

UK Forestry 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 draft updated 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: and provides a basis for regulation and monitoring, however, 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 the 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?*

Yes. The Institute believes that the UKFS incorporates cross cutting themes. The UKFS should promote all UK forestry priorities. We welcome the way in which the draft revision explains how foresters should practice sustainable forest management, whilst recognising that professional expertise and judgement is also necessary. Though the revision has been light touch, which the Institute supports, some of our members are concerned about how the balance has been struck between economic, social and environmental objectives of sustainable forest management (SFM). We need to be encouraging more diverse forests and woodlands. A proportion of the Institute's members are in support of the UKFS being forward looking in its approach to climate resilience and the new figure of a maximum of 65% allocation to a single species within a forest management unit. But in order to convince key users and stakeholders, we advise that evidence for this change is referenced more explicitly in the text at this point in the standard, 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 are not considered and promoted within the standard, including timber, 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?*

Yes. The draft content remains applicable to all four countries of the UK, where nations wish to diverge, this could be achieved through individual policies or grant incentives. 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, some members in Northern Ireland are concerned about the change to 65% single species and some parts of the sector across the UK will need to be supported 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, or being too prescriptive, 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?*

No. Whilst the new edition does still provide the needed flexibility, concern has been raised by some of our members – with some of our members agreeing and others not, that the standard has not been developed with full sector consultation, without consensus being sought. There needs to be increased consideration on how the proposed technical changes are to be applied. A proportion of our members feel that the regulators are using UKFS to try and enforce governments policy or an individual's preference. The UKFS provides ample opportunity for each vested interest to express their views – archaeology, ecology, landscape etc.

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. Some of our members were surprised by the proposed species percentage changes, though these are welcome if applied in the correct context for the correct purpose. Therefore, the Institute suggests that the UKFS provides more explicit evidence in the text at this point as to why this percentage change is made, recognising the challenges this might pose to some business practices. Overall, we are in support of the development of the UKFS and appreciate that changes are required to meet the developing climate and biodiversity crises 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.



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?*

No. There is a need to recognise that extensive work is required to achieve an acceptable balance on the ground, taking account of the owner's objectives. 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. We recognise the pressure many monocultures are under in Europe from pest and disease threats, but consideration is needed for forestry in a landscape scale context and the natural diversity of site types. Forestry needs to be seen as a circular economy within the UK, with payments being recognised for wood and non-wood products alike. Some of our members feel that greater consideration needs to be given to the use of plastics and how these impact the environmental credentials of forestry, with the waste hierarchy being a part of the UKFS. As well as additional emphasis on a need to demonstrate sustainable management, instead of “considering” sustainable activity. Whilst this creates flexibility across different woodland types, it also downgrades these requirements to advice that can be adopted on choice, rather than encouraging wider thinking and collaboration.

It is important that the UKFS provides a positive framework within which professional foresters can achieve management objectives and contribute to wider policy objectives such as climate change mitigation and increased resilience. Whether this be through altering species compositions, using local seed sources or being an advocate for plastic free management. Professional foresters need to be able to make sound silvicultural decisions.

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. Although, it is recognised that some aspects of forest management lend themselves to ‘yes or no’ compliance, but most do not. The recent revision provides technical updates and clarification in relation to changes in expected forestry practice, in accordance with legislative changes. This has been achieved through improving the usability of the document, providing a balance that encourages productive and constructive discussion about good regulation that will increase the international standing of UK forestry. It is accepted that as a profession, we need to be constantly developing our standards. However, the UKFS must be applicable to all UK forests and the Institute believes that where the forest manager can justify an appropriate exception to their management practice, their decisions should be supported by regulators. It is neither possible nor desirable to be so prescriptive, given the range of geographies and situations it must apply to.

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

The UKFS is a technical document that will provide a point of reference for professional foresters and others with an interest in promoting SFM. 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, for delivering a better framework of habitat networks and riparian woodlands to support species, habitats, soils and water, whilst providing sheltered coupes for commercial species to thrive. Delivery of sustainable woodland will be achieved 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.

One of the strengths of the Institute is its wide membership and range of opinions, with some members very much supporting a strengthening of the language within the UKFS and the encouragement of a greater diversity of species. Our support for the UKFS includes our commitment to working with the four nations on



an accredited training system to ensure the UKFS is well understood by professional foresters. 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 profession in supporting the UKFS, facilitating dialogue when objectives differ and enabling our businesses and workforce to deliver modern, sustainable forestry.