



Re: Review of  
30/07/2014

To Whom It May Concern

## Introduction to review of draft Australian FSC Standard

AFCA and its members believe that due to decades of over logging and climate change it is now no longer possible to achieve sustainable industrial native forest logging in Australia nor in Primary forests around the world. AFCA believe that if the concerns we raise in this submission are met and the risk assessment process is followed correctly then the only acceptable method of taking wood from forests under an FSC certification would be extremely small scale, selective, sensitive and scientifically based extraction methods.<sup>1</sup> Our participation and submission is made in good faith that our concerns will be addressed in the IGI's.

The Australian Forests and Climate Alliance has reviewed to a limited degree (owing to time constraints) the draft of Australian FSC Standard issued for comment, (hereafter referred to as Draft AFSCS). We have concerns with fundamental premises on which content of the draft is based and discuss these below to ensure that any comments we make in the spreadsheet provided for analysis of the performance criterion indicators proposed for Draft AFSCS are considered or 'qualified' in relation to that discussion.

### **Fundamentally flawed premises:**

#### **1. That industrial scale logging in native forests can be certified to FSC when the legislative framework in Australia is streamlining environmental destruction together with the known uncertainty of climate change**

It should be recognised by FSC that the Australian native forest logging industry is currently failing to comply with the requirement of the Regional Forest Agreements (the law). In short;

- (I) the CAR reserve systems are inadequate and out of date,
- (II) the Action Statements have largely been ignored at the forest management level.
- (III) Monitoring data required by the Regional Forest Agreements is not available to underpin the sustainability of current practices.

“The One Stop Chop”, a report commissioned by members of AFCA, authored by the Environment Defenders Office, and published by Lawyers for Forests, highlights the inadequacies of the current logging regime and legal structure in Australia. A full copy of the report can be found at the following link

<http://www.edotas.org.au/wp-content/uploads/2013/10/One-Stop-Chop-Final-report.pdf>

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<sup>1</sup> i.e. that could be proven to do no more damage

From a legal perspective FSC needs to be aware that while the requirements of the Regional Forest Agreements are not being met certification to the FSC cannot be achieved. That is: currently state based logging agencies have achieved certification to the Australian Forestry Standard (AFS) when the Regional Forestry Agreement i.e. the federal requirements (the law) by which they must operate are not being met. The One Stop Shop report highlights how the Regional Forestry Agreements are in fact streamlining environmental destruction and FSC indicators MUST NOT allow certification under such a regime. If they do the FSC risks the accusation that it makes misleading claims of sustainability.

Following the commissioning of the “One Stop Shop” it is now AFCA’s informed decision that even compliance with the Regional Forest Agreements would not achieve satisfactory environmental outcomes worthy of certification to sustainable forest management. Given that most auditors are not aware of the complexity that is highlighted in the One Stop Chop FSC is now faced with an ethical obligation to rule against such large scale industrial activities.

It must also be recognised by FSC that based on available science Australian Native forests cannot withstand industrial logging regimes. This is evidenced by widespread documented vulnerability of endangered species particularly in relation to the effects of climate change. On this basis the precautionary principle should not allow an industrial logging regime to be applied to native forests in Australia either.

FSC needs to acknowledge the fact that current biodiversity loss globally is exceeding the background rate by at least one or two orders of magnitude, and raising serious concerns about its contribution to the possibility of undesired, abrupt, non-linear environmental change – which could occur at a continental or a planetary scale.<sup>2</sup> Multiple recent scientific reports attest to the verity of these claims, referenced in Appendix A.

Any damage to any one of these ecosystems impacts another. Species know no national boundaries. They need native forest ecosystems to remain intact with connectivity. The Australian standard must also address this fact for its native forest ecosystems are supporting critically endangered elements of others globally. If Australian native forests are further degraded and/or lost, but so too will the global biological reserve system, for it does not function independent of decreed state forest or even private forests estates.<sup>3</sup>

The Draft AFSCS needs to demonstrate cognizance of the extreme risk posed by industrial logging to native forests and the current unlawful logging practices.

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<sup>2</sup> Candel, pers comm.

<sup>3</sup> Barry, G. (2014). *Terrestrial ecosystem loss and biosphere collapse*. *Management of Environmental Quality*, Vol. 25 No. 5, pp. 542-563. (Madison, WI) – New science finds that two-thirds of Earth’s land-based ecosystems must be protected to sustain the biosphere long-term. Yet about one-half of Earth’s natural ecosystems have already been lost. The paper proposes terrestrial ecosystem loss as the tenth ecological planetary boundary (along with climate change, biodiversity loss, and nitrogen deposition which have already been exceeded, and six others nearing the limit). It is proposed that 66% of Earth’s land – 44% as intact natural ecosystems and 22% as agro-ecological buffers – must remain intact to sustain the biosphere. *This would require ending industrial primary forest logging and restoring old-growth forests to reconnect fragmented landscapes and bioregions.* .... The paper proposes the first measureable and spatially explicit terrestrial ecosystem loss threshold as part of planetary boundary science. What ecological science knows about biodiversity and old-growth forest loss, abrupt climate change, and ecosystem collapse is reviewed. It is suggested patterns of habitat fragmentation identified in ecosystems and landscapes – that ecological systems “percolate” to a new simplified state and often collapse when ~40% are lost, and noting the critical role of habitat connectivity – also hold true for the biosphere (the sum total of global ecosystems).

**High risk factor from logging native forests: To log native forests is to increase bushfire severity and intensity across the continent thereby actively promoting risk of destruction of (all) Australian forests, not only native forests.**<sup>4 5 6</sup>

**2. That ‘outcomes’ based operational prescriptions for preventing harm can be replaced by ‘indicators’ that allow for what amounts to ‘experiments’ in process management.** With something as critical as preventing irreversible damage to one of the globes most embattled biophysical spheres, (its natural remaining forests), no margin for error should be assumed to be acceptable. To err on the side of caution must be the credo therefore for any standard purporting to attempt damage prevention. Every indicator should function not only as a measure of performance but wherever possible as a prescription for exactly how to **avoid, that is, prevent** damage. To not attempt this is an abrogation of responsibility of a standards developer.

Many indicators in the Draft AFSCS are careless (non measurable, subjective, open to ‘interpretation’ by assessors), being based on the IGIs in such a manner that where there is not systematic provision for ‘loopholes’ in the IGIs adopted by the Australian standard, these loopholes are provided by a re-wording of the Australian version of the indicator, or by relegating to non compulsory notes vital aspects of operational procedures. The introduction to the draft alludes to the fact that there are ‘guidance’ notes attached to indicators but it also stipulates that ‘such *guidance is not considered normative, i.e. mandatory, in FSC standards.*

**A simple example: 6.4.4.** Wherein the IGI standard that ‘Hunting, Trapping Fishing, and collection or rare and /or threatened species is prevented has had an outcomes based approach implicit in the wording (outcome – illegal harvesting is prevented) - this outcome in the Australian standard is watered down, made useless or not mandatory by language change. Here the absolute term ‘prevented’ is replaced by an indeterminate statement ‘all reasonable measures are implemented to prevent’ and etc. It has become some ‘process based thing’ (not an outcome that can be determined). Hence adherence to it cannot be determined by an assessor. As no mandatory action is stipulated the Organisation can argue that despite all their (open to interpretation of an assessor) ‘reasonable’ attempts to prevent illegal activity it happened anyway, thereby getting away from the responsibility of ensuring good management/governance in a forest they are ‘managing’, or, possibly with such an open ended scenario, ‘exploiting’.

It is not enough that indicators state activities take place in such a manner that biophysical impact is ‘**somehow**’ avoided. It is beholden on the standards developer to indicate - we **are** dealing with ‘indicators’ - specifically **how** the activity can take place without negative impact. To measure performance each indicator must be specific. Performance indicators as mechanisms of audit have to be strictly defined. They are ‘indicators’ – of performance or not. There can be no provision for ‘partial’ performance which is to be ‘interpreted’ by an auditor according to who is paying for the assessment.

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<sup>4</sup> [Study finds logging increased intensity of Black Saturday fires](#), James Campbell, published *Herald Sun*, August 03, 2014:39PM  
THE heat and severity of Kinglake and Marysville fires that killed 159 people on Black Saturday was significantly increased by clear-fell logging of forests, scientists believe. In a landmark two-year study of the Kilmore East and Murrindindi Mill fires, which destroyed Marysville and severely damaged Kinglake, scientists from Melbourne University and the ANU examined satellite images of hundreds of thousands of trees burnt on Black Saturday. The scientists say the study showed conclusively that logging in the decades prior to Black Saturday made the deadly blaze much more extreme. They also warn that increased fire danger in forests lasts for up to 70 years after an area is logged, with the risk peaking between 10 and 50 years.

<sup>5</sup> **Australia's national forest management policy "a colossal mess and an international embarrassment"**  
<http://www.canberratimes.com.au/national/oldforest-loss-catastrophic-study-20110912-1wp4o.html#ixzz2NZjjBbX3>  
New research shows Australia has lost 99 per cent of its old-growth mountain ash forests, with "catastrophic implications" for bushfire control, water harvesting and wildlife conservation, a leading scientist says.

<sup>6</sup> [Logging and Bushfire Danger](#), F. Pike, Nature NSW Winter 2013 (publication National Parks Association NSW)

This approach **derives** from the FSC generic indicators on which the Australian standard is based. It includes the provision for assessors to appraise performance based on ‘non compulsory’ notes. This is not adequate. It removes the mandatory nature of the indicators of performance from the standard. A benchmark must be established against which performance can be measured. This cannot be open to ‘interpretation’. To render it such exposes it to being seen simply as a ‘loophole’ by which the indicator might be seen to be ‘falsely’ satisfied. As the language of any performance indicator be definitive, non ambiguous, so too must a note which further defines it be definitive, non ambiguous, non **‘optional’** in regard to whether it is adhered to.

When dealing with complex living systems wherein a number of unforeseen effects are possible and predicted effects (of activities known to damage) are almost certain, to develop a standard that might permit such ill effects by not mentioning in detail the precautions which ‘should’, (not ‘may’) be undertaken to ensure that the activity takes place in a manner that renders these ill effects impossible, is illogical (if the outcome is supposedly no damage), inappropriate (if the standard purports to be a preventative tool) and unethical (if it applies to situations wherein the very existence of life forms is at stake).

To render critical indicators non mandatory and to allude to them only in non mandatory notes is to make a mockery of the standard.

So, we find the layout of the standard inadequate. The breaking down of prescriptions for performance, essential elements of a criterion, into non mandatory ‘notes’ contravenes the very concept of a performance indicator within a standard. Notes which fall outside the mandatory wording of a performance indicator might as well not exist. They must be moved up into the wording of the performance indicator itself in order to be relevant. To be relevant they must be mandatory, non negotiable.

### **3. That there be provision for conversion of native forest to plantation**

Anomalies exist throughout the Draft AFSCS. We find anomalous that there might be ‘arbitrary’ exceptions to a rule, a criterion. In this case the criterion is: *6.9 The Organisation shall not convert natural forest to Plantations, nor natural forests or Plantations to any other land use* But it is followed immediately by exceptions which WILL allow it to occur: *except when the conversion:*

*a) affects a very limited portion of the area of the Management unit*

*b) will produce clear, substantial, additional, secure long-term conservation benefits in the Management unit, and*

*c) does not damage or threaten High Conservation Values, nor any sites or resources necessary to maintain or enhance those High Conservation Values.*

In relation to **exception a)**: which means conversion of native forest to plantation or to any other land use is allowed where it *affects a very limited portion of the area of the Management unit*.

Why is this to be allowed? We already know that Conversion of native forest to non native forest doesn’t necessarily happen all in one go so to make it happen bit by bit is not to stop it happening.

It is frequently undertaken bit by bit, by stealth. The indicator in the Draft AFSCS allows for exactly this. To have this in an Australian Standard is to ‘give permission’ to Organisations to destroy native forests piece by piece across Australia. Let us illustrate this by example of what happens in Australia, using only one state as an example, NSW.

Large areas of native forests in north-east NSW are now being intensively logged (>80% basal area removal), with many such areas being planted or seeded. History has shown that Forestry Corporation is prepared to retrospectively claim such forests as plantations decades later. Many of the NSW Forestry Corporation’s current hardwood “plantations” were not claimed as such until decades after they were logged. In the late 1990’s a Eucalypt Plantations Technical Advisory

Committee was established to review hardwood areas which had never previously been claimed as plantations with records of them as native forests dating back to the 1960s and 1970s. The EPTAC rejected the historical “evidence” for many claimed plantations and EPTAC site inspections found that some did not meet the legal definition. The Forestry Corporation subsequently disbanded the Committee and claimed many of the rejected areas as plantations.

In NSW in 2010 the then NSW government forest manager, Forests NSW, attempted this again. They established within the Department of Primary Industries a ‘Plantation Unit’ with the sole purpose of re-defining recovered forest ecosystems (in some cases primarily 60-70 year old maturing native forest ecosystem) as ‘plantations’. This was occurring even as native forests adjacent to these areas were being denuded of 80-90% of their vegetation with specific provisions in harvest plans to ‘destroy non-merchantable species’ and to leave only as seed trees one single species – a blatant exercise in ‘conversion by stealth’.

In relation to **exception b)** where *the conversion will produce clear, substantial, additional, secure long-term conservation benefits in the Management unit* we fail to see how destruction of any part of a management unit to convert it to a plantation will provide secure long term conservation benefits.

In relation to **exception c)** where the conversion is permitted if it *does not damage or threaten High Conservation Values, nor any sites or resources necessary to maintain or enhance those High Conservation Values* we find that conversion of any part of a management unit from a natural forest to a plantation will damage or threaten any high conservation values (and also low conservation values; it will threaten conservation values).

If the Australian or international industry or social chambers of FSC argue that the criterion has these exceptions in order that in some instances plantations might be converted to non forest uses then they should separate that concept from that of conversion of native forest to plantation. They require two separate criteria. They are not ‘sensible’ together. They seem to be together for the express purpose of providing a loophole whereby conversion of non native forest to plantation or to any other use might occur.

**4. That biodiversity protection can be effected by focusing protection from logging impact primarily on HCV, (including rare, endangered, threatened or currently vulnerable species and communities) without affording an equal level of protection to common species. This is no way mitigates risk to either rare, threatened or vulnerable species nor to common (currently ‘un’ rare) species.** This is a matter of common sense but new science now proves it.<sup>7</sup> That is, monitoring of populations and species and impact will have to be ‘across the board’. It can’t focus on what’s already severely impacted only or the entire suite of natural species becomes, ‘rare’. See the scientific argument in ‘How to make a common species rare’ in Appendix A for this cautionary tale. Common sense dictates that logging a native forest and undertaking monitoring to ensure irreversible damage is not done to species ‘across the board’ is not only impractical. It is impossible.

#### **FSC Australian standard language peculiarities:**

We reiterate in relation to the Draft AFSCS concerns previously raised re language in the FSC IGIs, upon which the Draft AFSCS is based. FSC glossaries contain specialised meanings for what might often be considered ordinary words. The glossaries also prescribe FSC interpretations of principles which might normally be considered universal e.g. the Precautionary Principle as it

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<sup>7</sup> *How to make a common species rare: A case against conservation complacency*

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Extracts in Appendix A

relates to E.S.D. We believe that FSC glossaries function at times not to elucidate but to obscure the real intent of the IGI's and also the Draft AFSCS, making the documents 'somewhat' misleading. When developing a standard presumably appropriate for access by the general public including individuals and companies seeking to reassure themselves that a product they intend to buy or use which has been certified by this standard, it seems inappropriate to assign highly specialised meanings to ordinary words without warning that this is the case. Glossaries are usually included in documents to explain terminology which is highly specialised. In the case of FSC indicators glossaries function to assign highly specialised meaning to what might otherwise be considered very ordinary words. Those accessing the documents should be warned about this in any introduction to the documents. Here's a classic and very important example of how FSC specialised language operates:

We can argue from the array of definitions of the word 'restore' in the FSC glossary (re IGI's) that: **'restore' does not really mean 'restore'**. The Australian draft standard is littered with instances whereby 'management impact' appears to be balanced by recommendations relating to 'restoring', that the forest manager restore habitat characteristics, biodiversity, ecosystems – such a range of restorative work. It appears most reassuring on first glance. However, upon examination of the FSC glossary definition of 'restore' we note that it **specifically precludes** *'recreation of any particular previous, pre-historic, pre-industrial or other pre-existing ecosystem'*. For the Organisation seeking certification responsibility to restore only extends this far: *'The Organisation is expected to take reasonable measures to mitigate, control and prevent environmental degradation which is continuing in the management unit as a result of such previous impacts'*. Here 'reasonable measures' is meaningless; another subjective phrase; there is no prescription for what a *reasonable measure* is; it's a courtroom loophole. Then, later on, the glossary definition continues with clauses which appear to contradict even this (hypothetical subjective) responsibility to take *'reasonable measures'* because: *'the Organisation is not obliged to restore environmental values that .... have been negatively affected by previous owners or Organisations'*.

In reality therefore we can see that an Organisation seeking FSC certification can argue (despite what is contained within the standard) that *it need not restore anything anywhere in an Australian forest* because (with the exception of some untouched old growth) almost all Australian forests have undergone some degradation at some point in post European history that is *'someone else's responsibility'*, that of some *'previous owner or Organisation'*.

FSC states unequivocally in relation to the IGI's that language must be precise, as per below.  
7. *Tangible: Indicators shall be written using a clear and consistent vocabulary, free from subjective elements. The use of such phrases as "ordinarily", "substantial", "proactive", "appropriate to", "minimize", "wherever possible", "thorough" or "best available" should be avoided.* Yet we encounter throughout the Australian draft standard references to *'reasonable measures should be taken to avoid'* as a substitute for the word 'prevent' which is a 'measurable' outcome. It either is prevented or not. The biophysical needs of the forest must not be subsumed to the needs of the Organisation to be able to continue damaging.

**'Best practice' as guided by Best Available Information (BAI) is systematically undermined without explicit reference to what it constitutes. This undermines validity of indicators**

Language and positioning of indicator qualifiers in notes amounts to lack of clear direction regarding elements which constitute best available information (BAI) for any given indicator, leaving them 'open to interpretation'. Elements which should be critical determiners of how logging must be conducted to prevent damage across specific scenarios and which constitute essential requirements of BAI must not be relegated to non mandatory **'notes'**, whereby, depending on wording, they 'may' or might not be taken into consideration as constituting what is BAI. Not present in the indicator itself, critical elements that should be taken into account can be rendered optional. That the concept that best available information inform logging practice can be

invalidated by ill defined, indeterminate requirements for inclusion of elements that should constitute BAI, for any given indicator, enshrines in the standard the opportunity for the ‘loophole’.

**Example:** 6.6.1 *Best Available Information is used to identify the habitat characteristics required by the range of naturally occurring species including regional variations in species across their geographical range that may be affected by management activities. (Adapted)* That’s fine but later on, in the notes to this criterion we can see that all habitat characteristics that might inform BAI do not necessarily have to be considered. Not the wording: those listed ‘**may**’ not ‘**shall**’ be included, (where they exist). 6.6.3 *Habitat characteristics to maintain and (restore) biodiversity are protected or recruited, including through the implementation of management activities. Habitat characteristics **may** include:*

1) *Old commercial and non-commercial trees whose age noticeably exceeds the average age of the main canopy;*

2) *Trees with special ecological value;*

3) *Vertical and horizontal complexity;*

4) *Standing dead trees;*

5) *Dead fallen wood;*

6) *Understorey plants;*

7) *Resting sites;*

8) *Small wetlands, bogs, fens;*

9) *Ponds; and*

10) *Small non-forest open areas*

*(Adapted)*

Then under ‘**guidance**’ (the utterly non mandatory aspect of this activity), we find that other habitat characteristics that might be necessary to inform BAI again only ‘**may**’ not ‘**shall**’ include, (where these exist).

**Guidance:** *the intent of this indicator is to give particular consideration to species and biodiversity not covered in Criterion 6.4, including species or species’ guilds with populations that are influenced by management activities. **Examples may include:***

1) *Forest interior specialists;*

2) *Early successional forest specialists;*

3) *Mature forest specialists,*

4) *Forest understorey species,*

5) *Species with large territories or home ranges with populations that may be dependent on specific habitat conditions,*

6) *Species at risk from habitat fragmentation and species with very restricted ranges limited by specific habitat conditions.*

**Performance measurement criteria (such as the list of biological legacies) must be mandatory and explicit, not optional and open to interpretation.**

### **Inadequate definition of and significance attributed to carbon as an environmental value**

Carbon storage potential is an environmental value that is *exponentially increasing in value*. FSC’s consideration of this environmental value of native forests is inadequate. The only mention it warrants is in Principle 6. where it features as an *aside* to ‘ecosystem functions’ (a mention in brackets highlighted below in red, below, that an ecosystem’s function shall include a baseline of carbon stocks and fluxes), as per the **bold** item (below).

Principle 6: Environmental values and impacts

The *Organization\** shall\* maintain, conserve and/or restore ecosystem services\* and *environmental values\** of the *Management Unit\**, and shall\* avoid, repair or mitigate negative environmental impacts. (P6 V4)

6.1 (New) *The Organization\* shall\* assess environmental values\* in the Management Unit\* and those values outside the Management Unit\* potentially affected by management activities. This assessment shall\* be undertaken with a level of detail, scale and frequency that is proportionate to the scale, intensity and risk\* of management activities, and is sufficient for the purpose of deciding the necessary conservation\* measures, and for detecting and monitoring possible negative impacts of those activities.*

6.1.1 Best Available Information is used to assess *environmental values\** within, and, where potentially affected by management activities, outside of the *Management Unit\**, including:

**1. Ecosystem functions\* (including a baseline of carbon stocks and fluxes);**

This is inadequate. FSC has no clear methodology for attributing to forest ecosystems their carbon related environmental value.

Globally we need to restore carbon stocks in native forests because those stocks are relatively resilient to pests, disease and fire (having evolved with these stresses) compared to monocultures of trees. FSC should differentiate between the 'value' of carbon stocks in natural forests and the stock in plantations based on the relative resilience (and risk to permanence) of those stocks.

Protecting and restoring stocks is far more important than worrying about fluxes. Restoring the natural carbon carrying capacity of native forests is the optimum goal from a climate perspective to both mitigate climate change and maximise adaptive capacity.

FSC should promote management actions that increase the permanent carbon stock of native forests. That means no native forest logging.

FSC should not certify any action that decreases the carbon stock of native forests. Logging old forests is always carbon negative no matter how 'light' the logging footprint. Logging old growth forests (whether selective removal of big trees or clearfell log) removes 40-60% of the carbon stored in the forest. This loss is permanent while ever the forests are in a logging regime.

**Re silviculture in native forests:** reducing the rotation length is always carbon negative. Nowhere should FSC condone this.

**The concept of Scale, Intensity and Risk analysis as a substitute/qualification for appropriate application of the precautionary principle of E.S.D.**

As far as Australian native forests go there are no safe threshold limits whereby it can be determined that an assessment of the scale, intensity and risk involved in planning for any given logging regime can provide against negative impacts either within that management area or any areas outside of it, as a consequence of the logging activity. AFCA makes this claim because it is already established that natural forests and the ecosystems within them and which they support in terms of providing recruitment of genetic material for species survival and ecological function (i.e. their function as buffers to and as connections between nature reserves, national parks, water catchments) are already so degraded in Australia that any further damage from industrial scale logging presents unacceptable risk, no matter the scale or intensity with which it is conducted. For Australia is already facing ecosystem dysfunction and as a consequence species collapse and this is occurring at almost every level. All aspects of its native forest ecosystems are being placed in jeopardy from logging, from forest hollow dependant marsupials, birds, invertebrates, to amphibians and fish, needing extensive watercourse buffering (more than occurs under either current prescriptive procedures of its current state forest managers or the apparently less prescriptive planned regime of FSC Australian standard). Even the loss of one colony of critically endangered (possibly unknown) an obligate pollinator from a native forest might mean collapse of a pollination regime with potential to adversely affect the biological function of any number of other species or systems. This is how delicately poised Australian nature is, on the 'brink' of survival. The assessment of the risk to it has been made by scientists repeatedly as per our attached evidence. But the survival is not only dependent on not losing any more critically endangered elements. The assessment has been made that Australian land management activities such as native forest logging will render even common species rare, as they are conducted now in



Australia. It would be in the interest of FSC Australia to take note of this and desist from the risk inherent in logging its native forests, i.e. certain biological (biodiversity) destruction.<sup>8</sup>

**A fundamentally sound premise:**

**That FSC standards apply to forests which *can* benefit from the application of the standards.**

The goal of FSC is to make logging an ecologically sound activity for global resource production. That can only be achieved by ensuring that absolutely no further damage occurs to earth's remnant native forests. They are already at the brink of survival along with the biological life forms they currently support. Any further damage will hasten the existing rates of extinction in these ecosystems, endangered globally and in Australia. No credible standard for ecological sustainability would allow an activity that hastens the extinction rate. No logging 'standard' that purports to ecological and or economic sustainability can continue to include industrial logging of native forests as a legitimate activity. They simply cannot be logged without damage and damage that is irreversible.<sup>9</sup>

The standard's criteria therefore can only sensibly apply to:

- (i) existing plantations and/or the establishment of sustainable forest 'ecosystems' over degraded land ('ecosystems' by definition if FSC principles are to apply),
- (ii) and or to the process whereby plantations might be managed with view to 'reversion' to more natural ecosystems that can in the long term be truly sustainably logged.
- (iii) Any logging in native forests that is extremely small scale, selective, sensitive with scientifically based extraction methods.

As we stated unequivocally in response to FSC asking whether as a basic premise (being its first 'filter' question) indicators could be - '*Globally applicable: 'Does the indicator apply to ALL types of forest?'*' – we do not believe indicators of any standard can be globally applicable. They cannot apply to any attempt at certification of industrial logging in native forests.

We hope that you will register the fact that our responses to any of the criteria for this Australian Standard are made with the understanding that they should apply only to extremely small scale, selective, sensitive and scientifically based extraction methods. In no way do we support their application to accreditation of any industrial forest logging.

Nevertheless we will make as detailed and appraisal of the standard in its current form as we can in the time permitting. So far we have only had time to undertake analysis of Principles 6, 9 and some of 5. We consider the mandatory timeframes stipulated by FSC International and national committees inadequate for the purposes of comprehensively analysing the implications of the various drafts of policy.<sup>10</sup>

yours faithfully



Secretary  
AFCA

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<sup>8</sup> **How to make a common species rare: A case against conservation complacency**

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<sup>9</sup> Immediate direct and irreversible indirect damage. See argument that '**Native forest logging is wildlife murder**' Appendix A in relation to established impacts of logging in native forests.

<sup>10</sup> Comments re FSC standard development timeframes as per AFCA submission re FSC International Generic Indicators