

**Woodmark Soil Association. Public Feedback Statement relating to FSC evaluation of VicForests, Victoria, Australia.**

August 2009

**Introduction**

This paper aims to provide preliminary public feedback following the evaluation of VicForests against FSC Principles and Criteria by Woodmark Soil Association.

In the event that an FSC certificate is awarded a publicly available report will be made available by Woodmark. However, until such time as a certificate is awarded, there is no obligation to report publicly and the availability of any report and/or the availability of detailed conclusions are at the discretion of VicForests. This paper aims to provide a summary of the evaluation process; an indication of the main issues raised by stakeholders; a short discussion of three key issues/objections raised by stakeholders; a summary of the overall conclusions.

VicForests has had the opportunity to review this summary and have consented to its availability.

**Summary of Process**

Pre-assessment 3-7<sup>th</sup> December 2007. Main assessment 10-14<sup>th</sup> November 2008

Main assessment site visits concentrated in East Gippsland and Central Highlands with one team of three people concentrating efforts in each region . Around 40 person days were committed to stakeholder consultation, detailed and in depth evaluation of all Principles, Criteria, Indicators and follow up.

**Assessment team**

- 1) Kevin Jones. B.Sc. Ecological Science, M.Sc. Forestry and Member of the UK Institute of Chartered Foresters. FSC forest and chain of custody assessments worldwide since 1996 and managed the Woodmark FSC certification programme since 2001.
- 2) Hamish Crawford, Lead Assessor - BEc/BSc Forestry, independent forestry consultant, over 20 yrs experience in forest and protected area management in Australia.
- 3) Dr Garrick Hitchcock; BA (Hons) and PhD Anthropology, Director, Arafura Consulting, Melbourne, Victoria.
- 4) Mark Stables; BSc Physical Geography/Ecology. Employed by Insites consultancy, Sydney as Project Ecologist (Botanist)
- 5) Guy Williams; BSc Ecology (Hons), Director of tda Environmental Consulting, Sydney.
- 6) Emily Blackwell; Emily has a BSc (Hons) in Environmental Science and an HNC in Forestry. Emily is Woodmark's Certification Manager for the Asia Pacific region

**Peer Review Panel**

- 1) Dr. Peter Kanowski – Professor of Forestry, Australian National University

2) Dr. Anne Wallis – Senior Lecturer, School of Life & Environmental Sciences, Deakin University.

3) Dr. Dermot Smyth –Adjunct Principal Research Fellow, School of Environmental Research, Charles Darwin University and a member of Australian Institute of Aboriginal and Torres Strait Islander Studies (AIATSIS).

**Certification Decision** – Woodmark Certification Committee.

### **Stakeholder Consultation**

Stakeholders were contacted before the audit by post and email (over 900 contacts). In addition consultation was carried out before and during the audit process including correspondence, telephone discussion and personal meetings. Examples of organisations/individuals who provided input included though were not limited to: FSC Australia; WWF Australia; Wilderness Society; Australian Conservation Foundation; Friends of the Earth; Greenpeace; My Environment; Environment East Gippsland; Aboriginal Affairs Victoria; National Native Title Tribunal; Native Title Services Victoria; Gunai-Kurnai Registered Aboriginal Party Department of Sustainability and Environment; Parks Victoria; Timber Communities Australia; Wood Products Victoria; Victorian Association of Forest Industries; Independent Researchers; Independent apiarists; Forestry Contractors.

### **Issues raised**

Positive. Stakeholders made a number of supportive comments including though not limited to: ongoing improvement in forest practice noted – in part a response to forest certification processes; the important role of forest in provision of employment; a professional and thorough approach to health and safety management; positive contribution to fire management; responsible and professional approach to dealing with stakeholders and native title claims; commitment to compliance with legal and regulatory requirements; operation within a strong system of protected areas; review of harvest levels (JoSHL) resulting in sustainable levels of production; innovative approaches to securing appropriate value for forest products.

Negative. Stakeholders made a number of negative comments including though not limited to: No evaluation should take place in native forest until there is an approved national standard; evaluation of VicForests in isolation of DSE is not appropriate; short term tenure of VicForests not consistent with long term commitment to maintaining forest values; inappropriate harvesting in old growth – biodiversity impacts; limited information, research, monitoring in relation to biodiversity values; harvest levels not sustainable; inadequate attention paid to impacts of forest management in relation to landscape level processes (e.g. fire, and water catchment issues); inefficient use of forest resource – high volumes used for chip or burnt in situ.

This is not an exhaustive list of positive and negative issues and is intended to summarise the general flavour of the many comments received. These issues are not

reviewed here. However a response from Woodmark on three of the key issues that generated significant comment is given below.

**1) Performance of an audit in natural forests in the absence of an endorsed national standard.**

Woodmark understands stakeholder concern in relation to performance of audits in the absence of endorsed national standards. This is not an uncommon issue having been raised in countries other than Australia. Woodmark's experience is that, given that FSC rules are explicitly designed to accommodate this situation through the use of adapted standards, and, given that other certification bodies operate in most regions, even if we were to exclude ourselves from carrying out an audit, another certification body almost certainly would conduct an audit. Irrespective of this practical consideration, Woodmark takes the position that any forest manager has the right to a fair and objective assessment. This is the basis upon which FSC has influence over the development of forest management practice and is fundamental to FSC mission. Woodmark fully supports VicForests pursuit of forest management in compliance with FSC requirements and its right to request an evaluation.

**2) Evaluation of VicForests in isolation of DSE – or Scope.**

Evaluation and definition of scope is challenging in the case of VicForests as a consequence of the legislative and administrative context. Considerable stakeholder comment was received in relation to the area that was subject to evaluation, and the entity that was subject to evaluation. It was noted that overall responsibility for stewardship of forests in Victoria is the responsibility of the Department for Sustainability and Environment (DSE). As such it was suggested that DSE should be the subject of FSC certification. However, DSE does not have responsibility for operational planning, harvesting and most management operations (notably excluding fire management), and critically do not have direct control over chain of custody. Nevertheless, VicForests is highly dependent upon the framework that DSE provides and would not currently be in a position to meet a number of FSC requirements without DSE active involvement e.g. management planning. DSE and VicForests work together on many aspects of management and are interdependent in relation to timber production and meeting FSC requirements.

VicForests fully recognises the interdependent nature of their operations with DSE and joint responsibility for forest stewardship.

The evaluation concluded that it was incumbent upon VicForests to ensure that DSE activity was compliant with and supported FSC certification requirements. Some corrective actions issued by Woodmark to VicForests are likely to require support from DSE for effective close out.

In summary the activity of DSE and VicForests were evaluated against the FSC Principles and Criteria in relation to all state forest land for which they are jointly and severally responsible in Victoria (c. 2.5m ha). Only product arising from areas defined within the Allocation Order will be eligible for FSC certification. (483,410ha) in practical terms for chain of custody purposes this will be limited to those areas defined by the 5 year Timber Release Plans.

### **3) Harvesting in old growth stands**

This is a complex and controversial issue. FSC principles and criteria do not explicitly exclude the possibility of harvesting in old growth per se, (nor indeed any other specific forest type) and in the absence of a nationally agreed definition of HCVF it is not clear how old growth will be interpreted in relation to FSC Principle 9 in Australia. Victoria does have large areas of forest protected in protected areas and reserves and a representative approach has been taken to this. That said the forests of Victoria contain globally unique ecosystems and species. Woodmark's overall conclusion was that on the basis of current FSC standards harvesting in old growth would not necessarily be automatically excluded, however, the approach adopted in Victoria was not consistent with the precautionary principle in relation to identification and protection of HCVF attributes present in old growth stands.

### **Overall conclusions**

Following Main Evaluation Woodmark concluded that VicForests could not currently demonstrate adequate compliance with FSC Principles and Criteria to justify issue of a certificate.

A number of non-compliances were noted that would require attention before a certificate could be issued. Major non-compliances were noted at Principle level for four Principles: P3 – Indigenous Peoples Rights; P6 – Environmental Protection; P8 – Monitoring; P9 – High Conservation Value Forests. Woodmark understands that VicForests is evaluating what action may be necessary in order to deal with these non-compliances.

Further Minor non-compliances were noted under all Principles. VicForests would need to deal with these non-compliances within a year of issue of any certificate.

Woodmark would hope that VicForests is both willing and able to address the non-compliances identified and modify approaches to forest management sufficient to achieve FSC certification. Woodmark would also hope that stakeholders recognise the integrity of the process to date and where possible offer support to VicForests in reviewing current practice to achieve compliance with FSC Principles and Criteria and positively address stakeholder concerns.