



*UK Woodland Assurance Standard Revision – 2nd Stakeholder Consultation¹
– response by the Royal Society for the Protection of Birds², January 2011*

Introduction

The RSPB welcomes the chance to comment on the development of the 3rd Edition of the UK Woodland Assurance Standard (UKWAS). We will also comment in further detail through our work on the UKWAS Steering Group and the next and final public consultation.

We are supportive of voluntary certification of sustainable forest management in the UK, such as UKWAS, as long as it meets all of the following criteria:

- meets priority species, habitats and designated sites needs under country biodiversity strategies, UK Biodiversity Action Plan, EU Birds & Habitats Directives & the Ramsar Convention;
- includes environmental, economic and social stakeholders and issues in all processes;
- is independently third party audited; &
- has transparent governance, standard setting, audit and appeal processes and procedures.

We do recognise the need for stability and continuity in the content of the standard to allow woodland owners and managers to effectively formulate and run their management plans. This revision should aim to be more of a refinement. We hope that this review process will be effectively supported by the two global forest certification systems that UKWAS meets – Forest Stewardship Council (FSC) and Programme for the Endorsement of Forest Certification (PEFC) - through timely and accurate advice, from their UK and International headquarters.

The RSPB has the following issues that this revision of UKWAS to needs to address:

A. Small and/or Low Intensity Managed Woodland certification

The RSPB would welcome further development of the UK Woodland Assurance Standard, and associated certification audit procedures to assist the uptake of UKWAS by owners of small and/or low intensity managed woodlands (SLIMW).

We recognise that some of the measures required to facilitate this, for example the setting up of SLIMW group schemes, may be beyond the scope of this revision of the standard and lie mostly with the FSC, PEFC and their certification bodies.

¹ Downloadable from: <http://www.ukwas.org.uk/standard/revision/index.html>

² Registered Charity England and Wales no. 207076, Scotland no. SCO37654. Contact details: Mike Wood, UK Forestry Policy Officer, RSPB, Ground Floor, 2 Lochside View, Edinburgh Park, Edinburgh EH12 9DH. E-mail: mike.wood@rspb.org.uk

Do you consider that the definition of 'small woodland' should be changed?

No, 100ha and below should be retained as the definition of a 'small' woodland, as well as the related existing definition of 'low intensity management' and the guidance and definition of 'Very Small' woodlands.

B. Restocking on priority open ground habitats

The RSPB would like to see UKWAS make a clearer commitment to not permitting the restocking on important open ground habitats, such as lowland heathland, blanket and raised bogs and coastal dune systems. The existing requirements on woodland design, management planning and removal of woodland for habitat creation are helpful, but could be improved.

This highlights an anomaly with the UK Forestry Standard (which underpins UKWAS), that allows the restocking on priority open ground habitats which are restorable, but quite rightly does not permit the initial afforestation of such habitats. The current version of the draft revised standard does still not properly address this issue.

C. Revised Requirements 3.5.1. & 6.1.3 on open ground habitat restoration

We welcome the proposed revising wording of the 'Requirement', 'Means of Verification' and 'Guidance' columns of Requirement 3.5.1, and to the 'Guidance' column of Requirement 6.1.3.

We are, however, concerned about the commentary within the consultation document – 'Revision Notes' for Requirement 3.5.1, and the consultation question that raise a new 'discussion point' on compensatory planting that was not part of the preparatory work to produce the current consultation draft text of the standard. Our biodiversity rationale is below.

Should 'compensatory planting' be acceptable to mitigate conversion to non-forested land?

No – changes to the standard should be limited to the current proposed revised text of the standard Requirements 3.5.1 and 6.1.3 in *UKWAS Revision 2009-2011: Consultation Draft December 2010*.

The RSPB considers that 'compensatory planting' should not, and must not be required by UKWAS for the restoration of priority open ground habitats, sites for priority species and designated wildlife sites under Requirements 3.5.1 and 6.1.3. Compensatory planting is a country forestry policy consideration, not an UKWAS matter. In addition to not requiring compensatory planting for priority biodiversity restoration and management within UKWAS, the UK Forestry Standard and country forestry strategies, we recommend that any consideration of compensatory planting must be at a country, not a site level.

The RSPB considers that 'compensatory planting' should not be required, and is not required, by the UK Forestry Standard and associated Biodiversity Guidelines for the restoration of priority open ground habitats, sites for priority species and designated wildlife sites. Restoring and managing these important wildlife habitats and sites is fully

consistent with sustainable forest management, as is not afforesting or replanting them. Requiring the 'compensation' of the loss of biodiversity damaging plantation forestry on restorable priority open ground habitats that meet UKWAS Requirement 6.1.1. would be an unacceptable and perverse interpretation of the principles, practice and concept of sustainable forest management. The RSPB is fully supportive of the requirement not to remove High Conservation Value Forests that consist of priority woodland habitats and species and designated woodland sites.

We consider that for country forestry policy makers, compensatory planting should not be a requirement for the restoration of priority open ground habitats, sites for priority open ground species and designated open ground wildlife sites. The proposed inclusion of site-level 'compensatory' planting into UKWAS is an inappropriate and unhelpful confusion of country forestry policy objectives with a voluntary sustainable forest management standard.

It is worth noting that Forestry Commission England, Scotland and Wales, and Forest Service Northern Ireland currently approve the restoration of priority open ground habitats through their respective forestry Environmental Impact Assessment processes and Felling Licensing (currently GB only, but NI are to introduce this) to meet the biodiversity commitments in country forestry and biodiversity strategies.

D. High Conservation Value Forest (HNCV) definition

We agree with the proposed definition of HCVF as meeting Requirement 6.1.1a, and related text changes to 6.1.1c on ongoing stakeholder consultation.

E. Open Space

We would welcome the opportunity to discuss the possibility of improving the biodiversity targeting of the 'open space' requirements of the standard, in terms of location, habitat type and condition. We would welcome this part of the standard driving the production of higher quality habitats, both in terms of initial opening up of forest areas through restructuring, but also the onward high quality management for wildlife.

We do recognise that the open space target area is used, and was negotiated into the standard, as a proxy for biodiversity, as well as for landscape and water quality reasons, and is derived from the UK Forestry Standard and associated Forest Guidelines.

F. Other issues

The RSPB has concerns, outside the standard review process, that impact on the environmental credibility of UKWAS. We consider that the full and widespread compliance with UKWAS may be restricted by the effectiveness of audit protocols and their implementation.

We also have concerns about the certification of controlled wood and how this relates to actual woodland management that protects and enhances biodiversity.