



Tree Safety Management Systems

Judith Webb
Chairperson
National Tree Safety Group
231 Corstorphine Road
Edinburgh
EH12 7AT

Our Ref. L/NTSG-1

Date. 21st June 2010

Dear Judith

NATIONAL TREE SAFETY GROUP CONSULTATION DOCUMENT – BRINGING COMMON SENSE TO TREE MANAGEMENT

At Quantified Tree Risk Assessment we seek to engender a sense of proportionality in our users and all concerned with the management of tree safety. Over the past ten years, we have led the way in tree risk assessment and management and therefore take a particular interest in the work of the NTSG and any guidance that develops from its endeavours.

Given that the consultation response is intended to be submitted electronically and in no other form, it is inappropriate to discuss the detail of the document here, but due to an inadequate consultation process we are compelled to communicate our wider concerns to you directly.

The prescribed consultation process inappropriately limits the extent of the consultee response and we cannot fully express our concerns and reservations about the proposed guidance. Additionally, the consultation website at <http://www.forestry.gov.uk/website/forestry.nsf/byunique/infd-7t6bs5> was unavailable to us between 18th and 21st June.

Our initial expectation was that the NTSG would produce an agreed stakeholder position statement. When it became apparent that this objective had been expanded to include the provision of guidance, we assumed that this would involve the publication of a simple, short, framework document that would enable the user to identify the general requirements of tree safety management, setting out the general considerations and a general range of options that might be adopted. In stark contrast, the consultation document extends to a somewhat incoherent eighty-five pages of confusion rather than clarification.

The discussion in chapters one through to six is repetitive, incomplete and inconclusive and, we would argue, largely unnecessary. In fact, it is evident, in its repetition, that chapter six has been written independently of the remaining chapters.

Having some knowledge of the issues discussed in the consultation document, we take from it the distinct impression that the authors have limited confidence in the arguments that are being advanced and this in turn has resulted in a confused discussion of and around the central issue.

In its present form, the document lacks clarity and is likely to further confuse the target audience. We respectfully request that the whole approach to the guidance be reviewed and that it is not published in its present form.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. J. Ellison', with a stylized, flowing script.

M. J. Ellison
Director

Quantified Tree Risk Assessment Limited