-in-South-Scotland-Final.pdf">https://sup.org.uk/wp-content/uploads/Position-Statement-on-Forestry-in-South-Scotland-Final.pdf</a>
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**Non-specific references**

work on Continuous Cover Forestry - multiple authors, including Forest Research

work on forest development types being led by Forest Research

work on pests and diseases from many sources, especially FERA, DEFRA and FR

New GB wide evidence (2020) has been published since last UKFS review on the ecological condition of woodland (via National Forest Inventory), which gives a signal for where to focus this UKFS review on, Forest Scotland.

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# APPENDIX 1: Respondent Organisations

ALGAO UK, Association of Local Government Officers
ALGAO: Cymru/Welsh Archaeological Trusts (curatorial sections)
Bidwells
British Association for Shooting and Conservation
Cairngorms National Park Authority
Chartered Institute for Archaeologists
CLA
Communities for Diverse Forestry
Confederation of Forest Industries UK
Continuous Cover Forestry Group
Dumfries and Galloway Council
Edwin Thompson
Forest Policy Group
Forest Stewardship Council (FSC) UK
Fountains Forestry UK Ltd
Gresham House
Historic England
Ilaria Ltd
Institute of Chartered Foresters
IUCN UK Peatland Programme
James Jones & Sons Ltd
Landscape Institute
National Trust for Scotland
Northern Ireland Environment Link
PEFC UK
Pryor & Rickett Silviculture
RDS Forestry Limited
Royal Forestry Society
RSPB
RTS Forestry
Scottish Environment LINK
Scottish Land & Estates
Scottish Outdoor Recreation Alliance
Scottish Wildlife Trust, Stirling & Clackmannanshire
Scottish Woodlands Limited
Seafield Estates
Tilhill Forestry Ltd
Trees for Life

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Wales Resilient Ecological Network (WaREN)

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Wildlife & Countryside Link

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Woodland Trust

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These do not add to 55 organisation names as a small number submitted more than one response.

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