

UK Forestry Standard: draft updated content

Response to consultation from Wildlife and Countryside Link

Introduction

- Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 67 organisations to use their joint voice for the protection of the natural world.
- Wildlife and Countryside Link covers England only and our response represents an English perspective on the UK Forestry Standard (UKFS). Our sister Links in Northern Ireland, Scotland and Wales will be submitting their own responses.
- We have provided responses to the questions where the expertise of our members can add relevant evidence for the consultation to consider. Overall, our response welcomes some improvements in the new edition of the UKFS, whilst highlighting a need to go further to strengthen nature recovery and biodiversity themes within the standard.

Response to call for evidence questions

- 1. 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?**

Biosecurity was highlighted as one of the six cross cutting themes, but there does not appear to be many new or improved requirements in response to the rapid increase in pests and diseases impacting the sector. Tree pests and diseases are becoming one of the greater threats to tree cover. The new edition should include more guidance on biosecurity, including measures to mitigate the risks of importing trees for planting, which is one of key pathways for introduced new pests and diseases.

- 4. 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?**

In Link's response to the initial 2021 consultation on reviewing the UKFS¹, we recommended that biodiversity themes be strengthened within the standard. We are pleased to see partial progress towards this in the new edition of the UKFS, although parts of the general forestry practice, biodiversity, climate change and soil chapters are still lacking in ambition for nature's recovery. Increased ambition for nature is required to ensure an effective balance between the economic, environmental, and social principles of sustainable forest management within the standard. Areas that still require strengthening for nature include:

- Minimum native & maximum single species requirements

¹ <https://www.wcl.org.uk/docs/UKFS%20Review%20-%20Link%20response%2010.08.21.pdf>

The 2017 edition of the UKFS² required a minimum of 5% of native trees or shrubs within a Forest Management Unit (FMU) and set a maximum allowance of up to 75% of trees being from a single species.

The new (GFP) GPR21 in the new edition of the UKFS³ updates these figures; to a minimum of 5 to 15% of native trees or shrubs within a FMU, and a maximum allowance of up to 65% of trees being from a single species.

These updates are welcome, given the biodiversity benefits provided by native species and species-diverse woodlands.⁴ However, the native minimum is not sufficiently clear or ambitious; setting a minimum within a moveable range will lead to the lower end of that range being used as the effective minimum. The range could well be read as retaining the existing minimum, whilst introducing a maximum, still at a low level.

The perception that the minimum for native species effectively remains at 5%, as the moveable range wording in the new edition allows for, contrasts sharply with the ambitious new commitment in the England Trees Action Plan 2021 to *“incentivize the creation of predominantly native broadleaf woodlands”*.⁵ Whilst this commitment only applies to England, similar aspirations to maximize native tree woodlands are held by the Scottish and Welsh Governments, and in Northern Ireland.⁶

A clearer approach, which would deliver more for biodiversity⁷, would be to set the native tree or shrub minimum at 15%, providing an unambiguous, ambitious benchmark. This should be combined with an uplift to B) GL16, which currently requires a minimum of 15% of a FMU to be managed with conservation and the enhancement of biodiversity as a major objective. This should be increased to 30%, to cover a new 15% native tree minimum and the requirement to manage 10% of a FMU as open ground or ground managed for the conservation and enhancement of biodiversity as the primary objective, with further headroom for nature. A 30% level would align with the UK Government’s 2020 commitment to manage 30% of land for nature by 2030.⁸

The maximum allowance of up to 65% of trees being from a single species is also insufficiently ambitious. A maximum allowance of 50% of trees being from a single species would deliver greater biodiversity and woodland resilience benefits.

²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/687147/The_UK_Forestry_Standard.pdf

³ https://consult.gov.scot/scottish-forestry/e8d0808b/user_uploads/ukfs-draft-document---consultation---october-2022.pdf

⁴ For a summary of these benefits, see: <https://naturallengland.blog.gov.uk/2020/12/03/tony-juniper-a-tree-pronged-approach-to-restoring-nature/>

⁵https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/987432/england-trees-action-plan.pdf

⁶ See for example - <https://gov.wales/every-household-wales-will-be-given-free-tree-plant-part-welsh-governments-commitment-tackle>

⁷ Also see the Woodland Trust’s State of the UK’s Woods & Trees 2021 report for further detail on these benefits: <https://www.woodlandtrust.org.uk/media/49731/state-of-the-uks-woods-and-trees-2021-the-woodland-trust.pdf>

⁸ <https://www.gov.uk/government/news/pm-commits-to-protect-30-of-uk-land-in-boost-for-biodiversity>

It should be flagged that footnote iii) to (GFP) GPR21 suggests a requirement to have a minimum of 15% native planting if woodland comprises 55% or below of a single species. This 15% would be welcome, as set out above, but would appear to conflict with the 5 to 15% native range proposed by the wording of (GFP) GPR21 itself. This should be clarified, by confirming a 15% native minimum throughout this section.

- Peat

The 2017 edition of the UKFS recommends that forest landowners and managers “avoid establishing new forests on soils with peat exceeding 50 cm in depth and on sites that would compromise the hydrology of adjacent bog or wetland habitats”. (S) GPR4 in the new edition of the UKFS provides some strengthening of language on this requirement, with the recommendation to ‘avoid’ replaced by the slightly firmer “new forests should not be established on soils with peat exceeding 50 cm in depth”.

Whilst this strengthening of language is welcome, the new edition should also highlight that soils with peat from 30 cm in depth, if they form an intrinsic component of the peat hydrological unit, also have potential for peatland restoration. This is the qualifying criteria now used for Nature for Climate Peatland Grant Scheme funding, and for Nature Scotland’s Peatland Action Fund. As stated in 2022 Defra, Natural England and Forestry Commission guidance on such funding decisions:

“The rationale for using a shallower cut-off is that the previous 50 cm threshold precluded a large part of the carbon store and made it more difficult to restore peatlands effectively. It also encouraged tree planting up to the edge of restoration sites with risks of trees self-seeding.”⁹

The new edition should not prohibit native woodland creation (especially through natural colonisation) on peat soils between 30cm and 50cm in depth (as is the case for all woodlands and forests on peat soils with a depth over 50cm). However, it should prohibit commercial afforestation on these sites as this risks large soil carbon losses and is not the best option for nature’s recovery. This would help ensure that more peatland is conserved and restored, benefitting biodiversity, carbon storage and flooding prevention.

- Biodiversity objectives

In Link’s 2021 consultation response, we recommended that the biodiversity chapter be built around a core biodiversity objective, to contribute to the recovery of nature. It is disappointing that the new edition of the UKFS does not contain such a core biodiversity objective.

Indeed, the new standard does not contain any reference to the Environment Act, which provides core biodiversity objectives for England. This is despite the Act’s core aims and key components, including the Local Nature Recovery Strategies (LNRSs) designed to deliver nature recovery at a landscape scale and the apex target to halt the decline in species abundance by 2030, being highly relevant to the biodiversity

⁹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/992439/Decision_support_framework_for_peatland_protection_and_the_establishment_of_new_woodland_Interim_June_2021_FINAL.pdf

chapter of the UKFS.¹⁰ The Environment Act, and similar pieces of legislation applying in Scotland, Wales and Northern Ireland, should be referenced within the UKFS, with forest managers encouraged to contribute to their objectives.

- Other points

A number of other recommendations from the Link 2021 consultation response designed to strengthen biodiversity themes have also not been taken up. Text in the new draft edition remains the same as the 2017 edition in the following key areas:

- Natural regeneration and colonization: Continues to be just 'encouraged' in (CC) GL15 despite natural regeneration offering significant environmental advantages.¹¹ Natural regeneration should also form the basis of a dedicated good practice requirement or guideline point in the biodiversity chapter, as well as in the climate change chapter, given the clear nature recovery benefits provided by this form of woodland creation and management.
- The use of chemical fertilisers: Continues to be a subject only for 'minimisation' through (GFP) GL20, despite the damage these products can inflict on woodland species.¹² A complete prohibition on using chemical fertilizers in sensitive woodland sites would deliver greater biodiversity benefits. The new edition should also consider tighter language on the use of pesticides, to ensure that requirements better deliver the aim to minimise their use.
- The planting of native species from non-local provenances: Is still listed as suitable for 'consideration' on page 33 in the biodiversity chapter, even though planting from local sources offers biodiversity, biosecurity and climate advantages.¹³ A good practice requirement encouraging local provenance for trees should be added to the biodiversity chapter.

On the positive side, it is welcome to see a new requirement through (B) GPR1 for forest plans to include measures to conserve, enhance or restore species identified in the statutory lists of priority species and habitats. This is an improvement on the 2017 UKFS, which did not tie these priority species obligations directly to forest plans.

Overall, despite some improvements on the 2017 edition, nature recovery and biodiversity themes remain somewhat underpowered in the new edition of the UKFS. This must be remedied if the UKFS is to strike an effective balance between the economic, environmental and social principles of sustainable forest management. As the report on the 2021 consultation highlights, *"significant numbers of respondents wished*

¹⁰ <https://www.gov.uk/government/news/world-leading-environment-act-becomes-law>

¹¹ See summary of those advantages here: <https://www.woodlandtrust.org.uk/plant-trees/natural-regeneration/>

¹² See RSPB paper on species impacts here: https://www.rspb.org.uk/globalassets/downloads/pa-documents/pesticides_and_wildlife_rspb_report.pdf

¹³ See Woodland Trust paper for more detail on these advantages: <https://www.woodlandtrust.org.uk/media/51501/tree-provenance-in-a-changing-climate-woodland-trust-position-statement.pdf>

to strengthen or enhance the biodiversity theme within the UKFS".¹⁴ Such enhancement is not yet fully evident in the new edition. Further strengthening of the biodiversity theme, both within the biodiversity chapter and in other parts of the UKFS, is required.

5. Do you think that the draft content of the new edition of the UKFS provides greater clarity than the current version on what is required of forest managers?

The draft new edition is clearer than the 2017 edition. In Link's 2021 consultation response, we suggested that the UKFS could be made more usable by clarity on what is a legal requirement and what is guidance. It is good to see this reflected in the new edition, with legal requirements clearly distinguished from good practice requirements and guidelines to implement those requirements, by the use of the consistent letter codes LR (for legal requirements), GPR (for good practice requirements) and GL (for guidelines), with prefixed chapter references (such as B for biodiversity chapter). This should be carried through into the final designed up edition, with consistent use of simple letter codes used instead of a more complex, confusing set of visual logos (as is the case in the 2017 edition).

6. Do you have any other comments you would like to make about the draft content of the new edition of the UKFS?

There are a number of other areas where guidance and language in the new edition can be improved.

- Flood risk

The new GFP GPR25 ('forest management should take account of flood risk to vulnerable downstream locations') is welcome, acknowledging the role that woodland can play in helping to reduce flood risk. However, the language could be stronger – 'take account' is a weak requirement. It should be complemented by a stronger requirement on woodland managers in flood-prone catchments to take active steps to restore natural systems that are more likely to hold water back.¹⁵

- Deer management

There is a distinct shift in language used around deer management in the new edition of the UKFS. Whilst the 2017 edition mentions culling only once, as something 'often' incorporated into a deer management plan, the new edition's general forestry practice chapter strongly suggesting that culling should always form part of a deer management plan (p21), which new (GFP) GPR6 states should always be applied in areas where deer are present. Given the complex welfare and biodiversity impacts involved, culling should be carefully considered in light of local circumstances.

¹⁴ <https://consult.gov.scot/scottish-forestry/5875ee93/results/whyresearch-ukfsconsultation2021analysisofresponsesfinal.pdf>

¹⁵ For an example of how nature restoration in woodland habitats can successfully reduce flooding risk, see the Sussex Flow Initiative: <http://www.sussexflowinitiative.org/>

- Access for people

It is disappointing that language around increasing woodland access has not been strengthened in the new edition. (P) GPR 1 simply retains the 2017 good practice requirement that “*landowners and managers should consider providing access to their forest, in addition to that required by statute*”.

Between the two editions, the Covid pandemic has demonstrated the health benefits of access to natural spaces, including woodland. 73% of UK adults surveyed in 2021 said that connecting with nature has been important in terms of managing their mental health during the pandemic¹⁶, a separate poll found 4 out of 5 people in England felt that an increase in accessible nature-rich areas should take place following Covid.¹⁷ This increased understanding of the need for accessible nature-rich areas, and increased evidence of the benefits of it, should be reflected better in the new edition, with a stronger encouragement on landowners and managers to increase access to woodland.

As part of this stronger encouragement to widen access, the UKFS should remind forest managers in England and Wales that unrecorded rights of way may be present on their land. When schemes are being designed and approved, forest managers should be encouraged to consult the register of Definitive Map Modification Order applications so that the design can consider any paths that are the subject of claims. Ideally, they should also consult the Ramblers’ Map of Lost Paths¹⁸ as this includes paths for which the claim is yet to be submitted.

- Open habitats

The new edition should provide more explicit guidance to discourage planting on non-woodland priority habitats and to encourage removal of trees where appropriate on those habitats, without requiring ‘compensatory planting’ where applicable. This would help to maintain and restore open habitats. While there is reference to peatland, the biodiversity importance of other habitats that could be adversely affected by forestry is not adequately reflected, and this could create conflicts in achieving biodiversity conservation.

- Hedgerows

The updated UKFS could be enhanced by including further reference to hedgerows and how these vital habitats can buttress and support the tree canopy, given the very close relationships between trees and hedgerows in farmed landscapes. Hedgerows offer a range of benefits that align with aims in the new edition of the UKFS, including carbon capture, increased biodiversity and reduced flooding.

¹⁶ <https://www.mentalhealth.org.uk/sites/default/files/2022-06/MHAW21-Nature-research-report.pdf>

¹⁷ <https://www.rspb.org.uk/about-the-rspb/about-us/media-centre/press-releases/nature-and-a-green-recovery-from-covid-19/>

¹⁸ <https://dontloseyourway.ramblers.org.uk/>

For questions or further information please contact:

Matt Browne, Head of Policy & Advocacy, Wildlife and Countryside Link

E: matt@wcl.org.uk

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