



UK Forestry Standard consultation 29/06/21 – 10/08/21

The UK Forestry Standard (UKFS) is the technical standard for sustainable forestry practice in England, Northern Ireland, Scotland and Wales. The UKFS was first published in 1998 and the current fourth edition was published in 2017. This consultation was part of a review of the current edition by the four administrations of the UK. This [first consultation](#) was intended to inform the considerations of the four country administrations regarding the cross-cutting themes that could be further developed in the next edition of the UKFS, supporting the principles of sustainable forest management. It was not looking for detailed comment on the current content, requirements and guidelines – these will be covered in a second consultation in spring 2022.

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

If Yes, please specify the potential areas you think should be covered, including robust evidence to support your comments.

If No, please state robust evidence to support your comments.

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?

If Yes, please specify the potential areas you think should be covered, including robust evidence to support your comments.

If No, please state robust evidence to support your comments.

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?

If Yes, please specify the potential areas you think should be covered, including robust evidence to support your comments.

If No, please state robust evidence to support your comments.

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

If Yes, please specify the potential areas you think should be covered, including robust evidence to support your comments.



We ask the Project Board to strengthen Requirements and Guidelines for stakeholder and public involvement, and indeed for Forests and People in general. Many UKFS Requirements and Guidelines involve taking certain factors into consideration, but relatively few ask the forest manager simply to consider doing something. Examples include Forests and Biodiversity Guideline 33 (consider expanding native woodland), Forests and Historic Environment Guideline 28 (consider providing access to features of historical interest), Forests and Landscape Guideline 6 (consider making use of a Landscape and Visual Impact Assessment), and Forests and Soil Guideline 19/Forests and Water Guideline 9 (consider planting woodland to protect erosion-prone soils and intercept sediment-laden run-off). Forests and People seems to contain a disproportionate number of calls merely to consider doing something, including at the Requirement level. The examples most immediately relevant to stakeholder and public involvement are perhaps good forestry practice requirement 7 (consideration should be given to involving people in the development of forestry proposals who have a recognisable interest in the proposal or its outcomes), and Guideline 1 (consider engaging with the local community by seeking their views, developing proposals that are responsive to them and building co-operative partnerships), but there are many other examples relating to public access, community use, education, volunteering, and local enterprise. While we recognise that circumstances and capacity can vary hugely from one forest to the next, only requiring forest managers to 'consider' taking action on these issues seems to downplay the importance of stakeholder engagement and the social benefits of forestry relative to all the other elements of sustainable forest management covered by UKFS. As implemented in this country through the UK Woodland Assurance Standard, the FSC Principles and Criteria require a certified organisation, 'proportionate to scale, intensity and risk of management activities', to 'proactively and transparently engage affected stakeholders in its management planning and monitoring processes', and to 'engage interested stakeholders on request'. The extent of certification in the UK shows that many forest managers are perfectly capable of meeting this requirement. We ask that, at the very least, the Project Board strengthen Requirements and Guidelines for stakeholder and public involvement in line with FSC/UKWAS requirements, but we would also welcome dialogue on strengthening other aspects of Forests and People in line with our Principles and Criteria.

If No, please state robust evidence to support your comments.

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

If Yes, please specify the potential areas you think should be covered, including robust evidence to support your comments.

If No, please state robust evidence to support your comments.



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?

If Yes, please specify the potential areas you think should be covered, including robust evidence to support your comments.

If No, please state robust evidence to support your comments.

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

If Yes, please specify the potential areas you think should be covered, including robust evidence to support your comments.

If No, please state robust evidence to support your comments.

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?

If Yes, please specify the potential areas you think should be covered, including robust evidence to support your comments.

If No, please state robust evidence to support your comments.

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

If Yes, please specify the potential areas you think should be covered, including robust evidence to support your comments.

We ask the Project Board to consider clarifying the status of UKFS Guidelines. On one hand they are described as 'guidance and advice for forest and woodland managers and practitioners', implying a degree of discretion in their application, while on the other hand they are described as 'the basis for assessing proposals, management operations and activities to ensure the sustainability of UK forests and woodlands' (p. 2). Whereas 'specific maximum and minimum values or proportions... serve as a starting point for assessing compliance with the Requirements', again implying a degree of discretion, it seems that 'a reasonable case for divergence' can only be made in 'exceptional circumstances' (p. 4). This last statement appears to give Guidelines the same status as good forestry practice requirements, from which 'there may, in exceptional cases, be reasons for divergence' (p. 4). Perhaps the Project Board could



indicate whether there is less, equal or greater scope for discretion with regard to compliance to Guidelines relative to good forestry practice requirements.

If No, please state robust evidence to support your comments.

FSC UK

info@fsc-uk.org · fsc-uk.org · 01686 413 916 · FSC® F000231

The Billiard Room · Town Hall · Great Oak Street · Llanidloes · Powys · SY18 6BN

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