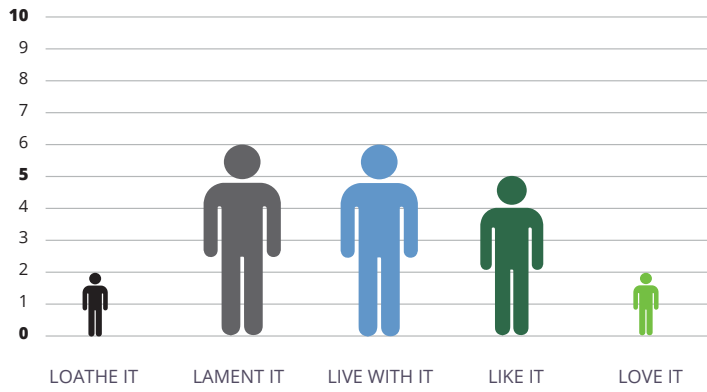


# NATIONAL STANDARD COMFORT LEVEL FEEDBACK

As part of the years AGM discussions we reviewed five possible themes emerging for the standards and offered the following feedback.

## HEADWATER STREAM PROTECTION



### I WOULD BE MORE COMFORTABLE IF:

More scientific input

**If they actually get hard buffer protected 10m minimum requirement**

Only temporary and permanent streams involved and covered by 5m machinery exclusion zone in plantations

**Clear definition of headwater stream, keep machinery out, but allow harvesting and crossings. Incorporate risk and biophysical elements**

Must apply to plantation. Buffer only (no exclusion hiller/filler?)

**30m exclusion buffers ie. No logging on all streams**

Buffers should be larger (15-20). Should apply to all areas in the management unit

**Ok for greenfield sites. Not clear on existing plantations within buffer zones.**

Clear definition communicable to practitioners/ auditors

**Need some outcomes/measures other than 10m**

Quantify. Auditable

**Make applicable to native forest only. Should be outcomes driven**

Clearer definitions of 'headwaters' - consistent interpretation nationally

**Buffers were assessed based on codes of practice and risk assessments**

Definition of headwater streams. Assessment of outcomes eg. No soil disturbance. Allow planned coupes to operate under previous system with restoration. 10m for new coupes.

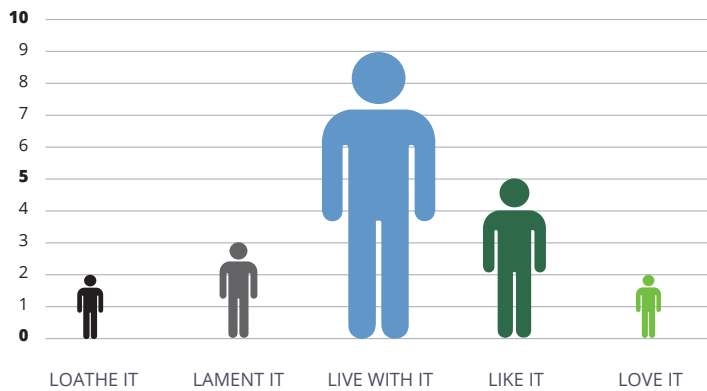
**There was clearer language in place re buffer zones, exclusion zones or filter strips**

Fixed buffers are not workable and can result in perverse outcomes. Machine exclusion zones with fixed crossings are minimal working outcome.

**CMA's were consulted for other insights**

Field testing will improve this. Adopt a risk based approach.

## REPRESENTATIVE SAMPLE AREAS



### I WOULD BE MORE COMFORTABLE IF:

10% to be moved to mature native vegetation where doesn't exist. Could include riparian

**Need alternatives to strict 10% with equivalent ecological outcomes**

Define objective - ie. Minimum native regeneration across estate requirements for plantation owners deal with ambiguity about % proactive restoration

**Annex D contained hard performance measures - Currently only process**

All operations reserve/rehabilitate 10% of FMU

**I support the Restoration Plan - very good to see this in the document. Would like to see the 10% requirements set aside reinstated. This is measurable.**

Outcomes that measure conservation/environmental benefits

**10% can be significant in some areas, how will it be introduced?**

Not relevant to the organisation I work for

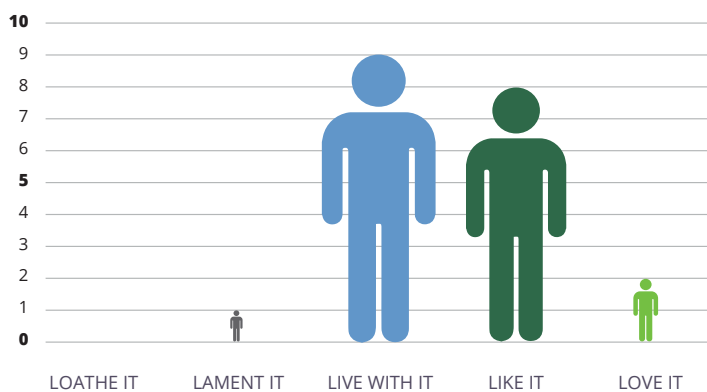
**Scale ie IBRA region defined ecosystems/vegetation communities. Restoration vs conversion of areas where ecosystems are not represented?**

Needs to focus on management not 'restoration'

**Define required reduction in restoration plan if 10% FMU is MANAGED (Footnote) OR IF 10% FMU is managed - can that be the RSA eg. No restoration needed.**

The 10% target seems too definitive particularly for sites which have less native veg than this when plantations were established.

## HIGH CONSERVATION VALUES - OLD GROWTH FORESTS



### I WOULD BE MORE COMFORTABLE IF:

Type 2 & Type 1

**Trying to reconcile what is a very hot topic issue**

Old growth definition might need more work. Definitely needs full protection

**Retain old numbering system so GIS systems don't need to change**

Generally good, include maintain or enhance of values/features

**Need to include Old Growth Type 2**

Old growth 1 and 2 protected from logging

**Required clearer definitions of type 2 old growth forests. What % area is minimum threshold?**

Adequate field testing for positive outcomes

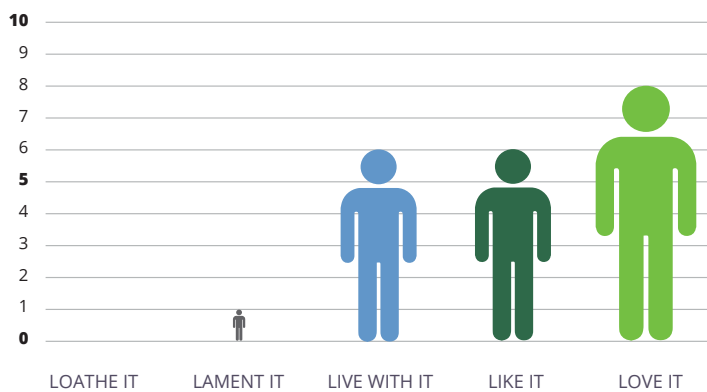
**No expert**

Not of major concern for the organisation I work for

**Clearer definitions and thresholds and field testing needed**

There were clearer criteria for determining 'rareness' - the assessments described to establish thresholds seem arbitrary

## NON-INDIGENOUS COSTUMARY RIGHTS



### I WOULD BE MORE COMFORTABLE IF:

Further Guidance required around application

**Where that activity doesn't damage environmental values**

It was more clear who has customary rights and what responsibility a grower has to accommodate

**Legal recognition of established use**

Happy

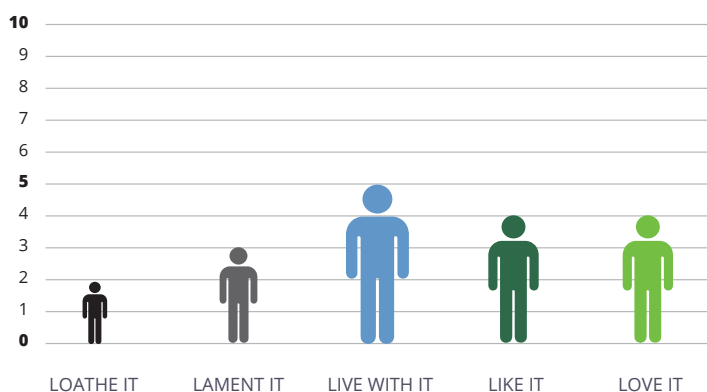
**A private business should have ultimate control on who accesses the land**

Guidance framework and definitions needed for 'non-legal' - customary

**Seeking an 'agreed' approach was less likely to lead to further dispute.**

Local communities definition needs clarification. "legality" issue is problematic.

## WORKERS RIGHTS



### I WOULD BE MORE COMFORTABLE IF:

Changes considered following legal advice

**Greater clarity around some of the key definitional questions**

Seems to provide good protection for workers and upload ILO conventions

**Provided it is stated that when it conflicts Australian law prevails**

Need to include OH&S, minimum wage standards, consultation processes.

**Employers stopped whinging about having to respect workers rights**

ILO Declaration be the basis of worker rights unless Australian law precludes greater protection

**Protect rights of small business owners**

Legal input required. Should not be the organisations responsibility to manage contractor workers rights

**Conflict with Australian law - address protection of workers rights**

Contradicts legislative requirements

**FSC is all about legality, so how can guidance require FM's to ignore illegal actions by workers**

Extensive legal implications. Requires legal advice ASAP