

## Forest Stewardship Council®

### UK FORESTRY STANDARD (UKFS) CONSULTATION:

The UK Forestry Standard (UKFS) is the technical standard for sustainable forestry practice in England, Northern Ireland, Scotland and Wales. The UKFS was first published in 1998 and the current fourth edition was published in 2017. This consultation was part of a review of the current edition by the four administrations of the UK. The draft content of the next edition of the UKFS has been informed by both the specialists' assessment and responses to the first consultation. This second consultation was intended to seek stakeholder views on this draft content and the changes and improvements that have been made.

#### Consultation Questions

**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?**

We appreciate the effort which has been put into attempting to clarify the status of guidelines, an issue we raised in the first consultation. Given the scope of UKFS, it is perhaps unsurprising that a single status did not fit all of the current guidelines, and that there are now effectively two categories, one mandatory and one advisory. We have no objection to this in principle, but we wonder if the best way to distinguish these categories is through differences in wording; to make life easier for standard users, perhaps it would be better for the mandatory elements to remain as numbered guidelines, and for advice to be presented in a different way, e.g. as 'advice notes' or 'recommendations'.

**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?**

We remain concerned that 'People' is one of the weaker chapters of the standard. It is heavily focussed on access and recreation, and still has an unusually high proportion of advisory guidelines. We do welcome the strengthening of People good practice requirement 7, which we hope will improve public involvement in forest planning, but in general the potential for community involvement and local livelihoods still feels underplayed. We also welcome the inclusion of legal requirements for Northern Ireland in relation to equality in service provision, but it is disappointing, given the generally low levels of diversity in the forestry workforce, that promotion of equality is not also explicitly addressed under employment and health and safety, being instead covered by the general reference to 'legislation relating to employment'. We wonder, given the current sector skills shortage, whether there should at the very least be an advisory guideline similar to the draft UKWAS 5 requirement that 'Large enterprises promote training and encourage and support new recruits to the industry'.