

## UKFS Review: Stakeholder Consultation 2021

### Introduction

As the Royal Chartered body for tree professionals in the UK, the Institute of Chartered Foresters welcomes the chance to provide a steer to the current review of the UK Forestry Standard (UKFS).

UKFS is the backbone of UK forestry. It is envied by other sectors at home and by forestry industry across the world. It is a standard: while it does form the basis for forestry regulation, it is not itself regulation. The standard combines legal requirements, good forestry practice requirements and guidelines, which encourage landowners and woodland managers to consider all the factors at appropriate levels in creating and managing woodland. We also have international commitments on sustainable forest management (SFM) – this, combined with the legal obligations, provide the framework for the UKFS.

The governments of the UK, crucially with their forestry experts, the public bodies, depend on it as the hallmark of sustainable forestry. The UKFS was also achieved through consensus, working with forestry and environmental bodies, to strike the right balance between the social, environmental and economic benefits of forestry. This is ever more important as we endeavour to tackle the dual climate and nature crises.

### About the Institute

The Institute of Chartered Foresters is the Royal Chartered body for tree professionals in the UK. It represents a huge breadth of membership, covering the full range of tree professionals – more so than any other organisation – and this range of expertise is one of its greatest strengths. It has around 2,000 members who practise forestry, arboriculture and related disciplines in the private and third sectors, central and local government, research councils, universities and colleges throughout the UK.

The Institute regulates standards of entry to the profession. It provides support to its members, guidance to professionals in other sectors, information to the general public, and educational advice and training to students and tree professionals seeking to develop their careers.

As the body responsible for professional standards in forestry we are ideally placed to comment on the review of UKFS. We fully support the review and are committed to supporting the process in whatever form that takes – whether as partner, convener, adviser or critical friend.

### Institute position

#### Priorities for the review

It is quietly but widely acknowledged that, apart from Scotland, the nations of the UK will not meet their tree planting targets, thereby seriously undermining UK's reputation and ability to mitigate climate change and address biodiversity decline.

As the need to grow more trees intensifies, there are likely to be more policies and schemes for trees that cause disagreement – as is already being seen, for example with breeding bird surveys or cultivation guidance. Truly sustainable forestry involves extensive work to achieve an acceptable balance. However, given the pressing need to act urgently on climate change, the risk of getting lost in the detail and losing sight of this bigger picture is high. Debates about points of detail in the UKFS cannot inhibit the urgent action needed. Discussions must be handled robustly to enable good forestry and protect against unsustainable practices, not to deal with every uncertainty and regulate each site at a micro level. Pragmatism and compromise are therefore essential in the review process. We all need sustainable, healthy, multi-purpose trees and woodlands.

### **What is UKFS for?**

UKFS is a standard, agreed by experts, that lays out the accepted good practice activities and procedures that ensure the sustainable management of woodland. It needs to be technically robust, evidence-based and professionally applied. The standard also needs to be flexible so that it is appropriate across all UK forest types without dictating management objectives. National policies and strategies will determine the priorities for forest type and forest management, and the incentives and regulations governments choose to use to deliver these priorities. Delivery of sustainable woodland will be by landowners or managers, working with the appropriate professionals applying technical skills, knowledge and advice.

UKFS is not a strategy or a manual or a mouthpiece for country policy, it is a standard. It still needs professional interpretation. We need multi-purpose woodlands, but the choices made by the landowner or manager, advised by the appropriate professional, will depend on the constraints of the site, the business, the available incentives, and much more besides. Woodland can be managed for a wide range of objectives, what is important is that it is done well and the appropriate considerations are taken into account. It is useful for the standard to provide guidance and examples of good practice, but it must continue to be clear on what is a requirement, what is guidance, and what is a 'nice to have'. For example, of course we must reduce manufactured waste wherever possible (presuming this refers to the use of tree shelters and the like) but this will only work if alternatives are available. Without robust enforcement for pests, young trees need protection.

We agree it is of course right to give appropriate consideration to forest resilience, climate change adaptation, carbon and biosecurity. All have grown in importance since the last revision and could be strengthened and updated, particularly biosecurity. However, most are already covered quite systematically, and it may not be desirable to have a lot of new requirements. The comprehensiveness and level of detail of UKFS can make it unwieldy and perhaps it is enough that the introductory wording is strengthened to emphasise resilience. We leave to the review board to decide in an ongoing process with stakeholders and practitioners how this should best be tackled and offer our advice along the way.

### **Who is UKFS for?**

At a time of dire environmental crisis, when there is so much public and political interest in trees, it may be tempting to gear UKFS towards a wider audience. The UKFS should maintain its focus on woodland creation and management. It should therefore be designed for those directly responsible: foresters, forest managers, owners and practitioners. Interpretation by professional foresters and qualified allied professionals is a vital component of the system to deliver sustainable forest management. While forming a crucial foundation to the UK's various policies, and to the sector's reputation, the UKFS is fundamentally a technical document and should not be watered down to cater to a general audience.

However, it is also there for those with a wider interest in forestry, such as NGOs, other agencies, consultants and consultees. UKFS can be used by them to ensure that the stated standard of SFM is being applied. For example, we know that agriculture policy makers across the UK are looking closely at the UKFS as an exemplar as they develop National Minimum Standards. There is also widespread misunderstanding across society in the UK as to the multiple roles of trees and our reliance on them. The UKFS must continue to speak directly to foresters, forest managers, owners and practitioners, but a wider readership can also be encouraged. When debate around forestry is increasingly polarised and the risks of getting it wrong are so grave, we need it more than ever. Public perceptions are all-important: trees can be all things to all people, and we must win hearts and minds about sustainable forestry and wood products, but UKFS is not and should not be designed for the public. Communication about the UKFS needs careful management to appeal to a wide audience, but the standard itself must be designed for technical and professional use.

Membership of the Institute is broad, but across the board there is support for and dependence on the UKFS. It works. Our members appreciate their part in it, whether their focus is on soils, recreation, heritage or anything else. We need multi-purpose woodlands and UKFS is and must continue to be the guide for this and for the professionals who deliver this.

### **Where is UKFS intended?**

One of the great strengths of the UK Forestry Standard is its UK-wide application, particularly as governments in England, Northern Ireland, Scotland and Wales diverge in their policy priorities, as is appropriate under devolution. UKFS is an expression of geography, not of politics. The principles underpinning sustainable forestry practice are technical in nature, not policy-driven, and should not diverge according to political preference. We are talking about the lifetimes of trees and forests: the timescales involved in forest planning and management as well as the UK-wide application of UKFS are very different from those of policy priorities.

Remembering what UKFS is for, presentation and engagement is important. Usability of the standard of course matters, and wider attention is to be encouraged, but it should not be diluted for a general audience, wherever that audience might be. Interpretation by professional foresters and qualified allied professionals is absolutely key. There appears to be growing impression that UKFS can somehow be a comprehensive checklist of requirements which are all black and white, but it is neither possible nor desirable to be so prescriptive, given the range of geographies and situations it must apply to. Governing bodies across the UK rely on it to be the hallmark of sustainable forestry; it encourages productive and constructive discussion about good regulation and increases the international standing of UK forestry as a whole.

There is a question of whether the UKFS should promote the consideration of wider land use objectives. Of course, this is an important consideration, but our view is that this needs no more emphasis than it already has. Without a land use strategy in the UK, it is hard to see how an individual manager could be expected to meet this and whose objectives in the differing nations would they be expected to meet. There is a risk that the review of UKFS becomes a political football. We must ensure the standard does not stray into policy by prioritising some policy drivers over others, such as carbon. It is the forest manager's role to manage the site in its context, taking into account all relevant sensitivities and objectives and the scale of the proposed operations.

## Closing comments

All four governments are under intense pressure to meet ambitious targets for climate and nature, which results naturally in some competition. There is also a level of polarisation in debate, not just in politics but from organisations who are focussed on one particular outcome, but this polarisation must be rebalanced – we need to focus on the commonalities and recognise the huge value of UKFS as promoting all our priorities. The review should be light touch and not bow to political pressure. The forestry sector does not want to break this up to different standards in different countries and the result of that could be catastrophic: for industry, for professional practice and for the environment. Indeed, there is huge value in having a standard that unites the whole UK and provides a commonality of approach to sustainable forest management as a technical document, maintaining balance and trust in professionals.

Without professional interpretation the standard cannot result in good SFM. The Institute will be hosting events with Forestry Commission from autumn 2021 and we are committed to supporting wider communications whereby we champion the standard, build on the understanding of critical aspects of it such as good management plans, and help to embed the right messages.

We have not canvassed all Institute members at this stage and so have not cast a yes/no vote for the specific review questions; this is our considered view as an Institute on the UKFS itself and the review exercise and we welcome a conversation if any clarification is needed. We will promote the review widely, engage with members in advance of the next round of consultation and encourage them to respond with their own comments and evidence. We look forward to working closely with the UKFS review board, with our members and with stakeholders across the sector and in government to ensure UKFS continues to be the gold standard and invaluable asset that it is.