

RFS comments on the UK Forestry Standard (UKFS) Draft content October 2022

The Royal Forestry Society (RFS) is the largest education charity dedicated to promoting the wise management of trees and woods across England, Wales and Northern Ireland. Across this area, RFS members are collectively responsible for the stewardship of the vast majority of managed woodland. We welcome the opportunity to comment on the UK Forestry Standard.

Key points

- There are some significant changes in the new draft, but it is not clear over what timescale these can be implemented. Some current forest management practices which are currently compliant with the UKFS, will become non-compliant unless this is implemented effectively and with adequate notice. Further consideration is needed to ensure we are not making forestry management more regulated than it needs to be through the new draft.
- We recognise the need to develop more species-diverse stands, to help build resilience within our forests. However, we are concerned that the proposed change to reduce the maximum to 65% single species within all forest management units (GPR21), will have adverse impacts upon productive forestry.
- The format of the UKFS would benefit from being easier to use as a reference document. We would recommend investigating the development of an app which could be used in the field.

Responses to questions from consultation

- 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?**

Cross cutting themes are evident in the new edition, but it remains difficult to quickly navigate in its current format. The document would be more user friendly if it had search functions which could bring up all relevant sections using key words or topics. Many users may still appreciate the PDF / paper-based format, but it would help if it could be accessed effectively on mobile devices, e.g. through the additional development of an app.

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, although it is clear that having devolved administrations complicates use of the document. If the information was in a different, more easily searchable format, it might be possible to filter out legislation which does not apply to a given country within the UK. Such a development would also make it easier to keep the document up to date with legislation or regulation changes in all UK countries.

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?

The new edition is generally clear about what are requirements or guidelines. It is good to see the need for flexibility when considering management objectives is stated, and also that there are aspects of forestry management which do not lend themselves to a simplified yes/no compliance. There are areas of potential conflict within the Standard, e.g. need for removal of deadwood to protect *Ips typographus* (new GL19) is contrary to aspiration to increase deadwood for wildlife habitat and other benefits, described throughout the document. This and other areas could be tightened up and defined more clearly.

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?

The balance, which we would recognise as being very important to get right, has moved towards strengthening environmental and social principles and is less supportive of productive forestry, e.g. the change to 65% single species (GPR 21). In order to reduce our dependence upon timber imports and to meet net zero targets, we need more land to be committed to productive forestry. We recognise the need to develop more species-diverse stands, to help build resilience within our forests, but we would be concerned if this change adversely impacted upon productivity, which we believe is very likely.

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?

Not in some areas, for example the new GL18 which refers to a duty of care and requirement to work with communities regards development of authorised trails. It is not clear what is expected to meet this guideline and in many cases, it will be impractical to implement, especially as access legislation across UK countries is not uniform. Conflicting guidance e.g. regarding removal of deadwood as described above.

6. 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?

The RFS has produced a number of reports which could help inform the UKFS.

[RFS report Bringing woodland into management 2019](#)

[RFS report - woodland creation opportunities and barriers 2020](#)

[RFS report - forestry and climate change 2020](#)

[RFS report - managing for resilience case studies 2022](#)

Royal Forestry Society
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