

## UK Forest Standard: Draft updated content

### Introduction

As the Royal Chartered body for tree professionals in the UK, the Institute of Chartered Foresters welcomes the chance to provide a steer on the update content 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. Our sector needs to set an example in the climate crisis and avoid polarised debate but instead work together to create sustainable woodlands and forests, in whatever form this might take.

### Response to Questions

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?*

The Institute believes that the UKFS incorporates cross cutting themes. However, it is important that we remember what UKFS is for, presentation and engagement is important. The UKFS should promote all UK forestry priorities. Polarisation should be discouraged, and this technical revision highlights the importance of not diluting guidance for a general audience to maintain the opportunities for interpretation and application by professional foresters. Though the revision has been light touch, which the Institute supports, some parts of the sector are concerned that there are elements which appear to be bowing to political pressure. The Institute is in support of the UKFS being forward looking in its approach to climate resilience and the new figure of 65%, but in order to convince its key users and stakeholders, we advise that evidence is published for the change, or there may be a risk of losing support from sections of the industry. The balance that this document was aiming to achieve could be lost if all priorities aren't considered and promoted within the standard, including protection of the natural environment and historic features.

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

The draft content remains applicable to all four countries of the UK. There is huge value in having a standard that unites the whole of the UK and provides a commonality of approach to sustainable forest management as a technical document, maintaining balance and trust in professionals. However, the pace of climate change is variable across the UK, and climate modelling is rapidly improving. As the guidance from this modelling develops, foresters need to be prepared to change their planning and practices. It should be recognised that the pace of this adaptation will vary between each region based on rotation lengths for different species, and that the sector will need to be supported to make changes to practice. For example, members in Northern Ireland are concerned about the change to 65% single species and will need to be supported not just to accept this but to put it in to practice. The standard should not be loaded with repetition but provide a key point of guidance for practical application. If we start pinning down specific requirements, there is a risk that the document will no longer be fit for purpose.

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?*

Whilst the new edition does still provide the needed flexibility, concern has been raised by some of our members that the standard has not been developed with full sector consultation, without consensus being sought. Input from lobbying organisations should always be balanced by input from professional foresters to prevent it being overly swayed by individual agendas. There needs to be increased consideration on how the proposed technical changes are to be applied. This is of particular relevance for coupe scale restructuring and resilience and the proposed changes from 70% single species to 65%. It is the forest manager's role to manage the site in its context, considering all relevant sensitivities and objectives according to the scale of the proposed operations. What we are hearing is this change is unanticipated, though welcome if applied in the correct context for the correct purpose. Therefore, the Institute suggests that UKFS provides clarification and evidence as to why this percentage change is proposed and communicate it well, recognising the challenges this might pose to some business practices. We must ensure the standard does not stray into policy by prioritising some policy drivers over others, such as carbon. However, overall, we are in support of the development of UKFS and appreciate that changes are required to meet the developing climate crisis in relation to resilience. The forest sector should be setting an example when adapting to climate change. This means that businesses will need to adapt and upskilling of foresters through knowledge exchange will be key.

It is also suggested that the language in part is adjusted to maintain the fluidity of the guidance. Terms like "ensure", in relation to resilience", are too specific and often cannot be guaranteed. For example, as mentioned in Climate Change GL5: Explore expanding forest cover through woodland creation, ensuring proposals are appropriate for the site and are designed to ensure tree species are resilient to the effects of climate change. These terms need to be achievable in practice. As a sector we can follow best practice to work towards this target and *design* woodlands for resilience, but without being able to guarantee that management practices will achieve this.



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

Truly sustainable forestry involves extensive work to achieve an acceptable balance. An increased consideration is needed to the landscape scale context and the natural diversity of site types, and we need to be supporting the commercial sector where sustainable management can be evidenced and practiced. The UKFS needs to reflect the variable pace of climate change across the UK and recognition is needed for timescales to implement changing management practices.

The proposed changes to species percentages may not be a plausible immediate change, but one that will influence the industry at various stages. We do not want to see professionals discouraged from following the UKFS due to the implications it may have on their overall management objectives, due to underlying pressures of suitable species choice – resulting in unsustainable management. However, there is a risk of getting lost in the detail and the Institute agrees that action is needed to achieve our climate targets. This is not only in relation to government targets, but also our need as a sector to be more forward thinking in building resilience and mitigation methods to allow for adapting to climate change. The UKFS needs to work with the Institute's members to ensure support for all nuances is provided to allow for effective decision making, based on professional judgment.

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?*

Some stakeholders appear to want UKFS to 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. The standard must not lose flexibility and must not dictate management objectives. The recent revision provides technical updates and clarification in relation to changes in expected forestry practice, in accordance with legislative changes. It has achieved a balance that encourages productive and constructive discussion about good regulation that will increase the international standing of UK forestry.

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

We must re-iterate that the UKFS is a technical document to be applied by professionals – therefore it should avoid trying to regulate at a micro level. The altering of species percentages is essential to the climate agenda and the future resilience of our woodlands but would benefit from further clarification and discussion prior to being finalised. It needs to consider the timescale of forest planning and management as well as UK-wide application. Delivery of sustainable woodland will be by landowners or managers, working with the appropriate professionals applying technical skills, knowledge, and advice. Pragmatism and compromise are needed, but balance must be maintained. We all need sustainable, healthy, multi-purpose trees and woodlands.

Our support for UKFS includes our commitment to working with the four nations on an accredited training system to ensure UKFS is embedded in forestry. Membership of the Institute is broad, but across the board there is support for and dependence on the UKFS. It works. The Institute will continue to work for its members and the sector in supporting UKFS, facilitating dialogue when objectives differ and enabling our businesses and workforce to deliver modern, sustainable forestry.