

BEDP ENVIRONMENT DESIGN GUIDE

TIMBER AND WOOD PRODUCTS FROM ENVIRONMENTALLY CERTIFIED FORESTS AND PLANTATIONS

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The note PRO 3 was originally published in November 2004, and was reviewed and expanded by Andrew Walker-Morison to form 3 papers:
 PRO 33: Timber and Wood Products from Environmentally Certified Forests and Plantations – Overview
 PRO 34: Timber and Wood Products from Environmentally Certified Forests and Plantations – Background
 PRO 35: Timber and Wood Products from Environmentally Certified Forests and Plantations – in Australia
This summary is the same for all 3 papers, although the papers themselves contain varying useful appendices and tables.

Summary of

Actions Towards Sustainable Outcomes

Environmental Issues/Principal Impacts

- Deforestation of high quality forest habitats continues and is a major cause of global biodiversity pressures.
- Many wood products, particularly imported wood products, continue to be sourced from areas where there is insufficient regulation or control in place to give confidence in sustainable forest management.
- In Australia there is evidence that native forest and plantation management has significant room for improvement, and that current practices may have an adverse effect on environmental sustainability.
- Plantation management is also a concern for some stakeholders, particularly through the clearing of forests for plantation establishment and the use of some chemicals.

Basic Strategies

In many design situations, boundaries and constraints limit the application of cutting EDGE actions. In these circumstances, designers should at least consider the following:

- Specify and demand wood products accredited by broadly-supported third-party environmental certification systems where possible. The range of such timbers available is expanding quickly, with increasing demand from specifiers being the most important driver of reform.
- Avoid timbers known to be at risk of coming from poorly regulated or illegally logged forests (refer Table 2 in PRO 34)
- Favour the use of locally grown (Australian and New Zealand) timbers and wood products where possible. Credible certified wood products should be the primary priority as the specification in Australia of certified products drives global demand for improved management, and lower-impact practices locally and globally.
- Utilise the decision-making tree in the note *PRO 30: Timber and Wood Products – Applications and ESD Decision Making*

Cutting EDGE Strategies

- Not all certification systems are third-party certified with chain-of-custody verification. Consider environmental claims against who is making the claim, and whether the claim is first party (self certification) second party (e.g. industry association certification) or genuinely independent third-party.
- Not all third-party certification schemes have equal credibility. There are a range of useful resources including this note to assess the differences between schemes. There is evidence that the best third-party schemes globally are delivering improved social and environmental outcomes.
- What constitutes 'sustainable forest management' is still poorly understood and the subject of intensive research. There is ample evidence that existing management practices, even in certified areas, will need to be improved to deliver environmental sustainability in the longer term. Striving for best possible practice now is crucial.
- When comparing schemes, consider in particular the breadth of stakeholder input, the degree of transparency and accountability, and the recommendations of key stakeholders in informing your approach. Most stakeholders have important perspectives in the protection and management of forests, which are a crucial component of global climate and biodiversity protection. No stakeholders' interests should be discounted. Standards that have multi-stakeholder support are likely to be more durable and deliver better outcomes for environmental management.

continued

Synergies and References

- Refer to the appendices in the companion papers mentioned above.
- There are a range of further useful resources at the end of this note. This note does not recommend any one reference at the time of writing as definitive.
- For information about the conservation status of global forests refer to the UN-WCMC site <http://www.unep-wcmc.org> and FAO's <http://www.fao.org/forestry/index>
- *BEDP Environment Design Guide: PRO 30: Timber and Wood Products – Applications and ESD Decision Making*

BEDP ENVIRONMENT DESIGN GUIDE

TIMBER AND WOOD PRODUCTS FROM ENVIRONMENTALLY CERTIFIED FORESTS AND PLANTATIONS – IN AUSTRALIA

Andrew Walker-Morison

Rapid advancement and change within Australia's predominant timber certification schemes has led to the revision of the original November 2004 paper PRO 33: Timber and Wood Products from Environmentally Certified Forests and Plantations. That paper now forms the summary for the extended content contained within the papers PRO 34: Timber and Wood Products from Environmentally Certified Forests and Plantations – Background, and this paper.

Certification appears to be generally leading to improvements in forestry practices in Australia. Whether certification is yet leading to truly 'sustainable' forestry is less clear. There are a number of tangible differences between the two schemes operating in Australia, including the degree of stakeholder support, identified in this review. Specifiers are encouraged to use certified timber over uncertified timber, but to be aware that certification standards differ, to understand these differences, and to make an informed choice accordingly.

Keywords

Australian Forest Standard (AFS) certification schemes, chain of custody, forest management, Forest Stewardship Council (FSC), timber, stakeholder participation

1.0 INTRODUCTION

Environmental certification in this paper refers to the process of verifying compliance with a standard of management for forests and plantations. Reputable forest certification is offered in conjunction with a chain of custody and labelling programs that allow customers to distinguish between different product offers. The overall goal of certification has been described as 'adoption of standards that will ensure forest management is environmentally sensitive, socially aware, and economically viable' (Upton and Bass, 1995). This paper seeks to:

- introduce the concept of forest certification to practitioners
- overview stakeholder interests and perceptions of the schemes in Australia
- discuss trends
- provide a list of information resources

2.0 CERTIFICATION IN AUSTRALIA

In Australia certification has developed in the context of a 30-plus year debate over appropriate native forest and plantation management. In some parts of Australia, notably Tasmania and Victoria, this debate remains characterised by polarisation and entrenched opposition, often portrayed as 'greenies vs. loggers'. This description unfortunately simplifies the range of perspectives and stakeholders present, such as: scientists, local communities, and indigenous interests, in an important and complex issue.

Government and industry stakeholders typically describe current Australian native forest management as demonstrating international best practice and protecting forest values, while conservation groups typically describe the same practices as destructive of

biodiversity and forest values. While this situation reflects tensions internationally, an ex-forester and senior international auditor for a Victorian timber manufacturer, described the Australian stand-off as the worst he has experienced in the developed world (Jones, 2007). Addressing this divide has remained elusive to all concerned, despite many protests, reports and government processes.

The key dynamics in Australian forestry debate underlie many of the claims and counter-claims that specifiers will encounter, and so are worth briefly outlining here. At the centre of conservation group concerns lie issues such as whether the forest reserve system, agreed between the states and the Commonwealth under the **Regional Forest Agreements (RFAs)** in the 1990s, sufficiently protect forest and related biodiversity values. There are arguments that they do not create adequate reserves (Dargavel and Kirkpatrick, 1998), whether water catchments should be logged (with arguments that they yield more water when left unlogged), how areas scheduled for timber production are managed (for example, whether clear felling is sustainable for the full range of forest species), and the use of certain chemicals in plantations and forests (such as those linked to mutations in amphibians and others, used to control animals, often native, eating seedling, resulting in their painful death). As a response to such concerns some conservation organisations have taken a policy position of opposing native forestry operations entirely.

The debate on how best to manage our native forests in Australia has evolved since the early 1970s, to the voluntary introduction of timber certification in the late 1990s by the industry and since. Components have been the local 'not in my back yard' community-based groups opposing forestry operations, professional foresters (typically proud of their competence in managing forest operations), multi-state political campaigns, and a complex web of industry, government

and corporate interests arising from the significant quantities of money flowing through the wood products sector. It is perhaps no surprise that a situation has arisen where a scheme that gives equal rights to **Environmental Non-Government Organisations** (ENGOS), is strongly backed by conservation groups but has limited support from native forest industry sectors and government (the Forest Stewardship Council or FSC), and a scheme sponsored by governments and strongly supported by the native forest sector in which ENGOS maintain they have little power is strongly criticised by conservation groups (the Australian Forest Certification Scheme or AFCS). What is more unusual internationally is the support by the Australian government of one standard (the AFCS) over the other (Roberts, 2006).

3.0 FOREST STEWARDSHIP COUNCIL

3.1 Overview and Recognition

Until the establishment of an FSC National Initiative in 2006, FSC certifications in Australia have proceeded using the FSC's 'Interim Standard' process. Under this process recognised certifiers certify operations using a standard developed by them, based on FSC International's principles and criteria. These standards, if recognised by FSC International, allow certified wood products with chain of custody to be traded internationally under the FSC label. The first Australian grower certified under this scheme was a Victorian plantation (exotic softwoods) and forestry (native hardwoods) company in 2004. In 2007, the first private native forest was certified in NSW. More than half a million hectares of forests and tree plantations have been certified in Australia, with the vast majority of these plantations being harvested for paper pulp production. More than 90 companies are participating in the FSC system as Chain of Custody certificate holders. At the time of writing, FSC is the only certification system recognised for timber credits by the Green Building Council of Australia although this is currently under review.

3.2 Critiques

Criticisms of the FSC in Australia have been made including:

- Variation in approaches, implementation, and depth of detail required under the two current Interim Standards in existence. FSC Australia comments that both of these are in accordance as a minimum with FSC principles and criteria and have been passed by FSC's international body, and it acknowledges that the Interim Standard development process does not allow sufficiently extensive stakeholder input or detail on issues such as addressing high conservation value areas,

and as a result is seeking to speed the development of a National Standard (Spencer, 2007).

- In at least one instance in Victoria, environment stakeholders have been highly critical, arguing that conditions put onto the forest manager have not been upheld adequately. The auditor contends that Corrective Action Requests have been made and addressed by the forester and may be reviewed on the Public Summary (SmartWood, 2007b).
- The FSC Board does not include government representation. This is due to FSC International policy requirements allowing government instrumentalities, but not department representation. It is understood that this ruling is intended to support the participation of community-based, non-government stakeholders, particularly in developing countries.
- The FSC governance structures have also been criticised for not appearing to meet Standards Australia's protocols for independent standard setting because FSC sets the overarching standards, and accredits the certifiers, and maintains a capacity to approve, or withdraw certifications. FSC contends that this independence exists and points out that they have been recognised within the International Organization for Standardization (ISO), that they have split off its accreditation function into a (wholly owned) separate company: the Accreditation Services International, and that certification within the FSC system is carried out by independent third party certification bodies.
- FSC certificates are available for products containing as little as 10 per cent FSC-certified content. FSC notes that wood that is not FSC certified must meet the FSC 'controlled wood standard'.

3.3 Strengths

The FSC in Australia demonstrates broad engagement and 'buy-in,' with representatives on their board and membership from the forest industry (including Timber Communities Australia, Timbercorp, The Laminex Group, Forest Industries Federation of WA), as well as social and environmental conservation organisations (including Australian Conservation Foundation and the Wilderness Society). At the time of writing, the Victorian Government appears to be setting a state government precedent in seeking FSC certification for its native forests, potentially during 2008. From stakeholder interviews conducted by the author, it is evident that the **Corrective Action Request**¹ (CAR) and audit processes have provided a basis for detailed and robust debate and appeal, with extensive and significant community involvement as noted under section '6.4.3 Grievance' and '6.3.1 Stakeholder Engagement, Participation and Transparency'.

¹ 'Corrective Action Requests' identify (called 'Non Conformancies' under the AFCS) are the mechanism in the audit process to identify and require rectification of a breach or breaches

The Rainforest Alliance, an FSC certifier, undertook a review of CARs issued prior to certification of 6 Australian and 19 New Zealand FSC management certificates in 2006 in conjunction with an auditor from the international company, URS. This was based on the publicly available Public Summaries issued as part of certification and subsequent auditing, and found that certification has influenced change in both forest management systems and practices with the greatest changes being required to:

- protect rare, threatened and endangered species
- stakeholder consultation
- the incorporation of social and environmental impact assessments into planning
- the use of chemicals for pest management
- management planning

(Mason and Jones, 2007).

4.0 THE AUSTRALIAN FOREST CERTIFICATION SCHEME

4.1 Overview and recognition

In 1999 the development of the Australian Forestry Standard was inaugurated as a joint initiative of Australia's public and private forest growers, the Commonwealth and State/Territory Governments, and the forestry industry. This was due to demand from export markets for certified product, with an Interim Australian Standard® released in 2003. The AFS aims to "provide a basis for credible, verifiable statements on the sustainability of forest management for wood production from individual forest ownerships" (Standards Australia, 2007b). The first forest manager certified under this scheme was in Tasmania in 2003. At the time of writing, all state forest agencies except Western Australia have received AFS certification with private organisations. The area certified under the AFS covers 8.676 million ha of native forests and plantations (PEFC, 2007b). Some Victorian plantations have completed AFS certification in dual certification under the AFCS and an Interim FSC Standard.

The AFS adapted elements of the existing frameworks of the international Montreal Process Criteria and ISO 14001 environmental reporting framework to develop a performance and systems-oriented standard that is recognised under the PEFC framework. The Montreal Process Criteria outlines areas or values of the forests for reporting, but not how performance should be measured. Some mandatory performance requirements are achieved by the forestry legislation existing in each State or Territory. The AFS was granted full Australian Standard® status in August 2007. In 2002, a report from a Finnish forestry consultancy, found as an Interim Australian Standard® the AFS to be 'compatible' with 9 out of 10 and 51 out of 56 FSC criteria, 'partially compatible' with one, and 'not compatible' with 3. The report was commissioned by the Forest and Wood Products Australia (formerly the Forest and Wood Products Research and Development

Corporation. Refer to the section '6.4 Discussion' below (Forest and Wood Products Australia, 2003). It should be noted that the report compared the standards at a high level and did not look at indicators and verification methods, the level of detail at which Standard goals are expressed in crucial performance criteria.

4.2 Critiques

The AFS has come under sustained criticism from the Australian non-government conservation sector and some academics (Cadman et al, 2007; Cadman, 2001; Gale, 2007a; The Wilderness Society, 2005). Critiques include that the standard development and final standard:

- Did not meaningfully incorporate stakeholders from conservation and community interests during standard development processes, including setting terms of reference without including ENGO representatives.
- Did not adequately implement appeal procedures under Standards Australia, and that guidelines were informal, unclear and not well implemented (Cadman, et al, 2007; Gale, 2007b). AFS Limited contends for its part that meaningful engagement was indeed attempted and that processes were well implemented (Australian Forestry Standard Ltd., 2007).
- Does not mandate improvements in management practices or reserves beyond those stipulated by the relevant existing State Forestry legislations. Forest managers and auditors argue that the AFS promotes a number of management systems that are over and above traditional practice.
- Does not prohibit broad-scale clearing of native forest for plantation establishment. Provisions are still present, though greatly reduced, under the full Australian Standard now in place. This appears to have been significantly reduced under the full standard but capacity does still exist, as it does in the FSC under even more limited conditions (refer Table 1).
- Does not incorporate adequate public review or participation in planning and management operations, or provide for meaningful public or independent overview to assess the efficacy of management strategies. AFS certified forest managers and auditors spoken to contend that extensive public review and participation occurs.
- Does not incorporate performance-based requirements that allow effective monitoring for assessment of conservation outcomes. This is contested by the AFS which points to their requirements under the standard to comply with state and Commonwealth legislation.
- Does not prohibit the use of chemicals or pest-control agents beyond legal requirements, or use of genetically modified organisms. AFS contends it encourages the use of 'less harmful' chemicals.

- Does not incorporate adequate transparent or verifiable performance standards, or provide for transparent and accountable dispute resolution and grievance procedures. Again this is contested by the AFS which points to legislative requirements, public summary documents, and grievance procedures.
- That the AFS has internal conflicts of interest as it is policed by the Joint Accreditation System of Australia & New Zealand which has a government board, when the government is the major client for certification, and substantially initiated and funded the development of the AFS standard (Cadman, 2007). AFS contends that processes are fully compliant with ISO requirements.²

4.3 Strengths

A consistent comment by forest managers and auditors spoken to for this paper in Victoria, NSW and Tasmania, was that implementation of the AFS was driving improvements in management systems in forestry operations (Berry, 2007; SAI Global 2007b; Swanepoel, 2007; Shaw, 2007). The potential implications of this are significant relating to improved feedback and decision-making from more timely and accurate data, including monitoring, surveys and audits designed to provide information on many aspects of forest and plantation management including biodiversity.

As noted, in preparation for the final standard for 2007, extensive amendments have been made to improve requirements including the removal of provisions in the AFS allowing broad-scale 'conversion'³.

Other changes include references to the call for a precautionary approach to be utilised, for forests to be able to self-regenerate, for monitoring techniques to be powerful enough to allow remedial actions, for public summaries to be available of independent audits, and for increasing provisions regarding control of invasive exotic species. The FSC calls for maximising all benefits from forests but does not specifically mention carbon sequestration. The AFS notes forests are important as carbon sinks, but the requirement is vague.

Supplementary documents, for example, encourage forest managers to 'reduce greenhouse emissions' and 'improve fuel efficiency' but make no mention of quantifying liberated or sequestered carbon). There is also indication that increased stakeholder consultation may be occurring as a result of AFS certification (Berry, 2007; SAI Global, 2007b; Swanepoel, 2007).

5.0 DISCUSSION

No independent comparative review of on-the-ground benefits from the implementation of both AFS and FSC in Australia has yet been undertaken. Two

comparison reports have been commissioned by Forest and Wood Products Australia, one by Finnish forestry consultancy Indufor Oy based on the FSC Principles and Criteria and the PEFC's Pan European Operational Level Guidelines against the AFS Interim Australian Standard⁴, and a more recent report by Australian consultancy Cailum Pty Ltd (Forest and Wood Products Australia 2003, 2006). Each finds the AFS and FSC to be broadly compatible (a claim disputed by the FSC), but also note differences in numerous areas including:

- the number of specific assessment requirements – 166 for AFS versus the 193 for Woodmark and 253 for Smartwood FSC standards.
- carbon cycle – no specific provision by FSC
- emphasis on continuous improvement – stronger under AFS
- stakeholder engagement – more extensive under FSC
- genetically modified organisms – restricted under FSC but not under AFS
- restoration of forest cover in plantations – required more specifically under FSC
- 'conversion'³ of old growth and high conservation value forests to plantations – originally permitted by AFS but now more restricted under AFS 2007
- chemicals restrictions – required under FSC but not AFS
- standards development processes – broader stakeholder involvement required under FSC
- review prior to logging – more public involvement required under FSC
- public disclosure of certification audits and corrective action requests – greater requirements under FSC (Forest and Wood Products Australia 2006)

The following items noted by Indufor Oy as not specifically required or addressed by the AFS appear still to be relevant:

- compensation for use of traditional knowledge of indigenous peoples
- diversifying the local economy and avoiding dependence on a single forest product
- the yields of non-wood products harvested (e.g. bush foods, water, honey)
- observed changes in the flora and fauna, and costs and productivity of forest management.
- for a proportion of overall forest area to be managed for conservation, and restore a proportion to natural forest where a plantation has been established
- the AFS Standard requires processes for participation and recognition of the views of

² An international framework for environmental reporting by Governments

³ This is the term given to clearing native forests for non-forest uses or plantation production, and which has been occurring at a large scale until recently in Tasmania.

local communities; however it does not directly require that the local knowledge is taken into consideration in the decision making.

- the Standard does not require information or pre-assessment of the impacts of introduced species on ecosystems and native species populations
- “The FSC has a **somewhat broader scope and** seeks to ensure that the forest is maintained as a fully functioning ecosystem capable of providing the full range of products, benefits and services. Still, the performance output can be equivalent in the both cases” (Forest and Wood Products Australia, 2003)

5.1 Stakeholder engagement, participation and transparency

A consistent finding of international reviews is that broad stakeholder engagement and participation is necessary at both standards development and certification implementation levels (Nussbaum and Simula, 2004). At this stage there are significant differences between schemes at both levels.

FSC

The Australian FSC Board has wide representation, but does not currently include the principal forestry union (which declined membership) or government representatives (proscribed by FSC policy). A weakness of the FSC Certifier Standards is that such standards are developed from the generic FSC format without extensive structured broad stakeholder input. The development of the full standard currently commenced, involves a broad range of stakeholders in a participative, consensus based approach. In the certification process under the Interim standards however, requirements are not just to *consult*, but *involve* a broad range of stakeholders in the process of certifications. The difference between consult and involve relates to the degree to which stakeholders are required to be included as stakeholders in decision-making processes. In one high-profile example concerns raised by external stakeholders during this process led to an independent bio-diversity assessment and placement into reserve of Regionally Significant (as classified under Australian law) stands of remnant native forest.

Public summaries of certification audits are required to be readily available, and are generally accessible and discursive (SmartWood, 2007b, 2007a; Soil Association, 2007). After certification forest managers are required to maintain ongoing consultation with local stakeholders, and certification audits have explicit provision for participation of local and relevant stakeholders (Alliance 2006, p.4; Soil Association, 2007, p.24). This process appears to be occurring in Australia, and provides an important opportunity for stakeholders to raise grievances (Amis, 2007).

A crucial test of a scheme's credibility and transparency is its demonstrated ability to identify and require rectification of breaches. Under FSC these are called **Corrective Action Requests**, are either 'major' or 'minor', are issued at the time of audit, and listed in

public summaries. Failure to address major CARs should lead to the loss of certification, and outstanding CARs can be the basis for grievances and appeal by stakeholders.

Australian Forestry Standard Board

The AFS Board has representation from industry, union, 'general' and government members, and the standard development task is delegated to the Technical Reference Committee which had representation from the ex-Aboriginal and Torres Strait Islander Commission. There was no substantive involvement or support from conservation groups in the final standard. ENGOs and the AFS disagree on the reasons for this, each arguing the other was at fault. The lack of ENGO participation halted recognition of the AFS as a full standard for three years from 2003 until 2007, as Standards Australia requires standards have "general agreement, characterised by the absence of sustained opposition by any important part of the concerned interests" and this condition had not been met satisfactorily, (Standards Australia, 2005). Standards Australia advised AFS Ltd that it needed to demonstrate engagement with conservation and consumer stakeholders (Blair, Streeter and Iskander, 2008). In June 2007 the joint Australian conservation groups wrote to the Australian Forestry Standard secretariat stating that it did not have their support, strongly criticising many aspects of the Standard (Cadman et al, 2007). The final standard balloted by AFS Ltd and passed by Standards Australia in August 2007, lists the involvement in the AFS Technical Reference Committee of one independent environmental scientist (School of Botany, University of Melbourne), a scientific organisation called the Ecological Society of Australia (ESA) along with an independent forest scientist, a representative for the conservation agencies of Governments and the ex-ATSIC Commissioner – all of whom are described by AFS Ltd as representing environmental interests (Edwards, 2008). No environmental non-government groups were participating at this time. In October 2007 the ESA issued a document stating that it was not and had never presented itself as being an environmental non-government group. When queried how a consensus based standard could be developed without the support of such stakeholders, Standards Australia advised that they had provided guidance to AFS Ltd that it should seek, and demonstrate that it had sought, to engage with ENGO and consumer groups, noting that if they did not choose to participate AFS Ltd could not force them. This the AFS did, ENGOs did not participate in further standard development, boycotting the process due to submitted objections. The standard was granted full status in 2007 (Blair, Streeter and Iskander, 2008). While the standards development process permits majority determination, it requires that "no major interest involved with the subject of the Standard has collectively maintained a negative vote" (Standards Australia, 2007a). It is unclear how Standards Australia could require that a third party be involved beyond its will to rectify this impasse.

AFS

Implementation of AFS has requirements for consultation during certification audit, however these appear to be limited to more traditional terms of reference and explanation of approach, rather than management changes resulting from, say, issues raised by conservation stakeholders (Bailey, 2007; Berry, 2007). Certification outcomes leading to additional conservation outcomes over those required by law were not identified in research for this note, although these may exist. Certification audits under AFS are not required to involve community stakeholders. Public reporting of AFS was generally found in comparison to be less accessible, less detailed, or to not address all criteria, and with **non-conformances**, the equivalent of CARs, outlined in little detail (DNV; 2007; NCS 2007; SAI Global, 2007a). There is no public report at this time that documents or analyses corrective action required by auditors for the AFCS.

Non-Certified Content Inclusion

As mentioned above in section 6.1.2, with certified content being possibly as low as 10 per cent in some products carrying certification badging, a final word is required on non-certified content inclusion. AFS, PEFC (the Programme for the Endorsement of Forest Certification Schemes), and FSC all require certified organisations using non-certified wood to obtain supplier declarations giving relevant undertakings, such as risk assessment, and assurance that the timber is not from illegal sources. However a number of transparency and accountability problems have been identified for both the PEFC and FSC processes for managing non-certified product overseas and in Australia (Taylor, 2008). This area remains a principal challenge and concern for all interested in confidence in environmental assurance.

5.2 Grievance Procedures

The success and credibility of any standard depends ultimately on its capacity to respond to changes, challenges, and criticisms brought by its constituency. Effective grievance, dispute resolution processes and transparency are crucial. In the preparation of this paper a number of stakeholders raised concerns and challenges with regards to grievance and dispute resolution, and transparency for both schemes.

Under the FSC grievances can be raised with auditors during certification or auditing, with the FSC Australia Board, and with FSC International. This process has already been invoked a number of times, in particular with regards to one high-profile certification and the FSC's controlled wood standard. Feedback from stakeholders was not universally positive regarding perceived outcomes (some are in progress), but consistent processes were reported to be operating, and the FSC appeared to be responding to issues raised both locally and, in the case of the controlled wood standard, with the engagement of FSC International (Amis, 2007; Jones, 2007; Taylor, 2008).

Under the AFS complaints and grievances procedure, any such issue must be submitted to the entity that the complaint is against. For example if the grievance relates to forestry practices – then submission would be made to the forest manager. Beyond this, grievances can be taken to the certifying organisation and to the standards body. In eight instances issues were raised and advice provided by AFS for pursuit of a grievance process, but details are not publicly available (Edwards, 2007). In Tasmania, the first state to have organisations certified under AFS, some conservation and community stakeholders have complained that complaint processes are unresponsive and circular (Bailey, 2007; Godfrey, 2004). Whether grievance mechanisms and such grievances are substantive requires a process in itself, and lies outside the scope of this document.

5.3 Managing our forests for sustainable outcomes

Finding a sustainable balance between use and stewardship for our forests will always be challenging, but crucial. Clearly there is disagreement between stakeholders as to whether this is being achieved, but there would appear to be some basis for concern. The Regional Forest Agreements, upon which current forestry land use decisions are made, have not been immune to independent scientific criticism with the State of the Environment Australia Report 2001 commenting “unfortunately the RFAs do not provide a comprehensive coverage of the native forest estate as there are important areas that have not been assessed” (Commonwealth of Australia, 2001 p.55). Confidence in Victoria was not assisted by a finding in 2001 that the comprehensive research undertaken as part of the Regional Forest Agreement had drastically over-estimated the quantity of timber available for sustainable yield, with a reduction following of 30 per cent (Vanclay and Turner, 2001). In 2006 in a scathing ruling a Federal court case found that under AFS certified Forestry Tasmania, the reserve system as implemented was failing to protect three species examined, including the Tasmanian wedge-tailed eagle. The court found that there was “no evidence on which to conclude that the State can or will protect the species through the Comprehensive and Adequate Reserve System in isolation, in the future” and further that “given Forestry Tasmania’s satisfaction with current arrangements, I consider that protection by management prescriptions in the future is unlikely” (Marshall, 2006). The case was overturned on appeal in 2007, in part on the basis that although the Commonwealth and the State had agreed in writing to protect threatened species, because it was always envisaged that logging would take place there was no guarantee that the environment, including the species, would not suffer as a result and so ‘protect’ did not really mean ‘protect’ (Sundberg, Finkelstein and Dowsett, 2007, para. 64-67 inclusive). The appeal did not refute the findings by Justice Marshall, that logging had a significant impact on threatened species. At the time of writing, the High Court is being asked to hear an appeal of the Full Court’s appeal decision.

Some independent scientists are also critical. Wintle, an independent environmental scientist who served on the AFS Technical Reference Committee, and Lindenmayer, a leading forest scientist based at ANU, level criticism within and beyond Australia: "Systematic approaches to demonstrating the sustainability of forest management are largely absent, implying that there is no burden to prove the sustainability of forest management. Court rulings in Australia (Brown vs. Forestry Tasmania) and the United States (Gifford Pinchot Task Force v. USFWS 2004) indicate that the burden of proof, in fact, rests with forest managers and agencies, and that at the current time, forest management agencies have failed to demonstrate sustainable forest management" (Wintle and Lindenmayer, 2007). These are substantive issues and raise important questions that need to be addressed for specifiers to have confidence in certified products. No data was provided by stakeholders contacted, that AFS certification is leading to quantifiable additions to conservation provisions, such as additional conservation reserves, over and above those required under law. For land management allocations and forestry operations, the AFS largely references existing state and federal legal requirements, and any additional provisions being made under certification were not able to be identified by the author. There are three supplementary AFS documents that encourage managers to undertake a range of conservation and other measures such as *Guidance for Medium and Large Native Forest Ownerships*, but these are not mandatory (Standards Australia, 2007b, p.9).

It appears that even in its Interim Standard form, the FSC has led to many changes in management requirements (Mason & Jones, 2007). However both schemes require an on-the-ground review to establish the precise nature, extent and value of any changes being made.

6.0 CONCLUSION

Certification is leading to changes in forest and plantation management practices in Australia and across the world, and should be strongly supported by specifiers. How fast and effective these changes will be is not yet known. Internationally certification appears to be providing real leverage and incentive.

Unsurprisingly the underlying tensions between exploitation and conservation continue to be played out in certification, and the correct balance may not yet have been found. Wintle and Lindenmayer argue that no certification scheme yet goes far enough "unless more explicit performance-based requirements for biodiversity protection are developed than currently are used, and unless adequate monitoring, tracking and precautionary adaptive management is put in place in Australia, maintaining the biodiversity and ecological values in our forests is at risk" (Wintle & Lindenmayer, 2007).

At the time of writing there are clear differences between the schemes operating in Australia. As

Indufor Oy note, performance of certification schemes *can*, despite differences, be equivalent. What is not clear, and will not be until an independent audit has been completed, is whether this is the case, or if either the AFS or FSC schemes are living up to their promises. Regular ongoing reviews will be necessary to benchmark performance and assure market trust.

Finally, it is worth noting that certification can potentially present a breaking mechanism for deadlocks over native forest management in Australia, as it has elsewhere. As Crawford notes, "one of the great benefits of independent, accredited, third party certification is that it provides an opportunity to de-politicise forestry, particularly with regards to native forests, where philosophical, political and sustainability issues have intertwined for years" (Forest and Wood Products Australia, 2006, p.27). There are already positive signs of this with conservation groups participating in the FSC process, agreeing to review their policy of opposing native forest logging (Lewis, 2007). Crawford singles out the FSC due to its global recognition and strong ENGO participation, but there would appear to be no reason why appropriate consultative frameworks could not be pursued by both the AFS and FSC schemes. After all, constructive engagement is, ultimately, the best hope for our forests, for related industries, and for the future of certification schemes themselves.

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APPENDIX

Australian Links and Resources

Specification links

AFS

- This site gives organisations certified under the AFCS which for 'chain of custody' covers AS 4707 and the PEFC's Annex 4 to the Technical Document. <http://www.forestrystandard.org.au/5processor.asp>
- In the Joint Accreditation System of Australia and New Zealand web site there are a number of search options. The best is to use 'Australia' in the country drop down menu and AS 4707 in the 'Other Standard' box to give organisations certified by JAS-ANZ accredited certification bodies. <http://www.jas-anz.com.au>
- Under the PEFC Information Register web site there are also a number of search options. <http://www.pefc.cz/register>
- Information on AFS certified products will soon be on the PEFC Products Database (Nov 2007).

FSC

For list of relevant products and outlets refer to: <http://www.fscaustralia.org/fsc-in-australia/find-a-fsc-certified-product/building-materials>

Australian Forestry Standard

Australian Forestry Standard: <http://www.forestrystandard.org.au>
 Montreal Process First Forest Overview Report 2003: http://www.mpci.org/rep-pub/2003/overview/index_e.html
 Australian Government Forest and Wood Products Australia
 (formerly the Forest and Wood Products Research and Development Corporation)
<http://www.fwprdc.org.au>

Selected Australian Certification Stakeholders

Gunns Ltd: <http://www.gunns.com.au>
 Hancock Victoria Plantations: <http://www.hvp.com.au>
 DNV: <http://www.dnv.com>
 Smartwood: <http://www.smartwood.org>
 National Association of Forest Industries: <http://www.nafi.com.au>
 World Wide Fund for Nature: <http://www.wwf.org.au>
 Australian Conservation Foundation: <http://www.acfonline.org.au>
 Greenpeace: <http://www.greenpeace.org.au>

Certification Assessments and Resources

Forest Management Public Summary for Hancock Victorian Plantations Pty Ltd:
<http://www.rainforest-alliance.org>. Select the 'forestry' link under 'programs'.

Hancock Watch

Australian conservation group perspective on Hancock Victorian Plantations' certification:
<http://www.hancock.forests.org.au>

Conservation Status Resources

Federal Government's Regional Forest Agreement: <http://www.rfa.gov.au>
 Wilderness Society overview: <http://www.wilderness.org.au/campaigns/forests>

Conservation Status Resources

Region and Specific Species Conservation Resources

Rainforest Information Centre Good Wood Guide (Australia)

For a domestic Conservation Group perspective and thorough resource:
http://www.rainforestinfo.org.au/good_wood/contents.htm

Information Resources:

UNEP Global Environmental Outlook http://www.unep.org/geo/geo3/english/pdfs/chapter2-3_forests.pdf