



1. Executive Summary

FSC ANZ has received very little unsolicited feedback regarding the performance of FSC-STD-AUS-01-2018 EN. To get a better understanding of the perceived performance and any revisions required of specific elements of FSC-STD-AUS-01-2018 EN, we have sent a questionnaire to all standard users and the FSC ANZ membership (which only includes Australian members).

Eight forest managers, one auditor and three environmental chamber members participated in the survey.

Generally, responses from forest managers were positive and indicated an overall positive view on the performance of FSC-STD-AUS-01-2018 EN, but concerns were consistently raised regarding conflicting requirements to comply with all national, local and international conventions, specifically concerning regarding workers' rights and employment conditions. Members' input primarily concerned the forestry scope of the standard, which is suggested to be revised to exclude public native forestry. Members also raised issues related to HCVs as well as improvement of workers' rights.

The need to for a stronger focus in climate change and bushfires in FSC-STD-AUS-01-2018 EN was a common theme among all respondents.

The replies to the questionnaire can be found in Annex 1. Below is a summary of to most common issues raised by respondents.

2. Approach

FSC-STD-60-006 V1-2 EN [Process Requirements for the Development and Maintenance of National Forest Stewardship Standards](#) calls for

A review report of all the comments on the standard; changes to associated elements of the FSC system; as well as external circumstances and the continued relevance of the standard shall be compiled within three (3) years of the standard's approval.



This document represents input to FSC ANZ's review report regarding solicited and unsolicited comments received by FSC ANZ regarding the performance of FSC-STD-AUS-01-2018 EN.

The document highlights issues that were raised by standard users and the membership.

3. Cross-chamber Comments

Mentioned by forest managers, members and the auditor alike is the need to incorporate climate change and bushfire mitigation and adaptation strategies into the standard.

There are also several respondents that believe the scope of the standard should be expanded to include non-timber forest products (NTFPs).

4. Feedback from Forest Managers

Regarding Principle 1, many forest managers highlighted conflicting requirements to comply with all national and local and international conventions as some national/local laws conflict with conventions. The issue with conflicting requirements is further highlighted in the input to Principle 2 where forest managers argue that Criterion 2.1 and its associated indicators conflict with local legislative requirements.

Forest managers also pointed out that Annex A could be deleted as it is not being kept up to date, and that Annex B should be deleted or revised to be more prescriptive in an Australian setting.

Regarding Annex F, forest managers argued that it needs to be modified as it is obsolete, too comprehensive for auditors to adequately assess and/or too onerous regarding the requirement to monitor the health of workers' exposure to pesticides.

Requirements regarding stakeholder consultation and engagement with Indigenous Peoples are mentioned several times in different context. Comments include:

- All of the indicators assume rights exist and Indigenous communities want to be engaged. What if they don't?



- The standard is heavily weighted to stakeholder engagement. This should be reduced. Private companies are private for reason and encouraging stakeholder input into how the private company sets its business goals is really none of the general public citizen's concern.
- Our preference would be for an industry single stakeholder engagement, perhaps at a state level, rather than for individual certified companies. We get relevant feedback from stakeholder directly engaged with our business but very little, if not none, from any other form of stakeholder including NGOs with vested interests. Making the best decision for the plantation/forest, it's management for longevity and financial contribution to its sustainability should be considered as a priority. Managing plantations/forest has to take into consideration of the points raised in the example but also acceptance of forest waste as a commercial enterprise to fund sustainability and reduced emissions.

Finally, one forest manager mentions that the relevance and application of the standard to small forest owners is very onerous and that the application to smallholders needs careful review to ensure it does not impede the involvement of farmers in commercial tree crops.

5. Feedback from Certification Bodies

Across the three certification bodies with forest management auditing in scope in Australia, only one auditor responded to the questionnaire. The auditor was involved in the audit of Sustainable Timber Tasmania and is the only respondent to provide input based on the standard's application in a large-scale natural forest setting.

The auditor suggests that the standard should include native "legacy trees" as environmental or habitat features to be protected. Legacy trees are individual trees of an agreed upon age that are to be protected as an "old-growth tree". These do not fit under the definition of old-growth forest (HCV 3.3) but are indicative of potential for old-growth conditions or features in a stand.

6. Feedback from Members

Members' feedback was exclusively from environmental chamber members and consequently focussed squarely on environmental issues.

All three respondents suggested changing the forestry scope of the standard to exclude public native forestry. If this change came into effect, state-owned corporations like Sustainable Timber Tasmania, VicForests and Forestry Corporation New South Wales would not be eligible for certification. One respondent noted that Victoria and Western Australia have already announced an end to native forestry by 2030 and 2024 respectively, and that the publicly owned native forests are needed for their conservation value, particularly following the 2019/20 bushfires.



One member suggested that there is a need for clarification regarding remnant vegetation within plantations, that is, vegetation that was present when the plantation was established, to specify that this cannot later be cleared as part of the plantation.

Regarding 6.5.2, it was suggested that for plantations, the minimum set aside should be increased to 20% as recent losses of forest due to climate induced fires have placed critical forest biodiversity under increasing threat. Hereby, the respondent points out, plantations can offer a significant opportunity to increase resilience in the landscape.

There was also a suggestion to explicitly state that harvesting of old-growth forest, hollow-bearing trees and koala habitats are not acceptable.

Regarding Intact Forest Landscapes (IFLs), it was suggested that the indicators should be strengthened to exclude all industrial activities within IFL areas in Australia, the current indicators allow logging outside core areas. It was also suggested that the definition of IFLs should be changed to reflect the size of wilderness areas in Australia which is much smaller than countries like Russia, Canada and Brazil.

Further, it was suggested that a new indicator is included under criterion 10.5 to specifically exclude salvage harvesting in the wake of bushfires. Presumably, this suggestion only pertains to native forests.

Finally, a social chamber member has emailed the Secretariat to inform us that Responsible Wood's revised standard offer better protections of workers' rights than FSC-STD-AUS-01-2018 EN, and that the standard as a minimum should be revised to be equivalent to Responsible Wood's.

7. Recommendations

In considering whether FSC-STD-AUS-01-2018 EN adequately addresses the issues raised by the respondents, the Board should:

- Be aware that the need for a stronger focus in the standard on climate change and bushfires has been highlighted by standard users and FSC ANZ members alike.
- Be aware that an expansion of the scope of the standard to include non-timber forest products was broadly supported.
- Be aware that the environmental chamber members that responded to the questionnaire wish to see the forestry scope of the standard changed to exclude public native forestry.
- Be aware that several forest managers have highlighted concerns regarding conflicting requirements in Criterion 1.5 to comply with all national and local and international conventions as some national/local labour laws conflict with conventions.



- Beware that a number of other issues were raised by one or a few stakeholders. Once the SDG has incorporated the changes in the scope of the revision, it is recommended that the Group reviews the input received in the survey. If further changes are required, the SDG can ask the Board to expand the scope of the revision to include these necessary changes.



Annex A

NFSS component	Revision required	Comments from forest managers	Revision required	Comments from members
Preamble	Yes: 2 No: 5 Don't know: 1	<p>Preface and Preamble could be shortened - does not add value. SDG, IWG and Technical Expert names are not required and many have moved. They are acknowledged elsewhere.</p> <p>Auditing Annexes needs further clarification. Qualifying as Low SIR definition does not allow single aged native forest stands and the word only is obsolete. Is the 5000m3 limit the harvest level or annual actual harvest?</p>	Yes: 3	<p>Public native forestry should be excluded from the scope of the standard. The HCV values</p> <p>The first paragraph should be revised to recognise that publicly owned native forests are unsuitable for FSC certification because they are now desperately needed for their conservation value, particularly post 2019/20 bushfires. As the WA government has recognised in a world hurtling towards climate catastrophe and with a biodiversity crisis, the public land estate meets the criteria of high conservation value. It would save everyone a lot of energy and angst if this were to be recognised at the level of the standard.</p> <p>The scope of the standard should exclude public native forest.</p>
P1	Yes: 4 No: 4	1.3.4 There shouldn't be any conflicts between FSC principle and criteria and international agreements and Australian federal, state and/or local laws	No: 3	



		<p>1.5 - conflicting requirement to comply with all national, local and international conventions where some national/local laws conflict with conventions.</p> <p>1.5.1: some legislation on FSC lists may not be relevant</p> <p>1.6.4: this can have perverse outcomes like rewarding illegal actions with an obligation to stop</p> <p>Annex A link to legal compliance spreadsheet is completely out of date. Consider leaving for the forest manager to update their own register. Delete Annex A.</p>		
P2	<p>Yes: 7 No: 1</p>	<p>2.1.1 - Australian law and regulations, which companies must already adhere to, would already meet or exceed the Core Conventions. 2.3.1 See comment under 2.1.1. Also usually a CoP is a guidance document, not a legal one.</p> <p>2.3.5 should be broadened to include lead indicators like the proactive measures taken to improve health and safety, instead of just lag indicators.</p> <p>2.1 - Exposes industry to wider sphere of PIA, and potential conflict between legal compliance and</p>	No: 3	<p>From social chamber member via email:</p> <p>“As a minimum, in the area of workers ‘rights the FSC National Standard needs to be equivalent to RWs (PEFC) Australian Standard for Forest management - this Standard has just been revised.</p> <p>It is now far superior to the FSC Australia Standard for FM - (which as you know we think is pretty lousy after there being no agreement on the sector when the standard was first developed (and therefore reversion to the IGIs)</p>



	<p>conformance with FSC standard. Would expect to see auditors consider that Principle 1 overrides this principle where it would be unlawful under Australian law to comply with ILO. See previous advice by Prof Creighton to FSC</p> <p>Disconnect between ILO provisions and Australian workplace law, and fall back ILO core provisions in the absence of all parties agreement continue to be problematic. Perceived issue is that some stakeholders are using standard to leverage political, not SFM, outcomes.</p> <p>Yes, as per question 8; 2.1 is conflicting with national, state and local laws.</p> <p>Annex B is complete nonsense. It lists the competencies that the SDG thought organisations did not have. It does not list the competencies an organisation actually needs. Where is silviculture, fire and forest management? It should be scrapped and replaced with a requirement to do a training needs analysis and implementation.</p> <p>Annex B - Training requirements need to be more prescriptive in an Australian setting.</p>		<p>I am happy to share with you the RW standards. The employers (economic chamber in FSC jargon) agreed to it for RW to I see no reason for them to object in the FSC context.”9</p>
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P3	Yes: 1 No: 6 Don't know: 1	All of the indicators assume rights exist and indigenous communities want to be engaged. What if they don't?	No: 3	
P4	Yes: 1 No: 6 Don't know: 1	4.1.1 - clarity on what constitutes a local community 4.7.3 - It is not clear if cultural includes Indigenous as Indigenous Peoples are covered in Principle 3	No: 3	
P5	Yes: 3 No: 4	5.4 More clarification on what is a reasonable attempt is required. In some areas an organisation will not be able to establish capacity. Annex C is not required given that FSC has a standalone FSC Ecosystem Services Procedure. All non-timber forest products should be able to be added to the certificate scope.	No: 3	
P6	Yes: 3 No: 4	6.4.2 Most organisations have a blanket policy where no machines, operations etc. are allowed into remnant vegetation. They are 'no go zones'. In most cases targeted field surveys to identify specific locations of habitat can be costly and unnecessary when the remnants (where species are mostly likely to live) are already managed under this policy.	Yes: 2 No: 1	It needs to be clear that remnant vegetation within a plantation, that is, vegetation that was present when the plantation was established, cannot later be cleared as part of the plantation. That is conversion. 6.5.5 For plantation FM a minimum set aside of 20% for restoration and or remnant native forest protection. Recent losses of forest due to climate induced fires have placed critical forest biodiversity under increasing threat.



		<p>Minor typo 6.7.2 3). Needs to reference 10.7.6 not 10.7.5.</p> <p>6.7.2 - old thinking and doesn't recognise rapid improvements in technology, scale of Australian landscape (QLD very different to Tasmania) and classification of more appropriate buffers that consider catchment area and drainage line features based on Lidar DEM, level of incision, permanence of water etc.</p>		<p>plantations offer a significant opportunity to increase resilience in the landscape. This would also better reflect the intent of Annex D</p>
P7:	<p>Yes: 1 No: 5 Don't know: 1</p>	<p>Why have annex E if these are all individual requirements.</p>	No: 3	
P8	<p>Yes: 4 No: 3</p>	<p>HCV assessments criteria and mis-match between expectations for plantation business which impact on HCV at only the very margins and Native forest businesses. Lack of broader spatial issue consideration is also an issue. If area adjoining a NP, then surely this needs consideration in evaluating an area HCV status.</p> <p>I do not believe a Certification Body can adequately assess all elements of Annex F (Monitoring Requirements).</p>	No: 3	



		<p>The requirement in clause 1.i) in Annex F to monitor the health of workers exposed to pesticides is more onerous than the obligations of the cross- referenced clauses and disproportionate to the risk of harm associated with pesticide use.</p> <p>Again the annex is obsolete</p>		
P9	<p>Yes: 0 No: 6</p>	No input	Yes: 3	<p>The standard needs to clarify that no logging of oldgrowth forest is acceptable. Also, no logging of hollow-bearing trees that are critical habitat for so many endangered species and no logging of koala habitat. These need to be explicit. Also the guidance box could be removed if the standard was clear. Again, climate and biodiversity crises demand that FSC stops sitting on the fence on some of these key issues.</p> <p>Australia should consider including native "Legacy Trees" as environmental or habitat features to be protected. Legacy trees are individual trees of an agreed upon age that are to be protected as "old growth tree". These do not fit under the definition of "old growth forest" (HCV 3.3) but are indicative of potential for old growth conditions or features in a stand. I think state of Tasmania developed some old-tree indicators including size, form, and age for this.</p>



				IFL indicators should be strengthened to exclude all industrial activities within IFL areas in Australia. These areas are very rare in Australia and the current indicators allow logging outside core areas.
Annex G	Yes: 3 No: 4	Clarify whether a HCV is an area or can be a single plant or animal species. See comments re HCV in plantation business context It would seem reasonable that plantations established on previously cleared farm land are considered low risk by default.	Yes: 2 Don't know: 1	In the Australian context the definition of IFL should be changed to reflect the size of wilderness areas in Australia which is much smaller. We don't have those massive tracts of forest... in fact when you look at the amount of forest left in Australia we are lucky that there are any areas that have had minimal disturbance. In the guidance box, it should be clear that logging is excluded from oldgrowth forests. The guidance box on old-logging is unhelpful and confusing and should be removed. The HCV assessment framework should simply identify that old-growth forest logging is not permitted.
P10	Yes: 2 No: 4 Don't know: 1	10.7.7 Damage to environmental values and human health from pesticides use is prevented and mitigated or repaired where damage occurs. Prevention and mitigation measures are in place. However if someone's health is damaged from pesticides, how do you know where that has come from ie. working in forestry or using chemicals at home	Yes: 2 Don't know: 1	There needs to be some clarity about what happens post bushfire. What was acceptable when a certificate was granted is not necessarily the same post major fire. There would need to be an assessment of the damage to habitat values etc. Expert Dr Andrew Smith has estimated (in a report for NSW EPA) that it could take decades to centuries for many of the habitat components of a forest to be back at pre-fire levels. Salvage logging only makes things worse and it needs to be specifically ruled out.



		More guidance is required for clause 10.6. Specifically is it appropriate to claim indirect ecological benefits, like replacement of harvesting of natural ecosystems or increased storage of carbon.		A new indicator under 10.5 to explicitly prohibit post fire salvage logging in native forest. The ecological impact of this has been shown repeatedly to be devastating.
Guidance for conducting an impact assessment	Yes: 2 No: 3 Don't know: 2	I don't believe it is a necessary part of the standard, it could be removed. It is not required in a Standard. Have you used the guidance? Regularly: 1 Sometimes: 1 Rarely: 2 No: 3	No: 1 Don't know: 2	Don't know how it is working in practice
Glossary of terms	Yes: 1 No: 5 Don't know: 1	HCV and HCV areas. This is confusing. Under Annex G HCV are considered areas of value.	Yes: 2 Don't know: 1	There will need to be revisions re oldgrowth, salvage logging, IFL etc Need to include old growth forest terms. Would like to see something about "legacy trees" regarding individual "old growth" trees. Would like to see National level guidance for stakeholders on role of the stakeholders and audit teams. Find a way for stakeholders to know they can talk confidentially with audit teams, particularly regulatory agencies. Only to align it with any changes



Cross-cutting issues

Issue	Input	
<p>External circumstances</p>	<p>All of the above (i.e.: bushfires, climate change adaptation, protection of ecosystem services and changes in public perception regarding specific issues)</p> <p>The relevance and application of the standard to small forest owners is very onerous. The application to small owners needs careful review to ensure it doesn't impede the involvement of farmers in commercial tree crops.</p> <p>Climate change impacts should be incorporated in future revisions of the standard.</p> <p>My only concerns are around stakeholder engagement. Our preference would be for an industry single stakeholder engagement, perhaps at a state level, rather than for individual certified companies. We get relevant feedback from stakeholder directly engaged with our business but very little, if not none, from any other form of stakeholder including NGOs with vested interests.</p> <p>Making the best decision for the plantation/forest, it's management for longevity and financial contribution to it's sustainability should be considered as a priority. Managing plantations/forest has to take into consideration of the points raised in the example but also acceptance of forest waste as a commercial enterprise to fund sustainability and reduced emissions.</p>	<p>yes- climate change demands greater forest protection. Trees/forests are the best carbon capture and storage technology we have and we should recognise that and give more possibilities re \$ for ecosystem services that will see larger areas protected for this. Also new research shows water transpiration is major source of fresh water ie more water in air from Amazon trees than in its rivers! Bushfires are clearly a new normal. Made worse by young saplings and logging.</p> <p>Climate change could and should be incorporated into Aus standard, regardless of whether the international standard adequately includes it.</p> <p>I see recent climate change induced fires as game changing hence the need for higher protection thresholds. Also the NFSS should specifically exclude fire salvage logging.as a new indicator under criterion 10.5</p>



	Nil	
Has the implementation of the NFSS affected your organisation's productivity (e.g. lower yield or increased costs)?	<p>Yes: 6 No: 1</p> <p>6.4.2 - targeted field surveys. Yes see comments under Principle 6.</p> <p>The redefinition of HCV criteria has created a lot of work reviewing and realigning related records and information. No further changes should occur to avoid any further costs.</p> <p>Principle 10 indicators relating to Integrated Pest Management - FSC pesticides policy has increased costs of plantation management.</p> <p>The entire Standard has become more challenging to demonstrate compliance.</p> <p>Broad HCV categorisation and requirements pertaining to area with limited rights and not subject to active commercial management undertakings.(asset protection areas only)</p> <p>Indigenous engagement costs for each meeting even when they are not interested. Non timber forest products could not be added to scope.</p>	
Has the implementation of	<p>Yes: 2 No: 5</p>	



<p>the NFSS had any positive impacts on your organisation?</p>	<p>The clear Annexes help us to focus on what is regarded as important by the standard.</p> <p>Maintaining FSC certification has received some positive public support</p> <p>Stakeholders are accepting of being certified to the FSC.</p>	
<p>Should indicators for NTFPs be included in the standard?</p>	<p>Yes: 2 No: 3 Don't know: 2</p> <p>Not aware of any markets for certified NTFPs</p> <p>Honey, Pepper berries, water</p> <p>The indicators are already there. don't add more indicators for very low level risks.</p>	<p>Yes: 2 Don't know: 1</p> <p>carbon, water and all the other things removed like bush rock, epiphytes etc</p> <p>Potentially for forest fungi and fruits eg native pepper.</p>
<p>What are the main issues, if any, you believe should be addressed in the revision of the standard?</p>	<p>All that I have commented on under the specific principles</p> <p>Application and accessibility to small forest growers.</p> <p>Minimise the linkage to other FSC Policies / Standards - e.g. Pesticide Policy - and having to reference multiple other Standards and Procedures.</p>	<p>Climate change, biodiversity crisis, bushfires</p> <p>The ones I have identified but the most obvious is to fix up the mess vis a vis old-growth logging and the scope of the standard. The failure of any state agency to obtain certification for their public native forest speaks volumes. 2 governments, Victoria and WA have or are actively canvassing ending public native forestry. FCNSW is actively engaged in conversion old-growth and rainforest logging. SST is still logging old-</p>



	<p>The standard is heavily weighted to stakeholder engagement. This should be reduced. Private companies are private for reason and encouraging stakeholder input into how the private company sets its business goals is really none of the general public citizens concern.</p> <p>ILO convention adaptation under Australian law. Monitoring workplace health without specific guidelines. HCV risk rating for plantations on farm land is low. Native forest clearing for mining, infrastructure, etc being excluded as a certifiable product when it goes to waste instead a of commercial biomass product to help reduce Australian and international CO2 emissions using coal or other fossil fuels.</p> <p>Make it simpler with less requirements on how to achieve the principles.</p>	<p>growth, endangered species habitat and rainforest. It is impossible to see how any of these agencies could gain certification. The impact to the system is non existent precisely because of their lack of success.</p>
<p>Anything else to add?</p>	<p>It would be good to have some general information outlining how conformance with this standards aligns with the EU's Sustainable Finance Rules especially the Taxonomy requirements that the EU defines as contributing to sustainable investment objectives.</p> <p>Keep up the great work!!</p> <p>Need to address the FSC Aus governance at the board.</p> <p>Overall the standard is mostly workable, the areas highlighted for change would make it a very usable and a sound standard.</p>	<p>I think FSC Australia has managed it's difficulties very well over the last 12 months</p>

