

CONSULTATION

Response Document



UK Forestry Standard: Proposed Key Changes (UK Governments)

10 August 2021

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Scottish Environment Link
- Northern Ireland Environment Link
- Wales Environment Link
- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- Environmental Science Association of Ireland

This response was coordinated by our [Country Policy Group](#). We welcome the opportunity to participate in this consultation and we would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at JasonReeves@cieem.net with any queries.

Consultation Questions

1. Should references to the need to consider forest resilience and climate change adaptation be strengthened throughout the UKFS?

If Yes, please specify the potential areas you think should be covered, including robust evidence to support your comments.

If No, please state robust evidence to support your comments.

Yes.

We agree that strengthening resilience and adaptation to climate change is a key issue to integrate throughout the UKFS. Forests will play a key role in adaptation through water cycle regulation, cooling and many other ecosystem services. It is not clear whether 'resilience' in this proposal refers to ecological resilience or supply chain resilience, or both. We would welcome clarification and stress the need for resilience in both.

Specific topic areas should include improving the connectedness between forest habitats to ensure woodland species are able to shift with changing climates. Additionally, restoring native woodlands to increase biodiversity is imperative to address ongoing declines and ensure they are ecologically resilient.

It is important to recognise that there are likely to be tensions between legislation to protect particular species and the need to allow a forest to evolve in response to climate change. Therefore, the UKFS must require strategic planning to deliver for both biodiversity and climate adaptation at a wider landscape scale. There may also be a need to reconsider the place of grazing in forests where suitable to prevent a build-up of a flammable understorey in some environments¹.

Biosecurity and genetic diversity of planting stock must also be considered. Wherever possible, native species of local provenance should be used to avoid unnecessary introductions adding to the increasing risk of disease and invasive non-native species (INNS) spread. Alternatively, species range shifts as a result of climate change will be an evolving issue that the UKFS must consider, for example the importance of new species unable to colonise woodlands due inability to cross the Channel in response to climate change. In any case, the risk of INNS and disease spread must also be fully assessed and managed in expanding forestry, particularly commercial forestry reliant on non-native stock. Clearer guidance on management approaches for introduced species would be beneficial and must be adaptable based on emerging evidence regarding range shifts etc.

Natural regeneration can significantly reduce costs, maintain local adaptation to conditions and, in woodlands, create a varied age structure. There is evidence that most semi-natural woodlands contain high levels of genetic diversity and that improving connectivity of these woodlands will improve adaptation and resilience².

¹ For example, see Nader, G., Henkin, Z., Smith, E., Ingram, R., & Narvaez, N. (2007). Planned herbivory in the management of wildfire fuels. *Rangelands*, 29(5), 18-24 and Davies Kirk W., Boyd Chad S., Bates Jon D., Hulet April (2015) Winter grazing can reduce wildfire size, intensity and behaviour in a shrub-grassland. *International Journal of Wildland Fire* 25, 191-199. <https://doi.org/10.1071/WF15055>

² https://cdn.cyfoethnaturiol.cymru/media/681946/gpg8-forest-resilience-3_genetic_diversity.pdf?mode=pad&rnd=13213117813000000

2. Should the UKFS further consider its approach to managing carbon in forests and woodlands and through the whole forest planning, managing and harvesting cycle?

If Yes, please specify the potential areas you think should be covered, including robust evidence to support your comments.

If No, please state robust evidence to support your comments.

Yes.

Since 2017, the emphasis on planting forests to capture carbon has grown exponentially. With political parties pledging large targets in manifestos, and Governments implementing new targets, there is a danger that inappropriate areas are planted to achieve targets or through offsetting projects at the expense of existing or potential future habitats that would capture more carbon.

Requirements and guidance must be clear on consideration of, and avoiding impacts on, other carbon and/or biodiversity rich habitats. For example, the 50 cm threshold for planting on peat should be reviewed in case the threshold is too deep, as implemented in the new 'Cultivation for Upland Productive Woodland Creation Sites' guidance issued by Scottish Forestry³.

We support the calls from Wales Environment Link for clearer regulation on which sites are suitable and unsuitable for afforestation and guidance on management to maximise carbon sequestration and storage.

Carbon management requires a whole life cycle approach and should include factors such as the risk of carbon loss through fire, and timber use after harvesting. When planting woodland, a full ecological impact assessment including of the carbon losses and gains over time must be made.

New woodlands may take 30 years or more to become a significant carbon sink, depending on the soil type and level of disturbance during establishment, what habitat they are replacing and the tree species used⁴. Assessments of losses and gains will help determine whether woodlands are the best option and whether they should be planted or could be generated through natural colonization, which can deliver a more immediate carbon sink.

³ <https://forestry.gov.scot/publications/1032-cultivation-for-upland-productive-woodland-creation-sites-applicant-s-guidance/viewdocument/1032>

⁴ P. Anderson (2021) *Carbon and ecosystems: restoration and creation to capture carbon*. Available at: <https://cieem.net/resource/carbon-and-ecosystems-restoration-and-creation-to-capture-carbon/>; R. Gregg, J. L. Elias, I Alonso, I.E. Crosher, P. Muto and M.D. Morecroft (2021) *Carbon storage and sequestration by habitat: a review of the evidence* (second edition) Natural England Research Report, NERR094. Natural England, York.

3. Do you think that a more systematic approach to biosecurity should be taken in the UKFS across the entire forest planning and management cycle?

If Yes, please specify the potential areas you think should be covered, including robust evidence to support your comments.

If No, please state robust evidence to support your comments.

Yes.

The design of a forest as well as the particular operations performed can influence the risk of the spread of pests, diseases and INNS, which are an important threat to forest species and forest resilience. The UKFS should promote the use of locally grown stock, native species and natural regeneration where possible to reduce the risk of imported diseases.

4. Does the UKFS need to develop its approach for stakeholder and public involvement?

If Yes, please specify the potential areas you think should be covered, including robust evidence to support your comments.

If No, please state robust evidence to support your comments.

Yes.

Forest expansion and restoration projects must be planned and implemented by biodiversity professionals that have the expertise and understanding of the relevant species, habitats and ecosystems and to identify impacts on priority habitats and species.

Additionally, a given project must be planned in consultation with local communities and stakeholders, and consideration given to its place in the wider landscape. Clear requirements within the UKFS on stakeholder engagement and best practice guidance on how to undertake this, are needed.

5. Should the UKFS approach to forest-level planning and management consider wider land use objectives and promote complementary action between the two?

If Yes, please specify the potential areas you think should be covered, including robust evidence to support your comments.

If No, please state robust evidence to support your comments.

Yes.

As previously mentioned, the UKFS must require strategic planning to deliver for both biodiversity and climate adaptation, and wider ecosystem services at a landscape scale. This should provide guidance on how to address proposals where there are conflicting objectives, for example in the event that conserving biodiversity and sequestering carbon

are not compatible, although these are often complementary, or likewise for commercial forestry and conservation of biodiversity.

Reform of the current land management systems in UK nations to deliver public goods offers an exceptional opportunity to reverse the ongoing declines of biodiversity. Co-ordination with the new agricultural policies, biodiversity offsetting, green infrastructure strategies and other such opportunities is needed to facilitate beneficial landscape-scale changes and support the delivery of public goods. There is also a considerable amount of forest on land that is not managed for traditional timber production although this may be managed for other ecosystem services. These might include urban woods as well as the margins of roads and railways.

It is essential to plan forest creation through the implementation of nature networks which can identify where new woodland would increase habitat connectivity while protecting the integrity of open habitats.

The role of forestry in natural flood management should also form an integral part of catchment-scale planning, with forestry planners working alongside the respective statutory environmental agencies, River Trusts, the River Restoration Centre and other relevant agencies. The use of forestry to alleviate flood risk should be listed as a priority alongside mitigation for and adaptation to climate change.

6. Do you think the UKFS should strengthen its approach to minimising and managing manufactured waste generated by all aspects of woodland management and operations?

If Yes, please specify the potential areas you think should be covered, including robust evidence to support your comments.

If No, please state robust evidence to support your comments.

Yes.

The UKFS can play a valuable role in promoting the use of alternative sustainable materials and minimising inputs. Guidance on these aspects would be welcomed.

7. Are there any other significant cross-cutting themes that should be integrated throughout the UKFS?

If Yes, please specify the potential areas you think should be covered, including robust evidence to support your comments.

If No, please state robust evidence to support your comments.

Yes.

Addressing the biodiversity crisis must be integrated throughout the UKFS. Nature-based solutions (NbS)⁵, in combination with radically reducing carbon emissions through halting fossil fuel usage, offer the only proven ways to achieve climate and biodiversity goals simultaneously. Opportunities for NbS should be recognised in the UKFS.

Protecting and improving the ecological condition of existing habitats important in carbon storage and for biodiversity, particularly ancient woodlands including the identification and designation of those woodlands planned to become tomorrow's ancient woodlands, should be a priority. In addition, a requirement to manage existing forestry to enhance biodiversity would support targets to address declines and improve resilience of existing woodlands.

Clear monitoring requirements and enforcement measures are also essential to ensure the credibility of the regulations and guidance. Currently, there is a lack of systematic monitoring of the Standard's implementation which poses risks of individuals conducting damaging practices.

We would like to see clear aims and objectives set out for each of the proposed key themes in addition to detail on how they will interact with each other. Objectives should be adaptable based on emerging evidence on the consequences of climate change and carbon sequestration and be consistent with domestic and international agreements on climate and biodiversity agreed at COP26 and COP15.

There is a need for more explicit advice about rewilding as the principle has been gaining traction in recent years⁶, for example, projects at Carrifran⁷ and the Knepp Estate⁸. However, advice must recognise variation in local conditions and allow experimentation to find out what works best to achieve particular goals. It is important that the UKFS does not hinder small-scale experimental rewilding where this will benefit biodiversity.

8. Is the information in the UKFS arranged and presented in the most useful way to enable the people who regularly use the Standard in your organisation (or the people that your organisation represents) to do their job?

If Yes, please specify the potential areas you think should be covered, including robust evidence to support your comments.

If No, please state robust evidence to support your comments.

No.

To improve the clarity of the UKFS, we suggest clearer definition of what is a legal requirement and what is guidance, and when enforcement measures will be applied if not

⁵ <https://cieem.net/resource/using-nature-based-solutions-to-tackle-the-climate-emergency-and-biodiversity-crisis/>

⁶ <https://cieem.net/resource/cieem-rewilding-position-statement/>

⁷ <https://carrifran.bordersforesttrust.org/>

⁸ <https://www.kneppestate.co.uk/>

adhered to. The language used should also promote going beyond the regulatory baseline by being unambiguous and promoting wider benefits of best practice.

We support Wales Environment Link's call for "a common one-country approach to implementation and monitoring... along with clear signposting to individual country requirements where these are in place."

9. Are there any other significant changes you would suggest to improve the usability of the UKFS?

If Yes, please specify the potential areas you think should be covered, including robust evidence to support your comments.

If No, please state robust evidence to support your comments.

No.

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