

### Specific Comment by Clause

Number	Requirement	Comment
1.1.3	The identity of the owner/tenant and their legal ownership or tenure shall be proven.	There is a need for clarity as to which tenants this applies to. Does it include all shooting and recreational tenants for example?
2.2.2	Availability of management plan documentation	Simplify so that only a summary is required to be publicly available.
2.8.1	Tree species selection, within a Woodland Management Unit	Is there opportunity for flexibility in the definition of a WMU, to include “off-site” areas to make better use of productive ground within the main WMU.
2.14.2	The owner/manager shall where applicable monitor and record. ...	This is an extensive list of requirements, however the key phrase is “where applicable” – is this list too long? Is more guidance needed ?
3.2.2	Harvesting documentation	Add (words in bold) - .... that are to be sold <b>by the woodland owner/manager</b> as certified .....
4.4	Protection of conservation value in other woodlands ...	This clause is confusing if read separately from 4.3 – suggest that it is simplified to read “Protection of conservation values in woodlands .... “
4.4.2	Restoration of semi-natural habitats	Is this requirement to “open-ended” – much planted moorland has a “high potential” to be restored?
4.7.1	Local Seed Sources	Is this too restrictive and impractical, given the impact of climate change. Should we be sourcing “native” seeds from more southerly regions?