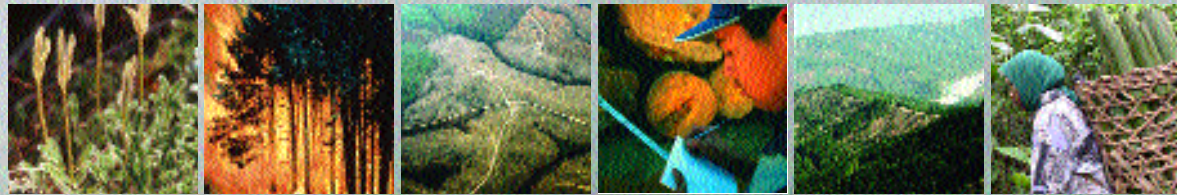


Footprints in the forest



**Current
practice
and future
challenges
in forest
certification**



A Report on the Australian Forestry Standard

February 2004

By Tim Cadman

1. History and current state of play of the certification scheme.

Creation and funding

The development of the Australian Forestry Standard (AFS) commenced in 1999.¹ Information regarding the development of the Australian Forestry Standard (AFS) was first made available to the public in the first quarter of 2000. Website materials were developed and publicly posted in April 2000.²

*“The scheme was established as a joint initiative between the Ministerial Council on Forestry, Fisheries and Aquaculture, with secretarial support provided by the Federal Government’s Department of Agriculture, Forestry and Fisheries (at that time known as “Agriculture, Forestry and Fisheries Australia”) and several forest industry sponsors: the National Association of Forest Industries (NAFI), Plantations Australia Plantation Timber Association of Australia - PTAA (at that time known as Plantations Australia) and Australian Forest Growers (AFG)”.*³

The development of the AFS was funded in equal parts by the participants to the Primary Industry Standing Committee of the Primary Industry Ministerial Council (or as it was in 1999, the Ministerial Council for Fisheries, Forestry and Aquaculture) i.e. the Commonwealth and the State and Territory Governments, and the peak forest and timbers industry bodies i.e. NAFI, PTAA and AFG.

A company - Australian Forestry Standard Limited (AFS Ltd) - was registered on 23 July 2003 and now manages the AFS along with the other components of the Australian forest certification scheme.

Motivation

The AFS website quotes the following motivation for the creation of the scheme:

“Buyers of timber, like buyers of other goods such as food and clothing, are becoming more interested in where the product they buy comes from, and how it has been produced. In order to satisfy this interest, timber producers around the world have begun to investigate various systems of independent certification of forest management.

The principal reassurance that consumers (or retailers) are seeking is that the forests supplying particular wood products are being well-managed,

¹ <http://www.forestrystandard.org.au/paper01.html> - accessed by the researcher 19/11/03

² <http://www.affa.gov.au/ffid/mcffa/scf/afs/standard.html> accessed by the researcher 27/04/03. This site has now been withdrawn

³ <http://www.affa.gov.au/ffid/mcffa/scf/afs/standard.html> accessed by the researcher 27/04/03. This site has now been withdrawn

including the achievement of important environmental controls. Quality forest management is also described as “sustainable management”.

Forest management certification achieves both a market advantage to reward better producers, and an environmental objective of protecting forest ecosystems.

Forest industries and communities which embrace sustainability will benefit as production systems, businesses and communities become more viable in the longer term... The Australian Forestry Standard (or “AFS”) applies community values and the science of forest management to identify the economic, social, environmental and indigenous criteria that are most important for assessing whether a forest is well-managed.¹

The objects of AFS Limited are to:

- *promote sustainable forest management in Australia's forests through an Australian Forestry Standard to be owned by the Company (AFS);*
- *support and maintain the development of the AFS, and other related or complementary standards;*
- *maintain accreditation as a Standards Development Organisation;*
- *support and facilitate the use of the AFS, and any related standards, for forestry certification within Australia; and*
- *seek mutual recognition for the AFS internationally.²*

Certified area

One certificate has been issued to the Tasmanian forestry company Gunns Ltd. The certificate covers approximately 220.000 ha.³

Forest Types

The standard is intended to cover all forest types (native forests and plantations) and to cover both public and private land of small, medium and large size (1,000 ha, up to 10,000 ha and over 10,000 ha).⁴ The system also contains provision for group certification of forest owners/ managers incorporated as a group for certification purposes.⁵

Label and chain of custody

A Chain of custody (CoC) standard has been prepared and is currently under consideration for recognition as an Australian Standard (AS) by Standards Australia (SA). AFS Limited has a logo, which can also be used as a label. Labelling rules are under development for use in 2004.

Level of certification

Current information on the website <http://www.forestrystandard.org.au/> refers to

¹ <http://www.forestrystandard.org.au/paper01.html> - accessed by the researcher 19/11/03

² <http://www.forestrystandard.org.au/implementing.html#5> - accessed 19/11/03

³ Personal communication between FERN and Mark Edwards, AFS Ltd, 30 January 2004.

⁴ <http://www.forestrystandard.org.au/paper03.html> and

<http://www.forestrystandard.org.au/paper10.html> -accessed by the researcher 19/11/03.

⁵ <http://www.forestrystandard.org.au/paper10.html> - accessed 19/11/03

“forest managers”, and indicates that the AFS has been developed in combination with existing forest policies, including the National Forest Policy Statement and the Regional Forest Agreements. The Australian Commonwealth (Federal) Government is not a forest manager. Responsibility for public forest management is conducted at the State/Territory level.

Comment: Based on the scope of the standard, it can be concluded that it relates to both State and Territory Government forest management agencies managing public lands and small/medium and large private companies and individual forest managers managing public and private forests, both on the single FMU and regionally.

Costs of certification

No information is currently available on the website regarding costs. The Australian Forest Growers applied to the Commonwealth Government for project funding to assist in providing templates for both small growers to meet the requirements of the AFS and also to form legal entities so that group certification could be undertaken of smallholdings.

2. Quality of the standards

Performance based standards?

The AFS is a national standard but utilises the international criteria provided by the Montreal Process. The standard is a combination of largely process-based criteria, with some performance-based, prescriptive measures included.

“Each of the performance and systems requirements are intended to be incorporated into forest management to the extent that the forest manager can control or influence their achievement within the forest covered by the certification. The Australian Forestry Standard will also provide a guide to verification and approaches to implementation, which accommodate different scales of ownership of native forests and plantations”.

“The performance requirements would need be applied at appropriate ecological scales, recognising that different criteria apply at different scales that will affect the ability of the forest manager to control or influence their achievement. The requirements should also be interpreted and applied in the context of the relevant policy and legislative framework”.

*“The system requirements would need to be applied in a manner commensurate with the size and nature of the forest manager's particular activities, and will be audited accordingly. The Standard would recognise that some requirements are inappropriate for some enterprises in some situations. Flexibility to allow local adaptation may, therefore, be acceptable”.*¹

Comment: The Montreal Process is a reporting mechanism whereby participating governments provide information on performance to the working group under the established criteria. Under each criterion there are a number of indicators against which fulfilment of the criteria can be measured. These include such basics as measuring fragmentation of forest types (1.1.a); area of forest land available for

¹ <http://www.forestrystandard.org.au/paper10.html> - accessed 19/11/03.

timber production (2.1.a), and so forth (Commonwealth of Australia, 1988. A Framework of regional [Sub-National] Level Criteria and Indicators of Sustainable Forest management in Australia).

While the Montreal Process is a step in the right direction [as it is an internationally recognised intergovernmental process], it does not in itself either define sustainable forest management (SFM), justifying itself by commenting that all criteria taken together contribute towards sustainable forest management (Commonwealth of Australia, undated. Assessing the sustainability of forest management), nor does it provide prescriptive measures that will result in SFM. This is a "passive" method of measuring progress towards sustainable forest management, which remains undefined. The development of regional (sub-national) level criteria and indicators of sustainable forest management continues this approach. These regional criteria are an Australian addition to the Montreal Process, and are an attempt to integrate Australia's Regional Forest Agreement process with its international commitments under the Montreal Process.

Legal matters

Does the standards reflect national regulations? The answer is clearly yes. The AFS includes provisions relating to Australia's signatory assent to the Montreal process, specifically Criterion 7, "Legal, institutional and economic framework for forest conservation and sustainable management".¹ The AFS requires 'compliance with current law as a minimum requirement and the first requirement of the first criterion states 'compliance with relevant legislation and other requirements to which the forest manager subscribes'.

Economic, social and environmental and spiritual values

The materials contained within the website lead to the conclusion that participation in the standards development by a wide range of stakeholders would make it inclusive of the above mentioned values.² AFS Limited states that the standard does encompass the four values, but environmental NGOs disagree. See the four appendices.

Standards level

Standards are set at regional level, and formulates in a broad way. The quality of the standard has been dismissed by most environmental NGOs in Australia as certifying the status quo.

"WWF's assessment of the draft standard is that it does not address key environmental concerns and will not be able to demonstrate a commitment to sustainable forest management. The standard does little more than allow "business as usual" forest practices, such as the conversion of native forests to plantations and the logging of high conservation value forests. Forests subject to these highly contentious practices could be "certified" under the standard".³

Comment: It is important to understand that the AFS is based upon the Montreal Process, and how it has been interpreted in a regional (sub-national) context via the National Forest Policy Statement and the Regional Forest Agreements (see comments

¹ <http://www.forestrystandard.org.au/paper06.html> - accessed 19/11/03

² <http://www.forestrystandard.org.au/paper1.html> - accessed by the researcher 19/11/03

³ See appendix 3

above). There is considerable divergence as to how forests are managed regionally by State Governments in Australia. State management procedures and guidelines vary considerably in their stringency from state to state. These variations relate to a broad range of elements, including: soil and water conservation; use of chemicals; silvicultural regimes; forest reservation targets; conservation of rare, threatened or endangered species; etc.

The materials contained within <http://www.forestrystandard.org.au/> indicate that interpretation of the standard is flexible according to size, tenure and regional circumstances. In this case, the standard itself is open to considerable interpretive flexibility:

*“The forest operations and activities to be included under a single certificate will depend on factors such as the nature, scale and intensity of activities. From a regional perspective, the varying contributions to sustainability of different types of forest use may need to be considered. Forest managers may in these situations rely on the broader environmental planning powers of Commonwealth, State and local government to manage regional sustainability requirements. Each of the performance and systems requirements are intended to be incorporated into forest management to the extent that the forest manager can control or influence their achievement within the forest covered by the certification. Flexibility to allow local adaptation may, therefore, be acceptable”.*¹

Further Comment: The implications of these statements need to be understood. Any certification system that allows such flexibility and which also allows for certification and labelling of a common “brand” – can only be as rigorous as its least stringent component. For instance, where one State may allow for the broad scale application of chemicals whose use is controlled or restricted in another state (as is the case for example with the browsing control agent 1080, used in Tasmania to kill native animals, but only permitted for use against feral animal pests in New South Wales), such performance reduces the value of the system – and any associated label – to that of the lowest common denominator.

In the case of Gunns Ltd (previously known as NORTH Ltd) management activities include the historical and current practice of clearing native forest, rainforest and old growth forest for conversion to plantations. Any company seeking to gain AFS accreditation will be brought down to the level of the least rigorous certificate holder in terms of environmental performance.²

3. Standards setting procedures.

The structure, composition and terms of reference for the AFS were developed by the instigators and sponsors of the standard (the Australian Federal and State Governments and associated agencies under the direction of the Ministerial Council referred to above, and the forest industry members, as outlined above). (<http://www.affa.gov.au/ffid/mcffa/scf/afs/standard.html> accessed by the researcher 27/04/03. This site has now been withdrawn)

¹ <http://www.forestrystandard.org.au/paper10.html> - accessed 19/11/03

² <http://www.nfn.org.au/kyoto/gp1.html> - [originally prepared] and accessed by the researcher 19/11/03

The standard setting process was managed and resourced by the AFS Steering Committee (AFS SC). The AFS Technical Reference Committee (AFS TRC) was the broad based stakeholder group which drafted the AFS over a period of nearly two years. Decisions made within this committee were independent of the AFS SC. The AFS TRC consisted of forestry sector representatives – more than half of the committee- as well as environmental NGOs, indigenous peoples, trade unions and scientists¹. Participants were broadly divided in the following four groups: community and consumers; scientists and professional bodies; regulatory or controlling bodies and forest owners and processors. Each representative on the AFS TRC had one vote at the postal ballot to approve the technical content of the final standard. By that time, however, all environmental NGOs had left the AFS TRC. See below.

Comment: The researcher was self-nominated and ultimately appointed to the AFS Technical Reference Committee to represent environmental NGOs, along with WWF, in 2000. Initially, WWF was the only environment group contacted to join the AFS process (M. Rae, *pers. comm.*, 08/03/00). The comments below are based on personal experience, and can be corroborated by WWF, in so far as they occurred at times when WWF was also present, and in the documentation provided in the appendices below.

The development of the standard structure in its initial stages occurred without the involvement of any civil society organisations, including environmental NGOs, or Indigenous Peoples' organisations. This was one of the main points of process contention that contributed to the complete withdrawal of environmental NGOs from the AFS in 2002. Environmental NGOs stated consistently that their full participation (rather than simple involvement by attendance at meetings of the Technical Reference Committee - TRC) was contingent on restructuring the AFS to make it more inclusive, and upon renegotiation of the terms of reference to include the needs and values and their constituents.

After repeated attempts to renegotiate the structure of the AFS it became apparent that its chair, Dr Hans Drielsma -the Chair, and identified as a member of the joint Federal/State Standing Committee for Forestry, but also an employee of the Tasmanian forest management agency, Forestry Tasmania- was either unable or unwilling to meet the needs and associated values of environmental NGOs. As it was

¹ The composition of the AFS TRC (the principle body responsible for the development of standards, as identified in <http://www.forestrystandard.org.au/>) is contained in the indicative list below:

Members/Representatives:

Hans Drielsma (Chair), Standing Committee on Forestry F
Warren Lang, National Association of Forest Industries F
Peter Taylor, Australian Forest Growers F
Michael Bullen, Standing Committee on Forestry (State) F
Doug Pittard, Standing Committee on Forestry (Commonwealth) F
Ross Penny, Institute of Foresters of Australia F
David Flinn, Forest Scientist
Mark Burgman, Environmental Scientist
Brian O'Neill, ANZECC Standing Committee on Conservation
David Bennett, Plantation Timber Association of Australia F
Michael Radda, National Furnishing Industry Association of Australia F
Tim Cadman, Environmental NGO
Caroline Pidcock, NSW Chapter, Royal Australian Institute of Architects
Rodney Dillon, Aboriginal and Torres Strait Islander Commission
Michael Rae, World Wide Fund for Nature
Lex McLean, Forest Harvesting Contractor F
Michael O'Connor, Australian Council of Trade Unions
Richard Brooks, Timber Merchants Association F
(Extract from the minutes of the AFS Technical Reference Committee meeting of the meeting 29/06/01)

not possible to meet these requirements, environmental NGOs would not fully participate in the TRC, and became increasingly concerned that the performance aspects of the standard were also unlikely to meet their requirements in relation to a broad range of environmental values. Environmental NGO submissions prepared in an attempt to improve the situation are included in the appendices below.

Ultimately the environmental NGOs withdrew from the process. Subsequent to this withdrawal, the website¹ continues to carry information that implies that environmental non-government interests are still associated with the AFS. The researcher has written to the AFS three times requesting information as to what groups or individuals these may be, but has to date received no response. The conclusion could be drawn that the AFS has maintained website materials containing this implied ongoing association with environment groups in an attempt to create the impression that the AFS is multi-stakeholder, participatory “eco” label.

The AFS comments on this as “Responses were sent to the researcher on this issue. The ENGOs did participate in the committee for a year and the web site only states the facts i.e. the period of time that they were on the TRC, only that”.²

Balanced participation

It is the view of the researcher that there is clear documentary and structural evidence, as outlined above, that the standards setting process were unduly influenced by forestry interests.

4. Certification process.

Certification bodies

Certification bodies accredited to undertake certification to the AFS and the CoC Standards will be available on the JAS-ANZ web site and a forest manager will be available to view each certification body to assist in their decision on an independent third party body. JAS-ANZ maintains a Register of Accredited and Certified Organisations, which lists all bodies accredited by JAS-ANZ, and all organisations and personnel certified under their accredited programmes. Accredited conformity assessment bodies will be available for both the AFS and the to be developed CoC standard. This enables both forest managers and owners, and firms or companies to have their forest or link in the supply chain of wood and timber products certified to the relevant Australian Standard.³

Stakeholder consultation

The AFS website states the following:

*In general, participation in certification should be fostered. However, the level of participation should be appropriate to the particular stage of the certification process, with broader stakeholder involvement during establishment and dispute resolution stages, and narrower representation during accreditation and certification stages.*⁴

¹ <http://www.forestrystandard.org.au/>

² AFS response to draft report 30 January 2004

³ <http://www.forestrystandard.org.au/implementing.html#5> - accessed by the researcher 19/11/03

⁴ (Dr Hans Drielsma, <http://www.forestrystandard.org.au/paper1.html> - accessed

Criterion 2 of the AFS provides the requirements for public participation. There are three requirements which are abbreviated as Identify stakeholders, Public input and Good neighbour. As with all certifications, the applicant must demonstrate compliance with the requirements and the certification body must verify compliance against the requirements. There is no set formula for the consultation process.

Comment: Consultation and participation in forest management planning varies considerably across the States and Territories, and in a standard that is based on State regulatory frameworks the extent of meaningful participation in determining management is open to debate. In Tasmania, for example public consultation is based on public meetings and face-to-face interviews with regional forest agency managers, but those managers are under no obligation to adopt the submissions of the community, nor are there any provisions for appeal.

Dr Drielsma's comments indicate that broad participation was supposed to have happened in the standards development phase (disputed by the researcher, and evidenced above), and that subsequent consultation during the course of a certification assessment is less rigorous. Other materials on the site, particularly under the section that outlines the composition and representative positions for stakeholders under <http://www.forestrystandard.org.au/paper09.html> again create an impression that participation is balanced and inclusive. This is disputed by the researcher.

Certification Process

Summary of the Steps in the Certification Process. The following are the main steps in the certification process as described on AFS website.

- *Initial approach - When a forest owner/manager makes an initial approach to a certification body the certification body will ask for some basic information about the forest in order to provide a quote and formal proposal.*
- *Scoping visit/pre-assessment - Though not essential, a pre-assessment is useful in identifying at an early stage any areas where a forest is unlikely to meet the requirements of the certification standard so they can be addressed before the main audit begins.*
- *Formal application - When a forest owner/manager is ready to proceed with certification they complete a formal application form and agree a fee with the certification body.*
- *Initial Visit - The certification body confirms that the audit plan is appropriate, that the team has the right competency, and that the system is ready for audit.*
- *Initial Audit - The certification body evaluates the management of the forest against the requirements of the certification standard.*
- *Certification - If the evaluation is positive a certificate of registration will be issued.*
- *Surveillance - The certification body will check the certificate holder to ensure continued compliance with the standard. They will check that any corrective actions the forest owner/manager was asked to carry out have been completed.*
- *Re-certification - The certification body will periodically need to re-*

evaluate the management of the forest against the requirements of the certification standard.¹

Reassessment/surveillance

There is an annual surveillance audit and certificates are to be re-assessed at three yearly intervals

Accreditation

Accreditation programmes are developed by JAS-ANZ and not by AFS Limited. AFS Limited is an accredited standards development organisation – JAS-ANZ offers the accreditation programmes and services for independent third party certification bodies.

Complaints mechanism

A complaints mechanism is included in the standard.² However, the researcher could find on how this complaints mechanism is being implemented.

- Transparency of the organisation.

The AFS website states

“All stages of the certification process should be transparent. This includes the development of certification standards, criteria and principles, the operations of accreditation and certification bodies, and the non-commercial results of certification, in forms that are accessible and meaningful”.³

The AFS standard has only recently been made freely available at the AFS web site. Hard copies can be purchased from SA. It is unclear of summary reports of certifications will be made available.

6. Is there a label linked with the certification scheme

A label and labelling rules are being prepared for use in 2004. A draft standard for CoC procedures has been developed and has been provided to SA for recognition as an AS. The CoC Standards covers inventory control and accounting of raw material flow or physical segregation and or marking of raw material.

The inventory control and accounting of raw material flow has two approaches- percentage input/output system or minimum average percentage system. A final draft prepared by the AFS “Technical Committee” covering this and other aspects of CoC is available at the AFS website.⁴

¹ <http://www.forestrystandard.org.au/paper10.html> - accessed by the researcher 19/11/03

² Final draft Australian Forestry Standard Page 171 of 207

³ Dr Hans Drielsma, <http://www.forestrystandard.org.au/paper1.html> - accessed 19/11/03

⁴ http://www.forestrystandard.org.au/publications/pdf/draft3_coc_standard_180803.pdf (accessed 19/11/03)

Appendix I:

Environmental Organisations' responses to the AFS

A Presentation to the Australian Forestry Standard Steering Committee by Tim Cadman

Abstract

There are structural, process, market and content problems associated with the current process for the AFS.

Non-sectoral structural weaknesses:

- openness and transparency ;
- independent, third party certification of agreed performance standards;
- product claims and market credibility.
- Issues of particular concern to environmental stakeholders (ENGOs) include:
- Intent of the AFS
- Management prescriptions
- Consensus building and
- Pace and timing.

Openness and Transparency

Social, environmental and economic elements need to be combined to deliver sustainable forest management. The current structure of the AFS is discriminatory against multi-stakeholder participation. The Steering Committee is completely comprised of government and commercial interests.

The current structure has restricted the access of some stakeholders to decision-making processes. Other stakeholders have a larger degree of influence over the process than other sectors and have already determined the parameters of the Standard without wider consultation. Stakeholder participation is a key component of the standards setting process.

In order to obtain meaningful accreditation by Standards Australia, the structure of the Steering Committee needs to include all key stakeholders. The same can be said of the Technical Reference Committee. All interests need to be represented and balanced to ensure no one interest – or group of convergent interests - predominates.

Independence

For a certification standard to enjoy market support, it must be clearly independent of government and free from dominance by any one interest group. Furthermore, the operational aspects of such a standard need to be monitored and audited by a third party.

The AFS has been developed to date by Government, in collaboration with industry associations. This challenges the assumption that the process is independent and representative of all sectoral interests. It could be legitimately argued that industry associations have been the principle contributors to the Standard to date, particularly in its formative stages.

The general thrust of the Standard to date has been to build on the forest management protocols and processes outlined by Montreal and Australia's various Regional Forest Agreements, along with the development of management systems via the ISO "14000" series. It is uncertain if these processes will provide for independent monitoring and auditing of the standard. The use of forest practices boards, or similar bodies, who are linked to forest management agencies and industry is not sufficient. Furthermore, a management-systems approach to operational issues does not necessarily guarantee that agreed on ground performance of management has been attained on the FMU.

The AFS requires provisions for allowing independent certification agencies to audit compliance against the standard with the Standard, and to work with all stakeholders when auditing reported breaches.

Product Claims and Market Credibility

If significant stakeholders are absent from key components of the standards setting process, it is not possible to claim that the Standard has been developed in collaboration with all stakeholders. Excluded parties are within their rights to inform the market that the Standard does not enjoy cross-sectoral confidence. The very purpose of the standard will therefore have been undermined.

On a number of occasions materials generated by the AFS (or participants in the AFS process) have claimed that the Standard has been developed in conservation interests.

The AFS should avoid all such claims until they can be substantiated. Otherwise, a false and misleading impression is created in the market. This will further undermine confidence if and when the final Standard is. Until all relevant stakeholders are meaningfully included in decision-making processes this claim cannot be made on any materials.

Intent of the Australian Forestry Standard

On the information that has been made available it is difficult for ENGOs to make an informed assessment as to the intent of the Standard. Clearly, the international market is demanding verifiable standards for management that enjoy the support of the community. This is the main reason for the current market predominance of the Forest Stewardship Council and the current lack of consumer confidence in such schemes as Pan European Forest Certification. A credible certification system is required that goes beyond superficial improvements and integrates the needs of stakeholders other than forest managers and owners.

ENGOs therefore seek a clear indication from the AFS as to its intent. Is it:

- A certification standard that will deliver a recognisable label guaranteeing products that have been sourced from well-managed operations supported by all stakeholders? Or
- A Government/industry initiative that meets the requirements of government policy and has been developed on behalf of industry?

Management Prescriptions

ENGOs are deeply concerned that the AFS will deliver a Standard that is based on existing practices and policies. Clearly, the desire to develop an AFS is a recognition that the market requires more than the current status quo, or there would be no need for an Australia Forestry Standard. Therefore, to promote the current regime as a new standard is deceptive.

Of particular concern is the possibility that any existing forestry operations could continue under the Standard. Forest conversion to plantations, logging of old growth, clearfelling, loss of threatened species habitat and chemical use are just some of the elements of existing management practices that ENGOs feel must be examined and negotiated by stakeholders. Clearly ENGOs could not support a standard that refused to examine such issues.

Consensus Building

ENGOs welcome the desire of forest owners, managers and government to develop an AFS. The Steering Committee is likely to be aware that ENGOs themselves are in the process of exploring the value of national forestry standard and at this stage the environmental requirements for certifying plantations in particular.

There is considerable scope to move forward with certification in Australia through these two parallel initiatives. The most logical step would be to combine the two processes, basing discussions around areas of commonality and working cooperatively on those. At this stage

NGOs are primarily concerned with working cooperatively with the plantations sector to develop a national certification standard. It is possible that this process may lead to further engagement with the forestry sector, in particular as it relates to private forest management, where there is a need to improve standards. This in turn could lead to the development of consensus surrounding public native forest management.

Therefore, NGOs would like to see the AFS address the development of a standard for plantation management as a first step in building confidence amongst all stakeholders. Further discussions relating to other sources of wood products could ensue depending on the degree of mutual trust generated via this initial standards setting process.

Pace and Timing

NGOs are concerned that the development of the Standard may be being driven by political, rather than stakeholder considerations. They are of the opinion that a process that delivers outcomes – albeit over a longer timeframe – is better than one that collapses due to external pressures for a quick delivery. Furthermore, the quality of such a Standard would be inferior to one that is produced in the fullness of time.

NGOs would therefore like to see the current timeframe of provision of a draft standard revised, in favour of a multi-stakeholder process that delivers a mutually acceptable outcome.

Appendix 2

13/3/02

Dear Madam/Sir,

We are writing to formally advise you of our complete withdrawal from and repudiation of the Australian Forestry Standard process.

The AFS process has comprehensively failed to address the issues that have been raised by our representative Mr Cadman throughout his involvement in the AFS Technical Reference Committee.

Our withdrawal is based on:

- the inability of the AFS to develop mechanisms to ensure that it is representative of the needs of all stakeholders;
- the lack of openness and transparency within the process;
- complete loss of confidence in the Chair, Dr Hans Drielsma, to preside over the process in a fair and impartial manner.

We would draw your attention to the many submissions Mr Cadman has made on our behalf, and feel that it is not necessary to repeat them .

We wish to stress that Mr Cadman has been unable to address any of the issues regarding environmental management that are of concern to us (particularly the use of clearfelling, the logging of old growth forests, the use of chemicals and the adoption of the RFA and Montreal processes as a surrogate for ecologically sustainable forest management).

Because of these process failings Mr Cadman has been precluded from fully representing his constituents and we understand that Mr Cadman, on our instructions, made this clear on a number of occasions to the secretariat.

ENGOS have never sought to exercise any greater level of control over the AFS process than any other stakeholder. They merely sought equal and full participation in all the decision-making processes to the same extent that forest industry organisations and other enfranchised bodies have been afforded. It is this lack of equal participation in the AFS process that has forced our withdrawal. This is a problem that confronts non-government stakeholders in a number of government and industry-sponsored certification schemes worldwide. It is for this reason that ENGOS favour certification schemes that are genuinely independent of government, and include auditing by a third party (independent, third party certification). These processes allow for all stakeholders to have equal input, something that is lacking in the development of the AFS.

We understand that Mr Cadman attempted to provide some level of private involvement to help the AFS become more participatory. However, the events of last week, including the letter from Dr Drielsma accusing Mr Cadman of misrepresentation, have forced us to terminate his involvement in no uncertain terms. Mr Cadman has fully and ably represented our views throughout his involvement in the AFS process, and such an accusation reflects directly on us, his constituents.

On account of these accusations, and the failure of the AFS process to be fair and impartial to all participants (rather than serve the interests of some sectors at the expense of others), we have taken the matter out of Mr Cadman's hands, and hereby inform you of the complete withdrawal of our involvement in this process and our removal of any form of endorsement for the AFS.

Yours,

From: Beth Schultz, Conservation Council of Western Australia; Peter Robertson, West Australian Forest Alliance; Cam Walker, Friends of the Earth; Peter Sims, Tarkine National Coalition; Rainforest Information centre; Jim Frith, Bridgetown Greenbushes Friends of the Forest; Reanne Brewin, Native Forest Network - Australia

Appendix 3

Australian Forestry Standard

(Extract from WWF Australia “Wildlife News” September 2002)

The Federal Government has recently released the draft Australian Forestry Standard for public comment. The draft standard is available from the Federal Government website: www.forestrystandard.org.au

The sponsors of the Australian Forestry Standard are the Federal and State governments (through the Australian Council of Forestry Ministers), the National Association of Forest Industries, Plantation Timber Association of Australia and the Australian Forest Growers. In seeking to develop an Australian Forestry Standard, the sponsors have recognised that consumers and retailers are seeking credible assurances that forest products are sourced from well-managed forests.

WWF and the Native Forest Network have participated in meetings of the technical reference committee for the standard.

WWF has participated in the technical reference committee to seek the development of a robust forest management standard that sets appropriate standards for forest management and enables Australia’s forest industry to credibly demonstrate to domestic and overseas markets that Australia’s forests are being responsibly managed.

Of over-riding importance in WWF’s assessment of the adequacy of the standard is whether the performance requirements preclude certification of forest practices that are clearly inconsistent with the intent of the standard - to contribute to the goal of achieving “environmentally responsible, socially acceptable and economically viable forest management.”

WWF’s assessment of the draft standard is that it does not address key environmental concerns and will not be able to demonstrate a commitment to sustainable forest management. The standard does little more than allow “business as usual” forest practices, such as the conversion of native forests to plantations and the logging of high conservation value forests. Forests subject to these highly contentious practices could be “certified” under the standard.

The seven criteria that are the core of the standard are, at best, open to wide interpretation and, at worse, open to abuse by unscrupulous forest managers and certifiers. As such, unless substantially revised, the standard will have no credibility on environmental or social grounds and will not receive wide stakeholder support.

Without broad community support the standard will fail the needs of consumers and retailers for a credible assurance markets that Australia is responsibly managing its forests.

Appendix 4

WEST AUSTRALIAN FOREST ALLIANCE MEDIA RELEASE

Friday 11 October 2002

Australian Forestry Standard a rubber stamp farce

Conservation groups say today's launch by state and commonwealth ministers of a new "Australian Forestry Standard" (AFS) is a farce.

"This so-called standard is just a rubber stamp for continued destruction", said Peter Robertson of the WA Forest Alliance.

"The standard is supposed to reassure consumers and the public generally that companies or logging operations that meet the standard are sustainable and their products are environmentally safe.

"The only question the media or the public need ask is, in order to qualify for a big tick under this new standard, will any logging operation anywhere in Australia have to make any significant changes?

"The answer is no.

"In fact, the so-called standard will approve as sustainable, current logging operations around Australia that are:

- Destroying rare old growth forests and rainforests;
- Killing endangered species;
- Destroying vital habitat;
- Causing severe soil erosion;
- Polluting streams and rivers;
- Spreading weeds;
- Contributing to Australia's massive greenhouse gas emissions.

"None of this will change as a result of the introduction of this rubber stamp standard. Companies will simply get a big tick for conducting business as usual.

"Most importantly, consumers will not be fooled, especially international consumers who are already very strongly indicating a preference for genuine certification/labelling schemes such as the Forest Stewardship Council (FSC) certification process."

Further comment: Peter Robertson 9420 7265