

LINK Consultation Response

Woodland Group response to UKFS consultation

10th August 2021



Scottish
Environment
LINK

Woodland Group response to the 'UK Forest Standard: proposed key changes' consultation

Consultation questions:

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

Yes, however, the current version of the UKFS has extensive references to climate change adaptation, alongside mitigation. The wording needs to be strengthened by being updated to the latest research, legislation and policy context but as far as references go, forest resilience and climate change already feature prominently throughout the UKFS. The issue in reality is that the UKFS needs to consider translating the references into requirements.

The UKFS does need to give much stronger consideration to ensuring that forest planning and management deliver action on the ground to increase forest resilience and climate change adaptation. There seems to be a gap between rhetoric and reality when it comes to the references to climate change adaptation and what is happening on the ground. This also highlights the UKFS implementation needs to be monitored on the ground. A clear example is the UKFS stating *'Introducing diversity in tree species and origins will ensure some thrive should others decline'* and yet in Scotland, the forestry sector is dominated by one tree species, which puts the sector at high risk because of the lack of diversity and long-term planning to diversify the sector. LINK would like to see consideration given to the requirement that a maximum of 75% may be allocated to a single species and if this is still appropriate for forest resilience and diversity and in line with national forest strategies, including the Forestry Strategy for Scotland. The requirement for a minimum 5% native broadleaves should also be reviewed and increased, as should the minimum open ground requirement. Further consideration should be given to how the UKFS can direct the strategic placement of native broadleaves planted to deliver the most benefit on site ie. where there are riparian areas, to link up other habitats, for amenity.

Another important example of rhetoric that is not translated into the reality of the woods and trees supported by grant schemes, is the UKFS guidance *'Woodland and trees that are appropriately located can help to alleviate the impacts of climate change on society and the environment'* and yet in Scotland there has been a failure to implement the Land Use Strategy and ensure that trees and woods are planted in the right place for the right reasons, and integrated with other land uses and delivering across multiple objectives. We believe that there are opportunities to strengthen the wording and implementation of the UKFS that would support the delivery of good practice on the ground across the UK and in Scotland.

The UKFS needs to introduce references and guidance to also reflect the nature emergency, the need to reverse nature's decline and the role of the UKFS and forestry sector in relation to the nature emergency. The wording used should reflect the context of the nature and climate emergency, or twin nature and climate crises. There is recognition that these crises are interlinked, and that trees and woods have a role to play in addressing these twin crises as nature-based solutions. Scottish Environment LINK uses the IUCN definition of nature-based solutions, and we recommend that this definition is also reflected within the UKFS in relation to the concept of nature-based solutions.

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?

The UKFS should consider its approach to tackling the twin climate and nature crises, which have been acknowledged by governments across the UK as interlinked. In Scotland the First Minister said in 2019 that *"The challenges facing biodiversity are as important as the challenge of climate change, and I want Scotland to be*



leading the way in our response.” Recently the Welsh Parliament also declared a nature emergency. In light of the prominence and scale of the challenge to address these twin crises the UKFS should fully consider how it can put forestry on the pathway to address these twin crises. We agree that the approach on carbon management in forests should extend to the whole forest planning, management and harvesting, but so should the approach to making forestry more nature-friendly be extended throughout the full cycle. The UKFS should seek to make the forestry sector one that benefits nature and climate, not a sector that avoids negative impacts on nature and climate.

On the question of carbon management, we agree that the UKFS should further consider its approach and incorporate carbon management throughout the whole forest cycle. The UKFS must work to improve both carbon sequestration and the security of forest carbon stores throughout the forestry cycle. This cycle starts with considering soil carbon and appropriate cultivation techniques for different soil types, based on the latest research; sound silviculture practices that can minimise carbon loss during harvesting and support the increase in timber products that store long-term, and also ensure the security and permanence of existing woods as valuable carbon stores and havens for biodiversity.

We note that in England, the recent Forestry Commission, Forest Research and Natural England “Decision support framework for peatland protection and the establishment of new woodland (Interim) June 2021 - GOV.UK (www.gov.uk)” categorises soils with a peat layer of 30cm or thicker as ‘deep peat’, stipulating that woodland creation will not be approved, except for some low density woodland types by agreement with the Forestry Commission. As the current UK Forestry Standard defines deep peats as soils with ‘peat exceeding 50 cm in depth’ and this is the depth currently applied in Scotland, we recommend that further discussion is undertaken, especially with Forest Research, to determine a UK wide definition which provides the best protection for carbon stocks in peat soils.

The UKFS requirements and guidance should be based on a thought-through strategy on the best blend of commercial, mixed and native woods and trees to address the climate and nature emergency.

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?

Yes. Biosecurity matters because imported plants pose a high risk for the introduction of new pests and diseases. In the context of climate change, which can exacerbate trees pests and diseases, increasing tree planting targets, and with an already high incidence of trees pests and diseases introduced in the UK since the 1990 (State of Woods and Trees, 2021), it’s all the more important that a thorough, more systematic approach is taken to biosecurity in the UKFS from forest planning and throughout the management cycle.

Throughout the UK we need to move away from importing trees outwith the UK and Ireland. To do this there needs to be significant investment in the nursery sector and into mainstreaming biosecurity assurance schemes such as the UK and Ireland Sourced and Grown (UKISG) scheme. In all circumstances the origin of the plants should be known, and UK and Irish grown plants preferred. Importing trees should be a last resort rather than the default. The UKFS can take a more systematic approach to biosecurity by introducing biosecurity requirements from nursery to harvesting. At the nursery stage the UKFS can require that all trees planted should be by default sourced and grown as locally as possible to the planting site. The Woodland Trust’s UKISG is now an established assurance scheme and can provide a model. Alongside this there needs to be investment in the UK nursery sector as part of a green recovery, to create good green jobs, supporting nurseries at a variety of scales and locations throughout the UK. Stock selection should be suited to the site, forest managers should be trained to spot any signs of pests and diseases and conduct regular surveys of their sites. As part of the forest planning process there should be a



built-in protocol for monitoring for pests and diseases, and also reporting and dealing with any instances as soon as they are noticed.

In summary, biosecurity understanding, and awareness needs to be built in throughout the forest cycle. The current UKFS alludes to this biosecurity, but it is relatively light touch given the importance of this topic for the commercial forestry sector and also for anyone planting trees and creating woods throughout the UK. In order to ensure resilience of the sector to pests and diseases biosecurity needs to be taken much more seriously than it is now.

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

Yes. This is even more important in the context of increasing tree cover targets; these will have a huge impact on our landscapes and on people's lives. We need to bring everyone along and ensure that as many people as possible in both urban and rural areas benefit from trees and woods. With this in mind, the UKFS should provide a stronger steer than simply 'Consideration should be given to involving people in the development of forestry proposals [...].' The Standard should require consultation with people and set the tone for forestry to adopt more of an outreach approach to help people understand the nature of the changes and opportunities that a forestry proposal represents.

Forestry has a major and long-term impact on both landscapes and the lives of those living nearby or people who visit the woodlands for enjoyment, education or recreation. It is therefore imperative that consultation and engagement with those who will be impacted is carried out. Communities, both of place and of interest, can contribute their own expertise and knowledge which will improve the process of forestry planning and management and achieve better outcomes, both for the land manager and the communities. For example, many people have knowledge of biodiversity, cultural heritage and outdoor recreation needs, as well as the potential future use of a woodland for community or educational purposes, which they can contribute to guide the forestry planning process.

Currently, the consultation for forestry process is opaque and difficult for non-foresters to engage in, with no requirement for stakeholders to be notified of new woodland schemes nearby, as is the case through neighbour notification in the development planning system. In addition, the requirement to produce (or to justify why the developer is not producing) an access management plan for every scheme would help to ensure the wider public interest is more formally considered in terms of recreation use of the woodland. The reason for this suggestion is outlined in further detail in the answer to question 7 below.

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

Yes. In Scotland the vision for forestry includes '*In 2070, Scotland will have more forests and woodlands, sustainably managed and better integrated with other land uses.*' There are certain sectors that stand out due to their lack of integration with each other (including forestry, agriculture, deer management), and yet these are sectors that, if better integrated, can make a huge contribution to Scotland and the UK's net-zero pathway.

Well-planned agroforestry can help deliver forestry targets by integrating trees into farming systems and can also provide farms with additional income and help balance out farm emissions where these cannot be fully neutralised by improvements in farming practices.



Another example is the lack of integration of deer management with the forestry sector, particularly with native woodland protection and management. It is clear that deer numbers and impacts are too high to allow for the natural regeneration and successful establishment of woodlands, with devastating impacts for our landscapes and condition of native woods, and yet, due to lack of integration between these sectors we are experiencing one of the most detrimental land use conflicts. Deer management and fencing costs the taxpayer money, and these costs should be covered by those land managers who want to promote unnaturally high deer numbers, not to those who want to see numbers and impacts brought to sustainable levels to allow woodlands to thrive and peatlands to be restored. The UKFS's role in this area is to require deer management to be built into forest plans and woodland creation schemes, support collaboration at landscape scale for landowners and support effective deer management over fencing. The current approaches of the UKFS to deer management are flawed because it guides managers to monitor when there is deer damage already happening: 'Monitor forest damage, and intervene to protect vulnerable trees from browsing and grazing mammals, including voles, deer, rabbits, hares, grey squirrels and livestock.' This approach means that forest managers wait until there is visible damage from deer before taking any management action. It also doesn't specify what the intervention would be for. This should be a clear requirement that deer management must be planned for from the forest planning stage, built into applications for grant schemes, and that there should be monitoring for impacts and intervention to reduce numbers to allow the natural regeneration of woodlands at a landscape scale and the successful establishment of new schemes.

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?

Yes. The main manufactured waste that we would like the UKFS to consider is deer fencing and its significant ongoing maintenance costs. In the long-term in Scotland deer numbers and impacts should be reduced through the implementation of the Deer Working Group recommendations to allow for woodland creation schemes without fences where appropriate. However, in the short-term and where fencing may still be a requirement, the removal of the fence once the woodland is established should be built into the woodland creation planning.

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

As a general comment, the 'People' section should be strengthened to give greater weight to the objectives and interests of both communities of place and communities of interest. Incorporating these views into the forestry planning and management processes through enhanced consultation and engagement would better reflect the wider public interest and support responsible land use, leading to more sustainable development longer term. This includes the scope to use forests for a range of purposes, such as tourism, education and local economic development, while also ensuring forests do not negatively impact on the landscape and ultimately are planted in the right places.

Currently the UKFS only asks foresters to "consider" engaging with communities, which too often means there is no meaningful consultation at all. We believe this should be a funding requirement for each scheme, with justification given in any application as to why this hasn't happened, for example if it falls below a certain hectare threshold.

We have particular concerns that the current UKFS has failed to be implemented in a way which fully supports legal requirements of land managers in Scotland to respect Scottish access rights and promote the use of woodlands for leisure and recreation, thus failing to fully support national efforts to promote outdoor activities taking place in woodlands, with all the benefits to health and wellbeing they bring.



Given the proposed step change in Scottish planting targets, from 12,000 ha currently to 18,000 ha by 2024/25, there is a real risk that recreational use of forests and woodlands will be severely impacted if sufficient weight isn't given to these interests before new woodlands are created. Commercial forestry has traditionally formed a block on public access across huge swathes of Scottish hillsides. We now have a situation where replanting of existing forests, along with the increased creation of new woodlands, has the potential to continue and even exacerbate this situation, bringing in yet more long stretches of deer fencing and impenetrable forestry - unless there is a requirement to fully take public access into account in every forestry grant application.

We would therefore make the case that at this time a new theme of 'Recreation and Public Access' be created to reflect the importance of our woodlands for public enjoyment, health and wellbeing, as well as the economic benefits that recreation and tourism bring to the forestry sector, including employment opportunities. This would ensure the wider public interest is protected and local communities as well as recreation bodies are more fully involved in forestry planning, leading to improved outcomes. Among other things, we suggest there is a requirement for an access management plan to be produced for every scheme, or in the case of smaller-scale proposals, the applicant should be required to justify why they have not produced such a plan. This plan would require discussion with local communities and recreation user groups and would take into account both existing patterns of access and opportunities for greater use of the woodland, as well as showing consideration for safely facilitating public access during planting or other forestry operations. If fencing is to be used, the plan should outline where regular access points will be created, both on established routes and at other points in the fence to enable access to the land away from paths. Any gates or path infrastructure should be suitable for those walking, wheeling, cycling or on a horse, and where appropriate, land managers should work with local communities to support cultural or educational activities which may take place within the woodlands.

While we are writing from the perspective of Scottish access rights, we anticipate that a stronger emphasis on recreation and public access would also bring many benefits to the other countries within the UK, to be implemented in line with each country's legislative access framework.

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?

Sections pertinent to different stages of the forest cycle are repeated in different chapters. For example, the section on maintaining a diverse composition within the forest management unit is repeated on pages 32, 48 and 72. We think that usability of the standard would be improved by organising the guidance according to different stages of the forest cycle e.g. establishment, felling, restocking.

However, the information in the UKFS is arranged, it would be much more useful to have all the metrics (maximum species, deer density, deep peat depth thresholds) presented in a single table that could be downloaded as a compliance checklist for forest managers, stakeholders and for Woodland Officers.

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

Currently UKFS compliance on the ground is not monitored extensively. Changes should be made to the standard to allow for its implementation to be monitored.

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Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 35 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

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