

Summary of 1st round and consideration of 2nd round UKWAS 2021

The 1st round was open to consultation in March & April 2021. Confor submitted a response, in total there were 38 (full list on UKWAS website). Of those responses a quarter were from ENGOs and only one public forest. In general foresters were outnumbered by other forest users.

The 2nd round is open now, closing on the 30th November 2021.

The Confor response had some impact and minor changes can be attributed to some of our comments. However several key issues still remain (listed below). The evidence presented to counter changes is still strong and some new evidence that can be added. In general the whole scheme is leaning more to conservation than commercial forestry.

In order to resist changes we must have our voices heard and in volume. Therefore for this second round we need to have a significant number of foresters submit a response. The Confor response will be available for anyone to use as a base. I would suggest the main undercutting theme should be forestry needs to be financially viable to support the non-economically elements of UKWAS, this is a point that is in danger of being lost.

There are two main issues which I have underlined 4.1.1. and 4.3.1.

Key points in the consultation which need to be addressed

2.6.1 – woodland creation new guidance states that afforestation may not be appropriate. Confor reply that decision is for the woodland owners, forestry professionals rather than UKWAS.

2.11.1 - during round 1 it was suggested that the area of a woodland managed primary for conservation increased from 15% to 30%. This was not accepted by the working group but shows how much pressure UKWAS is under.

3.1.2 – requirement to where possible reduce CO2 emissions across all forestry operations - the wording is open enough to allow current practices to continue but when UKWAS 6 comes along don't be surprised to see the wording strengthened!

3.2.3 – in round 1 a new requirement stated 'no stump harvesting', in round 2 the wording has been changed to allow stump removal for small set of reasons – biomass is not one of them. Confor argued against this new section and will continue to. If this is likely to affect your business, please let us know as stronger evidence is needed.

3.2.5 Ground preparation – UKWAS does not say no to deep ploughing instead it refers to minimising soil carbon loss and minimising cultivation and draining. However it does concede that managers should follow best practice so if best practice where to allow ploughing, then it would be allowed under UKWAS.

4.1.1 New requirement states that areas of high conservation (such as SSSI, SAC, NNR) are to be brought into good condition, the earlier wording was maintain and if possible enhance. However now if your WMU includes a SSSI that is declining you must revert it, however if you do not have complete ownership of the SSSI this would be beyond your control but still an auditable item you could not achieve.

Several points make reference to embedded carbon cost highlighting the need for a strong understanding of carbon within the woodland and supply chain pre and post forest gate.

4.3.1. g - states that all PAWS must be restored to native woodland. Although there is no time stated, WMU would need to show in the management plans how and when this would be achieved and could potentially be time limited in the future.

4.4.3 - the increase in semi natural habitat proposed in round 1 was from 5% to 10% this has stayed in but it does contribute to the 15% of the overall WMU managed primarily for conservation. I doubt it will be removed, but worth highlighting.

4.6.1 – natural reserves are (now/new) to be maintained in a favourable condition (requirement). This presents the issue of additional cost of maintaining a favourable condition in an area that may not generate much revenue.

4.6.4 – proposed change to levels of deadwood on site from 20 m³ per ha to 40 m³ per ha. Although deadwood is an important habitat it must be suitable to the site and species. There are no requirements on the type of deadwood, such as standing or diameter / thickness, but it cannot include stumps.

4.9.1 - b) Game release pens are located outside areas of high conservation value. This is a defined list by UKWAS and may not affect many WMUs. However should that list be expanded in future versions to include (for example) nature recovery areas (as suggested in round 1) or national parks then it will have a much bigger impact, this may be a loop hole that ENGOs seek to exploit.

5.3.1 – requirement to benefit 'locals'. RH raised the question 'what is local' in round 1 and could hyper theoretically auditors set a distance for contractors to be sourced from? The answer given was local has not been a issue with audits. This is not a good enough answer as we have seen FSC / ASI / SA tighten up elements (out sourcer issue) that have not been audited before.

5.5.1 – strengthen requirement - Where volunteers work on a site, they are treated commensurately with employees. Confor responded in first round however the working group did not make any changes for the 2nd round. Is this requirement likely to affect you? Information from members on this topic would be welcomed.

Glossary / definition issues

Genetically modified organisms (GMOS) definition is written to include gene edited organisms, such as the work on Grey Squirrels by Prof. Bruce Whitelaw at The Roslin Institute. Confor will be arguing that gene editing of GS has a limited life span unlike many of the early plant based experiments. Therefore the definition should be amended to show a better understanding of GMOs.

Repeated attempts to change Lower impact silvicultural systems (LISS) to Continuous Cover Forestry (CCF). However there was no desire from working group to change this but again it shows pressure from outside the commercial industry which could have far reaching impacts on timber production.

Areas Confor has had direct impact

There are some points in round 1 on which the Confor response has had impact:

2.1.3 - removal of wording indicating that resources to support the management plan are held and available for the length of the plan. This could have been interpreted as cash reserves. This wording has been removed.

2.2.1 – extra wording in guidance relating to carbon storage in wood products after the timber leaves the woodland. This is an important step as it moves the carbon discussion away from only being about in woodland benefits.

2.7.1 – removal of word gradually from restructuring of even aged woodland to allow managers to carry out operations in time period suitable for the site.

2.8.1 – in guidance there is recognition that non-native species may be appropriate in relation to climate change [assumption that this refers to carbon capture and storage].

3.2.5 – in guidance, reference to carbon balance explained in greater detail so not to be interpreted as a figure based on measuring exact carbon within a site.

Summary

Conservation aims and values are spread throughout the standard, for the majority of WMU owners / managers it is expected that the burden of these measures will be administrative as modern commercial forestry already encompasses these elements. However Confor has pointed out that additional administrative burden can create problems and dissatisfaction with any scheme. Certification of woodland is a high priority in order to supply the demands customers. There is a concern that smaller woodlands can find enough markets without certification which then removes a potential timber source from the certified sector.