



Scottish Environment LINK response to the UKFS Review, December 2022

Scottish Environment LINK welcomes this review of the UK Forestry Standard. Sustainable forest management means a nature positive, net zero approach that addresses the twin nature and climate emergencies. This document comprises the questions from the online consultation and our responses as submitted in the boxes provided.

1. Do you think that the draft content of the new edition of the UKFS has improved how cross-cutting themes, such as those explored in the 2021 consultation, are integrated throughout the Standard?

We believe the revised UKFS should refer to the now accepted link between the nature and climate emergency and the importance of identifying and implementing nature-based solutions to climate change and biodiversity loss. For instance, the opening statement of the [Glasgow Leaders' Declaration on Forests and Land Use](#) from UNCCC COP26 in 2021 reads:

We, the leaders of the countries identified below:

Emphasise the critical and interdependent roles of forests of all types, biodiversity and sustainable land use in enabling the world to meet its sustainable development goals; to help achieve a balance between anthropogenic greenhouse gas emissions and removal by sinks; to adapt to climate change; and to maintain other ecosystem services.

We recommend that in the draft 'Chapter 1 Introduction', sub-section '1.1 Purpose of the UKFS' a sentence is added that makes it clear from the outset that sustainable forest management in the UK in 2023 (when the new version will be launched) means addressing the nature and climate emergency. Then appropriate opportunities to refer to this should be used in each of the subsequent chapters, this would establish and signpost this as a foundational cross-cutting theme.

2. Do you think that the draft content of the new edition of the UKFS remains applicable in all four countries of the United Kingdom?

Yes. We recognise the difficulty of achieving this and the temptation to establish lower standards for sustainable forest management in order to find a common denominator. However, we feel that now is a time when ambition is essential and that the UKFS should set out high standards in its Good Practice Requirements and Guidelines to raise the bar on the contribution that UK forests and woodlands can make to meeting the climate and nature emergencies.

The UKFS can help to drive improvements in sustainable forest management. If the aim is to provide 'a basis for regulation, operating grant schemes and official controls, monitoring, and reporting', now more than ever is the time when the UKFS should be ambitious to rise to the huge challenges ahead.



3. In your opinion, does the draft content of the new edition of the UKFS achieve the right balance between providing clear and consistent requirements and guidelines and the need for some degree of flexibility to accommodate national, regional and local differences and contexts?

No. The UKFS defines what sustainable forest management is, and those who comply with the Standard can claim that their forest management is sustainable. We agree that some flexibility is needed to allow for national, regional and local differences and contexts, however we also believe that previous editions and the new draft Standard provide too much leeway to opt out of essential elements of sustainability.

The Good Practice 'Requirements' and Guidelines, which deal with matters as fundamental to sustainable forest management as soil protection, pest control, PAWS restoration, herbivore management and many others, use language like 'should', 'consider' and 'encourage' simply fail to convey the urgency these issues require. This leaves scope for forest managers to decide not to act on these matters in practice and still claim that they comply with the Standard. There are many examples of forest management that meets the UKFS on paper but fall short of sustainability in practice¹.

In our view, the UKFS must be accompanied by a clear compliance monitoring approach. This should require forest managers to set out, in writing, how they have considered their compliance with the Standard. These rationales should be publicly available and a small sample of them should be scrutinised by country forestry authorities to encourage a culture of continuous improvement in sustainable forest management. The investment of time in this activity would pay itself back many times over in terms of the value of delivery on the ground. Scottish Environment LINK is strongly supportive of increasing the funding available to the forestry authorities in order to deliver this monitoring.

4. Do you think that the draft content of the new edition of the UKFS strikes an effective balance between the economic, environmental and social principles of sustainable forest management?

No. We do not believe that the draft new edition will strike an *effective* balance between the economic, environmental and social principles of sustainable forest management. As set out in our answer to question 3, the wording of the Good Practice Requirements and Guidelines is too easy to meet on paper while deciding to take no action in practice.

The contrast with the calls for urgent, ambitious action for forests and woodlands to adapt to and mitigate climate change from the UK Government is striking. For example, the Glasgow Leaders' Declaration on Forests and Land Use from CoP26 (2021) calls for strengthened efforts to '*Conserve forests and other terrestrial ecosystems and accelerate their restoration.*' This is a much clearer, more



ambitious call for action than this subsequent draft edition of the UKFS which continues to merely call for people to ‘consider’ restoration of PAWS.

We recommend that this draft is reviewed in the context of the nature and climate emergency to determine whether it is fit for the purpose of ensuring the contribution of sustainable forest management in the UK to a nature positive, net zero future.

5. Do you think that the draft content of the new edition of the UKFS provides greater clarity than the current version on what is required of forest managers?

Yes. The draft for the new edition is considerably shorter than the current edition and the structure is clearer to follow.

6. Do you have any other comments you would like to make about the draft content of the new edition of the UKFS?

We would like to have seen the questions in this consultation follow on from those asked in the 2021 consultation. Resilience and climate change adaptation, the carbon cycle through forest planning, managing and harvesting and stakeholder involvement are very important aspects of sustainable forest management that would benefit from continuing focus through this Review.

There are three issues in particular that we would like to see changed in this consultation draft:

i. Deep peat depth definition

The 2017 edition of the UKFS recommends that forest landowners and managers “avoid establishing new forests on soils with peat exceeding 50 cm in depth and on sites that would compromise the hydrology of adjacent bog or wetland habitats”. (S) GPR4 in the new edition of the UKFS provides some strengthening of language on this requirement, with the recommendation to ‘avoid’ replaced by the slightly firmer “new forests should not be established on soils with peat exceeding 50 cm in depth”.

Whilst this strengthening of language is welcome, the new edition should also highlight that soils with peat from 30 cm in depth, if they form an intrinsic component of the peat hydrological unit, also have potential for peatland restoration. This is the qualifying criteria now used for public funding for peatlands, such as NatureScot’s Peatland Action Fund. As stated in 2022 Defra, Natural England and Forestry Commission guidance on such funding decisions:

“The rationale for using a shallower cut-off is that the previous 50 cm threshold precluded a large part of the carbon store and made it more difficult to restore peatlands effectively. It also encouraged tree planting up to the edge of restoration sites with risks of trees self-seeding.”¹¹



The new edition should not prohibit native woodland creation (especially through natural colonisation) on peat soils between 30cm and 50cm in depth (as is the case for all woodlands and forests on peat soils with a depth over 50cm). However, it should prohibit commercial afforestation on these sites as this risks large soil carbon losses and is not the best option for nature's recovery. This would help ensure that more peatland is conserved and restored, benefitting biodiversity, carbon storage and flooding prevention.

ii. The percentages of tree species, the new draft states:

NEW (GFP) GPR212: Maintain or establish a diverse composition within the forest management unit. A maximum of 65% may be allocated to a single species (see notes below). Guidance on species selection appropriate for the site (e.g. Ecological Site Classification tool) should be used to enhance resilience and mitigate risks. In all cases, incorporate all of the below:

- *5 – 15% native broadleaved trees or shrubs;*
- *10 – 20% of other species (which may include native broadleaved trees or shrubs); and*
- *10% open ground, or ground managed for the conservation and enhancement of biodiversity as the primary objective.*

Note:

i) Opportunities should be taken to further diversify species composition, especially in larger woodlands.

ii) In woodlands of less than 10 hectares and in native woods, the above proportions may be relaxed as long as the adjacent land uses provide landscape and habitat diversity.

iii) Where the proposed allocation of a single species is 55% or below, this can be balanced off with a greater proportion of other species and open space, so long as there is a minimum of 15% native broadleaved trees and shrubs, and 10% open space.

The 2017 version's Guideline stated:

Maintain or establish a diverse composition within the forest management unit; where only one species is suited to a site and management objectives, a maximum of 75% may be allocated to a single species (see notes below). In all cases, incorporate a minimum of:

- *10% open ground or ground managed for the conservation and enhancement of biodiversity as the primary objective;*
- *10% of other species;*
- *5% native broadleaved trees or shrubs.*

Note: (i) Where more than one species is suited to a site and matches the management objectives, opportunities must be taken to further diversify the above species composition.

(ii) In woodlands of less than 10 hectares and in native woods the above proportions may be relaxed as long as the adjacent land uses provide landscape and habitat diversity.

Essentially this means that the draft UK Forestry Standard has reduced the maximum of a single species from 75% to 65%. Our call is for greater ambition for diversifying forests and woodlands to increase their biodiversity contribution and their resilience against pests, diseases and climate change. We suggest the following:

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NEW (GFP) GPR212: Maintain or establish a diverse composition within the forest management unit. A maximum of 50% may be allocated to a single species (see notes below). Guidance on species selection appropriate for the site (e.g. Ecological Site Classification tool) should be used to enhance resilience and mitigate risks. In all cases, incorporate all of the below:

- *at least 15% native broadleaved trees or shrubs;*
- *at least 10% open ground managed for the conservation and enhancement of biodiversity as the primary objective.*

To provide resilience to pests, diseases and abiotic threats associated with climate change, intimate species mixtures, or a matrix of small patches of single species blocks, should be established. Contiguous single species blocks must not exceed 20% of the total area. Naturally occurring near monocultures, such as the Caledonian pinewoods are an exception. In existing forests, achieving may take time but must be an objective of the next iteration of the management plan.

iii. Deer density thresholds, the new draft states:

NEW (GFP) GPR61: In areas where deer are present, deer management measures should be developed and implemented as part of a management plan, ideally in co-operation with neighbours or as part of a Deer Management Group, with the aim that deer browsing does not prevent regeneration of trees or the development of resilient woodland habitats.

Deer impacts are a widespread and fundamental inhibitor of all types of forest and woodland development, restricting biodiversity and carbon sequestration and increasing management costs. So, a suggestion for an amended wording from us would be:

NEW (GFP): In areas where deer are present, deer management measures must be developed and implemented as part of a management plan, ideally in co-operation with neighbours or as part of a Deer Management Group, with the aim that deer browsing does not prevent regeneration or the development of resilient woodland habitats (i.e. densities in the region of around 3-5 per square kilometre are required for commercial conifer regeneration and approximately 2 per square kilometre for native woodland regeneration).

7. Are you aware of any evidence that has been published since 2017 on sustainable forest management, that should be considered when finalising the content of the next edition of the UKFS?

Yes. Last month, the Forest Policy Group published [‘Communities’ experiences of new forest planting applications in Scotland’](#) which is very pertinent to the People section of the UKFS. It provides an evidence base for understanding the realities of community engagement in new forest planting applications in Scotland. It clearly indicates that the intentions of the UKFS in relation to People are



too often not met in practice even though they can be met on paper. The widely supported [‘UKFS: A call to enhance the ‘people’ theme’](#) underlines this and suggests a number of ways in which the UKFS can be adjusted to better support communities affected by forestry proposals.

LINK has developed a paper on the Biodiversity theme of the UKFS which is similar to the above Call to Enhance the People Theme. We will send this to the UKFS Review team shortly.

We also believe that the [pre-approval draft of the 5th edition of the UK Woodland Assurance Scheme \(UKWAS\)](#) should be carefully considered. This version is available online and has been approved by the UKWAS National Steering Group and is now with Forestry Stewardship Council (FSC) UK and Programme for the Endorsement of Forest Certification (PEFC) UK for final approval where only minor changes are expected. As this draft states:

‘In the most recent revision, the requirements have been adapted to reflect the global challenges of climate change, biodiversity loss and the need to embed forest resilience, enhance the natural capital value of woodlands and safeguard the provision of valuable ecosystem services.’

As stated above, this revision of the UKFS is a timely opportunity to put the need to address the nature and climate emergency at the heart of how sustainable forest management is defined, discussed and implemented on the ground. The UKWAS statement above is a good example of how to set that ambition.

This response is supported by the following organisations:

- Nature Foundation
- RSPB Scotland
- Woodland Trust Scotland
- Trees for Life
- Scottish Wildlife Trust
- John Muir Trust
- National Trust for Scotland

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