

FOREST MANAGEMENT CERTIFICATION REPORT**SECTION A: PUBLIC SUMMARY**

Project Nr:	6531-GB		
Client:	UPM Tilhill (Tilhill Forestry Limited)		
Web Page:	www.upm-tilhill.com		
Address:	UPM Tilhill, Kings Park House, Laurel Business Park, Stirling, FK7 9NS		
Country:	United Kingdom (Scotland, England, Wales)		
Certificate Nr.	SGS-FM/CoC-000429	Certificate Type:	Forest Stewardship Certification (FSC) Group & Resource Forest Management
Date of Issue	2010	Date of expiry:	2015
Forest Zone:	Temperate		
Total Certified Area	168,215 ha		
Scope:	Forest Management of the UPM Tilhill group & resource manager certification scheme for forests in the UK producing softwood and hardwood round timber.		
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Evaluation dates:			
Main Evaluation	16-19 and 23-26 November 2009		
Surveillance 1			
Surveillance 2			
Surveillance 3			
Surveillance 4			

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AD 33-GB	Evaluation – UKWAS checklist (Observations)
AD 40:	Stakeholder Reports
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	List of stakeholders contacted



Complaints and Disputes

Procedures for submitting complaints, appeals and disputes, and the SGS processing of such are published on www.sgs.com/forestry. This information is also available on request – refer SGS Qualifor contact details on the first page.

INTRODUCTION

The purpose of the evaluation was to evaluate the operations of UPM Tilhill's Resource Manager Members and Group Members of the UPM Tilhill Group Certification Scheme against the requirements of the QUALIFOR Programme, the SGS Group's forest certification programme accredited by the Forest Stewardship Council.

1. SCOPE OF CERTIFICATE

The scope of the certificate falls within the Temperate Forest Zone and includes 293 Forest Management Units (FMUs)/Group Members as described below.

Description of FMUs:				
Description	Ownership	Area (ha)	Longitude E/W	Latitude N/S
Forests and woodlands under the UPM Tilhill Group Certification Scheme in Scotland, England and Wales. (208 Resource Manager members, full details of membership records are held by SGS)	Forest owners with UPM Tilhill as Resource Managers	66,225	UPM Tilhill head office in Stirling = longitude 03' 57" west. Longitude for individual members is available on request.	UPM Tilhill head office in Stirling = latitude 56' 08" north. Latitude for individual members is available on request.
Forests and woodlands under the UPM Tilhill Group Certification Scheme in Scotland, England and Wales. (85 Group member managed, full details of membership records are held by SGS)	Forest owners / managers with UPM Tilhill as providers of group member certification	101,990	UPM Tilhill head office in Stirling = longitude 03' 57" west. Longitude for individual members is available on request.	UPM Tilhill head office in Stirling = latitude 56' 08" north. Latitude for individual members is available on request.
Combined UPM Tilhill Group Scheme (293 members)	Total	168,215		

Size of FMUs:		
	Nr of FMUs	Area (ha)
Less than 100ha	68	4,054
100 to 1000 ha in area	184	67,712
1001 to 10000 ha in area	41	96,449
More than 10000 ha in area	0	0
Total	293	168,215

Total Area in the Scope of the Certificate that is:	
	Area (ha)
Privately managed	168,215
State Managed	0

Total Area in the Scope of the Certificate that is:	
	Area (ha)
Community Managed	0

Composition of the Certified Forest(s)	
	Area (ha)
Area of forest protected from commercial harvesting of timber and managed primarily for conservation objectives (inc. Ancient Semi-Natural Woodland (ASNW)).	45,547
Area of forest protected from commercial harvesting of timber and managed primarily for production of NTFPs or services	0
Area of forest classified as "high conservation value forest"	24,451
Area of non-forest managed primarily for conservation objectives	4,025
Total area of production forest (i.e. forest from which timber may be harvested)	122,668
Area of production forest classified as "plantation"	122,668
Area of production forest regenerated primarily by replanting	82,395
Area of production forest regenerate primarily by natural regeneration	40,273

List of High Conservation Values	
Description	Notes
<p>The following are designations under EU conservation laws :</p> <p>SAC = Special Area of Conservation (Habitats & Species Directive)</p> <p>SPA = Special Protected Area (Birds Directive)</p>	<p>These areas are included within the area of forest protected from commercial harvesting of timber and managed primarily for conservation objectives and the areas classified as HCVF.</p>
<p>The following is a designation under GB conservation law that offers statutory protection to habitats & species :</p> <p>SSSI = Site of Special Scientific Interest</p>	<p>These areas are included within the area of forest protected from commercial harvesting of timber and managed primarily for conservation objectives and the areas classified as HCVF.</p>
<p>The following is not a legal designation but is a well recognised definition within the UK Woodland Assurance Scheme (UKWAS) :</p> <p>ASNW = Ancient Semi Natural Woodland</p> <p>Woodland is referred to as ancient woodland when it has been in continuous existence since before 1600 AD in England, Wales and Northern Ireland, or since 1750 AD in Scotland.</p> <p>The term ASNW is used to describe semi-natural*stands on ancient** woodland sites.</p> <p>Semi-natural* woodlands are woodlands which are comprised mainly of locally native trees & shrubs, and have some structural characteristics of natural woodland.</p> <p>Ancient** woodland refers to the site of an ancient woodland irrespective of its current tree cover. Where the native tree cover has been felled (pre-certification) and replaced by planting of tree species not native to the site, it is referred to as a plantation on an ancient woodland site (PAWS).</p>	<p>These areas are included within the area of forest protected from commercial harvesting of timber and managed primarily for conservation objectives and the areas classified as HCVF.</p>
<p>Non-forest areas managed primarily for conservation objectives inc.</p>	<p>These areas are included within the</p>

List of High Conservation Values	
Description	Notes
open heath and grasslands, semi-natural woodlands and water courses, lakes and riparian zones.	area of non-forest managed primarily for conservation objectives

List of Timber Product Categories				
Product Class	Product Type	Trade Name	Category	Species (inc. potential)
Wood in the rough	Logs of coniferous wood	Sawlogs	Conifer	<i>Larix europaea</i> , <i>Larix leptolepis</i> , <i>Larix x eurolepis</i> , <i>Picea abies</i> , <i>Picea sitchensis</i> , <i>Pinus contorta</i> , <i>Pinus sylvestris</i> , <i>Pinus nigra var.maritima</i> , <i>Pseudotsuga menziesii</i> , <i>Taxus baccata</i> , <i>Thuja plicata</i> , <i>Tsuga heterophylla</i> .
Wood in the rough	Logs of coniferous wood	Fencing logs	Conifer	<i>Larix europaea</i> , <i>Larix leptolepis</i> , <i>Larix x eurolepis</i> , <i>Picea abies</i> , <i>Picea sitchensis</i> , <i>Pinus contorta</i> , <i>Pinus sylvestris</i> , <i>Pinus nigra var.maritima</i> , <i>Pseudotsuga menziesii</i> , <i>Thuja plicata</i> , <i>Tsuga heterophylla</i> .
Wood in the rough	Logs of coniferous wood	Logs for chips	Conifer	<i>Larix europaea</i> , <i>Larix leptolepis</i> , <i>Larix x eurolepis</i> , <i>Picea abies</i> , <i>Picea sitchensis</i> , <i>Pinus contorta</i> , <i>Pinus sylvestris</i> , <i>Pinus nigra var.maritima</i> , <i>Pseudotsuga menziesii</i> , <i>Thuja plicata</i> , <i>Tsuga heterophylla</i> .
Wood in the rough	Logs of coniferous wood	Logs for pulp	Conifer	<i>Picea abies</i> , <i>Picea sitchensis</i> .
Wood in the rough	Logs of coniferous wood	Fuel / Firewood	Conifer	<i>Larix europaea</i> , <i>Larix leptolepis</i> , <i>Larix x eurolepis</i> , <i>Picea abies</i> , <i>Picea sitchensis</i> , <i>Pinus contorta</i> , <i>Pinus sylvestris</i> , <i>Pinus nigra var.maritima</i> , <i>Pseudotsuga menziesii</i> , <i>Thuja plicata</i> , <i>Tsuga heterophylla</i> .
Other products of wood	Residue of coniferous wood	Baled brash	Conifer	<i>Picea abies</i> , <i>Picea sitchensis</i> , <i>Pinus contorta</i> , <i>Pinus sylvestris</i> , <i>Pinus nigra</i>

List of Timber Product Categories				
Product Class	Product Type	Trade Name	Category	Species (inc. potential)
				<i>var.maritima, Pseudotsuga menziesii, Thuja plicata, Tsuga heterophylla.</i>
Other products of wood	Residue of coniferous wood	Round wood Stumps for wood fuel market	Conifer	<i>Larix europaea, Larix leptolepis, Larix x eurolepis, Picea abies, Picea sitchensis, Pinus contorta, Pinus sylvestris, Pinus nigra var.maritima, Pseudotsuga menziesii, Thuja plicata, Tsuga heterophylla.</i>
Wood in the rough	Logs of deciduous broadleaves	Sawlogs	Deciduous (Hardwood)	<i>Acer platanoides, Acer pseudoplatanus, Alnus glutinosa, Betula pendula, Betula pubescens, Castanea sativa, Fagus sylvatica, Fraxinus excelsior, Prunus avium, Juglans regia, Populus spp, Salix spp, Quercus robur, Quercus petraea, Ulmus glabra.</i>
Wood in the rough	Logs of deciduous broadleaves	Fuel / Firewood	Deciduous (Hardwood)	<i>Acer platanoides, Acer pseudoplatanus, Alnus glutinosa, Betula pendula, Betula pubescens, Castanea sativa, Fagus sylvatica, Fraxinus excelsior, Prunus avium, Juglans regia, Populus spp, Salix spp, Quercus robur, Quercus petraea, Ulmus glabra.</i>
Wood in the rough	Logs of deciduous broadleaves	Round wood of small diameter for Coppice market, whose purchasers process into hurdle fencing or charcoal etc.	Deciduous (Hardwood)	<i>Corylus avellana</i>

Annual Timber Production				
Species (botanical name)	Species (common name)	Area (ha)	Maximum Annual Sustainable Yield (m ³)	
			Projected	Actual
<i>Larix europaea</i> , <i>Larix leptolepis</i> , <i>Larix x eurolepis</i> , <i>Picea abies</i> , <i>Picea sitchensis</i> , <i>Pinus contorta</i> , <i>Pinus sylvestris</i> , <i>Pinus nigra var.maritima</i> , <i>Pseudotsuga menziesii</i> , <i>Taxus baccata</i> , <i>Thuja plicata</i> , <i>Tsuga heterophylla</i> . <i>Acer platanoides</i> , <i>Acer pseudoplatanus</i> , <i>Alnus glutinosa</i> , <i>Betula pendula</i> , <i>Betula pubescens</i> , <i>Castanea sativa</i> , <i>Fagus sylvatica</i> , <i>Fraxinus excelsior</i> , <i>Prunus avium</i> , <i>Juglans regia</i> , <i>Populus spp</i> , <i>Salix spp</i> , <i>Quercus robur</i> , <i>Quercus petraea</i> , <i>Ulmus glabra</i> .	Larches, Norway Spruce, Sitka spruce, Corsican Pine, Lodgepole Pine, Scots Pine, Douglas Fir, Yew, Western Red Cedar, Western Hemlock, Norway Maple, Sycamore, Alder, Birches, Sweet Chestnut, Beech, Ash, Cherry, Walnut, Poplars, Willows, Oak, Elm.		1,682,150	1,069,853
			Average Yield Class 10 m ³ ha ⁻¹ . Annual allowable cut is based on UK yield models that are based on felling at age of maximum mean annual increment.	(Total Group Scheme certified timber sales)
Totals		168,215		

Approximate Annual Commercial Production of Non-Timber-Forest-Products				
Product	Species		Unit of measure	Total units
	Botanical Name	Common Name)		
No NTFPs have been or are currently produced for sale.				0

2. COMPANY BACKGROUND

2.1 Ownership

UPM is one of the world's leading forest industry groups. Today's globally operating company has origins dating back to late 19th century Finland. UPM has production facilities in 14 countries and it employs some 36,000 people worldwide. Sales in 2008 were EUR 9.5 billion. UPM's shares are listed on the NASDAQ OMX Helsinki stock exchange. The main UK office is in Stirling, Scotland.

2.2 Company Key Objectives

Objective	Notes
Commercial	
Primarily, profitable timber sales, cost effective restocking and increase in capital value of forest properties managed by the company. Other commercial income will be taken where opportunities arise.	UPM Tilhill manages commercial forests on behalf of its investment clients in order to maximise the commercial return from the forest consistent with sustainable forestry principles.

Objective	Notes
Maintenance of compliance with ISO 9001	Assurance under ISO 9001 supports standards in management quality.
Social	
Employee and contractor skill base to facilitate the primary commercial objective. Maintenance of compliance with ISO 18001.	Tilhill is part of the UPM Kymmene group, which has c.36,000 employees worldwide. Tilhill District offices have c.6 staff per office with c.20 at Headquarters. each District office operates a contractor list that will exceed 40 individuals. Assurance under ISO 18001 supports standards in health & safety.
Environmental	
Legal and FSC compliance to facilitate the primary commercial objective, plus reinforce the company's reputation and credentials. Maintenance of compliance with ISO 14001.	Environmental management provides a firm foundation for continuous improvements of environmental performance, as well as to an open dialogue with stakeholders. Environmental management procedures implemented throughout all operations follow a holistic approach, enable synergy effects and improve both environmental performance and the credibility of UPM Tilhill. Assurance under ISO 14001 supports environmental standards.

2.3 Company History

UPM Tilhill (Tilhill Forestry Ltd) was established over 50 years ago and is the UK's largest private forestry company. The present company results from the relatively recent merger and acquisition of several businesses including Tilhill, Economic Forestry Group and Shotton Forest Management. UPM Tilhill is now a wholly owned subsidiary of the international UPM-Kymmene plc Group based in Finland.

The UPM-Kymmene Group is one of Europe's largest forestry industry enterprises, which has developed over 100 years. The UPM-Kymmene Group's operations cover the full spectrum of the forest industry from forest management to production of end-products such as paper, construction materials and retail outlets. It is responsible for about 2 million hectares of forest management, principally in Finland, Canada, the USA and the UK. It is one of the world's most significant paper companies, focusing on magazine papers, newsprint and wood products. The group has a total raw material consumption of approximately 25 million m3. Annual business turnover is approximately 10 billion euros and it employs around 36,000 employees worldwide.

Tilhill have been actively involved with certification since 1999 / 2000. The Tilhill Resource Manager Certification Scheme is open to all of its existing clients. Many but not all have joined the scheme. Tilhill has a policy of encouraging all clients to ensure their woodlands are managed in accordance with the UKWAS. The Tilhill Group Certification Scheme is open to any owners of woodland within the UK mainland who wish to certify their woodland management and can achieve the requirements of the UKWAS Certification Standard.

2.4 Organisational Structure

Tilhill has a head office in Stirling with 13 main district offices throughout England, Scotland and Wales. A District or Business Manager, assisted by a number of specialist support staff, heads each district office. As well as forest management Tilhill also operates other related services

including forestry investment & property acquisition, timber harvesting, landscaping, utility arboriculture and land surveys inc. GIS mapping.

Tilhill currently manages some 200,000 hectares of woodland. Tilhill's client base currently includes traditional mixed estates and farms, large-scale forestry investment portfolios, government agencies and small-scale woodland owners. Tilhill operates two main forms of forestry services – Contract Services and Estate Woodland Services. Contract services are normally one-off, fixed price landscaping, maintenance or harvesting projects and do not fall within the scope of QUALIFOR certification.

The Estate Woodland Service provides the basis for management of properties for which Tilhill is responsible for overall woodland management. These areas currently comprise 200,000 ha of a wide range of forest types including plantations and semi-natural woodlands. Tilhill managed operations include establishment and management, harvesting and marketing, acquisition and wildlife management. All practical forest management and harvesting work is carried out through supervised contractors as Tilhill have no industrial staff.

2.5 Ownership and Use Rights

UPM Tilhill do not own land. All woodlands are owned by their clients and attract associated UK property rights. Forest owners/ investors can be either individuals or partnerships or companies.

The general public have access rights consistent with owners discretion but underpinned by statute law and access codes, eg the Land Reform (Scotland) Act, 2003 and the Scottish Outdoor Access Code, 2004, together with the Countryside Rights of Way (CROW) Act in England and Wales.

2.6 Other Land Uses

Other than recreational use, the only permitted use is for deer management and hunting by lessees authorised by UPM Tilhill.

2.7 Non-certified Forests

Non-certified forests were fully disclosed and discussed with the managers (a list is available via SGS if required). They are in the main, either young plantations which are not yet timber producing or modest sized properties without significant timber production. Where timber is produced from Tilhill managed properties it is subject to a controlled wood assessment procedure. Some are owned by clients with certified properties. They are managed to the same Tilhill standards and are subject to Forestry Commission (regulatory authority) guidelines and monitoring. Managers are clear that any timber production from non-certified forests has to be managed separately from certified timber. Timber sales procedures were checked accordingly and found in order.

3. GROUP MANAGEMENT

3.1 Group Management System

The Group Scheme Manager (GSM) with a team of internal auditors provides a gap assessment & report, acceptance audit, access to a group certificate and annual management summary returns and internal surveillance audits. Tilhill are responsible for management planning and operations of Resource Manager (RM) members. Group self/agent (non-Tilhill) managed members (GM) are responsible for their own management planning and operations.

Both RM and GM members are bound by a membership constitution to which they provide a signed declaration of commitment.

Resource Managers are responsible for management planning and operations but must also apply the Tilhill Quality, Environmental and Health & Safety assurance management system (AMS), which is verified to: ISO 9001, ISO 14001, and OHSAS 18001 by BM Trada.

3.2 Membership of the Group

Potential members of the group are assessed using a Pre-Entry Checklist during which actions required to achieve UKWAS compliance are identified. These are the subject of internal Corrective

Action Requests (CARs). Once any internal major CARs have been addressed or amended to minor status, then, and only then, can applicants be accepted for entry into the group scheme, together with the pre-condition that applicants sign a commitment to compliance with the UKWAS and acceptance of the group scheme membership constitution.

The approach mirrors that used by FSC Certification Bodies. The pre-entry checklist (Membership Application Checklist (MAC)) mirrors the UKWAS standard.

There is steady net growth in the scheme.

3.3 Monitoring of Group Members

Tilhill have procedures for monitoring compliance with UKWAS in registered woodlands (for RM members) and also for monitoring Group members' compliance with UKWAS. The GSM's documented procedures set out the sampling guidance. Several trained auditors, under the direction of the GSM provide Membership Acceptance audits and Gap Assessments. They control and report on Acceptance Audits, Access to Group Certificate and manage a system of Annual Management Summary Returns and Surveillance Audits. Members are responsible for management planning and operations.

Sampling is 'risk adjusted' to account for heterogeneity. Members with poor records are monitored more frequently. Annual surveillance programmes are developed at internal auditors' review meetings.

At Re-Assessment all scheme members were still treated as non-SLIMF by Tilhill. Tilhill ' internal audit procedure assesses all aspects of the UK Woodland Assurance Standard (UKWAS), which is the FSC endorsed local FSC standard for the UK. The UKWAS complies with the requirements of the FSC Principles & Criteria. Similarly, SGS Qualifor's assessment covers all aspects of the Tilhill system, which in turn covers all aspects of UKWAS, and all UKWAS criteria are assessed by SGS during Main / Re- Assessment.

4. FOREST MANAGEMENT SYSTEM

4.1 Bio-physical setting

Britain has a relatively poor native tree flora of 32 species, including only 3 conifers. In addition, many exotic species have been introduced since Roman times, with large numbers of exotic conifer species introduced for commercial forestry purposes during the twentieth century.

Approximately 10% of Britain's land area carries tree cover (15% of Scotland, compared to 7% in England). This is an increase since the beginning of the 20th century, when forest cover stood at approximately 5%. However, this increase is composed predominantly of recent plantation forests, largely with exotic species. The UK has no remaining natural forests, but ancient semi-natural woodlands (ASNW) make up approximately 1% of land area. Since 1945 almost 50% of ancient semi-natural woodland has disappeared.

Large areas of degraded upland areas have been established during the last 50 years as even aged plantations of exotic species such as Sitka Spruce (*Picea sitchensis*), Lodgepole Pine (*Pinus contorta*) and Larch (*Larix* spp). Other exotics managed are Norway Spruce (*Picea abies*), Douglas Fir (*Pseudotsuga menziesii*), true firs (*Abies* spp.), Western Hemlock (*Tsuga heterophylla*). The only timber producing native species conifer, Scots Pine (*Pinus sylvestris*), has also been extensively planted as part of the same re-forestation programme.

Geology and Geography:

Tilhill managed forests and group scheme members are distributed throughout the UK apart from Northern Ireland. The geology is varied with mainly igneous and metamorphosed sedimentary bedrock of the ancient, primary and tertiary periods overlain by mainly thin or poorly drained soils. The topography is predominantly upland with minor proportions of lowland. The UK is subject to north Atlantic depressions and the climate tends predominantly to be wet and windy.

Ecology:

The climatic biome is moist and temperate reflecting the UK's location on the western seaboard of Europe. Vegetation types range from low altitude rough grassland to mixed woodland and upland

heather moorland. Apart from relatively small areas of indigenous forest habitat, woods and forests are derived from plantations created on previously grazed heathlands and grasslands that have remained free of natural forests for several centuries.

Soils:

Geology in the UK is complex and has resulted in a very wide range of soil types. However, predominant soil types are acidic brown earths, podsoles, gleys, peaty gleys and peats.

4.2 History of use

Britain's forests have been steadily denuded since the Bronze Age through both clearance and use of timber. As a result, by the beginning of the twentieth century very little forest remained. In response to this, the Forestry Commission was established in 1919 with the aims of establishing and maintaining adequate reserves of trees and production of timber, and of promoting the interests of British forestry.

The Forestry Commission had an active policy of reforestation, particularly from 1945 onwards, acquiring land and planting it mainly with exotic plantation species. In addition, it was also responsible for providing incentives for private forestry, aided in the 1970s and 80s by tax advantages. This resulted in the planting of predominantly exotic plantations in both the public and private sector.

By the 1980s there was increasing concern about wider forest goods and services, in particular landscape, recreation and biodiversity. As a result, incentives have been increasingly slanted towards encouraging multiple use forestry and increasing use of native species.

The Forestry Commission is represented by a Policy and Practice unit (previously the Forestry Authority) covering Great Britain with three national organisations in Scotland, Wales and England that are responsible for regulating forestry and providing grant aid to private owners. In Northern Ireland similar responsibilities are held by the Forest Service of the Department of Agriculture & Rural Development for Northern Ireland (DARDNI).

Approximately two-thirds of the UK's woodland resource is privately owned, often as part of mixed estates or farms. Few private ownerships exceed 1,000 ha. Most commercial private forestry is based on plantations. In recent decades, plantation crops of broadleaves or conifers have been established on many ancient woodland sites.

Management for timber production is not always the main objective of privately owned woodlands: management for game is common on mixed estates, and an increasing number of woods are managed specifically for recreation and conservation. Timber production is considered important in larger estates and company owned forests. Biodiversity and landscape conservation and recreational use are now almost always included as multiple objectives in management planning.

UPM Tilhill manages woodlands for a variety of objectives, according to the owner's priorities and the type of property. Timber production and financial profit are usually important objectives, but the conservation of rare species and habitats and recreation are often important, especially where there are nature conservation designations. The restoration of native woodlands is a common aim in many properties.

Adjacent land uses primarily include adjacent forests, upland sheep farms and areas of high density deer range.

4.3 Planning process

The owner/manager's strategic (long term: rotation or harvest cycle length) and medium term (3-5 years) planning, including long-term financial planning, is developed and documented in each individual property Management Plan. In addition, budgets are developed and approved annually.

The company's policies are developed, reviewed and revised as necessary by a Chairman and Board of Non-Executive Directors. The Board is supported by a Managing Director and his team, which includes the Head of Assurance and other managerial colleagues responsible for developing procedures. As well as ISO 9001 (quality), the company operates ISO 14001 (environmental) and OHSAS 18001 (health & safety) systems all of which are integrated under the Tilhill 'Assurance

Management System' (AMS). Finance, investment and technical specialists provide additional support.

Achievements are monitored against annual budgets, forecasts and operational plans within the management planning procedures. Management Plans for all properties are reviewed and updated every five years. In addition, progress against FC approved plans and grant claims is monitored.

All members of the company's group certification scheme have management plans as laid out in the company's Management Plan template or equivalent. In addition, many of the woodlands (or part of woodlands) have Forestry Commission Woodland Grant Scheme (inc. equivalent new devolved country variants) contracts or approved long-term forest design plans for larger forests., which will give an outline of planned management operations for a 5 or 10 / 20 year period (including felling, thinning, new planting and restocking by replanting or by natural regeneration). Other properties or parts of properties have not yet had operational plans or WGS plans provided for them. In those cases, broad proposals exist in the management plan.

Permission from the Forestry Commission is required for the felling of all trees in Great Britain (with certain limited exceptions). The FC regulates felling in private woodlands by granting a licence, approving a plan associated with a grant scheme (generally Woodland Grant Scheme (WGS or new devolved country variants) or approving a long-term forest design plan for larger forests. Most planting (and re-establishment through natural regeneration) on private land takes place with the assistance of grants made by the Forestry Commission or DARDNI.

Woodland Grant Scheme (WGS etc.) contracts identify overall management objectives and include a basic schedule of operations, describing the management activities planned over a 5-year period. Prescriptions are described in general terms for compartments. These documents often form the basis for the management plan.

Various other planning methods are used by the company, depending on factors such as scale, environmental sensitivity and landscape aesthetics. Environmental Appraisals or formal Environmental Impact Assessments are used to assess large scale (+100 hectares) afforestation proposals where required by the Forestry Commission. Thinning is regulated by either a Felling Licence (subject to the Forestry Act 1967) or a WGS contract.

The Forestry Commission frequently requires the production of a forest design plan prior to giving permission for large scale clear felling, restocking and afforestation.

All properties within the UPM Tilhill Group and Resource Manager certification schemes have management plans that are reviewed every five years. In addition, many woodlands (or part of woodlands) are the subject of Forestry Commission WGS contracts, which may give an outline of planned management operations for a 5 year period (including felling, thinning, new planting and restocking by replanting or by natural regeneration). Increasing use is made of 'Long Term Forest Plans' which are FC contracts to give longer approval for felling and restocking operations, giving 10 years in detail and a further 10 years in outline approval. All company managed properties have forest management records and budgets which monitor both forest operations and financial performance.

4.4 Harvest and regeneration

Clear felling followed by restocking by planting is the method generally employed for upland plantation management in Great Britain. Felling coupe size and shape are expected to comply with Forest Landscape Design Guidelines. Irregular systems and natural regeneration are increasingly used in ASNWs.

Motor-manual and mechanical whole tree, tree length and short wood harvesting systems with a variety of extraction methods including skidding, forwarding and cable crane may be utilised depending on site conditions and topography. Mechanical harvester felling followed by mechanical forwarder extraction is now the norm for most UK conditions.

In general, the aim, for commercial areas, is to grow crops to age of Maximum Mean Annual Increment (Max MAI) and then to fell. However, restructuring and the establishment of retentions as part of an agreed forest design plan or WGS contract may involve felling at ages other than Max MAI. UPM Tilhill managers use local experience or mensuration techniques to assess yield forecast of thinning or felling before harvesting.

UPM Tilhill employ a range of silvicultural practices, including clearfelling, group felling and retention of trees beyond economic rotation age. Continuous cover forestry systems are being used in semi-natural woodlands and are also being tried in some windfirm conifer plantations.

Restocking and afforestation in the UK is generally by planting. Natural regeneration is employed where realistic and is used more frequently for semi-natural woodland. Ground preparation is often carried out using mounding or scarification. Insect attack and weed competition are mitigated by such ground preparation techniques and choice of plant size. Use of chemical insecticides and herbicides are used when required if there is no realistic alternative not entailing excessive cost. UPM Tilhill has a general policy aim to reduce chemical use in this context. Burning of lop and top following felling is much less common but may be justified on some sites, e.g. for rabbit control.

In the UK the building of new forest roads and quarrying for such roads is governed by Environmental Impact Assessment regulations. This process is administered by the Forestry Commission and it is a process with which the company is familiar.

Fencing is sometimes necessary to protect against stock, deer and rabbits, coupled with control of game and pest species by shooting.

Afforestation of new native woodlands on semi-natural degraded sites usually involves direct notch planting with minimum ground preparation and maintenance.

4.5 Monitoring processes

Where a woodland is subject to a WGS contract, implementation of the prescribed management is checked by the Forestry Commission at a sample of sites. Other monitoring may be carried out on an *ad hoc* basis by statutory bodies or conservation NGOs where there are particular features of interest.

Regular visits are made to all properties and to vulnerable, sensitive and working sites by UPM Tilhill staff. Records are maintained of site visits, operations undertaken and production. Monitoring results are fed into Management Plan revisions, which normally take place every 5 years.

5. SOCIO-ECONOMIC AND ENVIRONMENTAL CONTEXT

5.1 Social aspects

Number of own workers (management and admin (staff))	c.150
Number of contract workers	Variable depending upon work loads, c.800
Minimum daily wage for agricultural/forestry workers	>UK Legally defined minimum wage
Infant mortality rates (under 5 years)	Very low
Proportion of workers employed from the local population (%)	Variable & low. Local people are being employed, but there are not that many that need to be employed from the local population for the scale of work concerned. It involves contractors & machinery as

	required. Local employment is appropriate for scale and intensity of operations.
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The social conditions in the main commercially productive conifer forest areas of the UK are similar, involving mainly Scotland, Wales, parts of Northern England and Northern Ireland. The rural economy is fragile within them all. Tourism is particularly important and landscape values are correspondingly high in many but not all parts of these areas. Whilst tourism can be important, woodlands in the other areas of the UK are equally important for economic regeneration policies and their amenity and recreational value to nearby urban populations (e.g. Scottish central belt, Southern England).

The UK now has a minimum wage structure and health and education standards are relatively high and comparable with the rest of Western Europe. Infant mortality is very low and literacy rates are very high.

Issues relating to amenity, specifically access and recreation are of major importance in the overall context of rural land management in the UK.

Where Forest Plans are prepared, a "scoping" meeting may be held with statutory consultees and local representatives to discuss proposals and exchange information prior to the preparation of the plan.

It is generally accepted in Scotland that the general public is at liberty to walk over any land provided he or she does so without causing damage to crops, fences and wildlife. This applies to the whole country with the exception of private gardens or grounds that form the curtilage of a dwelling house or other private residence.

In England and Wales the situation is more complex with many restrictions on public access to private land although the situation is currently changing with increasing legislative attention to public access in the countryside.

In England and Wales, the areas being opened up under the Countryside and Rights of Way Act 2000 ('CROW') are usually mountain, moor, heath, down and registered common land. The new rights cover most recreation activities carried out on foot, including walking, sightseeing, bird watching, climbing and running. Walking dogs must be on a lead in certain situations. The new right of open access does not include cycling, horse riding, driving a vehicle or camping unless already permitted. Gardens, parks and arable land are excluded together with closures and restrictions by farmers and landowners for up to 28 days for any reason or long term if necessary for land management, safety or fire prevention reasons. The "Countryside Code" launched in July 2004 is the official advice that supports the CROW Act.

These new CROW rights came into effect from September 19th 2004 and apply to designated regions of England with completion anticipated by the end of 2005. It is also anticipated that the new access will begin throughout Wales in May 2005. Some landowners are dedicating areas for permanent open access, e.g. FC.

In general, UPM Tilhill encourages public access on its the land that it manages. However, the owner has the final decision on access rights (subject to legal requirements). Public Rights of Way exist in some woodlands and are respected.

The UK population includes large numbers of different nationalities and cultural groups, many of which the UK economy is dependent upon. Generally they are closely and intimately integrated into British society and many families have spent several generations in the UK.

The UK timber production and processing industry is under economic pressure from the relatively high currency value of UK sterling and the impact of timber imports. The increase in UK landfill tax has meant that recycling of paper and card waste products has greatly increased, resulting in less demand for raw timber for these products. To an extent, this is now being offset by an increase in demand for small roundwood for woodfuel. Similarly, market pressure from imports has reduced on a relative basis due to changes in supply conditions within Russia and Scandinavia. However, the overall economic situation referred to as the 'global credit crunch' is affecting the UK economy like

others and this is having a serious impact upon UK demand and with a consequent downturn in prices. The UK timber market is still heavily affected by the building trade and any global economic downward pressure which affects building activity translates to the same pressure on timber prices. Whilst the medium to long term outlook is modestly optimistic, such current fluctuations are all representative of the fragility of the UK rural economy where farming is also under serious economic pressure.

5.2 Environmental aspects

The UK has approximately 2 million hectares of forest of which 575,000 hectares are estimated to be on Ancient woodland sites. Approximately 300,000 hectares of this can be described as Ancient and Semi Natural (ASNW) woodland, the balance having been converted into plantation.

Ancient woodlands are those that have had continuous woodland cover since at least 1600 AD in England and Wales, and since 1750 AD in Scotland. The term ASNW covers all stands of ancient origins that do not obviously originate from planting. This may include stands with naturalised alien species such as sycamore or beech.

ASNW represent the least modified semi-natural woodlands in Britain; they represent an unbroken link with the natural forests that developed after the end of the last glaciation, some 8,000 years ago. For example, native pine (*Pinus sylvestris*), or Caledonian pine forests as they are often called have been shown to contain several sub-populations of Scots pine that collectively form a genetically and biologically distinct western outlier of the natural distribution of this species. The pine-dominated Caledonian forest may once have covered more than 1.5 million hectares of the Highlands but the present area of native pinewood is now thought to be only 16,000 hectares of which more than half is scattered pine.

Areas within woodlands of particular significance for biological or geological reasons are given statutory designations as areas of special scientific interest (SSSIs) and have statutory protection.

The UK Biodiversity Action Plan (UKBAP) includes specific guidance and costed targets for a wide range of species and habitats that are the subject of Species Action Plans (SAPs) and Habitat Action Plans (HAPs). Individual local authorities have developed their own Local Biodiversity Action Plans (LBAPs).

The Forestry Commission has developed the UK Forestry Standard and has published 'Guidelines' for Nature Conservation, Archaeology, Recreation, Landscape Soil and Water.

Forest management is expected to meet the requirements of these guidelines and standards. There are also complex laws relating to the conservation of many species and habitats in the UK (eg The Wildlife & Countryside Act, 1981).

5.3 Administration, Legislation and Guidelines

The Forestry Commission separately in Scotland, Wales and England implements forestry regulation in Great Britain. (Regulation in Northern Ireland is controlled separately through the Department of Agriculture and Rural Development for Northern Ireland (DARDNI)).

The primary piece of legislation relating to forest management is the Forestry Act 1967. With certain exceptions, mainly relating to non-commercial situations, it is illegal to fell trees in Great Britain without the prior approval of the Forestry Commission. Permission is granted through a felling licence, normally conditional on regeneration or replanting, or through approval of a plan of operations for the site. The latter is an integral component of grant aid provided under the Forestry Commission's Woodland Grant Scheme (WGS).

Following recent political devolution in the UK the Forestry Commission has similarly devolved its structure and operations. Its role as a regulatory authority remains very similar in each of Scotland, England and Wales.

Approval of grant aid under the WGS is also conditional upon compliance with a range of Forestry Commission environmental guidelines, which aim to ensure that forestry operations are conducted in a manner consistent with the maintenance, protection and/or enhancement of soil, water, landscape, biodiversity and heritage values.

Where felling licences or plans of operations affect areas designated for nature conservation or landscape value, there is an obligation to consult the relevant statutory bodies prior to approval.

The other major aspect of legal control is health and safety. The Health and Safety at Work Act, 1974, and the Management of Health and Safety at work Regulations, 1992, enforced in Great Britain by the Health and Safety Executive, regulate this. The required safety standards for forestry operations are contained in a number of Safety Guides, produced by the Forestry and Arboricultural Safety and Training Council and its successor, the Arboriculture & Forestry Advisory Group.

The local standard used for this assessment was the FSC endorsed UK Woodland Assurance Scheme (UKWAS) standard which was first approved in 1999 and its revised 2nd edition in 2006. The UKWAS reflects the FSC GB standard and is now accepted as *the* forest management 'standard' in the UK. The UKWAS was used in conjunction with the SGS QUALIFOR Programme. In addition, the requirements of the UK Forestry Standard were also taken into account.

The UK Forestry Standard, developed by the UK Forestry Commission, is underpinned by a series of 'Guidelines' covering Archaeology, Landscape, Nature Conservation, Recreation, Soils and Water. Forest Practice Guides Nos. 1-8 also covers guidance for the management of semi-natural woodlands in the UK. It is a requirement of UKWAS that this guidance is adhered to.

Following the United Nations Conference on Environment and Development (UNCED) in Rio de Janeiro in 1992, the UK government became a signatory to the Convention on Biological Diversity and the Framework Statement on Climatic Change, and adopted the declaration on Sustainable Development and the Statement of Forest Principles. This led to the publication of Sustainable Forestry: the UK Programme and Biodiversity: the UK Action Plan, which committed the UK to the pursuit of sustainable forestry and the conservation of biological diversity.

The UK programme on forestry evolved as European countries signed the resolutions proposed by the Ministerial Conference on the Protection of Forests in Europe at Helsinki in 1993 (the Helsinki Resolutions). These resolutions provided guidance for countries on sustainable forestry management, conserving biodiversity, co-operating with countries with transitional economies and managing forests in relation to climatic change. The UKWAS adopts the principles and requirements laid down in these international agreements.

The Habitats and Birds Directives provide for a network of protected areas (Natura 2000) in the European Union and require member states to establish such sites and to develop systems to prevent damage to certain endangered species. This legislation is translated into GB law in the 'Conservation (Natural Habitats &c.) Regulations 1994'. The process of selection and approval of Natura 2000 sites in the UK is almost complete. Preceding Natura 2000, the UK Government's policies on nature conservation have been largely implemented through the Wildlife and Countryside Act 1981, which established a system of designates sites known as Sites of Special Scientific Interest (SSSI's) and provided for the protection and conservation of many UK species and habitats. The UKWAS requires participants to meet all of these requirements.

There are many other laws relating to the protection and welfare of animals. Those of most importance to forest certification concern anti-poaching legislation and close seasons for hunting game species, including the Deer Act Scotland 1996 and the Deer Act England and Wales 1963. Environmental Impact Assessment legislation covers all deforestation, afforestation and road building proposals that might have a significant environmental impact.

The following table lists the key national legislation, regulations, guidelines and codes of best practice that are relevant to forestry in the commercial, environmental and social sectors. This list does not purport to be comprehensive, but indicates information that is key to the forestry sector.

Legislation and regulation	Notes
Forestry Act, 1967	
Health and Safety at Work Act, 1974	
Management of Health and Safety at work Regulations, 1992,	
Conservation (Natural Habitats &c.) Regulations 1994	UK interpretation of the Habitats and Birds Directives, which provide for a

	network of protected areas (Natura 2000) in the European Union and require member states to establish such sites and to develop systems to prevent damage to certain endangered species.
Wildlife and Countryside Act 1981,	This established a system of designated sites known as Sites of Special Scientific Interest (SSSIs) and provided for the protection and conservation of many UK species and habitats. The UKWAS requires participants to meet all of these requirements.
Nature Conservation (Scotland) Act 2004	Provision to further the conservation of biodiversity.
Natural Environment and Rural Communities Act 2006	In essence, every public authority must conserve biodiversity, as per the UN environmental programme on Biological Diversity of 1992.
Deer Act Scotland 1996	
Deer Act England and Wales 1963	
Environmental Impact Assessment	This legislation covers all deforestation, afforestation and road building proposals that might have a significant environmental impact.
Guidelines and Codes of Best Practice	Notes
UK Forestry Standard	Developed by the GB Forestry Commission and the Forest Service of Northern Ireland
Forestry Commission / Forest Service Guidelines covering Archaeology, Landscape, Nature Conservation, Recreation, Soils and Water.	It is a requirement of UKWAS that this guidance is adhered to.
Forest Practice Guides Nos. 1-8 for the management of semi-natural woodlands in the UK.	It is a requirement of UKWAS that this guidance is adhered to.
Safety Guides	Produced by the Arboricultural and Forestry Advisory Group (AFAG) to the Health & Safety Executive.
FSC endorsed UK Woodland Assurance Scheme (UKWAS)	UKWAS standard was approved in 1999 and revised in 2006.

6. CHANGES IN MANAGEMENT, HARVESTING, SILVICULTURE AND MONITORING

The following table shows significant changes that took place in the management, monitoring, harvesting and regeneration practices of the certificate holder over the certificate period.

Description of Change	Notes
SURVEILLANCE 1	
SURVEILLANCE 2	

Description of Change	Notes
SURVEILLANCE 3	
SURVEILLANCE 4	

7. PREPARATION FOR THE EVALUATION

7.1 Schedule

A pre-evaluation was not necessary. Nevertheless pre-assessment communication took place to confirm relevant information. This assessment follows two previous five-year periods of certification (2000-2005; 2005-2010). Previous surveillance assessments, since 2000, have examined the company's management systems and identified any gaps that might affect maintenance of certification. Information from previous assessments was used to plan the main assessment. Key stakeholders were identified.

The re-assessment was carried out during the period 16-19 and 23-26 November 2009. A detailed itinerary is available.

7.2 Team

The table below shows the team that conducted this re-assessment evaluation.

Evaluation Team	
Team Leader & Lead Auditor	Has a BSc degree in forestry and other land management qualifications, over 30 years experience in forestry, mainly in the UK. Has over 400 days FSC auditing experience including overseas. UK & Eire programme manager for SGS forest management certification.
Auditor	Has a Forester's certificate, a 1 st class honours degree in ecology and a Ph D in wildlife management, with 40 years experience of temperate forest ecology in the UK. Has over 200 days auditing experience including overseas.
Specialist	Has a MSc degree in forestry and other land management qualifications with over 20 years experience in forestry management in the UK. Trainee auditor with over 20 days experience inc. six previous audits' shadow attendance experience and working as a specialist (Red Squirrel ecology and ISO 14001 trained).

7.3 Checklist Preparation

A checklist was prepared that consisted of the documents listed below. This checklist was prepared using the FSC-endorsed national standard.

This re-assessment in 2009 was audited against the second revised version of the UKWAS (pub.2006).

Standard Used in Evaluation	Effective Date	Version Nr	Changes to Standard
FSC Accredited National Standard for the United Kingdom – the UK Woodland Assurance Standard (UKWAS)	1 November 2006	2	1 st edition published 1999. This revised 2 nd edition published 1 Nov 2006.

Standard Used in Evaluation	Effective Date	Version Nr	Changes to Standard
SGS Qualifor: Group Management Checklist (AD34)	1 st February 2005	1	

7.4 Stakeholder notification

A wide range of stakeholders were contacted 4 weeks before the planned evaluation to inform them of the evaluation and ask for their views on relevant forest management issues. These included environmental interest groups, local government agencies and forestry authorities, forest user groups, and workers' unions. Responses received and comments from interviews are recorded under section 14 of this Public Summary.

8. THE EVALUATION

The Re-Assessment Evaluation was conducted in the steps outlined below.

8.1 Opening meeting

An opening meeting was held at UPM Tilhill Midlands District office, Newark, England. The scope of the evaluation was explained and schedules were determined. Record was kept of all persons that attended this meeting.

8.2 Document review

A review of the main forest management documentation was conducted to evaluate the adequacy of coverage of the QUALIFOR Programme requirements. This involved examination of policies, management plans, systems, procedures, instructions and controls.

8.3 Sampling and Evaluation Approach

A detailed record of the following is available in section B of the evaluation report. This section does not form part of the public summary, but includes information on:

- Sampling methodology and rationale;
- FMUs included in the sample;
- Sites visited during the field evaluation; and
- Man-day allocation.

Tilhill Certification Scheme forestry properties are widely distributed throughout the UK. Although they vary in size, the complexity of management is not high. Taking into account both Resource type members (managed by Tilhill) and Group type members (managed by owners or their forestry agents), there is not a lot of variation between both types of members in forest type. There is obviously a difference in management structure between types, but management objectives are often very similar. The relative impact of the management of these forests & woodlands is low, given conditions for forestry in the UK, i.e. although objectives are invariably the growing of commercial timber from indigenous and exotic plantations, significant environmental and social issues are low.

At their second re-assessment (i.e. 3rd certificate), Tilhill have a very well defined ISO based internal audit system which regularly assesses all areas of management. Coupled with this ISO internal (and ISO external) monitoring, Tilhill have a very well defined UKWAS internal audit system which regularly assesses members' UKWAS compliance. Previous audits by SGS have confirmed this is done professionally and diligently to a high standard and rigour. There is much geographic and management homogeneity for both types of member and, furthermore, every individual member is also subject to legal controls imposed by the Forestry Commission (government regulatory authority), e.g. approval of felling proposals and conditions on restocking. Forestry in the UK is very

well regulated, both environmentally and socially, with no record of significant corruption in any part of the UK. Risk of illegal forestry operations, bad practice or no legally imposed remedial action is extremely low. Therefore, the membership and management of the Tilhill group scheme is relatively uniform and managed within a uniform framework.

Group members in Midlands (England), North West England, Central Borders (Scotland) and Central Scotland Districts were sampled. This enabled a wide spread of UK geography and forestry conditions. Excluding complex planning and preparation plus extensive report writing, 19 auditor days in total using a team of 3 were involved for the evaluation, including field assessment and office based evaluation inc. stakeholder consultations. Full justification for sampling intensity is shown within the AD36B section of the report.

The Group Scheme Manager (GSM) was present throughout and group scheme administration was also assessed. Several active sites allowed the interview of contractor operators and clients' staff. This achieved assessment of both Tilhill management systems and a good sample of individual Tilhill Resource Member and Group Member managers. This allowed the coverage of a wide range of forest management operations and issues being assessed against the entire UKWAS for each member visited. Tilhill staff managers and internal auditors accompanied SGS auditors during all site visits.

8.4 Field assessments

Field assessments aimed to determine how closely activities in the field complied with documented management systems and QUALIFOR Programme requirements. Interviews with staff, operators and contractors were conducted to determine their familiarity with and their application of policies, procedures and practices that are relevant to their activities. A carefully selected sample of sites was visited to evaluate whether practices met the required performance levels.

8.5 Stakeholder interviews

Meetings or telephone interviews were held with stakeholders as determined by the responses to notification letters and SGS discretion as to key stakeholders that should be interviewed. These aimed to:

- clarify any issues raised and the company's responses to them;
- obtain additional information where necessary; and
- obtain the views of key stakeholders that did not respond to the written invitation sent out before the evaluation.

Nr of Stakeholders contacted	Nr of Interviews with		
	NGOs	Government	Other
MAIN EVALUATION			
95	3	8	7
SURVEILLANCE 1			
SURVEILLANCE 2			
SURVEILLANCE 3			
SURVEILLANCE 4			

Responses received and comments from interviews are recorded under section 14 of this Public Summary.

8.6 Summing up and closing meeting

At the conclusion of the field evaluation, findings were presented to company management at a closing meeting. Any areas of non-conformance with the QUALIFOR Programme were raised as one of two types of Corrective Action Request (CAR):

- ❑ Major CARs - which must be addressed and re-assessed before certification can proceed
- ❑ Minor CARs - which do not preclude certification, but must be addressed within an agreed time frame, and will be checked at the first surveillance visit

A record was kept of persons that attended this meeting.

9. EVALUATION RESULTS

Detailed evaluation findings are included in the AD36B/C and AD33 sections of the evaluation report. This does not form part of the public summary. For each QUALIFOR requirement, these show the related findings, and any observations or corrective actions raised. The main issues are discussed below.

9.1 Findings related to the general QUALIFOR Programme

PRINCIPLE 1: COMPLIANCE WITH LAW AND FSC PRINCIPLES	
<i>Criterion 1.1 Respect for national and local laws and administrative requirements</i>	
Strengths	
Weaknesses	
Compliance	<p>Changes in legislation are conveyed to managers, foresters and staff through line managers and advisory staff together with staff access to the company intranet system of information dissemination.</p> <p>Re- European law, recent modifications to the EU Species and Habitats Directives has introduced additional legislation on Protected Species. Tilhill staff interviewed were aware of the enhanced protected status on the species involved.</p> <p>There was no evidence of legal non-compliance.</p> <p>Staff were found to be aware of, and complying with the spirit of relevant codes of practice such as public access, nature conservation and wildlife management.</p> <p>Staff are also kept up to date on FSC and UKWAS and other new developments through continuing professional development, training and ongoing contact with SGS Qualifor, plus the internal information systems for staff and constant review of the professional forestry and timber trade press. Group members are kept up to date via regular communication with the Tilhill Group Scheme Manager. This communication enables the Group members to maintain conformance with the spirit of any relevant codes of practice, guidelines or agreements. This is supplemented by their constant review of the UK forestry related press including rural landowners' journals.</p> <p>Tilhill have demonstrated a very sound commitment to the spirit of sustainable forest management. They have continued to add to previous achievements in developing documented systems of management. The Certification manager is highly experienced & knowledgeable and manages a robust and high quality internal auditing system to maintain the UKWAS and related standards. He is supported by a well-qualified and knowledgeable team of internal auditors.</p> <p>As well as ISO 9001 (quality), the company operates ISO 14001 (environmental) and OHSAS 18001 (health & safety) systems all of which are integrated under the Tilhill 'Assurance Management System' (AMS). Safety precautions, protection plans and emergency procedures are therefore comprehensive and highly systematic leading to low risk management where the company is carrying out forest management and operations. Group members also implement safety precautions, protection plans and emergency procedures where carrying out forest management and operations. Ongoing contact with Tilhill and the Group Scheme Manager assists this implementation through advice and monitoring.</p>
<i>Criterion 1.2 Payment of legally prescribed fees, royalties, taxes and other charges</i>	

Strengths	
Weaknesses	
Compliance	UPM Tilhill are committed to payments and taxes required under legal and contractual agreements. Evidence seen of VAT tax payments to the UK Government. No evidence of non-payment from records sampled.
<i>Criterion 1.3 Respect for provisions of international agreements</i>	
Strengths	
Weaknesses	
Compliance	<p>Dialogue with managers confirms that UPM Tilhill is committed to all binding agreements such as CITES, UNCED - Sustainable Development inc. Statement of Forest Principles, Agenda 21 & the Biodiversity Convention (Rio 1992) and European Ministerial Conference - General Guidelines for the Sustainable Management of Forests & the Conservation of Biodiversity (Helsinki 1993). As a consequence, UPM Tilhill is publicly committed to the UK Government's Biodiversity Action Plan and the UK Forestry Standard.</p> <p>Similarly, dialogue with managers confirms UPM Tilhill is committed to adherence to European nature conservation law through the Natura 2000 legislation and its UK interpretation through the Habitats Regulations 1994.</p>
<i>Criterion 1.4 Conflicts between laws and regulations, and the FSC P&C</i>	
Strengths	
Weaknesses	
Compliance	<p>No identified conflicts between UK laws and regulations versus compliance with the FSC Principles & Criteria. In this context, there is no evidence of conflict from substantiated outstanding claims of non-compliance related to forest management. In the same context, there is no evidence of conflict from any current legal disputes. Confirmed by sampling of records and stakeholder consultation.</p> <p>The UKWAS Steering Group has appointed an Interpretation Panel in the event of such query.</p>
<i>Criterion 1.5 Protection of forests from illegal activities</i>	
Strengths	At Canglour, a difficult and persistent problem of fly tipping has been astutely dealt with by closing off and obstructing dumping sites in the forest while maintaining opportunities for public access.
Weaknesses	
Compliance	<p>The occurrence of illegal activities in the forests is rare. Fly tipping of domestic waste at property entrances is dealt with by good contacts with police and local authorities. Vehicular gates at entrances to woodlands are usually locked to inhibit opportunities for dumping. Managers understood compliance with European and UK law in relation to Health and Safety and to Environmental issues. Standard procedures and work contracts indicate legal compliance.</p> <p>All site visits indicated a high level of compliance.</p>
<i>Criterion 1.6 Demonstration of a long-term commitment to the FSC P&C</i>	
Strengths	
Weaknesses	
Compliance	<p>The company has declared their commitment to compliance with the UKWAS standard in their forest certification policy and other numerous company publications together with their website (www.upm-tilhill.com). See under 'Services', going to either 'Forestry – Forest Certification' or 'Environmental'.</p> <p>As a membership requirement of the scheme owners are required to sign their commitment to the same UKWAS standard. Membership entry documentation for all the members sampled was checked for this requirement and found in order.</p> <p>All Tilhill Management Plans for UKWAS certified properties also include this commitment.</p>

PRINCIPLE 2: TENURE AND USE RIGHTS AND RESPONSIBILITIES	
<i>Criterion 2.1 Demonstration of land tenure and forest use rights</i>	
Strengths	
Weaknesses	
Compliance	<p>Properties are owned by individual and corporate clients with the company as managers. Legal title documents are held by clients' solicitors and copied to the company as required. Documentation can be made available to prove ownership under the UK's long established property laws.</p> <p>The Group Scheme entry process checks this requirement and this process was checked by SGS for all the members sampled.</p>
<i>Criterion 2.2 Local communities' legal or customary tenure or use rights</i>	
Strengths	
Weaknesses	<p>Observation 23/09: The recent designation of the Adopted Core Path within Dollar Woodlands requires to be incorporated into the revised management plan and maps at the forthcoming review.</p>
Compliance	<p>Public access is provided at all members sampled. From site visits, all existing permissive and traditional rights of way inc. footpaths and bridleways were being sustained.</p> <p>Interview with Tilhill confirms they are aware of this UKWAS requirement and the relatively recent legal requirements of the Land Reform (Scotland) Act 2003 plus the 'CROW' Act - Countryside Rights of Way Act (England and Wales) which deals with the obligations for landowners and people in accessing rural land.</p> <p>Throughout the audit Tilhill's clients and forest management were not impeding exercise of access rights as per the new legislation. There were several examples where public access had been facilitated. No concerns over UKWAS compliance on this issue.</p>
<i>Criterion 2.3 Disputes over tenure claims and use rights</i>	
Strengths	
Weaknesses	
Compliance	<p>Recourse to long established UK property law is available to both sides if required. There were no significant legal disputes ongoing for any of the properties visited. There was no evidence of any disputes from stakeholder consultation.</p> <p>See also under Criterion 2.1 (UKWAS 1.1.3) re. provision if required of title deeds etc.</p>
PRINCIPLE 3: INDIGENOUS PEOPLES' RIGHTS	
<i>Criterion 3.1 Indigenous peoples' control of forest management</i>	
Strengths	
Weaknesses	
Compliance	No indigenous people occupy forest lands in the UK and this section is not applicable.
<i>Criterion 3.2 Maintenance of indigenous peoples' resources or tenure rights</i>	
Strengths	
Weaknesses	
Compliance	No indigenous people occupy forest lands in the UK and this section is not applicable.
<i>Criterion 3.3 Protection of sites of special cultural, ecological, economic or religious significance to indigenous peoples</i>	
Strengths	

Weaknesses	
Compliance	No indigenous people occupy forest lands in the UK and this section is not applicable.
<i>Criterion 3.4 Compensation of indigenous peoples for the application of their traditional knowledge</i>	
Strengths	
Weaknesses	
Compliance	No indigenous people occupy forest lands in the UK and this section is not applicable.
PRINCIPLE 4: COMMUNITY RELATIONS AND WORKERS RIGHTS	
<i>Criterion 4.1 Employment, training, and other services for local communities</i>	
Strengths	<p>Throughout the audit there were many good examples of provision for rural employment by the company's business activities. At Boughton the use of niche markets was outstanding.</p> <p>Dalkeith estate is providing very high levels of public access. Dalkeith is also making a significant contribution to environmental education.</p> <p>At Jackson's Bank interpretive information is of a very high standard.</p> <p>Durham County Council's policy is to positively encourage and provide facilities for public access within their certified woodlands. At Waldrige Fell Country Park and Daisy Hill Local Nature Reserve the sensitive integration and management of public access is particularly commendable. All abilities access is available. The Ranger Staff at Durham County Council host Mini Ranger Road shows at Waldrige Fell Country Park and Daisy Hill Local Nature Reserve as a means of informing the general public of their management proposals, this is seen as a highly pro-active approach to stakeholder communication.</p> <p>At Canglour, Central Scotland District, special provision has been made to facilitate disabled access for fishing, supporting a local business and providing a bridge and car park.</p>
Weaknesses	<p>Observation 24/09: Private signs at the entrance to the Forest Banks block at Needwood are in place to deter people from visiting the area due to game management interests. This is in contrast to the situation at Jacksons Bank, another block of the same woodland complex, where exceptionally good public access has been provided and is heavily used by the public.</p> <p>Observation 25/09: At Haining, Central Borders District, a sign requesting that dogs are kept on a lead invites people into the forest. Once inside the forest another sign states, 'keep out'.</p>
Compliance	<p>Timber harvesting and forest management operations are sourced by Tilhill from local area contractors. This was verified from contractor interviews during site visits and dialogue with managers plus sight of office records for all the members sampled.</p> <p>The majority of Ranger staff who are employed by Durham County Council live locally. Durham is a major visitor centre for the local area bringing both employment and tourism benefits to the local economy.</p> <p>Durham County Council Ranger Service are assisted by a large number of local volunteers (around 300 individuals) who work throughout the year carrying out a wide range of operations within the woodlands.</p> <p>The company promotes training of contractors via ongoing improvements in operational practice through site supervision by experienced managers and internal monitoring surveillances. There are records of Tilhill organising or sponsoring training courses for contractors, e.g. water guidelines, health & safety, timber transport, first aid.</p> <p>The company employs both junior and new recruit management staff. The induction training provided, although informal is detailed and thorough.</p> <p>From site visits, public access was made available at all the members sampled.</p>
<i>Criterion 4.2 Compliance with health and safety regulations</i>	
Strengths	Tilhill staff at all levels and their systems exhibit a strongly evident safety culture. This has manifested itself with a gold award in 2008 to the company from the RoSPA (Royal Society of Prevention of Accidents).
Weaknesses	Previous surveillance raised Minor CAR 10 - At Boughton Woods (Geddington), free standing

	<p>high seats for deer control are poorly constructed, with nails rather than bolts being used to join support timbers and ladders. 'Lean-to' high seats have been in place for a considerable time and securing ropes show signs of rotting. There is no system for recording regular safety inspections.</p> <p>There are at least 6 free standing permanent high seats and approx. 70 portable 'lean-to' high seats at Boughton. Only the free standing permanent high seats have been located on a map and tabulated. The portable lean-to seats are not yet recorded in any way. Systematic safety inspection has not begun.</p> <p>The estate have not responded sufficiently to existing minor CAR 10 from the 2nd certificate and there are no exceptional circumstances why not. Certification audit protocol requires that a new Major CAR be raised. Original minor CAR 10 (2nd certificate) is therefore closed and Major CAR 10 (3rd certificate) raised. (The use of number 10 for both CARs is coincidental.)</p> <p>See below for close out of Major CAR M10 closed and new minor CAR 11 raised for monitoring of this same issue.</p> <p>There are also some gaps in the documentation and implementation of health & safety procedures.</p> <p>At a clear felling site at Norwood Estate, the Harvester and Forwarder operators had safety helmets that were considerably out of date. There is no systematic procedure in place for regular checking of these and other H&S items (e.g. first aid kits) on harvesting sites.</p> <p>At Boughton (a Buccleuch Estate) and Graythwaite Estates, there is no documentation confirming and no clear understanding of the role of 'Forestry Works Manager', as per 'Managing Health & Safety in Forestry' published by the Health & Safety Executive (and an UKWAS reference).</p> <p>At Dalkeith (a Buccleuch Estate) there is no documented lone working procedure for contractors, consistent with that for Buccleuch staff. At Boughton the forwarder operator had no hard hat properly available (locked in his land-rover). CAR 02 raised.</p>
Compliance	<p>The company have a documented company Health & Safety policy which is regularly updated. Senior management, inc. the managing director, publicly endorse the importance of safety within company literature. Similarly, the importance of safety to the company is further evident by there being a board director with specific responsibility company wide. This director has regular contact with the government's Health & Safety Executive (HSE) and receives updates on relevant UK safety law, regulations and recommended best practice which is fed into company procedures and the AMS.</p> <p>As well as ISO 9001 (quality), the company operates ISO 14001 (environmental) and OHSAS 18001 (health & safety) systems all of which are integrated under the Tilhill 'Assurance Management System' (AMS). Safety precautions, protection plans and emergency procedures are therefore comprehensive and highly systematic leading to low risk management where the company is carrying out forest management and operations. Group scheme members undertaking their own management were still suitably aware of relevant issues but not as systematically managed as by the company.</p> <p>Apart from the above CAR 02 references, field observations confirmed that for all the other members sampled, health and safety legislation and codes of practice are being implemented, discussions with staff and contractors demonstrate that they are aware of relevant requirements and have access to appropriate AFAG (the Health & Safety Executive's Arboriculture and Forestry Advisory Group) codes of practice plus there were contracts specifying health and safety requirements.</p> <p>All contractors are contractually expected to be fully competent by Tilhill and have supporting certificates which are systematically asked for and checked. Interview and the company files sampled demonstrated a high level of compliance, including adequate levels of first aid training.</p> <p>First aid kits were checked and found present on all active working sites and safe working practice was addressed via risk assessment procedures.</p> <p>All contractors and employees encountered were adequately provided with and using personal protective equipment (apart from the contractor forwarder operator at Boughton – see CAR 02).</p> <p>Ref. Major CAR 10 raised above.</p> <p>Tilhill and Buccleuch Woodlands / Boughton Estate responded positively in writing with a</p>

	<p>suitable action plan within 2 weeks of Major CAR issue.</p> <p>From previous audit site visits and this one it is confirmed that Boughton is the only Buccleuch estate member of the Tilhill Group Scheme to use high seats for deer control. Following the SGS audit the Tilhill Group Scheme Manager also raised an internal Major CAR , which was accepted by the Buccleuch Woodlands Senior Forest Manager and Boughton Estate, based on the following :</p> <p><i>Deficiency : At SGS 2008 External Audit found high seats poorly constructed and not consistently monitored. The return visit by SGS in November 2009 found work incomplete and no acceptable reason for delay in work being completed.</i></p> <p>Tilhill has therefore already taken swift action and agreed a satisfactory response with Boughton. This is a relatively minor and localised issue raised to major status through audit protocol rather than a major systemic issue and there are no alternative Buccleuch Woodlands sites which could be inspected for further evidence. The Tilhill Group Scheme Manager has closely monitored Boughton’s response and is able to report from site that there has been good progress to date and the work required should soon be completed. Objective evidence has been provided to SGS from the Tilhill Group Scheme Manager by photographs.</p> <p>Based on the Tilhill Group Scheme Manager’s report and the photographic evidence, SGS will therefore close this SGS major CAR now and issue a new SGS minor CAR to monitor its close out conclusion with a site visit to Boughton by SGS at SA2010.31.</p> <p>Major CAR M10 closed and new minor CAR 11 raised.</p>
Criterion 4.3 Workers’ rights to organise and negotiate with employers	
Strengths	
Weaknesses	
Compliance	<p>Staff interviewed confirmed that managers are encouraged to be members of a professional institute and employees are not deterred from joining a trades union or employee association. Many contractors engaged by the company are members of the Forestry Contractors’ Association (FCA). No evidence was observed of employees or other workers being deterred from negotiating on a collective basis if desired.</p>
Criterion 4.4 Social impact evaluations and consultation	
Strengths	<p>There are examples of evidence from stakeholder comments and related site visits where Tilhill has received commendation for its approach to solving timber traffic difficulties. Ref. stakeholder comments from the public summary report (AD36A document) , section 15.</p> <p>The Ranger Staff at Durham County Council host Mini Ranger Road shows at Waldridge Fell Country Park and Daisy Hill Local Nature Reserve as a means of informing the general public of their management proposals - this is seen as a highly pro-active approach to stakeholder communication.</p>
Weaknesses	<p>Following stakeholder concerns about timber haulage through the village of Newhouses (see Observation 9/06), Tilhill agreed to restrict timber traffic through the village of Newhouses to 0700 – 2100 hours, except in exceptional circumstances. A log was maintained by the local residents that indicated that timber trucks passed through the village on 33 occasions outside these hours between 11 May and 23 September 2009. Furthermore, following stakeholder concerns about timber haulage through the village of Newhouses (see Observation 9/06), a timber lorry has apparently struck the wall of Barnstead, a house in Newhouses.</p> <p>At Durham County Council although site inspection takes place as part of general operational management with field notes being recorded, given the scale, intensity and type of woodland and the extent of public access openly encouraged, there is no documented strategy in place to systematically assess or monitor the condition of mature and semi-mature broadleaved trees present within many of the woodlands. At Dollar Woodlands the disused quarry (Compartment 25) is a hazard to members of the public, staff and contractors.</p> <p>CAR 05 raised.</p> <p>Observation 22/09: The Great Allotment management plan has no neighbours map or list, but see the Group Scheme Manager’s new management plan template which already addresses this shortfall as it has this section added for completion by managers.</p>

	<p>Observation 26/09: The Baileys Lane route into Skirden Hall, North West England District, is used for informal public access, but it is also a major route for timber haulage into the large adjacent Forestry Commission Gisburn Forest complex. The Tilhill manager is opposed to the local council's proposal to upgrade the route to a formal bridleway due to public safety concerns. This proposal requires a careful consideration of public safety and alternatives to encouraging increasing public use of a busy haulage route.</p> <p>Observation 27/09: See CAR 05 above and Observation 9/06 . During the audit at North West England District a timber haulage vehicle had difficulty negotiating the road between two houses at Newhouses. The driver moved barrier posts on a private car park and moved a flower pot without replacing them. The vehicle reversed onto some allegedly private land. The police attended the scene but found no evidence of criminal damage. The haulage firm were actually trialling the use of a new vehicle on the route but had not informed Tilhill of their intention. Given the high sensitivity of the haulage of timber through Newhouses, not informing Tilhill and the behaviour of the drivers was insensitive behaviour by the contracted haulage firm. An internal Non-Compliance Record (NCR / CAR) was raised by the District Manager to this effect. No further action is required but this incident is relevant to the ongoing concerns at Newhouses.</p>
Compliance	<p>Re. Greenfield / Newhouses part contribution to CAR 05 raised above - Tilhill remain committed to trying to find an alternative route and evidence was seen of very recent and ongoing dialogue with the owners of neighbouring Cam Forest and the National Park aimed at resolving the current difficulty.</p> <p>At the active harvesting sites visited there was good provision of industry standard hazard warning signs. Sampling of risk assessment documents for previous operations for the other properties visited confirmed a suitable approach to health & safety including consideration of neighbours and people using the forest for access.</p> <p>There is satisfactory social impact evaluation and consultation. Management Plans or associated documents and files contained adequate stakeholder lists or records. Scrutiny of the management plans for all the members sampled confirms that, where relevant, they include provision for safeguarding features of cultural significance and stakeholder lists & records contain all relevant organisations and neighbours. There is satisfactory evidence of consultation with stakeholders by all the members sampled.</p>
<i>Criterion 4.5 Resolution of grievances and settlement of compensation claims</i>	
Strengths	
Weaknesses	
Compliance	<p>No outstanding grievances or compensation claims. Interview with managers stated there were no current complaints (other than Greenfield / Newhouses). Confirmed by stakeholder consultation and sampling of a wide variety of correspondence files and records. Any grievances are noted by the District Manager and brought to the immediate attention of the Senior Manager. If deemed appropriate, it is raised as a non-conformity through the company's Assurance Management System (AMS). If it is a potential legal matter, UPM Tilhill's solicitors are advised with a view to recourse to the UK legal system for dealing with disputes if required.</p> <p>There is a file containing records of communications with stakeholders relating to the Greenfield issue. At Greenfield, forest managers at all levels in Tilhill are actively seeking an alternative timber extraction route.</p> <p>All contractors engaged by the company are also covered by an 'umbrella' policy of the company. The vast majority of the company's contractors have self employed 'staff' and therefore have no need for Employers' Liability insurance. In contrast the company as a major employer of staff does have EL insurance cover with office display of the certificate at company offices and HQ.</p> <p>Public Liability insurance cover for contractors was checked from file records for all the sites visited and found satisfactory. Insurance records sampled showed either £2 million or £5 million public liability cover dependent upon the size of the contractors' business.</p>
PRINCIPLE 5: BENEFITS FROM THE FOREST	
<i>Criterion 5.1 Economic viability taking full environmental, social, and operational costs into</i>	

<i>account</i>	
Strengths	
Weaknesses	
Compliance	<p>The overall standard of management plans sampled was very high. Long term FC approved plans were particularly well written with high quality analysis, design and presentation. E.g. Dalkeith, Graythwaite, Boughton. Where FC approved long term plans do not yet exist, the company's management plan template is excellent and well thought through for UKWAS compliance.</p> <p>Forest management takes account of environmental, economic and social impacts of proposed operations.</p> <p>For example, FC regulatory authority approved planning of operations and company records for all sites inspected took into account views by ENGOs (e.g. on birds, squirrels, ancient woodland) and felling, plus consequent timber transport impacts. Site inspection and contract records confirm the company usually engage locally based contractors. There was also evidence of consideration and contact with neighbours and the general public.</p> <p>Suitable financial records and budgets for income & expenditure were seen for company managed properties. Adequate records were seen for Group member managed properties.</p> <p>Therefore, all Management Plans inspected and site visits indicated compliance.</p> <p>Forest management operations include fencing, ground preparation, planting, drainage, weeding, maintenance and timber harvesting. The assessment demonstrated a cost effective approach with a commitment to account for environmental, social and operational costs sufficient to maintain ecological productivity.</p>
<i>Criterion 5.2 Optimal use and local processing of forest products</i>	
Strengths	At Boughton the use of niche markets was outstanding, e.g. Cricket bat willow, faggots for riparian works, woodfuel etc.
Weaknesses	
Compliance	<p>Timber harvesting and forest management operations are sourced by Tilhill from local area contractors This was verified from contractor interviews during site visits and dialogue with managers plus sight of office records for all the members sampled.</p> <p>Throughout the audit there were many good examples of provision for rural employment by the company's business activities. Commendably, the estates of Graythwaite, Dalkeith and Boughton (both Buccleuch estates) also consciously provide local employment opportunities.</p>
<i>Criterion 5.3 Waste minimisation and avoidance of damage to forest resources</i>	
Strengths	At Jacksons Bank, Needwood, horse extraction is being used to reduce impacts with exceptional results.
Weaknesses	The combined harvesting of timber, brash and stumps at Haining suggested that recommendations had not been followed and led to negative impacts and the raising of Minor CAR 03 (See under UKWAS 4.2.1). As a result of this, the Tilhill Guidance Note and Operational Control: Biofuel Harvesting and the Operational Control: Stump Harvesting will be modified to indicate that intentions to harvest brash and stumps from the same site will be referred to the appropriate Regional Harvesting Manager.
Compliance	<p>Evidence of efficient harvesting with no significant damage was seen the vast majority of sites sampled.</p> <p>It is company policy not to burn lop & top. From interview, all managers were aware of the need to be able to justify burning for UKWAS compliance. No evidence of burning was encountered during this audit. The company's environmental management system requires a proper appraisal procedure before burning is sanctioned. The GSM makes Group members aware of this same requirement.</p> <p>No Whole Tree Harvesting in the conventional sense (i.e. from stump cut to crown) was encountered. From interview company managers are aware of UKWAS requirements to carefully consider its use re. significant impacts and only practise with a valid justifiable reason. However, there is increasing interest in harvesting brash and stumps from clear fell sites, which increases the potential for negative environmental impacts. Tilhill staff were generally well aware of the sensitivities and available knowledge. Tilhill has taken a lead in</p>

	<p>researching and introducing robust guidance with their, 'Guidance Note and Operational Control: Biofuel Harvesting' and, 'Operational Control: Stump Harvesting'.</p> <p>There is a good general awareness of fire prevention and protection requirements. Emergency Response Plans are provided at District offices and the relevant fire services are provided with maps of forest blocks and access points.</p> <p>As well as ISO 9001 (quality), the company operates ISO 14001 (environmental) and OHSAS 18001 (health & safety) systems all of which are integrated under the Tilhill 'Assurance Management System' (AMS). Safety precautions, protection plans and emergency procedures are therefore comprehensive and highly systematic leading to low risk management where the company is carrying out forest management and operations. Group scheme members undertaking their own management were still suitably aware of relevant issues although not as systematically managed as by the company.</p>
<i>Criterion 5.4 Forest management and the local economy</i>	
Strengths	Throughout the audit there were many good examples of provision for rural employment by the company's business activities. Commendably, the estates of Graythwaite, Dalkeith and Boughton (both Buccleuch estates) also consciously provide local employment opportunities.
Weaknesses	
Compliance	<p>Timber harvesting and forest management operations are sourced by Tilhill from local area contractors This was verified from contractor interviews during site visits and dialogue with managers plus sight of office records for all the members sampled.</p> <p>The majority of Ranger staff who are employed by Durham County Council live locally. Durham is a major visitor centre for the local area bringing both employment and tourism benefits to the local economy.</p>
<i>Criterion 5.5 Maintenance of the value of forest services and resources</i>	
Strengths	
Weaknesses	Observation 30/09 There was an example among members where game management needs to demonstrate compliance with UKWAS more fully.
Compliance	<p>Forest management takes account of environmental, economic and social impacts of proposed operations.</p> <p>For example, FC regulatory authority approved planning of operations and company records for all sites inspected took into account views by ENGOs (e.g. on birds, squirrels, ancient woodland) and felling, plus consequent timber transport impacts. Site inspection and contract records confirm the company usually engage locally based contractors. There was also evidence of consideration and contact with neighbours and the general public.</p> <p>Hunting, shooting and fishing is carefully regulated, appropriate licences are held and training is provided. Shooting leases and associated documentation inc. licences were inspected.</p>
<i>Criterion 5.6 Harvest levels</i>	
Strengths	
Weaknesses	The combined harvesting of timber, brash and stumps at Haining suggested that recommendations had not been followed and led to negative impacts and the raising of Minor CAR 03 (under UKWAS 4.2.1). As a result of this, the Tilhill Guidance Note and Operational Control: Biofuel Harvesting and the Operational Control: Stump Harvesting will be modified to indicate that intentions to harvest brash and stumps from the same site will be referred to the appropriate Regional Harvesting Manager.
Compliance	<p>Harvesting and restocking plans inspected do not jeopardise the long-term productive potential of the woodlands and are consistent with management objectives.</p> <p>Managers record basic mensurational data in order to provide estimates of future production and control of yield is usually carried out on an appropriate area basis with reconciliation of actual production versus forecast. Records of recent yield were sample checked. All were satisfactory in terms of figures that would be expected for the crops concerned.</p> <p>Management Plans and field observations demonstrating compliance were inspected.</p> <p>No instances were encountered where harvesting of Non Timber Forest Products was at a level which could exceed the long term productive potential of the resource.</p>

	<p>Venison production does not exceed the potential of the woodlands.</p> <p>There is increasing interest in harvesting brash and stumps from clear fell sites, which increases the potential for negative environmental impacts. Tilhill staff were generally well aware of the sensitivities and available knowledge. Tilhill has taken a lead in researching and introducing robust guidance with their, 'Guidance Note and Operational Control: Biofuel Harvesting' and, 'Operational Control: Stump Harvesting'.</p>
PRINCIPLE 6: ENVIRONMENTAL IMPACT	
<i>Criterion 6.1 Environmental impacts evaluation</i>	
Strengths	<p>The restoration of the formally designed landscape at Boughton Park (a Buccleuch estate) was outstanding.</p> <p>At Canglour, Central Scotland District, a recent harvesting operation involving a trial of destumping and brash removal, and subsequent site preparation has been very effective with a high compliance with environmental guidelines (c.f. experiences at Haining, Central Borders District). The input of the company's ecologist has played an important role in providing the written guidance for this work.</p>
Weaknesses	<p>The planning of woodland operations does not always include the marking on a site plan of hazards, constraints and special features. A documented timber sales contract for harvesting operations where their scale and sensitivity merits such a contract is not always completed.</p> <p>At Boughton (a Buccleuch Estate) there is a lack of a system of providing harvesting contractors with a site plan showing hazards, constraints and special features. This is inconsistent with that found at Dalkeith (also a Buccleuch Estate). In addition, at Boughton there was no documented timber sales contract for the active harvesting operations. Apart from other considerations, a written contract should specify who is undertaking the various Health & Safety responsibilities inc. who is the 'Forestry Works Manager'.</p> <p>CAR 09 raised.</p> <p>Observation 8/09: Tilhill documents seen to date, do not fully highlight the importance of Plantations on Ancient Woodland Sites (PAWS) inc. ground flora re. timber extraction operations. The Tilhill harvesting proposal document seen only refers to the need for awareness of 'sensitive flora'.</p>
Compliance	<p>FC regulatory authority approved Forest Plans are consulted on with statutory external bodies such as government environmental protection and conservation agencies. For new planting the same consultation mechanism including EIA and environmental regulatory requirements where appropriate will allow other stakeholders to propose amendments to proposals for Tilhill / members' consideration and FC (regulatory authority) planning approval requirements.</p> <p>At site level, constraints maps and risk assessments are used to ensure that potentially impacted elements are identified prior to commencement of works.</p> <p>Completed restocking, active / recent harvesting operations, active ground preparation for restocking was inspected. Landscape appraisal within management planning was also assessed. Management plans inspected assessed their impacts with adjoining land and nearby habitats inc. consideration at a landscape level. Members' sampled are covered by plans containing viewpoint photomontages.</p> <p>These operations plus scrutiny of Management Plans demonstrated compliance.</p> <p>The planning of woodland operations can occur at a number of different levels. At all sites visited this included the obtaining of relevant permission and provision of notification during the early stages of planning. Of the sites visited these maintained detailed contracts which specified special conditions of operation or restrictions to ensure special features were protected and best practice followed. Forest management contracts are based on standard company contract documentation.</p> <p>Scrutiny of the management plans for all the members confirms that, where relevant, they include provision for safeguarding features of cultural significance and stakeholder lists & records contain all relevant organisations and neighbours.</p>
<i>Criterion 6.2 Protection of rare, threatened and endangered species</i>	
Strengths	<p>At Greenfield, North West England District, a red squirrel reserve has been established and a full time red squirrel conservation officer appointed. This is a highly commendable approach and will result in effective monitoring of a wide range of wildlife species.</p>

	<p>At Waldrige Fell (Durham County Council Woodlands) an exemplarily pro-active approach to non-chemical bracken control is being implemented within the SSSI.</p> <p>The Dalkeith (a Buccleuch estate) manager's contribution to Grey Squirrel control / Red Squirrel (UK BAP species) conservation is highly significant at national level. Both the estate and the manager are commended for this.</p> <p>The Tilhill 'Toolbox' on Squirrel conservation is a good, succinct and clear piece of guidance available to staff and contractors.</p> <p>Boughton (a Buccleuch estate) is to be commended for producing its own whole estate Biodiversity Action Plan. Boughton also has good relationships with the local FC Conservation Manager and co-operates over Red Kite management. The estate has established many new hedgerows and is re-introducing the native Grey Partridge at Boughton.</p>
Weaknesses	<p>The Management Plan for Greenfield includes the conservation requirement for the rare white-clawed crayfish. Coupe planning documents do not include this requirement.</p> <p>At Boughton (a Buccleuch estate), the estate's own excellent Biodiversity Action Plan (BAP) produced in 2007 highlights both Water Vole and Dormouse as priority species. There is a significant section of riparian area between the centre and the adjacent western boundary area that might still have Water Vole which has not been surveyed. The estate BAP identifies the need for a Dormouse survey by a third party but this is still to happen. The area LBAP officer has not yet been contacted for comment and input on these species.</p> <p>CAR 01 raised.</p> <p>At Touch Estate (Group member), adequate survey of black grouse presence had not been conducted prior to erection of a deer fence, nor had monitoring been conducted following erection. Black grouse are known to occur in the area and monitoring should be put in place, and appropriate mitigation if necessary.</p> <p>CAR 04 raised.</p> <p>Observation 18/09: Forest ride management in Geddington Chase wood within the SSSI / PAWS area at Boughton is contrary to Natural England advice. The forest manager's efforts to alternate mowing as per NE advice have been negated by the estate game department.</p> <p>At Dollar Woodlands one of the main objectives is to develop and maintain the biodiversity of the forest. However the Management Plan does not identify specific and comprehensive measures to maintain and enhance the areas of the woodland designated as SSSI and ANSW. (See Minor CAR 06).</p>
Compliance	<p>Management plans inspected and site visits indicated a high level of compliance. From interview all managers demonstrated a good knowledge of rare, threatened and endangered species and requirements.</p>
<i>Criterion 6.3 Maintenance of ecological functions and values</i>	
Strengths	<p>Tilhill commissioned a recent study into the 'Significance of Deadwood and Forest Residues for Sustainable Environmental Development in the Managed Forest' by Aberdeen University.</p> <p>At the harvesting site at Norwood Estate, a lack of standing deadwood in a typical first rotation stand of spruce was been modified by operator selection of suitable live stems to provide a future deadwood resource. An exemplary piece of work.</p>
Weaknesses	<p>Observation 19/09: At Greenfield, North West England, provision of deadwood is only marginally compliant.</p>
Compliance	<p>Tilhill has a policy in place for the conservation of deadwood habitats. Site visits to all members sampled indicated compliance with dead wood conservation requirements. Staff and Group members demonstrated an awareness of the new UKWAS requirements.</p> <p>Previous Audit follow-up :</p> <p>Previous surveillance raised CAR 11; Game management is causing a negative impact on the woodland ecosystem at Oaks Wood, North Wales District, where a pheasant release pen is situated within an ASNW causing a detrimental impact on the woodland ground flora and invertebrate fauna. The release pen has been removed from this woodland and a review of the location of all release pens is in progress to ensure appropriate locations. The matter has been discussed by the Group Scheme Manager with the Tilhill Group Scheme internal auditors</p>

	<p>and will be given greater attention at membership entry and internal surveillance.</p> <p>CAR 11 (previous certificate) closed.</p> <p>No intensive game management was seen at the majority of members sampled.</p> <p>There are pheasants shot at Boughton, Graythwaite, Dalkeith and Cardross. From the site inspection of these estates, game management is not sufficiently intense to cause long-term or widespread negative impacts on the woodland ecosystem.</p>
<p>Criterion 6.4 Protection of representative samples of existing ecosystems</p>	
Strengths	<p>At Durham County Council Woodlands at Waldrige Fell Country Park and Daisy Hill Local Nature Reserve, a commendable approach to habitat conservation is being implemented throughout.</p>
Weaknesses	<p>At Dollar Woodlands there is the need to clarify the commitment to designating Natural Reserves and Long Term Retentions. (see Minor CAR 06).</p>
Compliance	<p>The attention being given to the identification and management of biodiversity areas was of a high standard at all properties visited and was documented in Management Plans for the members sampled. Analysis of these management plans confirmed compliance but see contribution to Minor CAR 06 re- Dollar.</p> <p>All staff and managers (inc. Group Members) interviewed were familiar with the definitions of Natural Reserves and Long Term Retentions.</p> <p>The company management plan template is well designed to show compliance with these criteria.</p> <p>In a non-plantation context, veteran trees are commendably recognised by the Tilhill manager assisting with Cardross (Group Member) as an ecologically rich habitat and planning is underway for their proposed maintenance and enhancement.</p>
<p>Criterion 6.5 Protection against damage to soils, residual forest and water resources during operations</p>	
Strengths	<p>At Norwood Estate harvesting operations and site management were of a very high standard. The Harvesting Site Monitoring Report that is in use in Central Scotland District represents an exemplary approach to recording and monitoring environmental and safety issues.</p> <p>At Dollar Woodlands, the recent completion of operations to construct a new forest road and also undertake forest road improvement have been implemented to a very high standard.</p>
Weaknesses	<p>However, some harvesting operations were not compliant with Forest and Water Guidelines. Extraction tracks had not been used and maintained in a manner that minimised their environmental impact.</p> <p>At Haining, Central Borders District, water was running down a forwarder track and across a temporary brash bridge onto the floodplain. The extraction track was heavily rutted and the machine had broken through the brash mat. Both brash and stump harvesting has been carried out at this site following conventional timber harvesting. At Haining, Central Borders District, two diesel fuel bowsers were sited in standing water on a floodplain.</p> <p>At Graythwaite, a Group member in North West England, there was incomplete mitigation of siltation run off from an active timber loading bay.</p> <p>CAR 03 raised.</p>
Compliance	<p>With the exception of the CAR above, all site evidence and documentation observed in connection with the members sampled showed compliance with all relevant guidelines.</p> <p>Apart from the CAR site references, at the other sites visited where active harvesting was seen to be taking place, implementation of operations was consistent with current best practice. The machine operators interviewed demonstrated sensitive use of brash matting to mitigate impact particularly in softer ground conditions.</p> <p>Managers clearly understood the requirement for environmental impact assessment determination when a new forest road is proposed. A new section of road at Norwood had been approved and completed to a very high standard. At Dollar Woodlands, the necessary consents for roading operations are fully covered by the approved of Long Term Forest Plan.</p>

	<p>Otherwise, no new forest roads were constructed on the other members sampled.</p> <p>Re. CAR 03 - At Haining, extraction was immediately halted until remedial site actions had been attended to.</p> <p>In addition, written guidance has been amended requiring all intentions by managers to harvest brush and stumps from one site to be referred to Regional Harvesting Managers.</p> <p>Site visits to Canglour and Norwood confirmed that this was not a widespread problem.</p> <p>Swift site specific response and other progress to closure noted, but remains open for evidence of further systematic response by the company plus operational evidence follow up at next surveillance.</p>
Criterion 6.6 Chemical pest management	
Strengths	<p>The Group Scheme Manager's recent note to Tilhill managers on available pesticides and the FSC 'Highly Hazardous' list is very practical, easily understood guidance. The Tilhill 'Toolbox' on Cypermethrin use is a good, succinct and clear piece of guidance available to staff and contractors.</p> <p>The investment of time and resources by Tilhill (SW Scotland) in the search for non-chemical methods of controlling weevil impacts, including the inclusion of a Tilhill member of staff on the Forestry Commission's working group, represents an exemplary approach to this urgent and important topic.</p>
Weaknesses	<p>Observation 13/09: A summary document outlining the regional approach to <i>Hylobius</i> control and the status of research and trials investigating alternatives to chemicals is required.</p> <p>Observation 14/09: FC Practice Guide '15' – 'Pesticide Use in Forestry' is not always well known or readily available to Tilhill staff.</p> <p>Observation 15/09: Suitable 'Contractors' Instruction Orders' (CIOs) for spraying for several properties were seen but one example had a contractor giving similar bulk pesticide use returns. Use records need to be per individual property for accuracy.</p> <p>Observation 16/09: Existing use of the Tilhill AMS system for a hazard assessment / selection decision to check available herbicides can bring up some FSC 'Highly Hazardous' list products, therefore relying upon the individual manager's awareness for no inadvertent use of HH products on certified properties. The FSC HH list has been drawn to the attention of managers elsewhere by the GSM. (There was no evidence or reason to believe that FSC HH list products were being used on certified woodlands.)</p>
Compliance	<p>Since its initial certification the company has prepared its second chemical reduction strategy which has now been developed into an exemplary document illustrating the company's awareness of best practice and a commendably comprehensive and systematic approach to management of this subject. The strategy 'Reduction in Synthetic Chemical Use 2004-2009' includes the following – management, past use assessment, past use analysis, review of progress against previous targets 2000-2004, general strategic approach to reduction and specific aims for reduction. The use of synthetic chemicals inc. pesticides and fertilisers is managed through the company integrated Assurance Management System which incorporates ISO 9001, ISO 14001 and OHSAS 18001. This includes operational controls for specification, use, storage and transport. These controls stipulate measures to minimise safety and environmental impacts from specification and planning to implementation and completion. They include specific monitoring and record keeping requirements. Management of pesticide use by group scheme members is evaluated against these controls as part of their acceptance audit process.</p> <p>There is a very strong culture relating to the responsible use and a reduction in chemical use among company employees. Group members interviewed adopt a similar approach with their use of pesticides which was covered in Management Plan and Group Scheme documentation. Following previous application to FSC, the company now have derogation for Alpha-cypermethrin, Cypermethrin, Aluminium phosphide and Warfarin. Derogation has been approved for these products following a final decision from FSC. Conversely, Propyzamide has not been approved and temporary derogation is no longer available. Company staff have to complete a 'decision recording sheet' within their AMS system for using such products. The company have stopped using Propyzamide since before the temporary derogation ended (June 2009).</p> <p>The company is trialling the use of indigenous nematodes as a potential non-chemical method of controlling weevil attack on restocking sites in South West Scotland. The company also maintains liaison with the Forest Research Agency.</p>

Criterion 6.7 Use and disposal of chemicals, containers, liquid and solid non-organic wastes	
Strengths	
Weaknesses	
Compliance	<p>It continues to be the case that there was good awareness among company staff interviewed of UK chemicals revisions and new environmental controlled activities regulations. Company managers and contractors are suitably certified in the safe use of chemicals, and there was evidence of adherence to relevant guidelines plus keeping of records. Only small quantities of chemicals are used per site and all operations are subject to the appropriate risk assessment procedure. The company maintain comprehensive records of use and hazard rating data. Examples of records were seen for each property sampled. Group members sampled also main records of use and similarly use small quantities. Group scheme internal monitoring by the Group Scheme Manager is maintained.</p> <p>Records and interview confirm that inorganic fertilisers are not often used by the company or group members. In the instances where they have, these have only been used to correct nutrient deficiencies on low grade soils in upland plantation conditions.</p> <p>The company hold a valid certificate of registration under the control of pollution act 1989 which covers the companies activities such as carrying waste and old pesticide containers for licensed disposal. The certificate is issued by SEPA (Scottish Environment Protection Agency) but provides UK cover.</p> <p>Company waste management guidance is provided for managers within the Tilhill AMS system. Managers interviewed are fully aware of current waste management legislation and regulation. In addition to the company Waste Management Policy, Group members interviewed were also aware of requirements and had documented references.</p> <p>No waste disposal non-compliance issues were encountered.</p> <p>It is company environmental policy as part of their ISO 14001 certification that use of biodegradable lubricants should be used where practicable. The company also encourage their Group members to use it.</p> <p>At the active harvesting sites visited plans and equipment were in place to deal with accidental spillages.</p> <p>At the other sites visited without active harvesting, managers interviewed were also familiar with the potential use of pollution control equipment. Previous operational records for these sites confirmed provision was part of contingency planning.</p>
Criterion 6.8 Use of biological control agents and genetically modified organisms	
Strengths	
Weaknesses	
Compliance	<p>Guidance is provided to managers in assessing the need and justification for the use of biological control agents, e.g. nematodes for weevil control, <i>Rhizophagus grandis</i> for bark beetle control. The company is trialling the use of indigenous nematodes as a potential non-chemical method of controlling weevil attack on restocking sites in South West Scotland. The company also maintains liaison with the Forest Research Agency.</p> <p>Biological control agents are not used on any of the properties sampled but Tilhill have documented their approach to BCAs.</p> <p>From interview of the company managers and group members for all these sites visited no known GMOs are used and this is confirmed by sight of plant supply certificates sampled. The GSM is aware of the UKWAS requirement with GMOs.</p>
Criterion 6.9 The use of exotic species	
Strengths	
Weaknesses	
Compliance	<p>Exotic conifers are the key species in UK forests. Species selection within plantations was found to be appropriate for site and management objectives with an emphasis on the use of native species for all purposes other than commercial timber production. Exotic tree species</p>

	<p>are sometimes perpetuated for landscape and recent cultural reasons or as silvicultural nurses for broadleaves, consistent with UK silvicultural practice.</p> <p>No non-native non-tree species have been introduced at any of the sites in recent times. Some sites possess <i>Rhododendron ponticum</i> whose existence has been longstanding and well before the start of certification in 1999. There is either intention or specific plans to control its invasive spread and pursue removal.</p> <p>Otherwise there have been no such introductions of exotic species.</p>
Criterion 6.10 Forest conversion to plantations or non-forest land uses	
Strengths	
Weaknesses	
Compliance	<p>No natural forests or woodland with areas and features of particular significance for biodiversity, including sites important for endangered but mobile species and natural processes in critical situations have been converted to plantation or non-forested land.</p> <p>No significant Christmas tree growing was encountered at any of the sites visited.</p> <p>The UKWAS Interpretation Panel has recently (Oct 2008) issued guidance on conversion including windfarms and Tilhill internal auditors interviewed were well aware of this and its requirements.</p>
PRINCIPLE 7: MANAGEMENT PLAN	
Criterion 7.1 Management plan requirements	
Strengths	<p>The Management Plan for Norwood Estate, Central Borders District is exemplary.</p> <p>At Dalkeith (a Buccleuch estate), Graythwaite and Great Allotment, standards of management planning were particularly high.</p> <p>At Dalkeith and Boughton (both Buccleuch estates), plus Graythwaite and Great Allotment, managers demonstrated an impressively wide and in depth knowledge of silviculture.</p>
Weaknesses	<p>All management plans inspected were assessed as compliant re. UKWAS requirements with the following exceptions :</p> <p>At Durham County Council Woodlands although there are three broad landscape scale management plans in place covering all the woodland sites, there are not comprehensive management planning documents in place appropriate to the scale and size of each woodland site, as per UKWAS requirements.</p> <p>At Dollar Woodlands the plan does not identify specific and comprehensive measures to maintain and enhance the areas of the woodland designated as SSSI and ASNW.</p> <p>CAR 06 raised.</p> <p>Observation 3/09: At Needwood, Midlands District, two different versions of the Management Plan were presented. No annotations had been made relevant to agreed revisions.</p> <p>Observation 4/09: At Touch Estate (Group Scheme), recommendations made in the commissioned report by a consultant should be appraised and either incorporated into the Management Plan or justification given for dismissing them.</p> <p>Observation 5/09: At Canglour, Central Scotland District, the objective of moving the SSSI from 'unfavourable' condition to 'favourable recovering' should be indicated in the Management Plan.</p> <p>Observation 7/09: The Management Plan for Dollar Woodlands has been subject to review and amendment during its current five-year period (now in year 5) and at the time of assessment, various sections of text remain devolved from the main contract.</p>
Compliance	<p>The Tilhill management plan template for UKWAS compliance is a very well thought out and robust document. Management plans containing all of the above features are available for all Resource Managed and Group Member managed properties. All Management plans</p>

	<p>inspected, interviews with staff and site visits indicated a high level of compliance. The Tilhill template continues to be refined as evidence of a commendable approach and constant effort in improving management systems.</p> <p>All management plans inspected were assessed as compliant re. UKWAS requirements a) to k), with the exceptions recorded above.</p> <p>With regard to appropriate silvicultural systems, all sites visited complied with this requirement. From interview, managers pursue the use of LISS (Low Impact Silvicultural Systems) where constraints imposed by wind do not occur. However, clear felling often has to be practiced, given the frequent nature of exposure on the unstable upland forestry soils found on many of the sites visited. This is consistent with UK conditions and experience from windblow, now in second and sometimes third rotations.</p> <p>From analysis of Management Plans and site visits there was demonstrated compliance in terms of compliance with acceptable coupe sizes for felling.</p>
Criterion 7.2 Management plan revision	
Strengths	The new system of prompts and guidance devised by the Tilhill Group Scheme Manager within the recently revised management plan template is a further example of the overall very high standard of Group Scheme management.
Weaknesses	Observation 8/09: Boughton (Buccleuch estate) is aware the management plan 5 year review needs to commence soon but it has not yet begun.
Compliance	<p>Confirmation from inspection was provided that all Management Plans are reviewed after five years. Management Plans for all members sampled specify a five-year life-span after which they will be reviewed. Management Plans demonstrating compliance were inspected.</p> <p>Dialogue with managers also confirms this takes place, including review of monitoring, latest research, new practice guides, and any new information provided by contractors, neighbours, local people and statutory bodies & NGOs from ongoing consultation and UKWAS auditing. A five year review is also a regulatory requirement of approved FC Long Term Forest Plans.</p> <p>Implementation of recent and past work activity seen at the sites visited was in accordance with Management Plan documentation.</p>
Criterion 7.3 Training and supervision of forest workers	
Strengths	
Weaknesses	
Compliance	<p>Company policy is only to engage adequately qualified staff and contractors with appropriate levels of supervision. Staff receive an annual performance appraisal which includes an assessment of training requirements. The company hold training records for all staff and samples were seen. Senior and middle management staff are invariably well qualified with very good practical and management experience. Many company staff are Chartered Foresters, where there is a professional membership requirement to maintain continuing professional development. The company has the scale to provide in house training or provide external specialists where required. Full use is made of the company intranet and electronic communication system to disseminate information updates.</p> <p>Company managers are also kept up to date on FSC and UKWAS through training and the company information system. Managers were found to be aware of and complying with the spirit of relevant codes of practice.</p> <p>From interview and checking of sample contract documentation, managers for all the sites visited ensure that operators have the required level of competence.</p> <p>Site monitoring by the company was in evidence via site inspection records, maintenance of compartment records and review of management plans for all the sites visited. All managers interviewed were able to confirm record of supervision of operations including site visits.</p>
Criterion 7.4 Public availability of the management plan elements	
Strengths	
Weaknesses	

Compliance	<p>Interview confirms the company make summary management details available on request. Long Term Forest Plans and WGS type forestry scheme plans by the company are put on a public register website by the FC regulatory authority, together with public consultation meetings and individual consultation with statutory and NGO bodies. Management planning documentation is available for all company managed properties and the company is willing to make this publicly available upon request. Similarly, management planning documentation is available for all group member managed properties and the members are willing to make this publicly available upon request.</p> <p>There was also suitable example evidence of contact being made with neighbours to explain management plan elements, including where adjacent felling as a consequence of forest restructuring was appropriate.</p>
PRINCIPLE 8: MONITORING AND EVALUATION	
<i>Criterion 8.1 Frequency, intensity and consistency of monitoring</i>	
Strengths	<p>Tilhill site supervision notebooks for managers cleverly contain a 'watermarked' range of reminder prompts for a wide range of items, inc. health & safety plus conservation.</p> <p>Monitoring of deer pressure by exclosures at Boughton has been particularly well thought through.</p>
Weaknesses	<p>At Durham County Council Woodlands a documented tree safety monitoring system is not in place and there is no monitoring of known UK BAP species.</p> <p>At Dollar Woodlands and Durham County Council Woodlands insufficient annual monitoring is in place to assess the effectiveness of measures employed to maintain and enhance the areas within the management unit designated as SSSI and ASNW.</p> <p>Within Tilhill management systems there is a lack of long term recording of genetically improved stock, provenance and seed origin. Group members visited were also not recording such information but agreed it would be useful.</p> <p>Tilhill's approach to recording timber yields is not uniform with variation between managers. Felling yields and cumulative thinning yields are not kept systematically.</p> <p>CAR 07 raised.</p>
Compliance	<p>Management Plans demonstrating compliance were inspected. These include monitoring requirements and Site Inspection Records are maintained following site visits. Operational site monitoring by the owner / manager at an associate member visited is less formalised but constant.</p> <p>Tilhill monitor both via a structured programme for overall forest management and at specific site level for operations. Furthermore, there is an internal monitoring system for both ISO and UKWAS compliance.</p> <p>Tilhill monitor for ISO compliance whereby managers are obliged to raise an internal Non-Compliance Record (NCR) for any incident against the relevant ISO standard. This system is checked via external monitoring by an independent certification body.</p> <p>Similarly, Tilhill operates internal monitoring for UKWAS compliance which is managed by the Group Scheme Manager (GSM). Forests are regularly monitored with visits every 2 years or less if appropriate. Managers complete an annual monitoring record for the Tilhill Group Scheme certified forests for which copies are retained within individual property files and originals sent to the Group Scheme Manager for review & analysis for any concerns against UKWAS compliance. The annual monitoring record is done on a standard form and so is consistent and replicable, allowing comparison over time.</p>
<i>Criterion 8.2 Research and data collection for monitoring</i>	
Strengths	<p>Dalkeith (a Buccleuch estate) is making a contribution to the Forest Research Agency's work on managed cattle grazing of the woodland SSSI and provision of site facility for a national Oak trial.</p>
Weaknesses	
Compliance	<p>Site Inspection Records are effectively maintained by members (overall) and used (see</p>

	<p>UKWAS 2.3.2). An Annual Management Summary is completed for all Group Member managed and Tilhill Resource Managed properties. These were seen for all members sampled. This provides a valuable summary of monitoring activity, results and management recommendations resulting from them.</p> <p>Costs, productivity and efficiency of forest management activities is monitored by senior managers and company directors both by review of individual managers at their annual staff appraisal, and via production of the management accounts which support the regulatory required annual financial accounts. Interview of managers confirms this aspect of monitoring. Given their commercial objective as an organisation, Tilhill are keenly aware of the need to analyse costs & productivity and this is the case.</p> <p>In addition to Tilhill's own annual monitoring of rare, threatened & endangered species, there is close liaison with ENGOs and government conservation agencies over specific species and habitats. Tilhill are continuing to trial the use of nematodes (bca) to control weevil attack of young trees during initial restocking. Tilhill has taken a lead in researching and introducing robust guidance with their, 'Guidance Note and Operational Control: Biofuel Harvesting' and 'Operational Control: Stump Harvesting'.</p> <p>The Regional Manager North has a thorough knowledge of current research and continues to investigate alternative treatments including the use of 'Electrodyn' and 'Flexicoat' treatments and the use of nematodes (bca).</p> <p>The company also maintains liaison with the Forest Research Agency.</p>
<i>Criterion 8.3 Chain of custody</i>	
Strengths	
Weaknesses	
Compliance	<p>The Tilhill system of timber advice notes and load weight tickets plus Tilhill invoices does enable timber to be traced back to the forest of origin. The Tilhill computerised accounting system is well bedded in. Risk of non-certified timber sources entering the system is low.</p> <p>Each Tilhill forest manager liaises with their colleague Tilhill harvesting manager (often based in the same Tilhill office). Each Tilhill harvesting manager is responsible for organising their system of advice notes and load weight tickets and thereafter checking the respective invoice. This system requires that loads of timber be identified by forest name location & date of lorry uplift, weight or measure, haulier and market destination. Group member managers operate similar systems using advice notes and weight tickets to identify individual loads and thereafter used as data for invoicing.</p> <p>The system achieves adequate site traceability.</p> <p>The Group Scheme Manager ensures that managers are aware of their certification code number.</p> <p>Timber can be sold standing or at roadside to timber purchasers but operations can also continue to the mill gate of sawmills and small roundwood processors. Tilhill harvesting managers and Group member managers maintain record of all weight tickets and any measured timber during harvesting operations. This is used as data to raise sales invoices.</p> <p>Sample records of timber sales were checked at District and Group members' offices and at Tilhill Headquarters. All were in order. There were no incidences of non-FSC being shown as FSC, all other documentation sampled was in order. Chain of custody code number was being used on invoices sampled.</p>
<i>Criterion 8.4 Incorporation of monitoring results into the management plan</i>	
Strengths	
Weaknesses	<p>Although a degree of monitoring is taking place within Durham County Council Woodlands, for example, maintenance of site visit inspection records by ranger staff following site visits. There is not a system implemented to enable ease of extrapolation of data for use in positive and effective management planning. (See CAR 07).</p>
Compliance	<p>Monitoring is referred to as a section within management plans and plans seen have site specific approaches. The Management Plans of all members sampled were inspected and demonstrated compliance.</p> <p>From interview and discussion, both the Group Scheme Manager and those forest managers interviewed well understand the relevance of monitoring for the purpose of analysis,</p>

	<p>particularly for management plan reviews.</p> <p>When management plans have been due for review, assessment confirms that managers consider and analyse where appropriate such monitoring data with a view to assisting the plan review. A procedure is in place for regular inspections and recording of findings for all Tilhill Resource Managed and Group Member managed properties to check this aspect of monitoring. There were several examples at each property of data being analysed and taken into account by management for management plan reviews, e.g. timber yields, financial performance, forest diversity in terms of age and species alterations, success of restocking practice, deer control and aspects of conservation, e.g. SAC/SSSI/ASNW condition, ancient woodland restoration success and management for Biodiversity Action Plan fauna and flora etc.</p>
Criterion 8.5 Publicly available summary of monitoring	
Strengths	
Weaknesses	
Compliance	<p>An Annual Management Summary is completed for all Group Member managed and Tilhill Resource Member managed properties. This summary monitoring data for all the members inspected is readily available and these were seen for all members sampled. This provides a valuable summary of monitoring activity, results and management recommendations resulting from them. The company summarise results of their individual property monitoring within management plan revisions. These are carried out every 5 years. Although some of the Management Plans under the UKWAS certification process are still less than 5 years old, dialogue with managers confirms the company maintain a commitment for this requirement, making non-confidential information publicly available where appropriate and reasonably requested. Such data will also be discussed with the FC regulatory authority at formal reviews of LTFPs.</p> <p>Management Plans demonstrating compliance and containing provision for monitoring summaries were inspected for all members sampled.</p>
PRINCIPLE 9: HIGH CONSERVATION VALUE FORESTS	
Criterion 9.1 Evaluation to determine high conservation value attributes	
Strengths	
Weaknesses	<p>Observation 18/09: Forest ride management in Geddington Chase wood within the SSSI / PAWS area at Boughton is contrary to Natural England advice. The forest manager's efforts to alternate mowing as per NE advice have been negated by the estate game department.</p> <p>The Management Plan for Dollar Woodlands included clear maps, however it does not currently identify the ASNW located within the management unit. (See part contribution to CAR 06).</p>
Compliance	<p>In common with other UK forest managers, Tilhill have determined through consultation with national stakeholders (FC regulatory authority and Scottish Natural Heritage, Natural England and the Countryside Council for Wales that designated Special Areas of Conservation (SACs), Special Protected Areas (SPAs), Sites of Scientific Interest (SSSIs) and Ancient Semi-Natural Woodland (ASNW) shall be classed as High Conservation Value Forest (HCVF). Tilhill and the Group Members have then reviewed all woods and forests under their management for the presence of such sites with identification and mapping.</p> <p>Management plans inspected for the members sampled demonstrated this process and confirmed a high level of compliance.</p>
Criterion 9.2 Consultation process	
Strengths	
Weaknesses	
Compliance	<p>There was evidence of the normal country variant type of Woodland Grant Scheme or Long Term Forest Plan) process working. This process requires approval by the Forestry Commission (regulatory authority) including appropriate levels of consultation under the guidance of the Forestry Commission. SACs, SPAs, SSSIs / ASSIs and ASNW are regarded within the UK as HCVFs by all statutory consultees. Copies of consultation correspondence, stakeholder lists, maps and FC approved plans were available for all sites visited.</p>

	<p>These HCVF woodland habitats are designated by the respective country governments' statutory agencies with responsibility for conservation. Designation is confirmed with Tilhill's and Group Members' forest managers via correspondence with the agencies and site constraints checking with the FC regulatory authority when making management plan / grant scheme applications.</p> <p>Tilhill's and Group Members' forest managers are able to demonstrate suitable liaison and good working relationships with Scottish Natural Heritage, Natural England and Countryside Commission for Wales plus the Forestry Commission regulatory authority.</p>
Criterion 9.3 Measures to maintain and enhance high conservation value attributes	
Strengths	<p>Tilhill has developed an exemplary and commendable management approach to the identification, appraisal, selection and management of Plantations on Ancient Woodland Sites (PAWS). PAWS are ASNW sites that were subject to plantation management before FSC / UKWAS certification began.</p> <p>Graythwaite estate is commended for its astute acquisition of an adjacent PAWS site and its subsequent restoration by removal of conifers.</p> <p>At Canglour, Central Scotland District, the response to an internal CAR on PAWS planning has been excellent and a very good plan is now in place.</p> <p>Horse extraction is being used in a PAWS restoration project at Needwood, Midlands District to ensure low impacts with excellent results</p>
Weaknesses	<p>At Dollar Woodlands one of the main objectives is to develop and maintain the biodiversity of the forest. However the Management Plan does not identify specific and comprehensive measures to maintain and enhance the areas of the woodland designated as SSSI and ANSW. (See part contribution to CAR 06).</p> <p>Observation 20/09: At Dalkeith (a Buccleuch estate) there is a lack of reference in planning documentation to tackle exotic invasive woody shrub species at the Carberry PAWS area. At Graythwaite and Boughton the PAWS documented rationale / implementation plans are sparse.</p>
Compliance	<p>All such designated sites identified are marked on management plans and are subject to management prescriptions designed to enhance and protect them. Monitoring is either in conjunction with the conservation agency responsible for the site, e.g. SSSI condition monitoring by SNH / NE / CCW or recorded via the company's own monitoring of biodiversity and environmental condition and changes.</p> <p>Tilhill maintains good working relationships with the statutory nature conservation organisations, i.e. SNH, NE and CCW. Tilhill employs an ecologist who routinely conducts inspections and provides reports on conservation requirements to assist in preparing management prescriptions to safeguard RTE species. SSSIs are marked on maps and managed in co-operation with government conservation agencies.</p> <p>All the sites visited had any woodland areas of particular conservation value, as identified in section 6.1.1, retained as woodland and there was no new conversion to plantation or non-forested land.</p> <p>Tilhill has developed an exemplary and commendable management approach to the identification, appraisal, selection and management of Plantations on Ancient Woodland Sites (PAWS). Monitoring of PAWS is covered in Tilhill management planning.</p> <p>The Group members with PAWS also address monitoring via the overall monitoring plans within their management plans.</p> <p>The management of ASNW / SNW is to a high standard throughout the sites visited. From interview all managers demonstrated a good knowledge of ASNW management requirements under UKWAS.</p>
Criterion 9.4 Monitoring to assess effectiveness	
Strengths	
Weaknesses	
Compliance	<p>Managers make site visits to SACs, SSSIs and ASNWs. This includes periodic assessment of the condition of their habitats. SACs and SSSIs located on members' properties are subject to formal condition monitoring by SNH, NE and CCW. These are assessed as being in,</p>

	<p>essentially, an 'unfavourable' or 'improving / favourable' condition. Where found 'unfavourable' by the statutory government conservation agency, the agency will engage with the landowner concerned and propose / agree suitable remedial measures to regain a 'favourable' condition for the site with subsequent monitoring to determine success. E.g. Boughton SSSI and NE, Cardross SSSIs and SNH. Suitable engagement was seen from records of correspondence and agency stakeholder interview.</p> <p>Relevant Management Plans seen also clearly outline woodland monitoring operations that are practised and these consider the condition of any HCVF areas together with the efficacy of the measures to protect and enhance them.</p>
PRINCIPLE 10: PLANTATIONS	
<i>Criterion 10.1 Statement of objectives in the management plan</i>	
Strengths	<p>At Dalkeith (a Buccleuch estate), Graythwaite and Great Allotment, standards of management planning were particularly high.</p> <p>The Management Plan for Norwood Estate, Central Borders District is exemplary.</p>
Weaknesses	<p>All management plans inspected were assessed as compliant re. UKWAS requirements with the following exceptions :</p> <p>At Durham County Council Woodlands although there are three broad landscape scale management plans in place covering all the woodland sites, there are not comprehensive management planning documents in place appropriate to the scale and size of each woodland site, as per UKWAS requirements. At Dollar Woodlands one of the main objectives of the Management Plan is to develop and maintain the biodiversity of the forest. However, the plan does not identify specific and comprehensive measures to maintain and enhance the areas of the woodland designated as SSSI and ASNW.</p> <p>CAR 06 raised.</p> <p>Observation 3/09: At Needwood, Midlands District, two different versions of the Management Plan were presented. No annotations had been made relevant to agreed revisions.</p> <p>Observation 4/09: At Touch Estate (Group Scheme), recommendations made in the commissioned report by a consultant should be appraised and either incorporated into the Management Plan or justification given for dismissing them.</p> <p>Observation 5/09: At Canglour, Central Scotland District, the objective of moving the SSSI from 'unfavourable' condition to 'favourable recovering' should be indicated in the Management Plan.</p> <p>Observation 7/09: The Management Plan for Dollar Woodlands has been subject to review and amendment during its current five-year period (now in year 5) and at the time of assessment various sections of text remain devolved from the main contract.</p>
Compliance	<p>The Tilhill management plan template for UKWAS compliance is a very well thought out and robust document. Management plans containing all of the above features are available for all Tilhill Resource Member managed and Group Member managed properties. All Management plans inspected, interviews with staff and site visits indicated a high level of compliance. The template continues to be refined as evidence of a commendable approach and constant effort in improving management systems.</p> <p>Management Plans were assessed for all members sampled. All management plans inspected were assessed as compliant re. UKWAS requirements with the above exceptions.</p>
<i>Criterion 10.2 Plantation design and layout</i>	
Strengths	
Weaknesses	
Compliance	<p>There is planning and site evidence of restructuring taking place in virtually all the members' sites visited during this assessment.</p> <p>Due to lack of felling requirements, restructuring is not appropriate within Durham County Council Woodlands but the woods are already fairly diverse in character.</p> <p>The small area of new cricket bat willow planting within the riparian area at Boughton was seen to be competently planted and highly appropriate in its design location. The new native woodland planting at Graythwaite adds further species and age class diversity to what are already diverse woodlands. Otherwise all planting seen was restocking only. This is</p>

	<p>consistent with current commercial forestry trends in the UK. All such new planting seen was of good to acceptable standard and suitably well designed (as was the restocking).</p> <p>Although few certified woodlands were encountered, Tilhill staff are totally familiar with modern design requirements of new woodlands in order to meet FC planting grant conditions.</p> <p>The requirement to co-operate with neighbours with regard to plantation design seldom applied during this audit as most woodlands were isolated within agricultural land or open hill ground. Tilhill staff interviewed are aware of this requirement as part of normal stakeholder consultation. There was suitable example evidence of contact being made with neighbours.</p>
Criterion 10.3 Diversity in composition	
Strengths	
Weaknesses	
Compliance	<p>From the analysis of the species proportions shown within Management Plans, plus the visual evidence from the associated site visits for the members sampled there was demonstrated compliance.</p> <p>Managers interviewed were aware of the minimum species diversity percentage requirements and the requirement guidance under UKWAS.</p>
Criterion 10.4 Species selection	
Strengths	
Weaknesses	
Compliance	<p>All sites visited complied with this criterion based on management plan rationale, dialogue with managers and site observation. The normal range of conifer and broadleaves used in UK forestry management was encountered. From discussions with managers and the site evidence seen, the use of non-native North American conifers and European conifers and broadleaves was suitably balanced for plantations.</p> <p>Management Plans and site visits for all the members sampled demonstrated compliance.</p>
Criterion 10.5 Restoration of natural forest	
Strengths	<p>Tilhill has developed an exemplary and commendable management approach to the identification, appraisal, selection and management of Plantations on Ancient Woodland Sites (PAWS). PAWS are Ancient Semi-Natural Woodland (ASNW) sites that were subject to plantation management before FSC / UKWAS certification began.</p> <p>Graythwaite estate is commended for its astute acquisition of an adjacent PAWS site and its subsequent restoration by removal of conifers.</p> <p>At Canglour, Central Scotland District, the response to an internal CAR on PAWS planning has been excellent and a very good plan is now in place.</p> <p>Horse extraction is being used in a PAWS restoration project at Needwood, Midlands District to ensure low impacts with excellent results.</p>
Weaknesses	<p>Observation 20/09: At Dalkeith (a Buccleuch estate) there is a lack of reference in planning documentation to tackle invasive Snowberry & Rhododendron at the Carberry PAWS area. At Graythwaite and Boughton the PAWS documented rationale / implementation plans are sparse.</p>
Compliance	<p>Tilhill's process for the identification, appraisal, selection and management of PAWS involves an information-gathering phase that uses a specially designed form. This takes account of different information sources and Ecological Site Classification. This appraisal provides an overall site rating that is used as a basis for deciding on an appropriate restoration option. Monitoring is covered in management planning.</p> <p>The Group members with PAWS also address restoration and their monitoring within their management plans.</p> <p>There were site examples of suitable restoration practice being implemented.</p>
Criterion 10.6 Impacts on soil and water	
Strengths	<p>At Canglour, Central Scotland District, a recent harvesting operation involving a trial of</p>

	<p>destumping and brash removal, and subsequent site preparation has been very effective with a high compliance with environmental guidelines.</p> <p>At Norwood Estate upgrades to the existing roads system, use of brash mats on the harvesting site and operator knowledge of site safeguards and environmental standards were of a very high standard.</p> <p>The Harvesting Site Monitoring Report that is in use in Central Scotland District represents an exemplary approach to recording and monitoring environmental and safety issues.</p> <p>At Dollar Woodlands, the recent completion of operations to construct a new forest road and also undertake forest road improvement have evidently been implemented to a very high standard. This is particularly commendable given the constraints encountered relating to the topography and general ground conditions.</p> <p>At Jacksons Bank, Needwood, horse extraction is being used to reduce impacts with exceptional results.</p>
Weaknesses	<p>Harvesting operations were not always compliant with Forest and Water Guidelines. Extraction tracks had not been used and maintained in a manner that minimised their environmental impact.</p> <p>At Haining, Central Borders District, water was running down a forwarder track and across a temporary brash bridge onto the floodplain. The extraction track was heavily rutted and the machine had broken through the brash mat. Both brash and stump harvesting has been carried out at this site following conventional timber harvesting. At Haining, Central Borders District, two diesel fuel bowsers were sited in standing water on a floodplain.</p> <p>At Graythwaite, a Group member in North West England, there was incomplete mitigation of siltation run off from an active timber loading bay. CAR 03 raised.</p>
Compliance	<p>At the other sites visited where active harvesting was seen to be taking place, implementation of operations was consistent with current best practice including Forest and Water Guidelines. Extraction tracks had been used and maintained in a manner that minimised their environmental impact. The machine operators interviewed demonstrated diligent use of brash matting to mitigate impact particularly in softer ground conditions. Evidence of efficient harvesting with no significant damage was seen at these sites.</p> <p>Re. CAR 03 above : At Haining, extraction was immediately halted until remedial actions had been attended to. In addition, written guidance has been amended requiring all intentions by managers to harvest brash and stumps from one site to be referred to Regional Harvesting Managers.</p> <p>The fuel bowsers were immediately moved to an acceptable location. Site visits to Canglour and Norwood confirmed that this was not a widespread problem.</p> <p>Swift site specific response and other progress to closure of CAR 03 noted, but remains open for evidence of further systematic response by the company plus operational evidence follow up at next surveillance.</p>
<i>Criterion 10.7 Pests and diseases</i>	
Strengths	<p>In Central Scotland District deer browsing impacts and subsequent deer management are very effectively monitored using the 'Nearest Neighbour' method to objectively assess browsing levels on restocked areas.</p> <p>At Canglour, Central Scotland District, very effective use is made of a contractor in assessing and anticipating the need for weevil outbreaks on restocked areas.</p> <p>Graythwaite estate has shown leadership in a part of the country with increasing red deer management pressures by chairing the local Deer Management Group and setting an example in its own robust deer control measures.</p>
Weaknesses	<p>At Durham County Council woodlands, although there is a robust system of site inspection recording being implemented, there is no system currently in place to systematically monitor the condition of mature and semi-mature broadleaved trees present within many of the woodlands. See Minor CAR 05.</p> <p>There were examples among members where management of deer is not sufficient to regulate the impact of deer and not sufficiently documented for UKWAS compliance.</p>

	<p>At Boughton (a Buccleuch Estate) there is insufficient deer control within Geddington Chase wood which also contains a Site of Special Scientific Interest (SSSI).</p> <p>At Cardross there is negligible reference to deer management within the otherwise well presented management plan 2008-2027. Documented planning for deer is presently too sparse.</p> <p>CAR 08 raised.</p> <p>Observation 10/09: At Skirden Hall deer impacts were being subjectively monitored and stalkers being managed accordingly. However, no objective estimates were being made.</p> <p>Observation 11/09: At Canglour, Central Scotland District, there is an effective link with the deer stalker but a cull target should be provided.</p> <p>Observation 12/09: At Canglour, Central Scotland District, damage assessments are made by a contactor. These should be recorded and the information passed to the Wildlife Manager.</p>
Compliance	<p>Site Inspection Records are completed where appropriate following all visits to woodlands. All Management Plans inspected for the members sampled, with the exception of Durham CC, contain provision for monitoring tree health and grazing impacts and staff make regular inspections.</p> <p>Restructuring is leading to a more diverse age structure with improvements in the creation of future windfirm edges for coupes as previous large areas of a single age class are broken up with felling. There was visible evidence of increasing structural diversity from site inspection and review of the Management Plans for all the members sampled.</p> <p>Windthrow hazard assessments are used to anticipate problems and plan accordingly. Increasing diversity of plantations should help to reduce the threat of pest and disease problems. All the managers interviewed had a good knowledge of these risks.</p> <p>There is contact and co-operation with other forest owners over Grey squirrel control at Graythwaite and Dalkeith. Written deer management strategy and objectives are provided for the members sampled.</p> <p>At Central Borders District there is a very effective strategy in place whereby forest properties are allocated to High or Low risk management types, no stalking is let in the High Risk properties so that professional staff can focus there on deer management targets. This approach has been very effective in reducing deer damage to restocked areas.</p>
<i>Criterion 10.8 Monitoring of impacts, species testing and tenure rights</i>	
Strengths	
Weaknesses	
Compliance	<p>For all the sites visited, site inspection records are maintained within forest management files. Monitoring by the owner / manager of Group Member managed members is less formalised but constant. The plans for all the sites visited, all identify the requirement for monitoring. Site inspection records are kept for all woodlands. The management planning documentation reviewed and the staff interviewed both confirm a commitment to make use of monitoring data. All managers interviewed understood the purpose and value of suitable monitoring for incorporating its analysis into revised management strategy and management plan reviews, including any impacts from plantation silviculture or exotic species.</p> <p>Given the centuries long established legal system of property law in the UK including rural land, monitoring of tenure rights in the UK does not relate to the development of plantation forestry itself, but only applies to minor boundary disputes from existing plantations. New plantation forestry in the UK is a minority activity in comparison to the existing plantations of woods and forests, many of which are well into their second rotation.</p>
<i>Criterion 10.9 Plantations established in areas converted from natural forests after November 1994</i>	
Strengths	
Weaknesses	
Compliance	<p>No natural forests or woodland with areas and features of particular significance for biodiversity, including sites important for endangered but mobile species and natural processes in critical situations have been converted to plantation or non-forested land after November 1994.</p>

	<p>All the sites visited had some woodland areas of particular conservation value retained as woodland and there was no new conversion to plantation or non-forested land.</p> <p>The management of ASNW / SNW is to a high standard throughout the sites visited. From interview all managers demonstrated a good knowledge of ASNW management requirements under UKWAS.</p>
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10. CERTIFICATION DECISION

SGS considers that UPM Tilhill's forest management of the Tilhill Group Certification Scheme members' forests in the UK can be certified as:

- i. There are no outstanding Major Corrective Action Requests (CARs).
- ii. The outstanding Minor Corrective Action Requests (CARs) do not preclude certification, but UPM Tilhill is required to take the agreed actions before next surveillance assessment. These will be verified by SGS QUALIFOR at the first surveillance to be carried out about 12 months from the date of the issuance of the certificate. If satisfactory actions have been taken, the CARs will be 'closed out'; otherwise, Minor CARs will be raised to Major CARs.
- iii. The management system, if implemented as described, is capable of ensuring that all of the requirements of the applicable standard(s) are met over the whole forest area covered by the scope of the evaluation;
- iv. The certificate holder has demonstrated, subject to the specified corrective actions, that the described system of management is being implemented consistently over the whole forest area covered by the scope of the certificate.

11. MAINTENANCE OF CERTIFICATION

During the surveillance evaluation, it is assessed if there is continuing compliance with the requirements of the Qualifor Programme. Any areas of non-conformance with the QUALIFOR Programme are raised as one of two types of Corrective Action Request (CAR):

01. **Major CARs** - which must be addressed and closed out urgently with an agreed short time frame since the organisation is already a QUALIFOR certified organisation. Failure to close out within the agreed time frame can lead to suspension of the certificate.
02. **Minor CARs** - which must be addressed within an agreed time frame, and will normally be checked at the next surveillance visit

The full record of CARs raised over the certification period is listed under section 12 below.

The table below provides a progressive summary of findings for each surveillance. A complete record of observations demonstrating compliance or non-compliance with each criterion of the Forest Stewardship Standard is contained in a separate document that does not form part of the public summary.

MAIN EVALUATION	
Issues that were hard to assess	No issues were hard to assess.
Number of CARs closed	2 Minor Cars from the previous surveillance were closed, 1 being raised to a Major CAR.
Number of CARs raised	1 New Major CAR and 9 new Minor CARs were raised. The Major CAR has since been closed prior to this report and a new Minor CAR raised for its monitoring, resulting in currently no Major CARs and 10 new Minor CARs.
SURVEILLANCE 1	
Issues that were hard to assess	
Number of CARs closed	Outstanding CARs were closed.

Nr of CARs remaining open	Outstanding CARs from previous evaluations were not closed.
New CARs raised	New Major CARs and Minor CARs were raised.
Certification Decision	The forest management of the forests of remains certified as: <ul style="list-style-type: none"> ▪ The management system is capable of ensuring that all of the requirements of the applicable standard(s) are met over the whole forest area covered by the scope of the evaluation; and ▪ The certificate holder has demonstrated, subject to the specified corrective actions, that the described system of management is being implemented consistently over the whole forest area covered by the scope of the certificate.
SURVEILLANCE 2	
Issues that were hard to assess	
Number of CARs closed	
Nr of CARs remaining open	
Nr of New CARs raised	
Certification Decision	
SURVEILLANCE 3	
Issues that were hard to assess	
Number of CARs closed	
Nr of CARs remaining open	
Nr of New CARs raised	
Certification Decision	
SURVEILLANCE 4	
Issues that were hard to assess	
Number of CARs closed	
Nr of CARs remaining open	
Nr of New CARs raised	
Certification Decision	

12. RECORD OF CORRECTIVE ACTION REQUESTS (CARs)

CAR #	Indicator	CAR Detail					
		Date Recorded>		Due Date>	Next assessment	Date Closed>	
10 (previous Surveillance)	UKWAS 8.1.1	08 Oct 2008				26 Nov 2009	
		Non-Conformance:					
		Health and Safety is being compromised.					
		Objective Evidence:					
		At Boughton Woods (Geddington), free standing high seats for deer control are poorly constructed, with nails rather than bolts being used to join support timbers and ladders. 'Lean-to' high seats have been in place for a considerable time and securing ropes show signs of rotting. There is no system for recording regular safety inspections.					
Close-out evidence:							

CAR #	Indicator	CAR Detail					
		<p>There are at least 6 free standing permanent high seats and approx. 70 portable 'lean-to' high seats at Boughton. Only the free standing permanent high seats have been located on a map and tabulated. The portable lean-to seats are not yet recorded in any way. Systematic safety inspection has not begun.</p> <p>A permanent high seat was inspected with estate staff and, although there was evidence of past maintenance, it was agreed it required further repairs. The door hinge to the shelter was broken and almost fell off when opened. The ladder had some splitting in the vertical timbers and rungs were not slotted into the vertical timbers but nailed to the top surface. Only one out of several portable lean-to high seats seen was securely fixed with a ratcheted strap, the rest seen were tied with old and thin polypropylene rope showing its age and wear. They were not very stable for climbing the ladders.</p> <p>The estate have not responded sufficiently to this existing minor CAR and there are no exceptional circumstances applying.</p> <p>Certification audit protocol requires that a new Major CAR be raised. Original minor CAR 10 (2nd certificate) is therefore closed and Major CAR 10 (3rd certificate) raised. (The use of number 10 for both CARs is coincidental.)</p>					
11 (previous Surveillance)	UKWAS 6.4.3	Date Recorded>	22 Oct 2008	Due Date>	Next assessment	Date Closed>	26 Nov 2009
Non-Conformance:							
Game management is causing a negative impact on the woodland ecosystem							
Objective Evidence:							
At Oaks Wood, North Wales District, a pheasant release pen was situated within an ASNW causing a detrimental impact on the woodland.							
Close-out evidence:							
The release pen has been removed from this woodland and a review of the location of all release pens is in progress to ensure appropriate locations.							
The matter has been discussed by the Group Scheme Manager with the Tilhill Group Scheme internal auditors and will be given greater attention at membership entry and internal surveillance.							
CAR 11 closed.							
01	UKWAS 6.1.1	Date Recorded>	26 Nov 2009	Due Date>	Next assessment	Date Closed>	open
Non-Conformance:							
Rare species conservation is not being satisfactorily addressed.							
Objective Evidence:							
The Management Plan for Greenfield includes the conservation requirements for the rare white-clawed crayfish, highlighting the need for a high level of hygiene requiring the washing of machines being brought into the forest to reduce the risk of disease. Coupe planning documents do not include this requirement.							
At Boughton (a Buccleuch estate), the estate's own excellent Biodiversity Action Plan (BAP) produced in 2007 highlights both Water Vole and Dormouse as priority species that could benefit from estate awareness and management. Water Vole is known to exist adjacent the estate western boundary and they were known to be present in the centre of the estate approx. 10 years ago. There is a significant section of riparian area between the centre and the adjacent western boundary area that might still have Water Vole which has not been surveyed. Mink control for this potential benefit is low key despite several game department staff. The estate BAP identifies the need for a Dormouse survey by a third party but this is still to happen. The area LBAP officer has not yet been contacted for comment and input on these species.							
CAR 01 raised.							
Close-out evidence:							
02	UKWAS 8.1.1	Date Recorded>	26 Nov 2009	Due Date>	Next assessment	Date Closed>	open
Non-Conformance:							
Health & Safety guidance was not always adhered to.							

CAR #	Indicator	CAR Detail					
		<p>There are some gaps in the documentation and implementation of health & safety procedures. There was an example of lack of wearing personal protective equipment by a contractor.</p> <p>Objective Evidence:</p> <p>At a clear felling site at Norwood Estate, the Harvester and Forwarder operators had safety helmets that were considerably out of date. There is no systematic procedure in place for regular checking of these and other H&S items on harvesting sites.</p> <p>At Boughton (a Buccleuch Estate) and Graythwaite Estates, there is no documentation confirming and no clear understanding of the role of 'Forestry Works Manager', as per 'Managing Health & Safety in Forestry' published by the Health & Safety Executive (and an UKWAS reference).</p> <p>At Dalkeith (a Buccleuch Estate) there is no documented lone working procedure for contractors, consistent with that for Buccleuch staff. A harvesting contractor had recently been working alone with machinery. The Buccleuch Estates Coupe Planning document refers to several AFAG safety guides but omits reference to number 802 'Emergency Planning'.</p> <p>At Boughton the forwarder operator had no hard hat properly available (locked in his land-rover). The contractors were working amongst mature hardwoods where deadwood was evident in the canopy and a potential danger. Just such an accident (being struck on the head by falling deadwood) was reported by an experienced contractor in the previous month's forestry industry journal.</p> <p>CAR 02 raised.</p> <p>Close-out evidence:</p>					
03	UKWAS 4.2.1	Date Recorded>	26 Nov 2009	Due Date>	Next Assessment	Date Closed>	open
		<p>Non-Conformance:</p> <p>Harvesting operations were not compliant with Forest and Water Guidelines. Extraction tracks had not been used and maintained in a manner that minimised their environmental impact.</p> <p>Objective Evidence:</p> <p>At Haining, Central Borders District, water was running down a forwarder track and across a temporary brash bridge onto the floodplain. The heavily sedimented water was then running into the water course about 20 metres downstream of the bridge. The extraction track was heavily rutted and the machine had broken through the brash mat. Both brash and stump harvesting has been carried out at this site following conventional timber harvesting. Although attempts had been made to use brash bales and stumps to repair damage, there was insufficient brash available following brash harvesting.</p> <p>At Haining, Central Borders District, two diesel fuel bowsers were sited in standing water on a floodplain approximately 10-15 metres from a major water course. Any spillage would have entered the water course, though none had occurred. Non-compliant operations were immediately halted until closed out.</p> <p>At Graythwaite, a Group member in North West England, there was incomplete mitigation of siltation run off from an active timber loading bay. The siltation was crossing the road and entering a minor watercourse leading to Lake Windermere. There had been exceptional rain but the source was agreed by those present as more likely coming from a spring adjacent to the loading bay. No straw bales had been inserted to mitigate. This is now a common water management practice for harvesting sites and it was agreed by those present that it would help mitigate the siltation.</p> <p>CAR 03 raised.</p> <p>At Haining, extraction was immediately halted until the following remedial actions had been attended to;</p> <ol style="list-style-type: none"> 1. The extraction route has been repaired to reduce further soil erosion, 2. Water on the extraction track has been redirected away from the water course, and 3. Silt traps and straw bales have been positioned to reduce run-off and siltation, <p>In addition, written guidance has been amended requiring all intentions by managers to harvest brash and stumps from one site to be referred to Regional Harvesting Managers.</p> <p>The fuel bowsers were immediately moved to an acceptable location. Site inspection reports from Canglour and site visits to Canglour and Norwood confirmed that this was not a widespread problem.</p> <p><u>Swift site specific response and other progress to closure noted, but remains open for evidence of further systematic response by the company plus operational evidence follow up at next</u></p>					

CAR #	Indicator	CAR Detail					
		<u>surveillance.</u>					
		Close-out evidence:					
04	UKWAS 5.4.2	Date Recorded>	26 Nov 2009	Due Date>	Next Assessment	Date Closed>	open
		Non-Conformance:					
		A deer fence has been erected without appropriate planning to minimise effects on wildlife.					
		Objective Evidence:					
		At Touch Estate (Group member), adequate survey of black grouse presence had not been conducted prior to erection of a deer fence, nor had monitoring been conducted following erection. Black grouse are known to occur in the area and monitoring should be put in place, and appropriate mitigation if necessary. CAR 04 raised.					
		Close-out evidence:					
05	UKWAS 7.4.2	Date Recorded>	30 Nov 2009	Due Date>	Next Assessment	Date Closed>	open
		Non-Conformance:					
		There has been an example where the owner/manager has not adequately mitigated the wider impacts of woodland operations on local people. There were examples where the owner/manager has not adequately mitigated the risks to public safety.					
		Objective Evidence:					
		The owner/manager has not adequately mitigated the wider impacts of woodland operations on local people re. breach of an agreement made with local residents and damage caused to a house by timber vehicles. Following stakeholder concerns about timber haulage through the village of Newhouses (see Observation 9/06), Tilhill agreed to restrict timber traffic through the village of Newhouses to 0700 – 2100 hours, except in exceptional circumstances. A log was maintained by the local residents that indicated that timber trucks passed through the village on 33 occasions between 11 May and 23 September 2009 outside of the agreed hours. In addition, a timber truck has apparently struck the wall of Barnstead, a house in Newhouses. The owner/manager has not adequately mitigated the risks to public safety re. procedures and measures for assessing hazards in areas used by the public are not in place. At Durham County Council although site inspection takes place as part of general operational management with field notes being recorded, given the scale, intensity and type of woodland and the extent of public access openly encouraged, there is no documented strategy in place to systematically assess or monitor the condition of mature and semi-mature broadleaved trees present within many of the woodlands. At Malton Picnic Site a dead tree was observed immediately adjacent to a frequently used car park and public footpath. (The tree health / safety monitoring issues at Durham have also been identified by Tilhill's internal group scheme auditing.) At Dollar Woodlands the disused quarry (Compartment 25) is a hazard to members of the public, staff and contractors. There are no warning notices or adequate protection by fencing. This hazard is not identified on the Dollar Woodlands Management Plan maps. CAR 05 raised.					
		Close-out evidence:					
06	UKWAS 2.1.1	Date Recorded>	30 Nov 2009	Due Date>	Next Assessment	Date Closed>	open
		Non-Conformance:					
		All woodlands are not fully covered by appropriate management planning documentation.					
		Objective Evidence:					

CAR #	Indicator	CAR Detail					
		<p>At Durham County Council Woodlands although there are three broad landscape scale management plans in place covering all the woodland sites, there are not comprehensive management planning documents in place appropriate to the scale and size of each woodland site, as per UKWAS requirements a) – k). (Durham CC woodland management is equivalent to SLIMF status as no commercial timber is produced.) This is the subject of an existing internal CAR and is clearly recorded as requiring urgent attention within the Tilhill Group scheme.</p> <p>In addition, at Durham County Council Woodlands, although a sufficient electronic GIS mapping system is used as a major management planning tool, the constraints layer applicable to Waldridge Fell Country Park did not include the 33KV power line wayleave which traverses the site, and is evidently a significant hazard to both public users and Durham County Council staff, volunteers and contractors.</p> <p>At Dollar Woodlands one of the main objectives of the Management Plan is to develop and maintain the biodiversity of the forest. However, the plan does not identify specific and comprehensive measures to maintain and enhance the areas of the woodland designated as SSSI and ASNW.</p> <p>The Management Plan for Dollar Woodlands include clear maps, however there are a number of omissions – the current maps do not identify the area of ASNW located within the management unit, the adopted Core Path, the clear identification of both the long term retention areas and the area of natural reserve, the local historical feature known as the Dollar Stone and the disused quarry which is clearly a significant hazard.</p> <p>CAR 06 raised.</p>					
		Close-out evidence:					
07	UKWAS 2.3.2 / 2.3.3	Date Recorded>	26 Nov 2009	Due Date>	Next Assessment	Date Closed>	open
		Non-Conformance:					
		<p>A documented plan for monitoring, consistent with management objectives and appropriate to the scale and intensity of management is not available for some woodlands.</p> <p>Monitoring records for planting and timber yields are not being kept in a form which ensures they are of use over the long term.</p>					
		Objective Evidence:					
		<p>At Durham County Council Woodlands, a degree of monitoring is taking place, for example the maintenance of site visit inspection records by ranger staff following site visits. However, a documented tree safety monitoring system is not in place and there is no monitoring of known UK BAP species, e.g. the presence of Great Crested Newts at Waldridge Fell.</p> <p>At Dollar Woodlands and Durham County Council Woodlands (Waldridge Fell Country Park) insufficient annual monitoring is in place to assess the effectiveness of measures employed to maintain and enhance the areas within the management unit designated as SSSI and ASNW.</p> <p>Although a degree of monitoring is taking place within Durham County Council Woodlands, assimilated monitoring data, which is mainly held electronically, is not readily accessible for use in management planning. E.g. maintenance of site visit inspection records by ranger staff following site visits.</p> <p>(The monitoring issues at Durham have also been identified by Tilhill's internal group scheme auditing.)</p> <p>Within Tilhill management systems there is a lack of long term recording of genetically improved stock, provenance and seed origin. This is important for both conifers, and also broadleaves, particularly for any replanting of PAWS sites. It is of use to future management in order to judge growth performance and now also relevant to monitoring the effects of climate change.</p> <p>Tilhill have already identified the potential method to do so for their own management as the Tilhill 'Griffin' compartment database has a section for provenance but all examples seen had no entries. E.g. Great Allotment, Greenfield. Group members visited were also not recording such information but agreed it would be useful. E.g. Boughton, Graythwaite.</p> <p>Tilhill's approach to recording timber yields is not uniform with variation between managers. Felling yields and cumulative thinning yields are not kept systematically. Yield data so recorded would assist budgeting and enable local yield modelling. Managers interviewed indicated there is reliance upon fresh sample plot data every time with no cross checking reference to past data.</p> <p>CAR 07 raised.</p>					
		Close-out evidence:					

CAR #	Indicator	CAR Detail					
08	UKWAS 5.1.4	Date Recorded>	26 Nov 2009	Due Date>	Next Assessment	Date Closed>	open
		Non-Conformance:					
		There were examples among members where management of deer is not sufficient to regulate the impact of deer and not sufficiently documented for UKWAS compliance.					
		Objective Evidence:					
		<p>At Boughton (a Buccleuch Estate) there is insufficient deer control within Geddington Chase wood which also contains a Site of Special Scientific Interest (SSSI).</p> <p>Concerns raised by SGS at Surveillance 04 in 2008 were further confirmed by the site visit in 2009 and examination of documented stakeholder comments. Although the estate can show deer cull records, the visibly evident contrast in surface vegetation and natural tree regeneration illustrated by fenced enclosures to monitor this issue is marked. The Ancient Woodland SSSI area constitutes approx. a quarter of the wood. The government's conservation agency with overall responsibility for the condition of SSSIs is Natural England. Their letter dated 30 Jan 2006 (then English Nature) says that "At present, the sole factor stopping the SSSI being assessed as 'favourable' is the lack of natural regeneration. This is a direct result of the high populations of fallow and muntjac deer present within the wood." The estate has recently commissioned Deer Initiative staff to prepare a revised deer management plan. Their draft plan of January 2009 concludes on page 5 that "The enclosure plots illustrate an extremely serious issue regarding unsustainably high numbers of muntjac and fallow deer on the estate given the browsing damage observed. Unsustainably intense and prolonged browsing pressure from the local populations will mean further degradation of the Ancient Semi-Natural Woodland, the SSSIetc."</p> <p>At Cardross there is negligible reference to deer management within the otherwise well presented management plan 2008-2027. On page 7 Sporting rights are declared in hand with deer control by the estate gamekeeper. The estate's overall management agent's letter dated 9 July 2008 clarifies that "deer are managed by the shooting tenant on Cardross estate, the tenant employing a full time gamekeeper." This explains that sporting rights are not actually in hand. The letter goes on to say that "Culls are carried out in order to minimise damage to tree and agricultural cropsThe shooting tenant and his gamekeeper are informed by the estate of any areas of concern regarding crop damage and respond on an arising basis to any potential problems."</p> <p>Tilhill internal monitoring raised a lack of a written deer plan as an internal CAR but closed it on the basis of the management agent's letter above. SGS' view is that the letter alone is not adequate for UKWAS compliance and there is evident need for clarity of communication between Tilhill as forest managers and the tenant's game keeper. The current forest manager has not yet established relations with the keeper. The keeper is not aware of UKWAS certification requirements. No cull targets have been set or browsing thresholds stated as an alternative. There was evident deer presence in young restocked areas with more restocking planned for next year. There is a PAWS site and also native woodland where natural regeneration will not thrive under browsing pressure. Browsing evidence was seen on Holly on the PAWS site and native tree regeneration on the periphery of Flanders Moss SSSI.</p> <p>Documented planning for deer is presently too sparse and requires improved communications between the Cardross forest and game managers plus more detail for UKWAS compliance.</p> <p>CAR 08 raised..</p>					
Close-out evidence:							
09	UKWAS 4.1.1	Date Recorded>	26 Nov 2009	Due Date>	Next Assessment	Date Closed>	open
		Non-Conformance:					
		The planning of woodland operations does not always include the marking on a site plan of hazards, constraints and special features. A documented timber sales contract for harvesting operations where their scale and sensitivity merits such a contract is not always completed.					
		Objective Evidence:					
		<p>The planning of woodland operations at Durham County Council woodlands does not always include the marking on a site plan of hazards, constraints and special features.</p> <p>At Boughton (a Buccleuch Estate) there is a lack of a system of providing harvesting contractors with a site plan showing hazards, constraints and special features. This is inconsistent with that found at Dalkeith (also a Buccleuch Estate). In addition, at Boughton there was no documented timber sales contract for the active harvesting operations. Apart from other considerations, a written contract should specify who is undertaking the various Health & Safety responsibilities inc. who is the 'Forestry Works Manager'.</p>					

CAR #	Indicator	CAR Detail					
		CAR 09 raised.					
		Close-out evidence:					
M10	UKWAS 8.1.1	Date Recorded>	26 Nov 2009	Due Date>	26 Feb 2010	Date Closed>	19 Jan 2009
		Non-Conformance:					
		Health and Safety is being compromised with unsafe high seats for deer control.					
		Objective Evidence:					
		<p>From surveillance audit SA2008.24</p> <p>At Boughton Woods (Geddington), free standing high seats for deer control are poorly constructed, with nails rather than bolts being used to join support timbers and ladders. 'Lean-to' high seats have been in place for a considerable time and securing ropes show signs of rotting. There is no system for recording regular safety inspections.</p> <p>Minor CAR 10 (2nd certificate) raised.</p> <p>From re-assessment audit RA2009.3</p> <p>There are at least 6 free standing permanent high seats and approx. 70 portable 'lean-to' high seats at Boughton. Only the free standing permanent high seats have been located on a map and tabulated. The portable lean-to seats are not yet recorded in any way. Systematic safety inspection has not begun.</p> <p>A permanent high seat was inspected with estate staff and, although there was evidence of past maintenance, it was agreed it required further repairs. The door hinge to the shelter was broken and almost fell off when opened. The ladder had some splitting in the vertical timbers and rungs were not slotted into the vertical timbers but nailed to the top surface. Only one out of several portable lean-to high seats seen was securely fixed with a ratcheted strap, the rest seen were tied with old and thin polypropylene rope showing its age and wear. They were not very stable for climbing the ladders.</p> <p>The estate have not responded sufficiently to existing minor CAR 10 from the 2nd certificate and there are no exceptional circumstances why not. Certification audit protocol requires that a new Major CAR be raised. Original minor CAR 10 (2nd certificate) is therefore closed and Major CAR 10 (3rd certificate) raised. (The use of number 10 for both CARs is coincidental.)</p>					
		Close-out evidence:					
		<p>Tilhill and Buccleuch Woodlands / Boughton Estate responded positively in writing with a suitable action plan within 2 weeks of Major CAR issue.</p> <p>From previous audit site visits and this one it is confirmed that Boughton is the only Buccleuch estate member of the Tilhill Group Scheme to use high seats for deer control. Following the SGS audit the Tilhill Group Scheme Manager also raised an internal Major CAR, which was accepted by the Buccleuch Woodlands Senior Forest Manager and Boughton Estate, based on the following :</p> <p><i>Deficiency : At SGS 2008 External Audit found high seats poorly constructed and not consistently monitored. The return visit by SGS in November 2009 found work incomplete and no acceptable reason for delay in work being completed.</i></p> <p><i>Corrective Action agreed between Tilhill Group Scheme Manager and Boughton Estate :</i></p> <ol style="list-style-type: none"> 1. Make safe towers and ladders. 2. Ensure all staff responsible for use of high seats are aware of best practice with regard to construction, siting and maintenance. 3. Set in place a documented, at least annual, regime of consistent impartial checking of high seat safety to ensure that the present scenario does not repeat <p>Tilhill has therefore already taken swift action and agreed a satisfactory response with Boughton. This is a relatively minor and localised issue raised to major status through audit protocol rather than a major systemic issue and there are no alternative Buccleuch Woodlands sites which could be inspected for further evidence. The Tilhill Group Scheme Manager has closely monitored Boughton's response and is able to report from site that there has been good progress to date and</p>					

CAR #	Indicator	CAR Detail					
		<p>the work required should soon be completed. Objective evidence has been provided to SGS from the Tilhill Group Scheme Manager by photographs.</p> <p>Based on the Tilhill Group Scheme Manager's report and the photographic evidence, SGS will therefore close this SGS major CAR now and issue a new SGS minor CAR to monitor its close out conclusion with a site visit to Boughton by SGS at SA2010.31.</p> <p>Major CAR M10 closed and new minor CAR 11 raised.</p>					
11	UKWAS 8.1.1	Date Recorded>	19 Jan 2009	Due Date>	Next Assessment	Date Closed>	open
Non-Conformance:							
Health and Safety is being compromised with unsafe high seats for deer control.							
Objective Evidence:							
<p>Boughton Estate require to complete the following work that they have stated will be done in response to this non-compliance (on which good progress to date has been noted).</p> <ol style="list-style-type: none"> 1. Make safe towers and ladders. 2. Ensure all staff responsible for use of high seats are aware of best practice with regard to construction, siting and maintenance. 3. Set in place a documented, at least annual, regime of consistent impartial checking of high seat safety to ensure that the present scenario does not repeat. 							
Close-out evidence:							

13. RECORD OF OBSERVATIONS

OBS #	Indicator	Observation Detail			
8/06	UKWAS 6.1.1	Date Recorded>	17 Nov 2006	Date Closed>	26 Nov 2009
Observation:					
Yorkshire Dales NP. It is important here that an invertebrate survey is added to the ecological survey requirements.					
<p>Response: It is recognised that this is an important requirement at Cleartop Wood, but it has not been possible to do this due to budget constraints. Given the importance of this particular woodland, this is considered to represent an important omission. This observation therefore remains open and may be raised to a CAR at next surveillance depending upon progress.</p> <p>Comment 2008: This remains outstanding due to staff changes. It will be checked at an internal surveillance audit on 01.12.08. <i>This remains open and now requires urgent attention.</i></p>					
Follow-up evidence:					
<p>Comment 2009: This group member has left the Tilhill Group Scheme. This Observation is closed.</p>					
9/06	UKWAS 6.1.1	Date Recorded>	17 Nov 2006	Date Closed>	26 Nov 2009
Observation:					

OBS #	Indicator	Observation Detail			
		<p>Re. Greenfield Forest. The haulage route for timber from this forest runs through a small village (Newhouses). There is intense stakeholder concern. Forest managers at all levels in Tilhill are actively seeking an alternative route. An internal CAR is in place. Assess at next surveillance.</p> <p>Response: Tilhill are continuing to try to negotiate with the owners of Cam wood to try to find alternative access. Windblow is beginning to occur and the situation is becoming more urgent. This observation remains open.</p> <p>Comment 2008: An entire day was devoted to this important issue during which, a meeting with Tilhill managers provided an update along with a dossier of recent correspondence, etc concerning attempts to resolve this difficulty and a meeting was held with four residents of the Newhouses community in order to listen to and consider their recent concerns.</p> <p>Tilhill continue to negotiate with the owners of Cam forest to the north in the hope that access through this preferred route can still be achieved (Substantial amounts of money have been offered to Cam forest in order to secure access). However, it is now virtually impossible that this negotiation can be concluded by spring 2009, when Tilhill considers it necessary to begin to haul timber through Newhouses, having exhausted the possibility of using any of the other potentially alternative routes. Tilhill is therefore considering mitigation measures and preparing to begin harvesting and haulage through Newhouses in spring 2009.</p> <p>The residents of Newhouses considered that Tilhill had not thoroughly considered all options and had ignored an appraisal of a route through the village of Beckermonds. The residents also questioned whether the appraisal by Tilhill of timber value lost due to windblow was accurate and whether this was influencing the perceived urgency to extract timber and the figure that they are prepared to spend on the purchase of other rights of access. They also presented a list of issues that they were concerned about. A further meeting between Tilhill and the Newhouses residents is scheduled for 4 November 2008.</p> <p>Subsequently, and at the request of SGS, Tilhill has provided further information on the issues raised and this has been further appraised by SGS. There is clear evidence that the Beckermonds route was fully appraised and that the appraisal of the loss due to delayed harvest and subsequent windblow was realistic and as accurate as could be expected; the owner of Greenfields has forgone about £112,200 due to the 2005 windblow alone due to delays in harvesting. The list of issues presented by the residents reflects reasonable concerns and should be addressed by Tilhill.</p> <p>In conclusion, SGS accepts that Tilhill has done all that it could reasonably be expected to do to resolve this issue and that timber haulage through Newhouses, beginning in spring 2009, is now inevitable. The ongoing negotiations over the Cam forest access should continue as constructively as possible to try to find a permanent solution. The list of concerns raised by the residents should be the subject of careful consideration and mitigation by Tilhill. Virtually all of these issues can be ameliorated considerably by careful planning, realignment of the road with the provision of more passing places, and restrictions on load size and frequency of trips. This observation remains open for further monitoring.</p> <p>Follow-up evidence:</p> <p>Comment 2009: See further observations and CAR raised relative to this issue (Greenfield / Newhouses). This Observation is closed.</p>			
01/08	UKWAS 2.1.1	Date Recorded>	23 Oct 2008	Date Closed>	26 Nov 2009
		Observation:			
		The objectives stated in the draft plan for Bagley Wood do not appear to reflect the priorities of the owners. Dialogue with the owners is required to clarify the priority accorded to ecological objectives.			
		Follow-up evidence:			
		A major review of Management Objectives is underway and new objectives are being considered. This Observation is closed.			
02/08	UKWAS 2.1.1	Date Recorded>	23 Oct 2008	Date Closed>	26 Nov 2009
		Observation:			
		It was not immediately clear that the agricultural fields at Oaks Wood, North Wales are not included within the UKWAS certification area. This needs to be clarified in the management planning documentation.			
		Follow-up evidence:			
		These fields are included in the UKWAS certified area. Evidence was provided to support this and included in the Management Plan. This Observation is closed.			

OBS #	Indicator	Observation Detail			
		Date Recorded>		Date Closed>	
03/08	UKWAS 5.2.2	Date Recorded>	23 Oct 2008	Date Closed>	26 Nov 2009
		Observation:			
		At Bagley Wood chemical storage and records were exemplary. However, there is no sign indicating the presence of a chemical storage facility.			
		Follow-up evidence:			
		A sign has been placed on the chemical store. This Observation is closed.			
04/08	UKWAS 5.1.2/5.1.4	Date Recorded>	23 Oct 2008	Date Closed>	26 Nov 2009
		Observation:			
		At Kings Lynn, there are currently no vulnerable crops and deer management arrangements are adequate. However, plans to commence clear felling and restocking in 2010-2015 will create a need to monitor and control deer impact.			
		Follow-up evidence:			
		This requirement has been acknowledged by the manager and arrangements are in hand to attend to this when restocking begins. This Observation is closed.			
05/08	UKWAS 5.1.4	Date Recorded>	23 Oct 2008	Date Closed>	26 Nov 2009
		Observation:			
		Diligent management of the Tilhill Group Scheme at Boughton Estate (Geddington) has led to the raising of an internal CAR concerning the need to bring heavy deer impacts under control. The local manager has made encouraging progress toward this goal, putting in place sound monitoring methods, but sporting objectives on the estate appear to be constraining achievement. It is vital that deer numbers are regulated and current heavy impact is reduced to close out the internal CAR. .			
		Follow-up evidence:			
		Observation closed and Minor CAR 08 raised			
06/08	UKWAS 5.1.3	Date Recorded>	23 Oct 2008	Date Closed>	26 Nov 2009
		Observation:			
		Keepers at Boughton Estate have achieved localized control of grey squirrels but traps appear to be located in places convenient to game rearing areas and not necessarily in the most effective areas to control damage to broadleaved trees. A documented plan should be developed that ensures trapping locations that effectively target woodland management objectives.			
		Follow-up evidence:			
		The forest manager is in discussion with the estate's managing agent and the game department. Documentation is being incorporated as part of the forthcoming management plan 5 year review. Observation closed.			
07/08	UKWAS 5.5.1	Date Recorded>	23 Oct 2008	Date Closed>	26 Nov 2009
		Observation:			
		At Oaks Wood, North Wales, old redundant fences remain in the woodland. These should be removed.			
		Follow-up evidence:			
		This is acknowledged by the manager and will be removed when machines are next in the wood. This Observation is closed.			
08/08	UKWAS 6.3.2	Date Recorded>	23 Oct 2008	Date Closed>	26 Nov 2009
		Observation:			
		At Weston Heath, North Wales, restocking with Douglas fir in 2004, prior to UKWAS certification, had been difficult to establish and the area has subsequently been beat up with larch. The high environmental and economic cost of establishing this crop on a PAWS should be questioned. It is clear that birch and Scots pine are regenerating onto the area and this should be considered as a more suitable successor stand.			
		Follow-up evidence:			

OBS #	Indicator	Observation Detail			
		<p>This has been reappraised by a new manager who considers that this site is suitable for Douglas Fir and Larch and that other PAWS within the woodland are better suited to restoration. Regeneration of birch and pine will be encouraged and their presence will exceed the minimum 5% restoration. This will be concentrated on the northern edge of the restock site to allow linkage into the existing hedgerow network. Increased presence of native species will be present within all restock areas, through natural regeneration, but restocking with broadleaves will be concentrated where there is connectivity to adjacent ASNWs and external hedgerows. This will be of the greatest benefit to improving habitat and extending wildlife corridors. This has been appended to the Management Plan which is due for review observation is closed.</p>			
09/08	UKWAS 6.4.3	Date Recorded>	23 Oct 2008	Date Closed>	open
		Observation:			
		At Netherwood, North Wales there is an intention that the game tenant will upgrade a redundant pheasant release pen for further use. This needs to be checked and the pen removed if further use is not manifested. This is still pending and an inspection by the manager is due.			
		Follow-up evidence:			
This remains open for further appraisal.					
10/08	UKWAS 7.1.1	Date Recorded>	23 Oct 2008	Date Closed>	open
		Observation:			
		At Kings Wood there is a proposal to fell 0.91 ha of beech wood in order to create a viewpoint. Although some discussion has occurred with local people via the local council, detail of an adequate consultation process is not clear. Provision and arrangements for local stakeholder meetings (involving the local councils Wildlife Officer and a representative of 'Friends of Kings Wood') and the relative roles of the Tilhill forester and local representatives need clarifying.			
		Follow-up evidence:			
This has not yet been addressed and remains open for further appraisal.					
11/08	UKWAS 7.1.1	Date Recorded>	23 Oct 2008	Date Closed>	26 Nov 2009
		Observation:			
		At Kings Lynn stakeholder consultation was focused on discussion with the local Parish Council. This may be inadequate and consideration should be given to ensuring that the full range of stakeholders have been provided with relevant information and given an opportunity to comment, especially prior to the commencement of timber harvesting in 2010-2015.			
		Follow-up evidence:			
This has been agreed and will be done prior to restructuring beginning. This Observation is closed					
1/09	Qualifor Group Scheme Checklist 6.2.d	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		Wild Share, North West England District, had previously been suspended from certification due to an internal Major CAR raised by Tilhill. On closure of the CAR the suspension was lifted and the forest reinstated in the scheme but the register was not amended to include the area.			
		Follow-up evidence:			
2/09	Qualifor Group Scheme Checklist 5.3.b	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		At Needwood, outstanding internal CARs relevant to UKWAS 1.1.5 (Group Scheme management), 5.1.4 and 6.1.2 had not been closed by the agreed date. An internal CAR relevant to UKWAS 6.4.2 was closed after a delay of three years. Tilhill has since introduced a new strategy already that insists that CARs must be closed within four weeks after which they will be raised to a Major CAR with two weeks to close and this has been successful.			
		Follow-up evidence:			
SGS to monitor this at future surveillance visits.					

OBS #	Indicator	Observation Detail			
		Date Recorded>		Date Closed>	
3/09	UKWAS 2.1.1	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		At Needwood, Midlands District, two different versions of the Management Plan were presented. No annotations had been made relevant to agreed revisions.			
		Follow-up evidence:			
4/09	UKWAS 2.1.1	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		At Touch Estate (Group Scheme), recommendations made in the commissioned report by a well respected silvicultural & native woodland consultant should be appraised and either incorporated into the Management Plan or justification given for dismissing them.			
		Follow-up evidence:			
5/09	UKWAS 2.1.1	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		At Canglour, Central Scotland District, the objective of moving the SSSI from 'unfavourable' condition to 'favourable recovering' should be indicated in the Management Plan			
		Follow-up evidence:			
6/09	UKWAS 2.1.1	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		The SRDP forestry grant application that has been prepared for Canglour, Central Scotland District, is exceptionally good, but the FC are currently blocking its processing due to complexities. FC should be approached again, especially given that SRDP funding is finite.			
		Follow-up evidence:			
7/09	UKWAS 2.1.1 / 2.1.3	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		The Management Plan for Dollar Woodlands has been subject to review and amendment during its current five-year period (now in year 5) and at the time of assessment various sections of text remain devolved from the main contract. The updated information requires to be incorporated into the contract plan during the impending management plan review, with all relevant supporting documents appended.			
		Follow-up evidence:			
8/09	UKWAS 4.1.1	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		Tilhill pre-commencement documentation seen to date, does not fully highlight the importance of PAWS inc. ground flora re. timber extraction operations. The Tilhill harvesting proposal document seen only refers to the need for awareness of 'sensitive flora'.			
		Follow-up evidence:			
9/09	UKWAS 8.1.2	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			

OBS #	Indicator	Observation Detail			
		<p>(ref. Observation 8/09) Neither does the same operations pre-commencement document cover first aid training. At Graythwaite, the harvester operator and forwarder operator both had (out of date) first aid training, but, importantly, neither of them knew if the other had any first aid training. A company manager at the North West England District Office was not yet aware of the new (Oct 2009) Health & Safety regulations on first aid training requirements. Although Tilhill have a very clear and outstanding commitment to health & safety and commendable overall standards in requisite training, the company need to establish a clear policy for these new first aid training requirements for hazardous operations, e.g. harvesting, chainsaw/scrubcutter cleaning and use of pesticides.</p>			
		Follow-up evidence:			
10/09	UKWAS 5.1.2	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		At Skirden Hall deer impacts were being subjectively monitored and stalkers being managed accordingly. However, no objective estimates were being made. Such estimates would provide a more objective basis for deer management.			
		Follow-up evidence:			
11/09	UKWAS 5.1.4	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		At Canglour, Central Scotland District, there is an effective link with the deer stalker but a cull target should be provided.			
		Follow-up evidence:			
12/09	UKWAS 5.1.4	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		At Canglour, Central Scotland District, damage assessment are made by a contractor. These should be recorded and the information passed to the Wildlife Manager.			
		Follow-up evidence:			
13/09	UKWAS 5.2.1	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		An update on weevil control measures by Tilhill was provided by a senior staff member at HQ Stirling ; experience is indicating the need for a regional approach with the highest risk Spruce areas almost always requiring at least one insecticide spray in the first year, with a reactive approach in subsequent years. In other lower risk areas, a reactive approach is routinely used. The Regional Manager North has a thorough knowledge of current research and continues to investigate alternative treatments including the use of 'Electrodyne' and 'Flexicoat' nursery applied treatments and the use of nematodes (biological control agent). A summary document outlining this regional approach and the status of research and trials investigating alternatives to chemical pesticides is required.			
		Follow-up evidence:			
14/09	UKWAS 5.2.1	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		FC Practice Guide '15' – 'Pesticide Use in Forestry' is not always well known or readily available to Tilhill staff (despite its 2004 publication and certain parts of its content being out of date, it is still referred to under UKWAS as a key reference document, a new edition is believed to be being prepared).			
		Follow-up evidence:			

OBS #	Indicator	Observation Detail			
		Date Recorded>		Date Closed>	
15/09	UKWAS 5.2.2	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		Suitable 'Contractors' Instruction Orders' (CIOs) for spraying for several properties were seen but one example had a contractor giving similar bulk pesticide use returns. Use records need to be per individual property for accuracy. Tilhill need to ensure all offices have addressed this issue as the North West England District office has done.			
		Follow-up evidence:			
16/09	UKWAS 5.2.4	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		Existing use of the Tilhill AMS system for a COSHH assessment / selection decision to check available herbicides can bring up some FSC 'Highly Hazardous' list products, therefore relying upon the individual manager's awareness for no inadvertent use of HH products on certified properties. The FSC HH list has been drawn to the attention of managers elsewhere by the GSM. (There was no evidence or reason to believe that FSC HH list products were being used on certified woodlands.)			
		Follow-up evidence:			
17/09	UKWAS 5.4.2.	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		At Haining, Central Borders District, a fence surrounding a Scots pine plantation has fulfilled its purpose and should be removed. A bird strike (a Blackbird – non protected species) was observed on the fence.			
		Follow-up evidence:			
18/09	UKWAS 6.1.1	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		Forest ride management in Geddington Chase wood within the SSSI / PAWS area at Boughton is contrary to Natural England advice. The forest manager's efforts to alternate mowing as per NE advice have been negated by the estate game department.			
		Follow-up evidence:			
19/09	UKWAS 6.2.2	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		At Greenfields, North West England, provision of deadwood is only marginally compliant and harvester operators may be foregoing opportunities to select deformed trees as future snags (c.f. observation at Norwood Estate, Central Borders District, a similar site).			
		Follow-up evidence:			
20/09	UKWAS 6.3.2	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		At Dalkeith (a Buccleuch estate) there is a lack of reference in planning documentation to tackle invasive Snowberry & Rhododendron at the Carberry PAWS area. At Graythwaite the PAWS documented rationale / implementation plans are sparse. There were also a few sheep seen on the recently cleared PAWS site at Graythwaite. At Boughton (a Buccleuch estate) the PAWS documented rationale / implementation plans are sparse. Managers interviewed all indicated these issues would be tackled at their forthcoming 5 year management plan reviews.			
		Follow-up evidence:			

OBS #	Indicator	Observation Detail			
		Date Recorded>		Date Closed>	
21/09	UKWAS 6.4.3	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		At Needwood an abandoned pheasant release pen has been left in situ causing a negative impact on the woodland.			
		Follow-up evidence:			
22/09	UKWAS 7.1.1	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		The Great Allotment management plan has no neighbours map or list, but see the GSM's new management plan template which already addresses this shortfall as it has this section added for completion by managers.			
		Follow-up evidence:			
23/09	UKWAS 7.2.1	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		It is noted that the recent designation of the Adopted Core Path within Dollar Woodlands requires to be incorporated into the revised management plan and maps at the forthcoming review. See also contribution to minor CAR under UKWAS 2.1.1.			
		Follow-up evidence:			
24/09	UKWAS 7.2.2	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		Private signs at the entrance to the Forest Banks block at Needwood are in place to deter people from visiting the area due to game management interests. At Jacksons Bank, another block of the same woodland complex, exceptionally good public access has been provided and is heavily used by the public. The signs at Forest Banks could be more user-friendly by including a brief explanation of the reason for deterring people and by redirecting them to the excellent facilities provided nearby at Jacksons Bank.			
		Follow-up evidence:			
25/09	UKWAS 7.2.2	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		At Haining, Central Borders District, a sign requesting that dogs are kept on a lead invites people into the forest. Once inside the forest another sign states, 'keep out'. This should be removed.			
		Follow-up evidence:			
26/09	UKWAS 7.4.2	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		The Baileys Lane route into Skirden Hall, North West England District, is used for informal public access, but it is also a major route for timber haulage into the large adjacent Forestry Commission Gisburn Forest complex. The Tilhill manager is opposed to the local council's proposal to upgrade the route to a formal bridleway due to public safety concerns. This proposal requires a careful consideration of public safety and alternatives to encouraging increasing public use of a busy haulage route.			
		Follow-up evidence:			
27/09	UKWAS	Date Recorded>	26 Nov 2009	Date Closed>	open

OBS #	Indicator	Observation Detail			
	7.4.2	<p>Observation:</p> <p>(See also Minor CAR 05 and Observation 9/06 above.) During the audit of members within North West England District, re. Greenfield Forest, a timber haulage vehicle had difficulty negotiating the road between two houses at Newhouses. The driver moved barrier posts on a private car park and moved a flower pot without replacing them. The vehicle reversed onto some allegedly private land. The police attended the scene but found no evidence of criminal damage. The haulage firm were actually trialling the use of a new vehicle on the route but had not informed Tilhill of their intention. Given the high sensitivity of the haulage of timber through Newhouses, not informing Tilhill and the behaviour of the drivers was insensitive behaviour by the contracted haulage firm. An internal Tilhill Non Compliance Record (NCR) / Corrective Action Request (CAR) was raised by the District Manager to this effect. No further action is required but this incident is relevant to the ongoing concerns of residents at Newhouses.</p> <p>Follow-up evidence:</p>			
28/09	UKWAS 8.1.1	Date Recorded>	26 Nov 2009	Date Closed>	26 Nov 2009
		<p>Observation:</p> <p>At Haining, Central Borders District, a forwarder had a cracked windscreen that had been in that condition for at least three months.</p> <p>Follow-up evidence:</p> <p>The site manager immediately discussed the issue with the contractor. The forwarder had been checked with the insurers two months ago. The screen was cracked four years ago, is made of 'Marguard' and was not required to be replaced. Written evidence of the insurers inspection was available.</p>			
29/09	UKWAS 8.4.1	Date Recorded>	26 Nov 2009	Date Closed>	open
		<p>Observation:</p> <p>Current systems to retain up to date valid insurance and competence certificates for contractors relies on each office administrator's own 'manual' systems. There is mention of an automatic prompt system from the forthcoming new Assurance Management System software 'Q-Pulse'. E.g. for Contractors' PL insurance, shooting lease holders' firearms certificates etc.</p> <p>Follow-up evidence:</p> <p>6.4.1/6.4.2</p>			
30/09	UKWAS 6.4.1/6.4.2	Date Recorded>	26 Nov 2009	Date Closed>	open
		<p>Observation:</p>			

OBS #	Indicator	Observation Detail			
		<p>There was an example among members where game management needs to demonstrate compliance with UKWAS more fully.</p> <p>At Cardross there is as yet incomplete communication between the forest manager (Tilhill) and the game keeper for the estate's sporting tenant. Because of this, the forest manager cannot fully demonstrate that : game rearing & shooting is fully in accordance with codes of practice by (e.g. British Association for Shooting & Conservation (BASC)) ; shooting, if any, of native game and quarry species (e.g. woodcock, hare), excluding deer, is at a level that has been assessed as sustainable ; game management is not sufficiently intense to cause negative impacts on the woodland ecosystem inc. rare or protected native flora and fauna.</p> <p>Two old snares of a legal type were observed safely out of use around a pheasant pen. This was not a non-compliance for UKWAS which finds game management perfectly acceptable under certain requirements. However, it is indicative of the sort of item which should be being discussed between the forest manager and the game keeper, together with sight of annual game bag records and confirmation of any deer/game management qualifications held and knowledge of his experience.</p> <p>At Boughton and Dalkeith (Bucleuch estates), estate documentation re. game management still refers to Hare as 'vermin'. Hare is a UK BAP species and this terminology is inappropriate. Hare is still a legal game species, and under UKWAS it can be culled for protection of young trees if suitable alternatives have failed, or, it can be shot for game, provided its population has been assessed as capable of sustainable game management.</p> <p>Game bag records were checked for Dalkeith and no Hare has been shot for several years, nevertheless the policy reference needs to be changed. Similarly, at Boughton the estate manager could relate an example in the north-west section where protection of trees from hare browsing had been by tree protection materials rather than hare shooting. Again, however, the species should not be referred to as 'vermin', given its status as both a legal game and UK BAP species.</p> <p>This audit established no significant concerns over non-compliance but these issues should be addressed.</p>			
		Follow-up evidence:			
31/09	Qualifor Group Scheme Checklist 4.1.e	Date Recorded>	26 Nov 2009	Date Closed>	open
		Observation:			
		Tilhill need to ensure their internal auditing covers fire planning and pollution control planning. The internal checklist could be more clear on checking these UKWAS requirements.			
		Follow-up evidence:			

14. RECORD OF STAKEHOLDER COMMENTS AND INTERVIEWS

Nr	Comment	Response
	Main Evaluation	

Nr	Comment	Response
Main Evaluation		
1	<p>Other (Local Community) - re. Greenfield Forest, North West England District. Stakeholders from the neighbouring village of Newhouses have maintained regular contact with SGS. They are concerned about the activities and alleged damage related to timber haulage through the village. During the audit a meeting was held with a representative group of residents.</p> <p>In summary, they wish Tilhill to continue to try to find an alternative route that would remove the need to route heavy lorries through the village as they are very concerned about alleged damage by vehicles to houses and roadside verges in the village. They presented a log of recorded times of timber traffic through the village that alleged that Tilhill had not kept to their written agreement to restrict the time of traffic movements.</p>	<p>(See also ref. Minor CAR 05 and Observations 9/06 & 27/09 above.)</p> <p>During the audit of members within North West England District, re. Greenfield Forest, a timber haulage vehicle had difficulty negotiating the road between two houses at Newhouses. The driver moved barrier posts on a private car park and moved a flower pot without replacing them. The vehicle reversed onto some allegedly private land. The police attended the scene but found no evidence of criminal damage. The haulage firm were actually trialling the use of a new vehicle on the route but had not informed Tilhill of their intention. Given the high sensitivity of the haulage of timber through Newhouses, not informing Tilhill and the behaviour of the drivers was insensitive behaviour by the contracted haulage firm. An internal Tilhill Non Compliance Record (NCR) / Corrective Action Request (CAR) was raised by the District Manager to this effect. No further action is required on this particular incident but it is relevant to the ongoing concerns of residents at Newhouses.</p> <p>Observation 27/09 was raised.</p> <p>Following stakeholder concerns about timber haulage through the village of Newhouses (see Observation 9/06), Tilhill agreed to restrict timber traffic through the village of Newhouses to 0700 – 2100 hours, except in exceptional circumstances. A log was maintained by the local residents that indicated that timber trucks passed through the village on 33 occasions between 11 May and 23 September 2009 outside of the agreed hours. In addition, a timber truck has apparently struck the wall of Barnstead, a house in Newhouses.</p> <p>CAR 05 was raised on the following basis under UKWAS 7.4.2.</p> <p>The owner/manager has not adequately mitigated the wider impacts of woodland operations on local people re. breach of an agreement made with local residents and damage caused to a house by timber vehicles.</p> <p>Also recorded as a complaint, see section 15 below.</p>
2	NGO (Scotland) – No comment to make.	Noted.
3	Government (Conservation Agency) – Generally content with communications and working relationship over SSSI management with Tilhill Group Scheme member whose estate has an area of SSSI.	Noted. The areas of SSSI in question were visited by SGS during the audit with no significant concerns or CARs raised.
4	Government (Regulatory Authority for Deer in Scotland) – No comment to make.	Noted.

Nr	Comment	Response
Main Evaluation		
5	<p>Government (Forestry Regulatory Authority) - Staff throughout FCS share a good working relationship with UPM staff. UPM's role in supporting and developing forestry in Scotland is highly valued.</p> <p>In particular, UPM have played a very helpful, catalytic role in developing Forest Research guidance on stump harvesting – this including financial support, literature reviews and site/data availability.</p> <p>Although we recognise that their interpretation of UKWAS 3.5.1 (re. conversion to non-forested land) is probably correct, we are, nevertheless, disappointed that UPM appear to have taken a narrow interpretation of it in relation to at least one wind farm site. We understand that the timber from an extensive area of deforestation might have been certified on the basis of the precise wording of that section. <u>If</u> this is indeed the case, we feel it may give the impression that the forestry sector is willing to accept large-scale deforestation (conversion to open ground habitat) as sustainable forest management. We believe it would have been more appropriate to compare <u>potential</u> woodland vs. potential open ground habitat, rather than <u>existing</u> woodland vs. potential open ground habitat. We believe this would have been consistent with section 1.1.5 of the Standard.</p>	<p>Noted.</p> <p>Noted and agreed. SGS has previously assessed this issue.</p> <p>UKWAS 3.5.1 requires that conversion to non-forest land must meet at least one of three criteria, the pertinent one in this situation being that - 'The new land use will be more ecologically valuable than the woodland in terms of the UK Biodiversity Action Plan.'</p> <p>SGS previously suggested to the UKWAS organisation that the UKWAS 2nd edition include specific reference to windfarm development in the context of conversion to non-forested land. This suggestion was not taken up and certification bodies have to work with the present UKWAS 2nd edition requirements. SGS, at a certificate holder client's request, referred the issue of windfarm development to the UKWAS Interpretation Panel. This led to the issue of UKWAS IP Guidance Note no.7, dated October 2008. However, the guidance note is not substantially different from the UKWAS 2nd edition and still permits (under certain but not all conditions), the certification of timber felled for such conversion and the maintained certification of the residual forest management unit. Certification of both aspects rests primarily under UKWAS 3.5.1 on the UKWAS requirement for 'The new land use will be more ecologically valuable than the woodland in terms of the UK Biodiversity Action Plan.' UKWAS 6.1.3 (re. biodiversity) and 1.1.5 (re. owner commitment) have less input than 3.5.1 over this conversion to non-forest land issue.</p> <p>It is believed that the UKWAS organisation will review the matter, either on a further interim IP basis or/and at formal UKWAS review under the 3rd edition due for Nov 2011.</p> <p>The stakeholder's comments on windfarm development shown opposite, whilst legitimately part of this certification report, are subjective and relate more to what they wish the UKWAS standard currently says in its requirements, than Tilhill's compliance.</p>
6	ENGO (UK) – No specific comments to make.	Noted
7	<p>Other (Organisation owning and managing rural land inc. forestry) - Tilhill have been actively seeking alternative methods to chemical control. Specifically, they have been trialling nematode application for weevil control.</p> <p>Tilhill have been supportive of red squirrel conservation project by providing temporary office space for project officer in Dumfries.</p> <p>Tilhill have been pro-active in helping to access Government money through the Strategic Timber Transport Fund to create an alternative 'haul road' by-passing the village of Eskdalemuir. This has been welcomed by the local community.</p>	<p>Noted. Referred to with commendation in the report by SGS.</p> <p>Noted.</p> <p>Noted. SGS has previously covered the timber haulage route issue in connection with the forest management audit of a project partner with Tilhill. Eskdalemuir is a small rural village in the Scottish Borders and the new road does indeed now by-pass the village. In contrast to the difficulties being experienced at Greenfield Forest in North West England with timber haulage through the village of Newhouses, neighbouring landowners with viable routes for a timber lorry route have not been unco-operative and Tilhill plus their partner have been able to build an alternative route.</p>

Nr	Comment	Response
Main Evaluation		
8	<p>Government (National Park Authority)</p> <p>No comments to make.</p>	Noted.
9	<p>Other (Private sector company involved in forest management)</p> <p>Tilhill staff are professional and pursue high standards. No adverse comments.</p>	Noted.
10	<p>Government (Regional Council Local Authority in South Scotland re. timber haulage)</p> <p>Believes that Tilhill operate very high standards on their timber haulage operations.</p> <p>Good consultation practice for management plans.</p> <p>Contacts made with Councils over road issues.</p> <p>Tilhill endeavour to ensure all harvesting operations follow the regional Timber Transport Group's voluntary agreements.</p> <p>Tilhill managers do participate in Community Council meetings when required and do canvas local communities during management planning stages.</p> <p>Through utilising the Strategic Timber Transport Fund, Tilhill have contributed to the benefit of the local road infrastructure. E.g. Tilhill involvement in projects such as Eskdalemuir and Lorg.</p>	<p>All points noted.</p> <p>SGS has previously covered the timber haulage route issue in connection with the forest management audit of a project partner with Tilhill. Eskdalemuir is a small rural village in the Scottish Borders and the new road does indeed now by-pass the village. In contrast to the difficulties being experienced at Greenfield Forest in North West England with timber haulage through the village of Newhouses, neighbouring landowners with viable routes for a timber lorry route have not been unco-operative and Tilhill plus their partner have been able to build an alternative route.</p>
11	<p>Other (Forestry Contractor) – Tilhill make an effort to provide continuity of employment. They are good at organising training like water guidelines and first aid courses.</p>	Noted.
12	<p>Government (Forest Enterprise - Wales) –</p> <p>No comment to make.</p>	Noted.
13	<p>Other (Land manager inc. woodlands) – Tilhill operate a good Group Scheme (for certification). Their auditors are experienced in forestry and the audit is thorough.</p>	Noted.
14	<p>Other (Landowner and manager inc. woodlands) – Tilhill have been helpful with management planning and they keep me 'right'.</p>	Noted.
15	<p>Government (Conservation Agency) – Concerned primarily over invasive natural regeneration by Sitka spruce onto an adjacent neighbouring conservation designated site in Wales (open ground inc. peat areas). Designations inc. SSSI, SAC and SPA.</p> <p>The Tilhill Group Scheme member's land is within a key Black Grouse (UK BAP species) management area and forest management needs to take this into account.</p>	<p>Noted.</p> <p>SGS to follow up at next surveillance.</p> <p>SGS to follow up at next surveillance.</p> <p>Previous audit visits to Wales have found evidence of Tilhill managed Group Scheme members undertaking commendable support of Black Grouse conservation.</p> <p>CAR 04 was raised under UKWAS 5.4.2 where a deer fence had been erected without appraisal and monitoring by a (non-Tilhill agent managed) Group member.</p>

Nr	Comment	Response
Main Evaluation		
16	Other (Private sector company involved in forest management) – Tilhill are ok, they know their stuff.	Noted.
17	ENGO (UK) – Impressed with Tilhill's support of Red Squirrel conservation, re. at Greenfield, North West England District, a Red Squirrel reserve has been established and a full time Red Squirrel conservation officer appointed, plus their providing temporary office space for the Squirrel project officer in Dumfries.	Noted.
18	Government (Forest Enterprise - England) – Graythwaite Estate have consulted and co-operated over deer management and Grey Squirrel control.	Noted.
Surveillance 1		
Surveillance 2		
Surveillance 3		
Surveillance 4		

15. RECORD OF COMPLAINTS

Nr	Detail		
	Complaint:	Date Recorded >	26 Nov 2009
	<p>Re. Greenfield Forest, North West England District. Stakeholders from the neighbouring village of Newhouses have maintained regular contact with SGS. They are concerned about the activities and alleged damage related to timber haulage through the village. During the audit a meeting was held with a representative group of residents.</p> <p>In summary, they wish Tilhill to continue to try to find an alternative route that would remove the need to route heavy lorries through the village as they are very concerned about alleged damage by vehicles to houses and roadside verges in the village. They presented a log of recorded times of timber traffic through the village that alleged that Tilhill had not kept to their written agreement to restrict the time of traffic movements.</p>		
	Objective evidence obtained:		

Detail		
<p>Re. Greenfield Forest. The haulage route for timber from this forest runs through a small village (Newhouses in West Yorkshire). There is intense stakeholder concern. Forest managers at all levels in Tilhill are actively seeking an alternative route. An internal CAR is in place. Assess at next surveillance.</p> <p>SGS found that Tilhill were continuing to try to negotiate with the neighbouring owners of Cam Forest to try to find alternative access. Windblow is beginning to occur and the situation is becoming more urgent. This observation remains open.</p> <p>In 2008 an entire day was devoted by SGS to this important issue, during which a meeting with Tilhill managers provided an update along with a dossier of recent correspondence, etc concerning attempts to resolve this difficulty and a meeting was held by SGS with four residents of the Newhouses community in order to listen to and consider their recent concerns.</p> <p>Tilhill continued to negotiate with the owners of Cam Forest to the north in the hope that access through this preferred route could still be achieved (Substantial amounts of money have been offered to Cam Forest in order to secure access). However, it proved virtually impossible that this negotiation could be concluded by spring 2009, when Tilhill considered it necessary to begin to haul timber through Newhouses, having exhausted the possibility of using any of the other potentially alternative routes. Tilhill therefore considered mitigation measures and prepared to begin harvesting and haulage through Newhouses in spring 2009.</p> <p>The residents of Newhouses considered that Tilhill had not thoroughly considered all options and had ignored an appraisal of a route through the village of Beckermonds. The residents also questioned whether the appraisal by Tilhill of timber value lost due to windblow was accurate and whether this was influencing the perceived urgency to extract timber and the figure that they were prepared to spend on the purchase of other rights of access. They also presented a list of issues that they were concerned about. A further meeting between Tilhill and the Newhouses residents was scheduled for 4 November 2008.</p> <p>Subsequently, and at the request of SGS, Tilhill provided further information on the issues raised and this has been further appraised by SGS. There is clear evidence that the Beckermonds route was fully appraised and that the appraisal of the loss due to delayed harvest and subsequent windblow was realistic and as accurate as could be expected ; the owner of Greenfields has forgone about £112,200 due to the 2005 windblow alone due to delays in harvesting. However, the list of issues presented by the residents reflects reasonable concerns and should be addressed by Tilhill.</p> <p>In interim conclusion, SGS accepts that Tilhill has done all that it could reasonably be expected to do to resolve this issue and that timber haulage through Newhouses, begun in spring 2009 was inevitable. The ongoing negotiations over the Cam Forest access should continue as constructively as possible to try to find a permanent solution. The list of concerns raised by the residents should be the subject of careful consideration and mitigation by Tilhill. Virtually all of these issues can be ameliorated considerably by careful planning, realignment of the road with the provision of more passing places, and restrictions on load size and frequency of trips.</p> <p>However, during the re-assessment audit in Nov 2009 of members within North West England District, re. Greenfield Forest, a timber haulage vehicle had difficulty negotiating the road between two houses at Newhouses. The driver moved barrier posts on a private car park and moved a flower pot without replacing them. The vehicle reversed onto some allegedly private land. The police attended the scene but found no evidence of criminal damage. The haulage firm were actually trialling the use of a new vehicle on the route but had not informed Tilhill of their intention. Given the high sensitivity of the haulage of timber through Newhouses, not informing Tilhill and the behaviour of the drivers was insensitive behaviour by the contracted haulage firm. An internal Tilhill Non Compliance Record (NCR) / Corrective Action Request (CAR) was raised by the District Manager to this effect. No further action is required on this particular incident but it is relevant to the ongoing concerns of residents at Newhouses.</p> <p>Observation 27/09 was raised by SGS.</p> <p>Following stakeholder concerns about timber haulage through the village of Newhouses (see Observation 9/06), Tilhill agreed to restrict timber traffic through the village of Newhouses to 0700 – 2100 hours, except in exceptional circumstances. A log was maintained by the local residents that indicated that timber trucks passed through the village on 33 occasions between 11 May and 23 September 2009 outside of the agreed hours. In addition, a timber truck has apparently struck the wall of Barnstead, a house in Newhouses.</p> <p>CAR 05 was raised by SGS on the following basis under UKWAS 7.4.2.</p> <p>'The owner/manager has not adequately mitigated the wider impacts of woodland operations on local people re. breach of an agreement made with local residents and damage caused to a house by timber vehicles.'</p> <p>To be followed up by SGS under CAR 05.</p>		
Close-out information:	Date Closed >	dd MMM yy
Complaint:	Date Recorded >	dd MMM yy
Objective evidence obtained:		

	Detail		
	Close-out information:	Date Closed >	dd MMM yy
	Complaint	Date Recorded >	dd MMM yy
	Objective evidence obtained:		
	Close-out information:	Date Closed >	dd MMM yy

End of Public Summary