

UK Forestry Standard Consultation

Comments by

Northern Ireland Environment Link

18th 12th 2022

Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the natural and built environment of Northern Ireland. Its 66 Full Members represent 190,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

These comments are made on behalf of Members, but some members may be providing independent comments as well. If you would like to discuss these comments further, we would be happy to do so.

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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?

No.

Biosecurity was highlighted as one of the six cross cutting themes, but there does not appear to be many new or improved requirements in response to the rapid increase in pests and diseases impacting the sector. Despite tree pests and diseases becoming a greater threat to tree cover, page 33 of the draft UKFS states that ‘consideration can also be given to planting a proportion of native species from non-local provenances’.

Planting locally sourced and grown trees is the most effective way to mitigate against pests and diseases, whilst also supporting the local economy, and providing biodiversity and climate advantages. The new edition of UKFS should include more guidance on biosecurity, including recognition of the role of using UK and Irish sourced and grown trees and a stronger acknowledgement of the risks around importing trees for planting, which is one of key pathways for introduced new pests and disease.

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

Yes.

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.

A significant proportion of the good practice requirements and associated guidelines only require the user to “consider” the sustainable activity or action, rather than to actually implement that activity or action. Whilst the regular use of the term “consider” creates flexibility across different woodland types, it also downgrades these requirements to advice that can be adopted or ignored based on an individual’s personal preference or level of expertise. This has arguably enabled key components of the UKFS to be poorly adopted across the UK and this revision has not addressed this key point. More directive language should be used to give stronger signals on what should be adopted wherever possible, which still enables flexibility if something isn’t possible.

For example, ancient woodlands are priority habitats for conservation across the UK and a priority for restoration in all four countries. Approximately half of the remaining ancient woodland in the UK is still under historic plantation forestry (Plantation on ancient woodland sites - PAWs). This revision only requires the user to “consider” their restoration, it does not require restoration to be actively pursued where possible. With ancient and long-established woodland covering just 0.04% of the landscape in Northern Ireland, restoration of this irreplaceable habitat must be prioritised or it will be lost to future generations forever.

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?

No

Whilst Northern Ireland Environment Link (NIEL) is pleased to see some progress has been made towards an increasing focus on biodiversity in the new edition of the UKFS, parts of the general forestry practice, biodiversity, climate change and soil chapters are still lacking in ambition for nature's recovery. An increased ambition for nature is required to ensure an effective balance between the economic, environmental, and social principles of sustainable forest management within in the standard. Areas that still require strengthening for nature include:

Minimum native and maximum single species requirements

The 2017 edition of the UKFS¹ required a minimum of 5% of native trees or shrubs within a Forest Management Unit (FMU) and set a maximum allowance of up to 75% of trees being from a single species.

The new (GFP) GPR21 in the new edition of the UKFS² updates these figures; to a minimum of 5 to 15% of native trees or shrubs within a FMU, and a maximum allowance of up to 65% of trees being from a single species.

These updates are welcome, given the biodiversity benefits provided by native species and species-diverse woodlands.³ However, the native minimum is not sufficiently clear or ambitious.

The 2017 edition of the UKFS made it clear that in all cases, incorporate a minimum of:

- 10% open ground or ground managed for the conservation and enhancement of biodiversity as the primary objective;
- 10% of other species;
- 5% native broadleaved trees or shrubs.

A clearer approach, which would deliver more for biodiversity⁴, would be to set the native tree or shrub minimum at 15%, providing an unambiguous, ambitious benchmark. This should be combined with an uplift to B) GL16, which currently requires a minimum of 15% of a FMU to be managed with conservation and the enhancement of biodiversity as a major objective. This should be increased to 30%, to cover a new 15% native tree minimum and the requirement to manage 10% of a FMU as open ground or ground managed for the conservation and enhancement of biodiversity as the primary objective, with further

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/687147/The_UK_Forestry_Standard.pdf

² https://consult.gov.scot/scottish-forestry/e8d0808b/user_uploads/ukfs-draft-document---consultation---october-2022.pdf

³ For a summary of these benefits, see: <https://naturalengland.blog.gov.uk/2020/12/03/tony-juniper-a-tree-pronged-approach-to-restoring-nature/>

⁴ Also see the Woodland Trust's State of the UK's Woods & Trees 2021 report for further detail on these benefits: <https://www.woodlandtrust.org.uk/media/49731/state-of-the-uks-woods-and-trees-2021-the-woodland-trust.pdf>

headroom for nature. A 30% level would align with the UK Government's 2020 commitment to manage 30% of land for nature by 2030.⁵

NIEL supports the reduction in current maximum of 75% single species. However, the proposed maximum allowance of up to 65% of trees being from a single species is too high. We recommend that a maximum of 50% single species would be more appropriate to deliver greater biodiversity and woodland resilience benefits.

Peat

The 2017 edition of the UKFS recommends that forest landowners and managers “*avoid establishing new forests on soils with peat exceeding 50 cm in depth and on sites that would compromise the hydrology of adjacent bog or wetland habitats*”. (S) GPR4 in the new edition of the UKFS provides some strengthening of language on this requirement, with the recommendation to ‘avoid’ replaced by the slightly firmer “*new forests should not be established on soils with peat exceeding 50 cm in depth*”.

Whilst this strengthening of language is welcome, the new edition should also highlight that soils with peat from 30 cm in depth, if they form an intrinsic component of the peat hydrological unit, also have potential for peatland restoration. This is the qualifying criteria now used for Nature for Climate Peatland Grant Scheme funding, and for Nature Scotland's Peatland Action Fund. As stated in 2022 Defra, Natural England and Forestry Commission guidance on such funding decisions:

*“The rationale for using a shallower cut-off is that the previous 50 cm threshold precluded a large part of the carbon store and made it more difficult to restore peatlands effectively. It also encouraged tree planting up to the edge of restoration sites with risks of trees self-seeding.”*⁶

The new edition should not prohibit native woodland creation (especially through natural colonisation) on peat soils between 30cm and 50cm in depth (as is the case for all woodlands and forests on peat soils with a depth over 50cm). However, it should prohibit commercial afforestation on these sites as this risks large soil carbon losses and is not the best option for nature's recovery. This would help ensure that more peatland is conserved and restored, benefitting biodiversity, carbon storage and flooding prevention.

Biodiversity

GL7 in the draft UKFS has been amended to remove the reference to “biodiversity” (page 45 in current UKFS). Improving woodland condition is a welcome addition but could be subjective without stating for what purpose. We recommend amending GL7 as below to reinstate this key component and remove ambiguity.

(B) GL7: Manage native woodlands to improve their condition for biodiversity; base management proposals on protecting or extending semi-natural features characteristic of

⁵ <https://www.gov.uk/government/news/pm-commits-to-protect-30-of-uk-land-in-boost-for-biodiversity>

⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/992439/Decision_support_framework_for_peatland_protection_and_the_establishment_of_new_woodland_Interim_June_2021_FINAL.pdf

that woodland type, and controlling invasive non-native species and deer; place special emphasis on ancient semi-natural woodlands.

The UKFS should tie in to other related strategies such as the forthcoming Environment Strategy and Biodiversity strategy in Northern Ireland and other relevant strategies across the UK to ensure consistency of approach

Other points

The use of chemical fertilisers continues to be a subject only for 'minimisation' through (GFP) GL20, despite the damage these products can inflict on woodland species.⁷ A complete prohibition on using chemical fertilizers in sensitive woodland sites would deliver greater biodiversity benefits.

Overall, despite some improvements on the 2017 edition, nature recovery and biodiversity themes remain somewhat underpowered in the new edition of the UKFS. This must be remedied if the UKFS is to strike an effective balance between the economic, environmental and social principles of sustainable forest management. As the report on the 2021 consultation highlights, "*significant numbers of respondents wished to strengthen or enhance the biodiversity theme within the UKFS*".⁸ Such enhancement is not yet fully evident in the new edition. Further strengthening of the biodiversity theme, both within the biodiversity chapter and in other parts of the UKFS, is required.

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?

No.

We welcome the clarification in the draft edition of UKFS on what is guidance and what is a requirement, this was one of the recommendations made by NIEL in our 2021 consultation response where we recommended that 'the UKFS could be made more usable by clarity on what is a legal requirement and what is good practice guidance'. This has been reflected in the draft UKFS, with legal requirements clearly distinguished from good practice requirements and guidelines to implement those requirements by the use of the consistent letter codes LR (for legal requirements), GPR (for good practice requirements) and GL (for guidelines), with prefixed chapter references (such as B for biodiversity chapter). This should be carried through into the final draft of the updated UKFS, with consistent use of simple letter codes used instead of a more complex, confusing set of visual logos (as is the case in the 2017 edition).

⁷ See RSPB paper on species impacts here: https://www.rspb.org.uk/globalassets/downloads/pa-documents/pesticides_and_wildlife_rspb_report.pdf

⁸ <https://consult.gov.scot/scottish-forestry/5875ee93/results/whyresearch-ukfsconsultation2021analysisofresponsesfinal.pdf>

However, as mentioned earlier in our response to question 3, a significant portion of the good practice requirements and associated guidelines only require the user to ‘consider’ the sustainable activity or action, rather than a requirement to actually pursue it. NIEL recommends that more directive language is used to give stronger signals on what should be adopted wherever possible, which still enables flexibility if something isn’t possible.

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

There are a number of other areas where guidance and language in the new edition can be improved.

Flood risk

The new GFP GPR25 (‘forest management should take account of flood risk to vulnerable downstream locations’) is welcome, acknowledging the role that woodland can play in helping to reduce flood risk. However, the language could be stronger – ‘take account’ is a weak requirement. It should be complemented by a stronger requirement on woodland managers in flood-prone catchments to take active steps to restore natural systems that are more likely to hold water back.⁹

Deer management

There is a distinct shift in language used around deer management in the new edition of the UKFS. Whilst the 2017 edition mentions culling only once, as something ‘often’ incorporated into a deer management plan, the new edition’s general forestry practice chapter strongly suggesting that culling should always form part of a deer management plan (p21), which new (GFP) GPR6 states should always be applied in areas where deer are present. Given the complex welfare and biodiversity impacts involved, culling should be carefully considered in light of local circumstances.

Access for people

It is disappointing that language around increasing woodland access has not been strengthened in the new edition. (P) GPR 1 simply retains the 2017 good practice requirement that *“landowners and managers should consider providing access to their forest, in addition to that required by statute”*.

The Covid-19 pandemic has demonstrated the health benefits of access to natural spaces, including woodland. Research carried out by Outdoor Recreation NI (ORNI) highlighted that nearly half (47%) of respondents spent more free time outdoors during lockdown than they did at the same time of year in 2019.

⁹ For an example of how nature restoration in woodland habitats can successfully reduce flooding risk, see the Sussex Flow Initiative: <http://www.sussexflowinitiative.org/>

The Woodland Trust policy paper 'Space for People' highlights that just 56% of Northern Ireland's population had access to a wood larger than 20 hectares within 4km of their home. This represents the lowest provision of woodland access across the UK.

This increased demand for accessible nature-rich areas, and increased evidence of the benefits of it, should be reflected better in the new edition, with a stronger encouragement on landowners and managers to increase access to woodland.

Open habitats

The new edition should provide more explicit guidance to discourage planting on non-woodland priority habitats and to encourage removal of trees where appropriate on those habitats, without requiring 'compensatory planting' where applicable. This would help to maintain and restore open habitats. While there is reference to peatland, the biodiversity importance of other habitats that could be adversely affected by forestry is not adequately reflected, and this could create conflicts in achieving biodiversity conservation.

Hedgerows and in field trees

The updated UKFS could be enhanced by including reference to hedgerows and how these vital habitats can buttress and support the tree canopy, given the very close relationships between trees and hedgerows in farmed landscapes. Hedgerows offer a range of benefits that align with aims in the new edition of the UKFS, including carbon capture, increased biodiversity and reduced flooding.

7. 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?

No.

-ENDS-