

Overview of the UK Forestry Standard

CONFOR RESPONSE TO THE CONSULTATION

Introduction

About Confor

Confor (www.confor.org.uk) is the not-for-profit organisation for the UK's sustainable forestry and wood-using businesses. It has 1,500 member companies, representing the whole forestry and wood supply chain from seed to saw.

About this consultation

To inform the review an initial assessment of the Standard's current technical content has been undertaken by specialists from the country forest authorities and administrations, Forest Research and external reviewers. This initial work suggested that, once updated, the majority of the technical content in the existing edition remains relevant.

However, the assessment also identified a number of significant cross-cutting themes that are relevant across the Standard and could be developed further. These cross-cutting themes form the basis of this first consultation and can be summarised as:

- Forest resilience and climate change adaptation
- Managing carbon
- A systematic approach to biosecurity
- Stakeholder and public involvement
- Complementary action between woodlands and wider land use objectives
- Minimising and managing manufactured waste.

This first consultation will help 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 is not looking for detailed comment on the current content, requirements and guidelines - these will be covered in the second consultation next spring.

Consultation questions

Q1. Should references to the need to consider forest resilience and climate change adaptation be strengthened throughout the UKFS?

The UKFS (the Standard) is used by professional foresters to support their work managing a wide range of forests and woodlands across the UK. The UK may only have 13% woodland cover, but that cover is incredibly diverse, in terms of location, precipitation, soil, altitude, exposure, to name but a few influencing factors. The professional forester uses the UKFS and their experience to ensure that the forest is resilient, sustainable and viable. Therefore, the UKFS cannot lay out generic sweeping statements that support one type of forestry and not another.

The forestry industry has been, and is, tackling the Climate Crisis [here](#).

Confor is a key signatory of the Climate Change Accord 2015 [here](#), and the Action Plan for Climate Change Adaptation of forest, woods and trees in England 2018 [here](#).

The Climate Change Adaptation Progress report 2019, [here](#), sets out several asks in any revision of the UKFS.

The recent Welsh Government Trees and Timber deep dive recommendations refers to climate change directly in numbers 13 and 14. The recommendations refer to the need to be flexible with tree species to adapt to climate change along with being innovative and taking latest research into account. The UKFS should not 'set in stone' recommendations that prevent foresters from being able to create resilient woodlands based on new science and experience.

Scottish government ambitions for forestry and wood-based industries contribution to climate change mitigation is laid out in the most recent [Climate Change Action Plan](#)

Resilience is about being flexible and being able to adapt when needed; forest plans should be adaptable to deal with sudden changes to the climate, the local and national economy, and other events such as global pandemics. Forests need to be resilient in many aspects including economically resilient. Each tree species is worth a different amount in timber value, and you need enough high value material to cover the cost of the low to no value material.

Resilience is also about ensuring the trees planted do more than just survive; healthy trees are more capable of resisting pests and pathogens, so planting trees not suitable to the site will result in weak trees that could slowly die and become a doorway to infection for the rest of the site, [here](#). The UKFS should support professional foresters to make the right choices to ensure their forests are viable.

It is important that sites are planted with the right species and in sufficient density to ensure both financial stability and resilience to all potential threats, those we know about now and those that may develop in years to come.

Q2. Should the UKFS further consider its approach to managing carbon in forests and woodlands and through the whole forest planning, managing and harvesting cycle?

Carbon is an important part of modern forest management however managing carbon within the forest cycle is still being researched. There have been many papers written on the subject but due to the wide range of woodland types we do not have a definitive answer, therefore yes the UKFS should support carbon in woodlands but not so prescriptively that it prevents foresters from 'following the science' as it emerges, and also carbon should not be given so much significance in the UKFS that it eclipses other valid management objectives, including providing future supplies of wood and providing income to manage woodland, because without management woodland will be less resilient, less able to deliver its potential and more at risk of pests and diseases that aren't spotted early enough. In the recent Royal Forestry Society conference several of the presenters were researching carbon in various formats, each was indicating early positive results, but we are nowhere near a position to radically change silvicultural practice – yet.

The targets for Net Zero are less than a forestry cycle away, the actions taken now will impact 2050. In order that forestry plays its full role in reducing carbon in the atmosphere it is important to use species that can sequester carbon the quickest but also can be used in long life projects to store the carbon past the point of felling such as construction. High yield class species have an important part to play

in achieving Net Zero. This is shown in the policy briefing note ‘Newly planted commercial forest can achieve 269% greater climate change mitigation than semi-natural alternatives’ [here](#).

It is also vital that a whole life-cycle approach is taken to assessing carbon and therefore the guidance that is provided in the UKFS – a focus only on the forest will produce unintended consequences that undermine achievement of Net Zero through other means, eg greater use of wood in housing and construction generally.

Q3. Do you think that a more systematic approach to biosecurity should be taken in the UKFS across the entire forest planning and management cycle?

The forestry industry already has, and demonstrates, best practice guidance in terms of biosecurity from nurseries through to sawmills. This has been evidenced by the way that woodland owners and contractors comply with SPHNS, nurseries have signed up to Plant Healthy and sawmills manage residues from infected trees. However, pests and diseases are one of the biggest potential threats to forestry, so it is imperative that good biosecurity is maintained by all. However, this comes at a price. The physical materials and the time to carry it out adds pressure to an already stretched budget. In order to maintain a woodland’s financial stability innovative biosecurity measures are required to make the process easier for all.

Forests have many users, and this is a weak link in the bio secure chain, e.g., non-professional visitors (both legal and illegal) are less likely to carry out good biosecurity. There is robust evidence that cleaning vehicles reduces the spread of diseases such as P. lateralis, [here](#), but it is highly unlikely that illegal users such as fly tippers or motor bikers are washing down as they leave a woodland. However, the UKFS should think carefully about resourcing and practicality before implementing guidance asking forest owners to create biosecurity cleaning stations for visitors. During 2020 /2021 there has been a massive rise in the area of woodland being visited. Forestry England recorded an increase of 35%, [here](#), and Confor members also reported, anecdotally, damage to woodland sites increasing.

This damage includes fly tipping such as garden waste which is known as a potential source of pest/pathogen entry into a woodland. The Commission for Architecture and the Built Environment along with Scottish Forestry advise against target hardening, [here](#), so, this leaves woodland owners with few options to protect woodlands or infrastructure. There is a need for good biosecurity to protect these sites, but it must be implemented in way that does not increase the burden on the woodland owner/manager.

Q4. Does the UKFS need to develop its approach for stakeholder and public involvement?

Confor members believe, that in recent years, the amount of anecdotal evidence from stakeholders preventing forest operations has massively increased. The UKFS needs to develop its approach to support foresters in doing their job and recognise their profession and expertise. Stakeholders have a right to be heard but should not be able to unduly, and without robust evidence, prevent or change forest operations that affect the viability of projects. The UKFS should be the bedrock for consultation, with foresters and stakeholders agreeing to work to set time scales within the Standard. Consultation periods should be clear and respected by everyone involved with it. E.g., should a stakeholder not reply to a consultation that does not give them the right to delay or use holding tactics to prevent good forest practice.

The forestry cycle is a long-term commitment, and many professional foresters may never fell the trees they plant, however trees are still a crop to be tended and harvested like any other agricultural crop. Currently the UKFS states ‘consideration’ (p136) when dealing with public involvement, however that should not mean that as professional foresters the ‘advice’ of the public needs to then automatically be followed - it is known that many people don’t like change and others may have their own particular view about what they see as right or wrong practice which is very personal. Therefore, the UKFS should develop its approach to public involvement to support the forester when they are following industry best practice. Unlike agricultural crops the wider public often has a sense of attachment to their local woods and forests even if they have no legal ownership over them, hence the heightened emotions that are often involved with forestry operations. The UKFS should be there to support foresters, and to do that it needs to be easier for the ‘lay’ person to read, follow and understand.

Q5. Should the UKFS approach to forest-level planning and management consider wider land use objectives and promote complementary action between the two?

Forestry is a long-term land management option, and it has the potential to affect neighbouring land use via elements such as water flow. The UK is relatively a small island consisting of many landowners with competing aims hence the requirement for consultation. Wider land use objects such as water flow, habitat corridors and deer management require cross boundary co-operation, so the UKFS should be supporting professional foresters to achieve such aims. Complementary planning already happens where the landowner is the same either side of the woodland boundary, the difficulty is when the land ownership changes at the woodland boundary. Currently there is no requirement for an agricultural holding that neighbours a woodland to undertake any form of consultation or complementary action barring a limited number of environmental activities, these do not include general agriculture activities. Complementary implies that both parties take part for the benefit of both. The UKFS should not be adding further burden to woodland management but should be supporting wider land management in such a way that it benefits all involved.

As other standards and strategies are written and implemented such as the upcoming England Deer Management Strategy and the whole holding Land Management Plans proposed under ELMs, more integration will naturally occur. It is important that the UKFS can support, capitalise and develop actions that allow foresters to integrate their plans with others while also retaining the freedom to manage their forests professionally. As a standard for forestry the UKFS needs to maintain its focus on forestry.

Q6. Do you think the UKFS should strengthen its approach to minimising and managing manufactured waste generated by all aspects of woodland management and operations?

The UKFS already supports existing regulation such as Control of Substances Hazard to Health and several waste management regulations (p214), so this already constitutes a strong approach. However, if there is strong evidence that manufactured waste from woodland management and operations is significantly increasing, then it would be beneficial to strengthen the approach to identifying best practice and guidance rather than regulation.

There are ongoing challenges with waste created by other forest users both legal and illegal. While camping in some areas is allowed there has been a significant increase in the amount of waste being left behind. Some in-forest activities do produce their own issues such as game rearing. However, the game industry has its own best practice and administering organisations, the UKFS should support/complement these organisations rather than replace them.

Where possible, prescriptive language should be avoided to allow the professional forester to use the latest technologies and practices, within the law, to carry out their job. Tree tubes are a good example of how a concept introduced years ago to improve tree establishment has created an issue for today, which the industry itself is already seeking to address, [here](#), without regulation but would benefit from support and encouragement from the UKFS.

Q7. Are there any other significant cross-cutting themes that should be integrated throughout the UKFS?

The majority of Confor members consulted answered this question as ‘no, keep the Standard simple’, but there were some who felt that the Standard could do more to highlight those people working within the forest supply chain. To expand the section about employment (p16) from one paragraph to be included within the introduction to each section. The UKFS in many ways celebrates the high level of best practice followed in the UK and as such it should celebrate the people as well. The benefit of expanding this section is to ensure that non-foresters who use the Standard can see the full expanse of specialists who are the vital cogs of the industry and delivering thriving and resilient forests.

Woodland creation is mentioned throughout the UKFS along with the many benefits of trees and woodlands; however, these benefits may not be fully realised if new sites are not managed. The UKFS should make it clear that new woodlands should be managed and maintained in order to achieve their full potential. This should be integrated as a theme, not for the professional foresters but for the others who use the UKFS especially in terms of woodland creation.

In consideration of prevalent market conditions where 80% of wood products used in the UK are imported and forecasts are strongly indicating global demand for wood products are going to at least double in the next 25 years, Confor believes that an important cross-cutting theme for UKFS should be ensuring the increase of a strategic wood fibre reserve to maximise the contribution trees and timber can make to green economic growth and climate change mitigation including material substitution and long term carbon storage.

Q8. 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?

This was a difficult question to answer as most members had differing views. The symbols and colours were mostly appreciated for making the Standard easier to navigate. Overall, the idea of the chapters or books work, as they allow the reader to quickly focus on one topic. However, that was also the downfall in that often the same information is repeated in different sections. For example, General Forestry Practice number 24 is repeated in climate change 15, water 57 and soil 5. And while the statement is important and can sit under all four headings it makes the document more difficult to navigate especially for non-professionals or those that use it infrequently. It also then makes the document longer than it needs to be.

There is a considerable amount of background information within the document and while useful for non-foresters it was felt that it overloaded the Standard making it longer than needed. Also, there were concerns about how current the background information could be kept up to date given the amount of research currently being undertaken and implemented.

Of the suggestions to improve the useability of the Standard several styles were mentioned by different members:

1. Consider mapping the points to allow easy cross check such as a tube map approach
2. More people are using it online so consider embedding the links to other documents in the text rather than at the end
3. Creating a shortened version with just the legal and good practice requirements in – a handy version to use in the field but having the full version to fall back on if required.
4. A version that loads easier on a phone (similar to number 3).

Q9. Are there any other significant changes you would suggest to improve the usability of the UKFS?

The overriding theme that come through from members when discussing this question was ‘keep it simple’. They want the UKFS to work for them and to support the industry. To that end the type of language used is very important as so much can hinge on single words and meanings. We suggest using ‘aspire to’ ‘endeavour’ ‘ideally’ rather than ‘must’ ‘have to’. The UKFS should be a positive document and the language used should reflect that.

A final word. Ensure professional foresters can use their experience and expertise to make local adjustments to forest management. The UK has an incredible range of woodlands and a national Standard need to support and recognise them all.