



[Click to choose Category]

# FIRST PUBLIC CONSULTATION MATERIAL

FSC\_AU\_FSS\_V2-0\_D1-0

The FSC Forest Stewardship Standard of Australia

[Click to add Publish Date]



# 1. INTRODUCTION

## Welcome to the first public consultation for the revised FSC Forest Stewardship Standard of Australia

The first public consultation of the draft second version of the FSC Forest Stewardship Standard of Australia (hereinafter referred to as ‘the Standard’) is open between 1 July and 31 August 2025. It will be used to collect stakeholders’ feedback on a series of questions regarding the proposed changes to the Standard. FSC ANZ encourages all interested stakeholders to participate and provide their feedback during this period.

You will find a set of supporting documents available for download. We advise you to please read through these materials before answering the consultation questions.

Kindly note that it is not mandatory to respond to all questions. You may choose to respond to the questions that are most important to you. You can save current progress and edit your responses intermittently until you submit your final responses before the close of the consultation period. The estimated time to complete all questions is 60 minutes.

Please be as specific as possible in your comments and provide suggestions to address your concerns where possible.

To facilitate participation in the public consultation, FSC ANZ will hold two identical webinars. Details about the webinars and registration information are provided below. In the webinars, we will explain the proposed changes to the Standard and address questions and comments from participants.

Date	Time	Register
29 July	18:00 - 19.30 AEST	<a href="#">Click here to register</a>
1 August	10:00 - 11:30 AEST	<a href="#">Click here to register</a>

If you have any questions, please contact FSC ANZ Senior Policy Manager, Stefan Jensen, at [s.jensen@au.fsc.org](mailto:s.jensen@au.fsc.org).

**Thank you for your participation!**

© 2025 Forest Stewardship Council, A.C. All Rights Reserved  
FSC® F000100

You may not distribute, modify, transmit, reuse, reproduce, re-post or use the copyrighted materials from this document for public or commercial purposes, without the express written consent of the publisher. You are hereby authorized to view, download, print and distribute individual pages from this document subject for informational purposes only.

# CONTENTS

<b>1. Introduction</b>	<b>1</b>
<b>2. Background</b>	<b>3</b>
Revision mandate	3
The revision process	3
What will happen to your feedback?	4
What happens next?	4
<b>3. Public Consultation Questions</b>	<b>5</b>
Background and interests .....	5
Overall assessment of the draft Standard .....	7
Introductory sections .....	7
PRINCIPLE 1: COMPLIANCE WITH LAWS (including Annex A) .....	7
PRINCIPLE 2: WORKERS' RIGHTS AND EMPLOYMENT CONDITIONS (including Annex B and Cultural Empathy Guidance) .....	8
PRINCIPLE 3: INDIGENOUS PEOPLES' RIGHTS .....	8
PRINCIPLE 4: COMMUNITY RELATIONS .....	9
PRINCIPLE 5: BENEFITS FROM THE FOREST .....	10
PRINCIPLE 6: ENVIRONMENTAL Values and Impacts .....	10
PRINCIPLE 7: MANAGEMENT PLANNING (including Annex C) .....	13
PRINCIPLE 8: MONITORING AND ASSESSMENT .....	14
PRINCIPLE 9: HIGH CONSERVATION VALUES (including Annex D and Annex E) .....	14
PRINCIPLE 10: IMPLEMENTATION OF MANAGEMENT ACTIVITIES (including annex F) .....	16
ANNEX H: GLOSSARY OF TERMS .....	18
Priority issues .....	18
<b>4. THANK YOU</b>	<b>18</b>

## 2. Background

### Revision mandate

In accordance with FSC International's requirements for the maintenance of Forest Stewardship Standards, FSC ANZ has reviewed the 2018 Australian National Forest Stewardship Standard for Australia to evaluate its performance. The comprehensive review showed that while the Standard is largely performing well, a revision is required to ensure it remains fit for purpose.

With an overall goal of maintaining continuity and consistency in the revised Standard while incorporating the necessary changes identified in the review, the FSC ANZ Board of Directors in 2022 approved a targeted revision of the 2018 Standard. The targeted nature of the revision means that the necessary improvements identified by the Board in the review process constitute the scope of the revision.

The [process page](#) for the revision provides more information about the revision process, including the review documents and detailed information about the scope of the revision.

Please keep the scope of the revision in mind when commenting. Issues that are out of scope will require compelling reasons and Board approval to be addressed.

### The revision process

In accordance with FSC-STD-60-006 V1-2 EN Process Requirements for the Development and Maintenance of National Forest Stewardship Standards, which provides the normative underpinnings for the revision process, the FSC ANZ Board has established a nine-person chamber-balanced Standards Development Group (SDG) to draft the revised Standard. The SDG members are:

Member	Organisation	Chamber
Carl Richardson (WA)	Australian Bluegum Plantations	Economic
Simon Cook (Tas) <sup>1</sup>	Forico Pty Limited	Economic
Judy Alexander (Vic) <sup>2</sup>	Foresa Consulting	Economic
Grant Wardell-Johnson (NSW)	Individual member	Environmental
Patrick Gardner (WA)	The Wilderness Society	Environmental
Sean Cadman (Tas)	Individual member	Environmental
Mark Brown (QLD)	Forestry Australia	Social
Tolita Davis-Angeles (QLD)	Individual member	Social
Lorraine Cassin (Vic) <sup>3</sup>	Australian Manufacturing Workers' Union	Social

The role of the SDG is to adopt, adapt or drop new and revised International Generic Indicators provided in FSC-STD-60-004 International Generic Indicators V(2-1). It can also add new Indicators as required.

---

<sup>1</sup> Currently being replaced.

<sup>2</sup> Replaced Tim McBride (HVP) in late 2024.

<sup>3</sup> Currently being replaced.

All revisions need to be justified. Conversely, the SDG is not permitted to make changes to the Principles and Criteria.

Following a thorough revision process, the SDG is now seeking public input to the draft Standard in the first of an expected two rounds of public consultations.

The SDG has also established a Consultative Forum to engage with interested parties throughout the revision process. The purpose of the Consultative Forum is to increase the SDG's access to expertise, data, and stakeholder perspectives and to increase transparency and communication in the revision processes. This forum is designed for those who want to be more deeply involved than the public consultation.

To join the Consultative Forum, which is open to all interested parties, contact Stefan Jensen at [s.jensen@au.fsc.org](mailto:s.jensen@au.fsc.org).

### What will happen to your feedback?

All feedback is valuable and will be read by the SDG and considered carefully. Based on the feedback received, the SDG will prepare a publicly available report including:

1. A summary of the issues raised;
2. An analysis of the stakeholder groups who have submitted comments;
3. A general response to each comment received;
4. An indication of how the comments have been taken into account in the subsequent revision work; and
5. An anonymised copy of all the formal comments as an annex (where consented to by the respondent - see the next page).

All feedback will be anonymised when it is provided to the SDG.

### What happens next?

Following the public consultation, the SDG develops a second draft of the Standard and develops and publishes the consultation report as part of this process. The second draft will go through a second round of public consultation and will concurrently be tested in a native and a plantation forest. Based on this, the SDG intends to develop the final draft of the Standard and publish a second publicly available report as part of this process. The SDG submits this final draft to the FSC ANZ Board of Directors for approval before it is submitted to FSC International for approval and publication.

### 3. Public Consultation Questions

This section presents topics and questions we would like your feedback on.

#### Background and interests

**1. Please select the option that best identifies your role:**

- ☐ FSC certificate holder (forest management)
- ☐ FSC certificate holder (forest management smallholder <1000ha)
- ☐ FSC certificate holder (chain of custody)
- ☐ FSC certificate holder (controlled wood/chain of custody)
- ☐ FSC certificate holder (controlled forest management)
- ☐ FSC promotional licence holder
- ☐ Forest industry (non FSC-certified)
- ☐ Environmental organisation
- ☐ Social organisation
- ☐ Certification body
- ☐ Contractor or contractor employee
- ☐ Academia
- ☐ Government
- ☐ Member of a First Nations community
- ☐ Representative of a First Nations community
- ☐ Member of a local community
- ☐ Representative of a local community
- ☐ Stakeholder affected by FSC-certified forestry
- ☐ Interested stakeholder
- ☐ Consultant
- ☐ FSC Network Partner
- ☐ FSC International staff member
- ☐ Other (please specify)

**2. Where are you based?**

- ☐ ACT
- ☐ New South Wales
- ☐ Northern Territory
- ☐ Queensland
- ☐ South Australia
- ☐ Tasmania
- ☐ Victoria
- ☐ Western Australia
- ☐ Overseas (New Zealand)
- ☐ Overseas (other than New Zealand)

**3. Are you an FSC member (Australia or international)?**

- ☐ Yes
- ☐ No

**4. If yes, please specify your chamber:**

- ☐ Economic
- ☐ Environmental
- ☐ Social

**5. If no, please identify the chamber with which you most closely align:**

- ☐ Economic
- ☐ Environmental
- ☐ Social

**6. What type of forestry are you primarily interested in?**

- ☐ Native forestry
- ☐ Plantation forestry
- ☐ SLIMF (native or plantation)
- ☐ Other (please explain)

**7. Do you consent to being contacted by FSC ANZ via email regarding your responses?**

- ☐ Yes
- ☐ No

**8. Do you consent to FSC ANZ anonymously publishing your comments?**

- ☐ Yes
- ☐ No

## Overall assessment of the draft Standard

### Question 1: What is your overall opinion of the revised Standard?

1 (strongly positive), 2 (positive), neutral, 3 (negative), 5 (strongly negative)

Please explain your response

## Introductory sections

### Non-timber forest products

Non-timber forest products (NTFPs) are not currently in scope and can, therefore, not be sold with FSC claims. The SDG has incorporated requirements into Annex G to enable the certification of NTFPs and has developed a list of NTFPs it suggests should be included in the Standard's scope. Considering NTFPs that are not listed cannot be FSC certified, the SDG would like to identify and include all relevant NTFPs in the Standard's scope.

The NTFPs identified by the SDG are:

- N6 Plants and parts of plants
- N7.4 Tannin
- N7.5 Essential oils
- N8.2 Medicinal plants and product
- N8.3 Pharmaceutical raw materials
- N9.4 Mushrooms and truffles
- N9.5 Native pepper berries, nuts, fruit and seeds
- N9.7 Game (from introduced species only)
- N9.8 Bee products

The identifiers provided in front of each NTFP refer to the product type nomenclatures provided in FSC-STD-40-004a V(2-1) FSC Product Classification.

**Question 2:** Do you have any concerns about one or more of the NTFPs proposed to be included in the scope?

**Question 3:** Which, if any, additional NTFPs would you like to see included in the scope?

**Question 4:** Do you have any comments on the NTFP Indicators in Annex G?

### Other

**Question 5:** Do you have any comments on the proposed changes in Section D.5 (SLIMF)?

**Question 6:** Do you have any other comments regarding the introductory sections?

## PRINCIPLE 1: COMPLIANCE WITH LAWS (including Annex A)

The SDG has not proposed any significant changes under Principle 1 but has updated Annex A.

**Question 7:** What is your overall opinion of the Principle 1 Indicators and the associated Annex A?



1 (strongly positive), 2 (positive), neutral, 3 (negative), 5 (strongly negative)

Please explain your response.

**Question 8: Do you have any comments regarding the Principle 1 Indicators?**

## PRINCIPLE 2: WORKERS' RIGHTS AND EMPLOYMENT CONDITIONS (including Annex B and Cultural Empathy Guidance)

The most significant changes in Principle 2 are:

- The incorporation of the FSC core labour requirements under Criterion 2.1.
- The introduction of non-binary language across the Principle (this is the only Principle with gendered language).
- The introduction of a requirement that workers with job responsibilities related to implementing Principle 3 have received cultural empathy training. This includes a definition of “cultural empathy training” in the glossary and non-normative guidance regarding the content of cultural empathy training, which follows at the end of Principle 10.

**Question 9: What is your overall opinion of the Principle 2 Indicators and the associated Annex B as well as the cultural empathy training definition and content guidance?**

1 (strongly positive), 2 (positive), neutral, 3 (negative), 5 (strongly negative)

Please explain your response.

**Question 10: Do you have any specific comments regarding Indicators under Criterion 2.1?**

**Question 11: Do you have any specific comments regarding the introduction of non-binary language?**

**Question 12: Do you have any specific comments regarding Indicator 2.5.2 and the associated definition of ‘cultural empathy training’ and cultural empathy training content guidance?**

**Question 13: Do you have any other comments regarding the Principle 2 Indicators?**

## PRINCIPLE 3: INDIGENOUS PEOPLES' RIGHTS

The most significant changes in Principle 3 are:

- A change in terminology from ‘Indigenous Peoples’ to ‘First Nations Peoples’. The SDG notes that increasingly ‘First Nations Peoples’ is the preferred terminology of Australia’s Traditional Owners, so to future-proof the Standard, the SDG proposes this change. The SDG is, however, not permitted to change the language in the Standard’s Principles and Criteria, and they, therefore, continue to refer to ‘Indigenous Peoples’. This has been explained at the start of Principle 3 in the Standard.
- The introduction of the Indigenous Cultural Landscapes concept as developed by FSC International.

#### **Question 14: What is your overall opinion of the Principle 3 Indicators?**

1 (strongly positive), 2 (positive), neutral, 3 (negative), 5 (strongly negative)

Please explain your response.

#### **Question 15: Do you have any specific comments regarding the change in terminology from 'Indigenous Peoples' to 'First Nations Peoples'?**

##### **Indigenous Cultural Landscapes**

The introduction of the concept of Indigenous Cultural Landscapes (ICLs) builds on the cultural landscapes requirements already in the Standard. The SDG has deviated from the International Generic Indicators by adding a requirement to obtain Free, Prior, and Informed Consent (FPIC) regarding the engagement strategies and actions The Organisation develops to protect identified Indigenous Cultural Landscapes from First Nations Peoples connected to the Management Unit. The SDG has also identified Indigenous Cultural Landscapes as a High Conservation Value under High Conservation Value 6.

The SDG recognises the importance of Indigenous Cultural Landscapes for Australia's First Peoples but appreciates that it can be challenging for forest growers to incorporate this requirement. In response, the SDG has developed non-normative guidance on the steps of an FPIC process. This guidance, which is applicable to all FPIC requirements in the Standard, is included in the consultation material but is not part of the Standard.

FSC ANZ is intending to develop a case study demonstrating the implementation of the Indigenous Cultural Landscapes requirements. The purpose of the case study will be to provide a best-practice example of how forest managers can navigate the complexities of this new concept and the associated requirements. The case study will be published separately from the Standard to be used by certified growers to inform their implementation of the new Indigenous Cultural Landscapes requirements.

#### **Question 16: Do you agree with the approach to Indigenous Cultural Landscapes taken by the SDG, including the proposal to designate Indigenous Cultural Landscapes as a High Conservation Value?**

#### **Question 17: Do you have any comments regarding the FPIC guidance document?**

#### **Question 18: Apart from the FPIC guidance and the planned case study, do you believe any other solutions are required to support the implementation of the new Indigenous Cultural Landscapes requirements?**

#### **Question 19: Do you have any other comments regarding the Principle 3 Indicators?**

### **PRINCIPLE 4: COMMUNITY RELATIONS**

The SDG has not proposed any significant changes under Principle 4.

#### **Question 20: What is your overall opinion of the Principle 4 Indicators?**

1 (strongly positive), 2 (positive), neutral, 3 (negative), 5 (strongly negative)

Please explain your response.

### Question 21: Do you have any comments regarding the Principle 4 Indicators?

## PRINCIPLE 5: BENEFITS FROM THE FOREST

The most significant change in Principle 5 is:

- Closer alignment with the International Generic Indicator under Criterion 5.2 to provide more clarity around the harvest level requirements in native and plantation forestry respectively.

### Question 22: What is your overall opinion of the Principle 5 Indicators?

1 (strongly positive), 2 (positive), neutral, 3 (negative), 5 (strongly negative)

Please explain your response.

### Question 23: Do you have any comments regarding the revised Indicators under Criterion 5.2?

### Question 24: Do you have any other comments regarding the Principle 5 Indicators?

## PRINCIPLE 6: ENVIRONMENTAL Values and Impacts

The most significant changes in Principle 6 are:

- The introduction of a new Indicator 6.3.4 to clarify the requirements for the intensity of clear-cutting in mixed-age and mixed-species native forests. The SDG considered a specific retention rate but opted against being too prescriptive. This Indicator is proposed as part of the focus of the revision on mitigating and responding to fires (further changes are introduced in Indicators 6.3.5 (see below) and 10.5.2 and 10.9.5). The purpose of the Indicator is to ensure the resilience of the forest and its ability to better withstand fire events.
- The introduction of a new Indicator 6.3.5 regarding salvage harvesting.
- Changes to the Indicators under Criteria 6.9 and 6.10 and a new Criterion 6.11 with associated Indicators prompted by changes made at the international level to implement the FSC Policy to Address Conversion. These changes, which were passed by FSC International's members at the 2023 General Assembly, have already superseded the requirements in the current Standard through an advice note and are, therefore, already in effect. Read more [here](#). The SDG has made no significant changes to the International Generic Indicators. In short, these new conversion-related requirements introduce a new conversion cut-off date of 31 December 2020 (compared to November 1994 previously). Plantations that were established on areas converted from natural forest between 1 December 1994 and the new cut-off date are date is not eligible for certification unless remedy for social and environmental harms caused by the conversion is provided in accordance with the FSC Remedy Framework which was the result of a motion approved by the FSC International membership at a recent General Assembly. The level of remedy depends on whether The Organisation was involved in the conversion with less stringent remedy requirements for non-involved organisations. No remedy requirements apply to plantations established on land converted prior to 1 December 1994, while plantations established on land that was converted after 31 December 2020 are not eligible for certification under any circumstances.

**Question 25: What is your overall opinion of the Principle 6 Indicators?**

1 (strongly positive), 2 (positive), neutral, 3 (negative), 5 (strongly negative)

Please explain your response.

**Question 26: Do you have any comments regarding Indicator 6.3.4?**

**Question 27: Do you have any comments regarding Indicator 6.3.5?**

**Question 28: Do you have any comments regarding the Criterion 6.9 Indicators?**

**Question 29: Do you have any comments regarding the Criterion 6.10 Indicators?**

**Question 30: Do you have any comments regarding the Criterion 6.11 Indicators?**

**Conservation area network threshold (Indicator 6.5.2)**

The current 10% Conservation Area Network threshold, often referred to as the “set-aside area,” is not included in the scope of the revision. Nevertheless, the SDG engaged in a constructive discussion on the issue, presenting various perspectives on a suggestion to increase the 10% threshold. Ultimately, the SDG agreed to keep the threshold unchanged at 10% while also including the main discussion points in the consultation material to seek feedback on the matter.

The Standard defines Conservation Area Network as:

“Those portions of the Management Unit for which conservation is the primary and, in some circumstances, exclusive objective; such areas include representative sample areas, conservation zones, protection areas, connectivity areas and High Conservation Value Areas.”

Below is a summary of the SDG’s main arguments for and against adjusting the threshold.

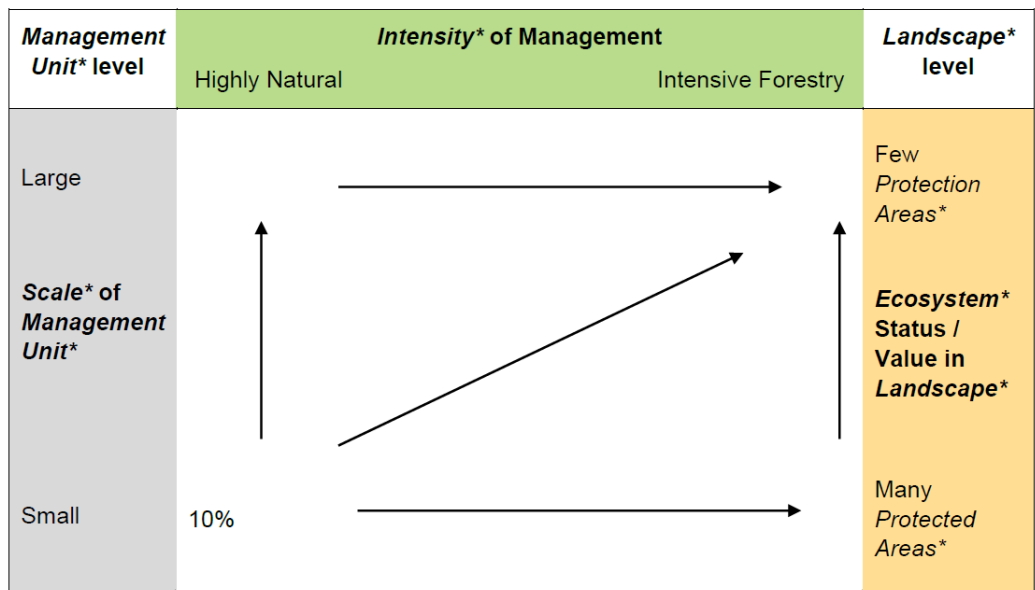
**SDG Arguments FOR Changing the Threshold:**

**Disparity with Annex D**

Annex D of FSC-STD-60-004 V2-1 EN *International Generic Indicators* states that the Conservation Area Network is generally expected to increase beyond the 10% minimum size, depending on the scale and intensity of management, as well as the status and value of ecosystems in the landscape (refer to the conceptual diagram below):

*“the Conservation Area Network\* is generally expected to increase from the 10% minimum as the size, intensity\* of management, and/or the status and value of ecosystems\* at the landscape\* level each increase.”*

Currently, this is not the situation; instead, the Conservation Area Network threshold in the Australian Standard remains constant at 10%, irrespective of size, intensity, and ecosystem status or value in the landscape. This does not align with the intent of Annex D.



**Government Pledges for Protection**

Furthermore, the world’s governments have pledged to designate 30% of Earth's land and ocean areas as protected areas by 2030, making a 10% minimum requirement inadequate.

**SDG Arguments AGAINST Changing the Threshold:**

**The size of the average Conservation Area Network across all certificate holders**

FSC-certified organisations in Australia currently maintain an average Conservation Area network of over 20%. While some are near 10%, others far exceed the threshold. Combined, Australian certificate holders oversee more than twice the required Conservation Area Network.

In addition, some larger growers with large conservation area networks are in conversations with state governments to hand these back to public management. An increase to the threshold could undermine this process since the growers would need to hold on to these areas to meet the increased threshold.

**The diminishing business case**

Forest managers invest substantial resources in establishing Conservation Area Networks without expecting financial returns. Raising the threshold to include additional unproductive area would further undermine the business case for maintaining or obtaining FSC certification.

**Stalling or decreasing the certified area in Australia**

Increasing the Conservation Area Network threshold would require some existing certificate holders to terminate their certificate or, alternatively, to acquire additional land solely for conservation purposes to maintain the size of their productive area, which does not align with the intended goals of this requirement. A higher threshold will likely also curtail the continued uptake of FSC certification in Australia, as it will render certification unobtainable for some aspiring certificate holders with smaller Conservation Area Networks.

**A landscape perspective**

Forests, both native and plantations, support conservation values across an integrated landscape. They should not be treated in isolation. Plantations, for example, provide fauna and flora habitat for a range of

species. There are scientific reports that demonstrates that a mosaic of well-managed forested landscapes consisting of plantation, native forests, non-forest vegetation supports a healthy range of habitat and species. Increasing the conservation area threshold from an arbitrary figure of 10% to something greater within a management unit may not necessarily lead to improved conservation outcomes.

### **The quality of the Conservation Area Network**

Concern was expressed that not enough consideration is given to the quality of Conservation Area Networks; i.e., quality vs quantity should be a consideration. This could lead to the temptation to allocate poorer-quality lands or lands not suited for development of high-quality forest ecosystems to the Conservation Area Network.

### **Await the outcome of FSC International's work on the issue**

FSC International has commissioned a study to better understand the challenges faced by standard developers and certificate holders in the development and implementation of the requirements in Criterion 6.5. The study aims to identify recommendations for meeting the objectives of the Criterion. Among the 11 recommendations in the report, only one is prescriptive in counselling a specific content-related measure for the International Generic Indicators, namely, that the 10% minimum threshold for large and medium-sized forests should be maintained. This study will inform the ongoing joint revision of the FSC Principles and Criteria and International Generic Indicators. It's important not to pre-empt this revision process, particularly since there is no recommendation to raise the threshold. Therefore, the threshold should remain unchanged for now and be re-evaluated in the next revision of the Standard after the new Principles and Criteria and International Generic Indicators are published.

**Question 31: Based on this, do you think the conservation area network threshold should be changed (keeping in mind that this is not in scope)?**

**Question 32: Do you have any other comments regarding the Principle 6 Indicators?**

## **PRINCIPLE 7: MANAGEMENT PLANNING (including Annex C)**

The most significant change in Principle 7 is:

- The incorporation of requirements regarding Indigenous Cultural Landscapes and Intact Forest Landscapes in Annex C (the core requirements regarding Indigenous Cultural Landscapes and Intact Forest Landscapes are provided in Principles 3 and 9 respectively).

**Question 33: What is your overall opinion of the Principle 7 Indicators?**

1 (strongly positive), 2 (positive), neutral, 3 (negative), 5 (strongly negative)

Please explain your response.

**Question 34: Do you have any comments regarding the Principle 7 Indicators?**

**Question 35: Do you have any comments regarding Annex C?**

## PRINCIPLE 8: MONITORING AND ASSESSMENT

The most significant change in Principle 8 is:

- Dropping Annex F (Monitoring Requirements) which is in the current Standard. This is based on feedback received during the review of the Standard, highlighting that the annex is of little value and that it is not possible for auditors to adequately assess conformity with the annex in a surveillance audit. To ensure monitoring requirements are not weakened, Indicators under Criteria 8.2 and 8.4 have been revised to require the monitoring of social and environmental impacts of management activities. The FSC ANZ Board has approved this change of scope.
- More detailed requirements under Criterion 8.5 to further bolster the integrity of FSC's supply chains, including requirements to support FSC's integrity work.

### Question 36: What is your overall opinion of the Principle 8 Indicators?

1 (strongly positive), 2 (positive), neutral, 3 (negative), 5 (strongly negative)

Please explain your response.

### Question 37: Do you have any comments regarding the proposal to drop Annex F?

### Question 38: Do you have any comments regarding the revised Indicators under Criterion 8.2?

### Question 39: Do you have any comments regarding the revised Indicators under Criterion 8.4?

### Question 40: Do you have any comments regarding Indicator 8.5.1?

### Question 41: Do you have any other comments regarding the Principle 8 Indicators?

## PRINCIPLE 9: HIGH CONSERVATION VALUES (including Annex D and Annex E)

The most significant changes to Principle 9 are:

- New requirements regarding Intact Forest Landscapes and a new Annex D that provides core area thresholds for each Intact Forest Landscape in Australia and the analysis underpinning the threshold setting.
- A change to the old-growth forest guidance box under HCV 3.3 in Annex E, which clarifies that all old-growth forest in Australia is considered rare and therefore must be maintained and/or enhanced.
- The introduction of a definition of "remnant native vegetation".
- The introduction of a new HCV 6.6, Indigenous Cultural Landscapes.

### Question 42: What is your overall opinion of the Principle 9 Indicators?

1 (strongly positive), 2 (positive), neutral, 3 (negative), 5 (strongly negative)

Please explain your response.

### Intact Forest Landscapes



Version 5-2 of the International Generic Indicators includes a suite of new requirements related to Intact Forest Landscapes. As part of the work to incorporate these changes, SDGs are required to set a threshold for the 'vast majority' of Intact Forest Landscapes that must be designated as 'core area' (areas that must be managed to exclude industrial activity), while the non-core areas can be subject to industrial activities as long as all other applicable requirements of the Standard are met, including the requirement to maintain and/or enhance this HCV.

The International Generic Indicators provide a generic 80% core area threshold, but SDGs are required to consider a local adaptation of the threshold.

The SDG has determined that due to the significant loss of Intact Forest Landscapes in Australia since 2000 of more than 50%, no case can reasonably be made to lower the core area threshold below 80%. Rather, in most cases, the SDG has set the core area threshold at 100%. Exceptions are:

- The Tasmanian Central Highlands, Tasmanian Northern Slopes, and Tasmanian Southern Ranges bioregions where significant Intact Forest Landscapes areas exist and enjoy high levels of formal protection. For each of these Intact Forest Landscapes, the Core Area threshold has been set below 100% but at +99%, which matches the level of formal protection.
- The Cape York Peninsular bioregion, which contains a high level of Intact Forest Landscape representation together with high levels of native title and native title claims combined with moderate levels of formal protection. Here, the Core Area\* thresholds range from 80% to 100%.

Importantly, as part of FSC Australia and New Zealand's commitment to working with First Nations Peoples by upholding their forest ownership, use and management rights, the SDG has determined that for First Nations-owned and managed Organisations, the core area threshold will default to 80%, except where the level of protection exceeds 80% in which case the threshold will match the level of protection.

In consultation with FSC ANZ's Indigenous Working Group (IWG), the SDG received feedback indicating this 80% default threshold for First Nations-owned and managed organisations can be unfair. This is because some communities' Management Unit, especially those on Cape York, may exclusively consist of Intact Forest Landscapes, thus rendering the vast majority of their Management Unit unavailable for commercial activities which would erode opportunities for commercial forestry. The Indigenous Working Group has suggested that alternative solutions are considered for First Nations-owned and managed operations.

Here, the SDG notes that there are currently no FSC-certified organisations on Cape York and that cultural extractive uses are considered non-industrial and can continue under the new Intact Forest Landscapes requirements and thresholds if a certificate were issued. The SDG also believes that the 20% non-core area of an Intact Forest Landscape will leave sufficient area available for forestry activities, especially considering the likely size of a Management Unit on Cape York. The IFL most likely to obtain FSC certification on the western side of Cape York stretches across 320,000 hectares and is not under any form of formal protection. With a core area threshold of 80%, this would leave 64,000 hectares as non-core area.

**Question 43: Do you agree with the SDG's approach to the threshold setting?**

**Question 44: Do you agree with the proposed thresholds?**

**Question 45: Do you have any comments regarding the new Intact Forest Landscapes Indicators under Criterion 9.2?**

**Question 46: Do you have any comments regarding the new Intact Forest Landscapes Indicators under Criterion 9.3?**

**Question 47: Do you have any comments regarding the new Annex D?**

**Question 48: Do you have any other comments regarding Intact Forest Landscapes?**



## Old-growth Forest

FSC ANZ issued interpretation INT-FSC-STD-AUS-01-2018\_01 in 2021 (located at the bottom of [this page](#)) to address the ambiguities in the old-growth guidance box on page 66 of the 2018 Standard. The scope of the revision required the SDG to incorporate this interpretation into the Standard without changing the guidance. The SDG did, however, determine that it is necessary to introduce stricter requirements than those provided in the interpretation. The guidance box has, therefore, been updated to clarify that all old-growth forest across Australia is considered rare and is, therefore, considered HCV 3.3 and must be maintained and/or enhanced. This change of scope has been approved by the FSC ANZ Board.

**Question 49: Do you have any comments regarding the proposed change to the old-growth forest guidance box in Annex E?**

## Other

**Question 50: Do you have any comments regarding the proposed definition of ‘remnant native vegetation’?**

**Question 51: Do you have any comments regarding the proposal to designate Indigenous Cultural Landscapes as a new HCV?**

**Question 52: Do you have any other comments regarding the Principle 9 Indicators and annexes?**

## PRINCIPLE 10: IMPLEMENTATION OF MANAGEMENT ACTIVITIES (including annex F)

The most significant changes to Principle 10 are:

- A new Indicator 10.5.2 that sets requirements for management activities in native forest following the impact of significant natural hazards (as defined in the Standard), insects and disease. The intention of this Indicator is to ensure salvage activities do not negatively impact habitat attributes.
- A new Indicator 10.9.5 and associated guidance that requires the organisation to implement a fire management strategy to mitigate the negative impacts of fire. This Indicator is in response to the revision’s focus on assisting forest growers mitigate the negative impacts of fire.
- The incorporation of new Indicators related to the use of chemical pesticides based on new International Generic Indicators produced by FSC International.

**Question 53: What is your overall opinion of the Principle 10 Indicators and Annex F?**

1 (strongly positive), 2 (positive), neutral, 3 (negative), 5 (strongly negative)

Please explain your response

## Restricted and Highly Restricted Highly Hazardous Pesticides

In response to a suite of new International Generic Indicators produced by FSC International (see [here](#)) for restricted and highly restricted highly hazardous pesticides, the SDG has:

- Identified restricted and highly restricted highly hazardous pesticides used in forestry in Australia and determined the use conditions for the highly hazardous pesticides it has approved for use in

Australia based on recommendations provided by an expert consultant engaged by the SDG. This is in accordance with the instructions for standard developers provided in Annex J of FSC-STD-60-004 V2-1 EN *International Generic Indicators*.

As part of this work, the SDG has produced “National HHP Framework Templates” for each of the identified restricted or highly restricted highly hazardous pesticides. The templates include five sections:

1. **General information on the target pesticide**
2. **Environmental and social risk assessment (ESRA)**. This section references ESRA that have been developed by a consultant and kindly been made available to FSC.
3. **Decision on the use of the target HHP in the country**
4. **Risk mitigation strategies**. Similar to section 2, this section makes reference to the ESRA.
5. **Definition of circumstances where a highly restricted HHPs may be used instead of a restricted HHP**. The SDG does not believe this section is relevant in Australia.

The templates and the associated environmental and social risk assessment are included in the consultation material and will be made available on FSC ANZ’s website when the Standard is published.

- Added a new section under Criterion 10.7 that includes Indicators that are only applicable to highly hazardous pesticides approved for use in Australia by the SDG. These Indicators are based on the International Generic Indicators provided in Annex J of FSC-STD-60-004 V2-1 EN *International Generic Indicators* and have been tailored to suit the Australian context. The Indicators were drafted by the expert consultant. Some Indicators are applicable to all 10 highly hazardous pesticides approved for use by the SDG, while others are only applicable to a subset of highly hazardous pesticides. The applicability of each Indicator is identified in brackets at the end of the Indicator. An overview of the applicability of all highly hazardous pesticide Indicators is provided in the Standard’s Annex F.

One SDG member has expressed concern about the process to incorporate the new HHP requirements into the Standard. Namely the SDG member is concerned that the SDG does not have the required knowledge to make informed decisions about these issues and therefore adds no value to the approval process and therefore shouldn't be able to influence decisions on pesticides use and use conditions. The SDG member instead believes pesticide use and use conditions should be determined by the grower based on an IPM process, the FSC International-approved pesticides list and an ESRA underpinned by the requirements of the Regulator (APVMA). Further, the SDG member points out that the process is incomplete since there is no clear process for what happens if the need to use a HHP that hasn't been considered by the SDG arises or if a pesticide is elevated to HHP by FSC International (FSC International is currently working on clarifying this process).

**Question 54: Do you have any comments regarding Indicator 10.5.2?**

**Question 55: Do you have any comments regarding Indicator 10.9.5?**

**Question 56: Do you have any comments regarding the HHP Framework Templates provided in Annex F, including the SDG’s decisions that the 10 highly hazardous pesticides may be used in FSC-certified forestry in Australia?**

**Question 57: Do you have any comments regarding the new and revised Indicators under Criterion 10.7?**

**Question 58: Do you have any other comments regarding the SDG's work to incorporate the new requirements for the use of highly hazardous pesticides?**

**Question 59: Do you have any other comments regarding the Principle 10 Indicators?**

## ANNEX H: GLOSSARY OF TERMS

A range of definitions in the glossary have been revised and new ones have been introduced.

**Question 60: To what extent do you agree that the terms and definitions in Annex H are clear, accurate and relevant?**

**Question 61: Do you have suggestions for improvements to specific terms and definitions? Are there any terms for which definitions are needed?**

### Priority issues

The scope of the revision included two priority issues, climate change and fire. The SDG has revised and introduced a range of Indicators regarding fire but has not developed Indicators that explicitly address climate change.

The SDG is of the opinion that because the issue of management options in the face of a changing climate is not settled in the literature and not currently addressed explicitly in the FSC Principles and Criteria or the International Generic Indicators, the best approach is to await the upcoming revision of these core FSC documents and incorporate the consequent changes in the next revision of the Standard.

The SDG also notes that analysis by FSC International has concluded that while FSC forest management standards do not explicitly mention climate change, they do offer a robust framework to demonstrate climate adaptation and mitigation performance by FSC certificate holders. In addition, the new requirements in the Standard related to fire and salvage harvesting may also help to mitigate the negative impacts of climate change on forests.

**Question 62: Do you believe the SDG has sufficiently addressed the issue of fire in the proposed changes to the Standard? If not, please suggest which additional changes you would like to see.**

**Question 63: Do you agree with the SDG's approach to the issue of climate change? If not, please suggest specific Indicators or approaches the SDG should consider.**

## 4. THANK YOU

Thank you for your valuable input.

The strength, value, and quality of FSC's normative documents are built on the active engagement of our stakeholders in their development and revision to ensure they are fit for purpose.

As a reminder, you can edit your responses until you submit your final responses before the close of the consultation period.

For further information about this revision process, please visit our [process page](#).

We greatly appreciate your participation.



**FSC Australia and New Zealand**

552 Victoria St  
North Melbourne VIC  
3051

**Email:** [info@au.fsc.org](mailto:info@au.fsc.org)