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5 March 2021

Dear Mr Watkins

### **Certification Scheme for Trees Outside Forests**

#### **Association of Tree Officers (ATO) - General comments:**

Thank you for the opportunity to make comments on the certification scheme.

The ATO recognised that the scheme is designed for landowners in general, but our response is based on the perspective of local authority (LA) tree/woodland officers.

Whilst we appreciate it needs to be robust in order to make it meaningful, for many Local Authorities such a scheme could not be achieved due to the ongoing financial cuts, with tree departments having had their resources significantly reduced.

One of our members who was involved in FSC certification in the past has stated that they found the 2 -3 days of yearly audit to be overly onerous and auditors had little knowledge of how LA's worked.

Many LA's have limited budgets and limited staff to carry out day to day duties and so would not be able to participate in the scheme as it is currently presented. Others may be more appropriately staffed with adequate budgets and would have in place some of the criteria that the scheme is encouraging so would be in a better position to demonstrate they are achieving the high standards.

For those LA's that can make the case for certification, it is likely to be in relation to issues such as:

- Increased tree planting targets

- Council climate adaption targets
- Council climate emergency plans

The certification scheme may also be attractive to LA's who wish to aspire and demonstrate commitment in such issues, and there may be reputational benefits for the LA.

The ATO would welcome the opportunity to work with you to develop the certification process, providing local knowledge of how LA tree departments operate, and the pressures they face.

The ATO offers the following comments for the PEFC consultation:

1. The Excel spread sheet provided as part of this consultation has not been completed as in its current form does not reflect the responsibilities of LA tree/woodland officers and is too onerous to complete.
2. For the certification scheme to be attractive to LA tree/woodland officers, it must be relatively easy to apply for, due to the pressure of workloads brought about by the lack of resources, noting that the standards need to be high for it to be worthwhile and creditable.
3. Much of the administration for certification a LA would have in place through the Council's 'standing orders' and in accordance with relevant legislation. Internal policies would also be in place for areas like procurement and health & safety. For the LA's with Tree Strategies/Policies and related procedures, this level of administration may not be too difficult to achieve. However, the criteria would become more onerous for tree officers, at a more local operational level.
4. The scheme is realistically achievable for small number of local authorities that are sufficiently funded and already have most of the systems, processes and strategy/policies in place, however, the draft criteria would still need to be simplified and tailored to LA's for the scheme to be attractive.
5. It should be noted that some Council's do not manage their trees strategically as one resource. This can lead to tree management varying from department to department depending on the financial and staffing resource. Therefore, the relevant systems, process and strategy/policies may not be in place for all departments. However, where it is in place, certification may be achievable if the criteria were to be simplified and tailored as suggested in No. 4 above.

6. It may be that under resourced Council tree departments could use the certification scheme to seek additional Council funding to bring the service up to certification standard. This may fit with strategic aspirations in reducing climate change.
7. It should be noted that local authorities cover several land use categories and council departments, for example trees on land managed by housing, education, parks, streets and woodlands.
8. Public consultation – This would need to be determined by each Council. Consultation varies from Council to Council and possibly department to department depending on resources available. Therefore, there should be sufficient flexibility in the criteria to account for this.
9. Commitment to long term financial planning for a site may also be an issue for LA's, due to the financial pressures on LAs and their priorities.
10. In terms of how the draft criteria for 'long term tree management' is referred to, this may be possible as many LA Tree Strategy/Policy documents range from 1 to 10 years, to account for changing policies, priorities, local pressures, finances etc.
11. The term 'Harvesting' and 'Silviculture' are used in the draft criteria, these are not in the main appropriate for LA woodland management, therefore, a general term like woodland management maybe more appropriate. In general, the criteria needs to reflect arboricultural terms and language in addition to those used in forestry.
12. The ATO sees some potential for such a certification scheme for LA tree departments that are reasonably well resourced and have the capacity to apply, and the ATO would like to work with you further on developing such a scheme in order to maximise uptake by LAs.

Your sincerely

Becky Porter

National Co-ordinator  
Association of Tree Officers