

UK Forestry Standard: Proposed key changes
Wildlife & Countryside Link consultation response
August 2021

Introduction

- [Wildlife and Countryside Link](#) (Link) is the largest environment and wildlife coalition in England, bringing together 60 organisations to use their strong joint voice for the protection of nature. We welcome this consultation on proposed changes to the UK Forestry Standard.
- Wildlife and Countryside Link covers England only and our response represents an English perspective on the Forestry Standard. Our sister Links in Northern Ireland, Scotland and Wales will be submitting their own responses.

Consultation questions

1. Should references to the need to consider forest resilience and climate change adaptation be strengthened throughout the UKFS?
 - Yes. Forest resilience and climate change adaptation are critically important themes in both the management of existing woodlands and planning of new woodland.
 - These areas could be strengthened in the UKFS by a clear statement of objectives, from which beneficial climate and biodiversity outcomes can flow. For example, on climate change adaptation, a clear objective would be for woodland to contribute to resilience ecosystem networks and to provide shelter and sustenance for wildlife species vulnerable to climate change impacts. The UKFS should be clear that UKFS compliance requires contribution to biodiversity recovery, to address the twin crises of climate change and biodiversity loss.
 - These objectives should reflect and further the UK Government's net zero by 2050 target, international climate commitments made at COP26, and international biodiversity commitments made at CBD COP15. They should also be shaped by the latest research and best practice.
 - UKFS has an important role to play in setting robust and rigorous Good Forestry Practice (GFP) requirements, as well as legal requirements and guidelines. The legal and good forestry practice requirements and guidance that flow from UKFS objectives must acknowledge that different locations and woodland types require different approaches and make it clear that biodiverse woodlands are the most resilient woodlands. This will require revision of some parts of the existing standard which encourages a very low biodiversity ambition approach to planting. The current minimum requirement of 5% of native trees or shrubs, and the allowance of up to 75% of planting being from a single species, do too little to help biodiversity adapt to climate change. The minimum requirement for native trees or shrubs should be increased and the single species allowance reduced, to better address the biodiversity crisis. Modelling by the Woodland Trust has shown how diverse native woodland in England 'can deliver a far greater range of urgently needed outcomes, including carbon sequestration, a reduction in flood risk, improved health and wellbeing, and a restoration of

ecological networks for wildlife'¹. A new plantation will not be as resilient to many of the increasingly intense impacts of a changing climate as a more complex woodland with a range of individual ages and canopy (and subterranean) structures.

- This reflects a wider truth, that climate change and biodiversity decline cannot be placed in separate boxes and should be addressed together. Both are driven by the same exploitation of natural resources, and result in degraded and exploited natural systems which are not able to provide the nature-based solutions that are such a big part of the answer. We cannot solve one crisis without tackling the other. In the words of Environment Minister Lord Goldsmith: 'To put it simply: there is no pathway to tackling climate change that does not involve protecting and conserving nature on a massive scale'².
- As such biodiversity guidance in the UKFS also need to be strengthened, making use of the National Forest Inventory's ecological condition indicators³. Woodland managers should be encouraged to plant the native, resilient trees that grow easily in English soils. These native trees will remain viable in their current locations long into the future and will play a full part in restoring natural habitats and species⁴, at a time when 41% of our wildlife is in long-term decline⁵.
- This biodiversity objective needs to be accompanied by guidance that highlights the need for woodland planting and management to follow best biodiversity practice. This includes increasing connectiveness between woodlands and adopting a 'right tree in the right place' approach, recognising the distinct local character of each woodland. What constitutes a 'right tree in the right place' approach must be made clear, drawing on best practice and sound principles, such as the Link Woodland Expansion Principles for England.⁶
- This guidance should also stress the need to protect other priority habitats from inappropriate planting, including precious open habitats. The planting of even small pockets of woodland on open habitat can have adverse effects on some important species, including reptiles, amphibians, and invertebrates. UKFS should encourage woodland managers to follow priority habitats guidance⁷ and make use of tools such as local biodiversity plans for local authorities (BAPS) and Defra's MAGIC mapping system, and where necessary carry out appropriate surveys, to ensure that appropriate consideration is given to such priority habitats prior to planting. Woodland managers should be encouraged to restore, buffer and increase the extent and connectivity of priority habitats, and to monitor the results of this work.
- UKFS must do more to integrate biodiversity and climate friendly management approaches across standard forestry planning and management practice. Tree planting and management approaches designed to deliver for climate and nature should not be siloed away into discrete projects, but rather applied across all woodland.

¹ <https://www.woodlandtrust.org.uk/media/47692/emergency-tree-plan.pdf>

² <https://hansard.parliament.uk/lords/2021-04-22/debates/96FFCDF9-3044-4D7C-8399-B306FCA8A4D1/BiodiversityEmergency>

³ <https://www.forestresearch.gov.uk/tools-and-resources/national-forest-inventory/what-our-woodlands-and-tree-cover-outside-woodlands-are-like-today-8211-nfi-inventory-reports-and-woodland-map-reports/nfi-woodland-ecological-condition/>

⁴ <https://www.woodlandtrust.org.uk/media/47692/emergency-tree-plan.pdf> (chapter five)

⁵ <https://nbn.org.uk/stateofnature2019/>

⁶ https://www.wcl.org.uk/docs/Link_woodland_expansion_principles_Feb2020.pdf

⁷ Including the Government's open habitats guidance

- Natural regeneration of native woodland habitats is a key way to achieve this and should be encouraged throughout the UKFS. Natural regeneration allows a greater range of habitats to develop, including transition habitats which can be valuable to biodiversity. Some management of natural regeneration is still required, for example to manage grazing pressure, or to prevent invasive species from taking root. Protecting existing open habitats must include preventing self-seeding impacts from non-native forestry. The role of UKFS should be to better promote and accommodate this approach to woodland creation, including through compliance with grant funding and felling licensing requirements.
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. There is a need for clearer requirements on which sites are suitable and unsuitable for afforestation for commercial carbon sequestration schemes, in order to protect priority habitats. This includes stronger requirements and improved guidance on avoiding damaging planting on peatland, reflecting the evidence showing that afforested peat soils experience ongoing loss of carbon⁸. The new FC-NE interim framework for peatland afforestation suggests 30cm as a boundary figure for deep peat⁹.
 - There is also a need for clearer guidance on management approaches that will maximize the long-term storage and accumulation of carbon in the wider environment, including in the soil. This guidance needs to reflect that carbon storage potential from forestry is wider than the planning, managing, and harvesting cycle typical of commercial timber forestry.
 - There is increasing evidence that maximizing the biodiversity of woodlands also leads to carbon storage gains. This includes a 2019 Royal Society study, showing that the greater amount of tree species, the more carbon stored by the woodland as a whole, in trunks, roots, deadwood, mould and soil. This carbon sequestration increase was attributed to differing tree species allowing more sunlight into the woodland and to wildlife boosting plant abundance and improving soil quality. Overall, for each additional tree species, the total carbon stock of the woodland increased by 6.4%¹⁰.
 - Clearer guidance is also needed on comparative carbon cycle impacts of different approaches to harvesting, reflecting the latest evidence on clearfelling. That evidence, profiled in a 2020 literature review commissioned by RSPB, shows that for some scenarios rotational clearfelling is observed to result in a reduction in soil carbon stocks, which may persist beyond the first rotation.¹¹ In contrast, slow-growing deciduous trees managed under low-intensity systems, such as continuous cover forestry, can result in long-term forest carbon stocks.

⁸ <https://www.iucn-uk-peatlandprogramme.org/sites/default/files/2020-04/IUCN%20UK%20PP%20Peatlands%20and%20trees%20position%20statement%202020.pdf>

⁹ <https://www.gov.uk/government/publications/decision-support-framework-for-peatland-protection-and-the-establishment-of-new-woodland-interim-june-2021>

¹⁰ <https://royalsocietypublishing.org/doi/10.1098/rspb.2018.1240>

¹¹ https://ww2.rspb.org.uk/Images/Forestry%20and%20climate%20change%20report%20Feb%202020_tcm9-478449.pdf

- UKFS guidance should confirm that exceptional circumstances can apply to justify short term carbon loss, if this is required to secure a significant biodiversity outcome (such as works to restore nationally important habitats, including Plantation on Ancient Woodland Sites).
- It should made clear that UKFS only considers the tree growing part of the cycle and doesn't guide what happens to carbon after harvesting. UKFS does not ensure that timber production and use is sustainable or carbon positive and should not be used to imply this.

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?

- Yes, a more systematic approach to biosecurity should be taken in the UKFS across the entire forest planning and management cycle. Poor biosecurity can affect any type of woodland with potentially far reaching economic, social and environmental consequences.
- Previous versions of the UKFS had to follow EU trade rules on plant imports, trade rules which led to the inadvertent introduction of many new and serious tree pests and diseases. Brexit creates an opportunity for the UKFS to encourage a cultural shift toward growing of plants in the UK, reducing the risk of new pests and diseases.
- The UKFS should also encourage natural regeneration through its guidance and requirements, highlighting the biosecurity benefits this method of woodland creation provides. Natural regeneration does not require imports, either internationally or domestically, removing the need for any potentially contaminated material in the creation of new woodland.
- The England Tree Action Plan confirmed that the England Woodland Creation Offer would be used to support natural regeneration, part of increasing Government support and encouragement for this method of woodland creation. The UKFS should reflect this new support and encourage natural regeneration, highlighting the biosecurity and significant biodiversity benefits¹² this approach offers. The natural regeneration of native species also offers resilience advantages - the majority of native tree species hold a high proportion of genetic diversity. If trees are supported to self-seed and spread, this can allow genetic mixing and the natural selection of the fittest, so each successive generation of tree can become better adapted to changing climate conditions¹³.
- The UKFS should also set out processes woodland managers can adopt to regularly check for pests and diseases, and to report and deal with any instances as soon as they are noticed.
- At the nursery stage the UKFS should require that all trees planted should by default be sourced and grown as locally as possible to the planting site. The Woodland Trust's UKISG¹⁴ is an established assurance scheme and provides a model for this.

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

¹² <https://www.woodlandtrust.org.uk/plant-trees/natural-regeneration/>

¹³ <https://www.woodlandtrust.org.uk/media/47692/emergency-tree-plan.pdf>

¹⁴ <https://www.woodlandtrust.org.uk/about-us/what-we-do/we-plant-trees/uk-sourced-and-grown-scheme/#:~:text=Our%20UK%20and%20Ireland%20Sourced,Ireland%20for%20its%20entire%20lifespan.>

- Yes. UKFS must be more than a narrow document for forestry practitioners. It should be a user's guide, accessible to everyone who engages with woodland. The language in the current iteration can appear aimed at the forestry sector, this can result in it being misinterpreted.
 - The UKFS should include full guidance on public engagement, drawing on best practice and encouraging compliance with tools such as Quality Assurance in Consultation¹⁵, as set out by the Consultation Institute
5. Should the UKFS approach to forest-level planning and management consider wider land use objectives and promote complementary action between the two?
- Yes. The UKFS should require forestry establishment and management to be planned as part of wider landscape objective and ecosystem services.
 - This whole-landscape approach should apply throughout the UKFS, including carbon storage sections. Woodlands should be seen as one part of a wider carbon storing landscape, with all habitats contributing to sequestration to different degrees – some to a greater extent than woodland.
 - A whole-landscape approach should be complemented by coverage of the whole range of woodland uses, including public use of woodlands for recreation and exercise. The healthcare benefits of greater access to woodlands are particularly relevant, as we emerge from the pandemic with a new appreciation of the relationship between access to nature and public health. Access to green space boosts mental health¹⁶ and encourages physical activity, making it a doubly powerful preventative healthcare tool. Public Health England have estimated that savings worth £2.1 billion a year to the NHS could be realised if everyone in England had good access to greenspace¹⁷. The UKFS should play its part in achieving an increase in public access to green space, encouraging those managing woodlands to maximise access to them and supporting those planning new woodland to build access in from the start.
 - The UKFS should acknowledge the role that Local Nature Recovery Strategies will play in coordinating different land uses. Introduced by the Environment Bill (expected to receive royal assent in autumn 2021) Local Nature Recovery Strategies will be local-level, data-driven instruments to identify and prioritise opportunities for nature recovery, also serving as mechanisms for targeting funding. They are likely to operate at the county level and will cover the whole of England. Once in place they will have a critical role in informing woodland planting and management decisions.
 - Control of invasive species should also be required elements in forest plans and woodland creation schemes, to address the substantial threat to biodiversity that they represent.
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?

¹⁵ <https://www.consultationinstitute.org/services/quality-assurance/>

¹⁶ https://www.mentalhealth.org.uk/sites/default/files/MHAW21_NATURE%20REPORT_ENG_web.pdf

¹⁷

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904439/improving_access_to_greenspace_2020_review.pdf

- Yes, UKFS should encourage waste reduction across all woodland.
- This should include guidance on deer and squirrel control. Alternatives to plastic tree guards should be encouraged where possible.
- Waste measures should extend to other forms of pollution. The UK Woodland Assurance Standard has recently consulted¹⁸ on ending the use of toxic ammunition in certified woodlands, on the grounds that lead is known to affect all physiological systems in animals, causing a range of sub-lethal impacts and substantial suffering, as well as presenting health risks to people who frequently eat wild-shot game¹⁹. Switching to non-toxic ammunition in all woodlands is essential on health grounds and should be encouraged within the UKFS.
- Pesticide use in nurseries represents another form of pollution, that can reach woodlands through new planting of nursery grown saplings. The UKFS should contain guidance on addressing this risk, highlighting the particular dangers posed by the use of acetamiprid to protect young trees. Further evidence is needed on the environmental impacts of acetamiprid use, which should be avoided or minimised and phased out according to a precautionary approach.

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

- As stated above, natural regeneration is an effective way to create new woodlands for wildlife. It provides significant biodiversity and climate benefits, is more cost effective than sapling planting, and results in trees that are well adapted to local climatic and environmental conditions. The UKFS should encourage this approach wherever possible.
- Biodiverse approaches to woodland creation and management should also be promoted through a focus on improving the ecological condition of woodland. The National Forest Inventory has made clear that only a small percentage of existing woodland is in good ecological condition²⁰. Measures to improve this situation should be prioritised in the UKFS review.
- A focus on the users of woodland is also required. The UKFS should encourage those creating woodland management plans to always including consideration of the benefits of woodland to people, based on the needs of users, along with benefits to nature and climate.
- 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.
- Updated guidance on management approaches to irreplaceable habitats, and to novel species, would also be useful.

¹⁸ <https://www.fsc-uk.org/preview.ukwas-consultation-presentation.a-1158.pdf>

¹⁹ <https://www.rspb.org.uk/globalassets/downloads/documents/birds-and-wildlife/gamebird-shooting-review/lead-ammunition.pdf>

²⁰ https://www.forestresearch.gov.uk/documents/7535/FR_NFI_Condition_Scoring_Results_England.pdf

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?

- The UKFS is not currently presented in a way that all users find easy to navigate. This should be addressed by:

Language improvements:

- Refreshment of language used in the standard is needed to ensure it results in improved practice beyond legal minimums.
- Existing UKFS guidance frequently uses terms such as 'consider' and 'encourage' which do not give clarity on the limited circumstances when it may be acceptable not to follow guidance. This wording also leads to uncertainty as to when and if enforcement action will be forthcoming if guidance is not followed. The UKFS must use less ambiguous terms in its requirements and guidelines.

Structure improvements:

- UKFS should be available in multiple formats to suit the needs of different users. This should include pdf and webpage-based versions.
- The UKFS also needs to be searchable, with hyperlinks between related sections

Content improvements:

- The UKFS could be made more usable by clarity on what is a legal requirement and what is guidance and should retain its standard-setting role for UK forestry.
- A reduced amount of narrative and simplified chapter structure would also assist – are seven separate chapters really required?
- A common one-country approach to implementation and monitoring should be adopted, with clear signposting to individual country approaches where these are in place.
- There are also a range of more detailed improvements we would like to see. Due to the short timeframe of the consultation, it has been difficult to provide this level of detailed feedback. A number of key detail points are below:
- A sub-section could be usefully developed within section 6.1, highlighting the range of different woodland habitats, such as rides, open areas and ponds, and profiling the species associated with each habitat. The sub-section could encourage diverse habitat creation, highlighting its benefits and biodiversity and climate gains that flow from it.
- Table 5.1, on producing a Forest Management Plan, could be improved, with more detail, more engaging diagrams and hyperlinks to relevant sections provided. More information on what you need to do to produce a Forest Management Plan, where you might need support, when appropriate surveys need to be undertaken and when to contact the statutory agencies would be particularly helpful.
- The UKFS should also contain more information on how to access appropriate data to make woodland planting and management decisions. Access to up-to-date data is crucial to ensure woodland planning maximises biodiversity and prevents damages to existing biodiversity assets.

- A number of helpful documents on biodiversity could be linked to within the UKFS, including:
 - Woodland Pollinator Sheet²¹
 - Reptile Habitat Management Handbook²²
 - UK BAP Priority Species List²³
 - Woodland wildlife toolkit (web based tool)²⁴
9. Are there any other significant changes you would suggest to improve the usability of the UKFS?
- The UKFS should be clearer on the what, why and when of enforcement. It should provide much greater clarity on what happens if specific regulations and guidelines are not followed. This clarity should be supported with changes that make the document more accessible to ensure users understand what is being enforced. The language currently used is aimed at the forestry sector and could be misinterpreted by stakeholders.
 - Detail should also be provided on checks needed beyond management plan periods, to allow woodland managers to plan in the long term.
 - The UKFS should also be clearer on how Government will use the tools it has its disposal, including grant terms, felling licenses, EIA regulations. It should also clearly state the objectives the Government will be trying to meet in deploying these tools.

For questions or further information please contact:

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This response is supported by the following Link members:

Amphibian & Reptile Conservation Trust

Plantlife

RSPB

The Ramblers

The Wildlife Trusts

The Woodland Trust

²¹ https://cdn.buglife.org.uk/2019/07/Woodland-Pollinator-Sheet-Final_0.pdf

²² <https://www.arc-trust.org/habitat-management-handbooks>

²³ <https://jncc.gov.uk/our-work/uk-bap-priority-species/>

²⁴ <https://woodlandwildlifetoolkit.sylva.org.uk/>