

## **CWA response to UKFS review consultation**

### **1. Should references to the need to consider forest resilience and climate change adaptation be strengthened throughout the UKFS?**

Yes

A recurring theme in our response to this consultation is that much of what's required is already contained within the current UKFS, however in many cases the language needs strengthening ("consider" to "should", and "should" to "must") and a much stronger focus on monitoring and regulating compliance is required. We recognise that this first stage consultation is intended to focus on cross-cutting themes rather than detailed comment on the requirements of the standard, however, our contention is that refining and developing the existing requirements, and effectively ensuring compliance with them, is in many cases the best way to strengthen these cross-cutting themes.

Where forest managers are not following the steer of UKFS (the "shoulds") this needs to be justified and evidenced. Above all, it needs to be clear that meeting the UKFS is a minimum standard, not an aspiration: there are unfortunately too many cases (public and private sector) where UKFS is not being achieved on the ground.

We recognise that commenting on forestry planning and regulation standards is often a "glass half-full" situation, and stands in contrast to agriculture and other rural land uses where there is no glass at all. The desperate need to implement adequate planning, consultation and regulation arrangements for these other land uses does not diminish the need to ensure that forestry's standards are met and improved where necessary.

UKFS already contains several appropriate references to increasing diversity e.g. "Maintain or establish a diverse composition within the forest management unit" and "consider a wider range of tree species than has been typical of past planting" - these need to be backed up by stronger requirements, e.g. reducing the maximum % of any species within a management unit to 60%. We recognise that a) in many situations the diversification of existing woods will only occur after harvest, and b) some flexibility is required for very small woodlands or native woods where a greater % of the dominant species occurs naturally.

The guidance on defining management units should be refined to prevent "compliance allocation", i.e. it should not be permissible for large landowners to claim they are meeting UKFS by aggregating discrete forest blocks, some of which do not meet UKFS requirements individually (e.g. by saying "we can have a 90% spruce forest here because we also have a native wood over here").

There should be greater emphasis on alternatives to clearfell, or, where clearfell is unavoidable, to reducing coupe size, to a) minimise risk of slope erosion/failure, and b) reduce downstream flooding risk, given the expectation of increased likelihood of extreme weather events.

### **2. Should the UKFS further consider its approach to managing carbon in forests and woodlands and through the whole forest planning, managing and harvesting cycle?**

Yes

We agree that the role of forests and woodland in managing carbon is vitally important, and that consideration of carbon balances should be central to forest planning, however it should be acknowledged that some aspects are not fully understood (e.g. above-ground carbon balances are better understood than soil carbon dynamics) and the science is both developing and contested. As per our

response to Q8, a web-based presentation of UKFS with links to guidance, best practice etc, would enable the standard to keep abreast of the development of the science in this area.

We note (and welcome) the recent updated guidance on ground preparation for upland sites in Scotland and believe that UKFS should reflect this precautionary approach, i.e. ground disturbance at planting (and restock) should be the minimum required for successful establishment, and ploughing should not be permitted on peaty soils.

At the same time, UKFS needs to recognise that managing carbon is not the only objective of forestry, and must be balanced with other objectives, so there will be occasions where the best option from a carbon perspective may not be the preferred management option for delivering multiple objectives (an obvious example being species choice at establishment or restock).

There is also a need to broaden the focus of the approach to managing carbon to ensure that it encompasses the whole forest planning, managing and harvesting cycle, covering: a) ensuring greater recovery from harvesting sites b) minimising use of plastics (treeshelters etc) c) reducing timber transport by encouraging more local utilisation and processing.

In the longer term the greatest target for decarbonisation is diesel use by forestry machines and timber lorries but we recognise that this requires external industrial innovation.

### **3. Do you think that a more systematic approach to biosecurity should be taken in the UKFS across the entire forest planning and management cycle?**

No

Whilst we recognise that biosecurity is a major challenge for forestry in the UK (and it is a significant component of the broader resilience issue) many of the measures required are out-with the scope of UKFS, and need to be addressed by legislation and broader regulation (e.g. international trade in tree seedlings and wood products, garden centres / horticultural trade).

It would be possible to tighten wording of existing requirements (“Managers should be aware of the risks posed by pests and diseases, be vigilant in checking the condition of their forests and take responsible measures to combat threats to tree health”, “Information should be reported to the forestry authority that might assist in preventing the introduction or spread of forest pests and diseases” and “Suspected pests and diseases should be investigated, reported to the forestry authority and biosecurity control measures recommended by the forestry authority carried out.”) to replace “should” with “must”, but it is difficult to see how this could be policed - it would be preferable to ensure that forestry authorities in the four nations are adequately resourced to support forest owners to address biosecurity issues.

### **4. Does the UKFS need to develop its approach for stakeholder and public involvement?**

Yes

The UKFS approach to stakeholder and public involvement needs strengthening. This is partly a matter of tightening language and increasing accessibility of the opportunities for stakeholder and public involvement but also entails ensuring compliance with existing processes, which are too often not properly adhered to.

The current UKFS requirement to “Consider engaging with the local community by seeking their views...”, should be strengthened: it should be a requirement (“must”) for all proposals over a given size threshold (100ha?) and a strong steer (“should”) for all others.

The UKFS does not distinguish between stakeholder consultation for private sector long term forest planning or for woodland creation proposals, however, our perception is that the majority of the issues arise with the latter, and there would be value in the UKFS adding specific consultation requirements for afforestation proposals over a specific size threshold.

Evidence of stakeholder concerns and suggestions for improvement of the consultation process for afforestation projects: <https://forestry.gov.scot/publications/817-stakeholder-engagement-to-inform-development-of-a-regional-woodland-creation-framework-scottish-borders-pilot-areas-1-2>

Key issues include that the timetable for consultation is too short for effective engagement (especially for organisations such as community councils which typically meet once a month at most) and incomplete and inconsistent access to supporting information to facilitate responses.

UKFS should give a stronger steer as to how forest managers invite the views of local communities and other stakeholders, which for larger and high sensitivity schemes should go well beyond relying on the forestry authority’s public register (especially as IT issues appear to have been restricting the functionality of these). For large or sensitive afforestation schemes there should be a pre-application scoping phase (analogous to that for LTFP development), which would give local stakeholders the opportunity to contribute positively to the design of schemes, rather than being limited to a brief window to respond to submitted proposals.

There should also be a presumption of transparency with respect to supporting documents unless there is a clear and specific need otherwise (we are aware of forestry authority staff refusing to share plans and supporting documents with stakeholders on broad grounds of “confidentiality”). For new woodland creation proposals in particular it should be a requirement that all relevant surveys (e.g. phase I habitat surveys) are made publicly available (with limited redactions e.g. for personal details or protected species).

There should be much clearer requirements on all forest managers to demonstrate that they have properly considered and where appropriate addressed comments from stakeholders and the public: in effect to “show their workings”. We recognise that it is not possible to please all the people all the time and that some comments and inputs (from statutory bodies as well as the public) can be irrelevant and on occasion vexatious, but the answer to this should be greater transparency, not treating the process as tick-box exercise, the outputs of which can be ignored.

Example: in 2016 FES consulted on their Land Management Plan for a large forest with which I am very familiar. The “existing species” map provided for stakeholder consultation contained >50 sub-compartment species errors, including a couple of Sitka spruce stands of >5ha (clearly visible on aerial imagery) identified as “broadleaves”. An annotated map identifying the incorrectly mapped sub-compartments was provided to FES: this was acknowledged, but the “existing species” map which accompanied the published plan in 2018, now available on the FLS website, is identical to the consultation version and is dated July 2016.

There should also be a requirement on forestry authorities to demonstrate that they have properly assessed plans and stakeholder comments – there is a widespread perception (in Scotland) that FLS plans receive minimal oversight: we are aware, for example of a case where FLS proposed to restock a larch site being felled for *Phytophthora ramorum* with larch - this may have been an honest mistake by FLS, but should have been picked up by the forestry authority before approval.

**5. Should the UKFS approach to forest-level planning and management consider wider land use objectives and promote complementary action between the two?**

Yes

UKFS should explicitly identify these wider land-use objectives, which should include community empowerment and land reform, a just transition, and the contribution of access to greenspace and woodlands to health and well-being. (This is an area where there may be divergence between 4 nations).

As with several other aspects of UKFS, there is an even greater need for complementary action with respect to other land-uses to ensure they catch up with forestry.

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

Yes

The UKFS should include requirements covering minimising and managing waste, in particular covering the use and disposal of plastic tree guards and the disposal of fencing materials.

**7. Are there any other significant cross-cutting themes that should be integrated throughout the UKFS?**

No

**8. 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?**

No

Whilst there is value in maintaining a single document, whether physical or in pdf form, the current version contains a lot of repetition and could be slimmed down.

At the same time, there is scope for moving to a web-based presentation of the standard, incorporating links to appropriate additional guidance, interpretation and examples of best practice. This would allow the standard to stay up-to-date as, for example, new evidence on soil carbon dynamics emerges. It would also provide an opportunity to recognise and reference the increasingly divergent policy regimes, grant processes and implementation specifications between the four nations.

**9. Are there any other significant changes you would suggest to improve the usability of the UKFS?**

Yes

Key changes required are:

- 1 Clarification that UKFS is a minimum standard, not an aspiration;
- 2 Increased guidance on interpretation and examples of good practice;
- 3 Greater clarity as to how compliance with the standard will be monitored and policed.

The revised UKFS should give a clearer direction to Forestry Authorities as to their responsibilities to monitor and regulate compliance with the standard.

On balance, we agree with the maintenance of a single UK Forestry Standard, however there needs to be greater recognition of the diverging policy regimes and broader context between the four nations, particularly within the introductory sections (see also response to Q8 above). In particular the repeated assertion that “the UK does not have a tradition of forests owned or managed on a community basis” needs to be removed or at least qualified to note that in Scotland community ownership and management covers a significant area of land and has done so for many years.