

A Response to Incredible Claims by The Wilderness Society

Australian Forestry Standard Limited
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1. A paper apparently prepared by or on behalf of the Wilderness Society¹, sets out a series of claims, statements, and opinions related to the Australian Forestry Standard (AFS), and certain certifications under the AFS, particularly in Tasmania. The assertions in the document are a mixture of falsehoods, half-truths and misleading inferences, and can be accepted as no more than a rhetorical device to promote The Wilderness Society's political positions in respect of an alternative forest certification scheme and Tasmanian forest policy.

The Australian Forestry Standard

2. The Wilderness Society paper criticises elements of the AFS that deal with forest clearance, chemical use and the management of oldgrowth forest.
3. The AFS has specific provisions related to the issue of forest land clearing which specifically provide for the protection and maintenance of biological diversity values and in particular:

The forest manager shall not undertake conversion, except in circumstances where conversion entails a limited portion of the forest type at the bioregional level and where it is reasonably certain that it does not involve viable examples of:

- *threatened (including vulnerable, rare or endangered) forest ecosystems;*
- *old-growth forest that is rare or depleted within a forest ecosystem; and*
- *important habitat of threatened (including vulnerable, rare or endangered) species.*

In addition the forest manager shall not carry out conversion of native forest which would result in that vegetation community or ecosystem becoming threatened or endangered in accordance with Commonwealth, State and Territory laws, regulation or species recovery plans.

Any conversion for plantation establishment...should also make a significant contribution to long-term conservation, economic and social benefits at the regional level.

These are strong constraints, and are not dissimilar to provisions made within the FSC international principles and criteria especially in criteria 6.10² as under:

6.10 Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:

- a) entails a very limited portion of the forest management unit; and*
- b) does not occur on high conservation value forest areas; and*
- c) will enable clear, substantial, additional, secure, long term conservation benefits across forest management unit.*

¹ Certifying the Incredible, The Australian Forest Standard. Barely Legal and not Sustainable. Wilderness Society, 2005

² http://www.fsc.org/keepout/en/content_areas/77/71/files/FSC_STD_01_001_FSC_Principles_and_Criteria_for_Forest_Stewardship_2004_04.PDF

4. In respect of chemicals, the AFS provides that:

The forest manager shall reduce reliance on chemicals (including pesticides and fertilisers) and favour alternative cost-effective methods (including safe biological agents) that minimise adverse impacts on the environment.

The AFS does not specifically prohibit the use of 1080 as a pesticide. It should be noted that under FSC certifications, 1080 is allowed for use within Australia and New Zealand against feral animal pests. 1080 is also widely used by the managers of Australia's national parks and conservation areas for the control of feral animal pests. It is also widely used in the agricultural sector.

5. It is claimed that AFS certificate holders in Tasmania have chemically contaminated domestic water supplies. There is no substantive evidence to this effect. The Tasmanian Department of Primary Industry, Water and Environment conducts regular testing for a wide range of pesticides within Tasmanian rivers and streams, and over the last 12 months of testing, it has made a positive detection in only four samples³. None of these detections was near levels that would constitute a risk to drinking water quality, and the source of the contaminations, has not been confidently established. Interestingly of the chemicals detected, all are permitted chemicals for use generally or under derogation within Australia, under FSC policies.
6. Within the major forestry regions of Australia, it has been estimated that there are about 5.2 million hectares of old-growth forest. Within this area, about 3.9 million hectares, or about 75% are within conservation reserves and protected from any timber harvesting⁴. The AFS provides for the assessment and identification of significant biological diversity values and related conservation values by the forest manager, and their protection and maintenance in all forest operations. This includes oldgrowth forest values.
7. The references to the Forest Practices System in Tasmania are not relevant to the implementation of the AFS. Claims made, even if they were true (which has not been established), relate to events before the development of the AFS, and before any certifications within Tasmania. Since that time, the Tasmanian Government has also extensively amended the Forest Practices Act, increasing the independence and transparency of the Forest Practices Authority. Any AFS certificate holder must meet legal and regulatory requirements of the relevant State or Territory, and all such requirements or obligations must be met to obtain certification. There have been no substantiated cases of abuses as claimed by the Wilderness Society. Should such issues arise, there are mechanisms by which such grievances can, and should be raised with certification bodies.
8. The references to legal actions being taken by an AFS certificate holder have no relevance to any provision of the AFS. Persons or organisations are free to take legal action to defend their rights when they perceive the law has been broken. The Court will determine whether or not there is merit in the case.

3 <http://www.dpiwe.tas.gov.au/inter.nsf/WebPages/CART-69STWK?open>

4 Australian Government, Bureau of Rural sciences: Old growth Forests in Australia, Feb, 2004, updated with the Tasmanian Community Forest Agreement, 2005

Governance of the AFS

9. The AFS is governed by Australian Forestry Standard Limited (AFS Ltd), a not-for-profit public company registered under Australian law. Membership is open to any person or organisation that supports its objectives, i.e. the development and promulgation of sustainable forest management through the Australian Forestry Standard.
10. The standard setting processes of AFS Ltd are governed by Standards Australia, Australia's national standards setting body. AFS Ltd is accredited as a standards development organisation by the Standards Accreditation Board of Standards Australia. As such AFS Ltd meets all the criteria and protocols established for standards development, as evidenced by a periodic audits by the Standards Accreditation Board, and draft standards must be approved by Standards Australia before they are published as Australian Standards.
11. The AFS Technical Reference Committee (TRC) established to develop and review the AFS operates according to consensus guidelines that ensure that no individual person or organisation can veto the process, no single interest can dominate the process, and no decision can be made in the absence of agreement from the majority of an interest category.
12. The process by which the AFS was developed is clearly outlined in the Record of Process, which has formed part of the public record since October 2003⁵. The record shows that the draft AFS was approved by the Technical Reference Committee for release for public comment on 11 August 2001. The minutes of the committee indicate that there was unanimous support for such release, and that the meeting was attended by two ENGO members. The two ENGO members resigned from the committee in March 2002, over six months after the release of the draft, and before the committee was reconvened to consider the public submissions, and finalise the drafting process. The claim that the ENGO members withdrew as a result of dissatisfaction with the considerations given to their input on the TRC is simply not supported by the facts as documented in confirmed minutes of the TRC. Their withdrawal occurred after they had participated in the unanimous decision of the TRC to exhibit the draft AFS for public comment, and before the committee subsequently met to consider that comment. Comments subsequently submitted by the ENGOs were provided to the TRC together with other public submissions. Had the ENGOs remained they could have put forward their views as outlined in the comment paper and debated the views with all other environmental, economic, social and cultural representatives on the TRC. The draft AFS contained significant elements, particularly in respect of public participation, which reflected ENGO input.
13. Irrespective of the process by which the AFS was originally developed, it is currently being reviewed. For this purpose, comments have been invited from the community, and specifically from interested parties, including leading national ENGOs within Australia. Invitations have been re-issued on several occasions to

⁵ http://www.pefc.org/internet/html/members_schemes/4_1120_59/5_1246_306/5_1123_810/5_1185_819.htm

ENGOS to join the TRC and participate in the review. To date such invitations have been ignored by those ENGOS apparently acting as a block in maintaining their opposition to the AFS. In their absence however, other groups with legitimate environmental interests have joined the TRC, albeit in the face of significant pressures by the ENGO block to deter them. It is of some significance to note the stated reasons for which Greening Australia withdrew from the TRC after pressure from the ENGOS. Put simply, they did not have the energy or resources to withstand the ENGO pressure.

14. The Wilderness Society report also fails to acknowledge the PEFC's 60 day international public consultation period during the evaluation of the AFS in 2004 where the consultant could have been advised of any issues of concern.