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SUBMISSION

To

FSC Controlled Wood Policy Committee

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on

Forest Stewardship Council Certification of Controlled Wood

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Honorary Secretary
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Submission on the Forest Stewardship Council Certification of Controlled Wood

Introduction

The Clarence Environment Centre (CEC) has maintained a shop-front in Grafton for over 24 years, and has a proud history of environmental advocacy. Believing the maintenance of healthy ecosystems and biodiversity is paramount, we see the protection of high conservation values in our natural environment, particularly those contained within native forests, is a priority.

Preamble

In the past we have been highly critical of the Australian Standard certification which has seen native forests in our region, NSW Far North Coast, trashed, with wide-spread breaching of the Integrated Forests Operations Approval (IFOA) and Threatened Species Licence. As a result we have been closely following the emergence of the Forest Stewardship Council's (FSC) certification scheme, which appeared to offer greater protection of high conservation values within native forests.

We have always been concerned over the lack of any specific requirement, under FSC certification, for forestry operations to be “ecologically sustainable”; and also of what we saw as the further watering-down of ecological protection through the “Controlled Wood” category.

Another major concern is the high degree of self assessment that is required by the holders of FSC certification, something that has recently seen Koalas being shredded in what is now a highly industrialised process. And while those incidents occurred in plantations, the same applies to native forests where modern industrial logging machinery has seen an enormous increase in collateral damage to biodiversity.

The FSC Certification process.

Our significant involvement in forestry issues over the years has taught us that the timber industry generally simply cannot be trusted to comply with regulations that they fundamentally disagree with. Very few forestry workers, from the head office down, have any concept of how biodiversity works, or its values. Even their ecologists are unable to recognise endangered ecological communities, or many of the threatened flora in the forests they are supposed to be protecting.

Our recently involvement in an in-depth assessment of an application for FSC Controlled Wood certification by Boral in NSW, highlighted these issues. We assessed two of the five State forest logging operations that were singled out by Boral for auditing by FSC assessors. One was at Wedding Bells State Forest which, just 12 months after logging had occurred, where we discovered an over-logged disaster zone, with as much as 80% basal area logged, with a dense regrowth of unmanaged exotic weeds dominated by Lantana. Identified habitat trees for threatened fauna had been damaged, while others had not been identified but subsequently logged. Several kilometres of endangered rainforest verges had been damaged, with clear evidence of Lantana encroachment into the rainforest which will be devastating.

We also have serious reservations over the selection of FSC auditors from overseas, that have no knowledge of local ecologies. In the Boral case, the auditors employed an Australian based ecologist to assist them, but he came from Victoria and freely admitted he knew nothing about local species, particularly flora. Apart from the cost of flying someone from Melbourne, and providing accommodation, why did the auditors not employ a local ecologist who was familiar with local species and communities?

As it happens, we understand Boral's application was rejected, but we can only wonder what the outcome would have been had our representatives not accompanied the auditors to the site and explained the issues first hand.

Another concern we had was with the chain of custody, the concept whereby a company, like Boral, which has no involvement in forest timber harvesting, can receive FSC certification, when neither the forest manager, Forests Corporation NSW, or the logging contractors, have that certification.

We even identified one instance, not related to a forest chosen for audit, where Forests NSW logged a patch of critically endangered old-growth Lowland Rainforest, and supplied the timber to Boral. The forest in question had been mapped as a dry sclerophyll community on the harvest plan, and not one of the 6 named ecologists that partook in the pre-harvest ecological surveys, identified the error.

We maintain that everyone, from the foresters that marked up the compartment, to the logging contractor, to the transport drivers, knew that the operation was illegal, and given the size of the logs, close to 2m diameter, and the species of tree, we maintain that staff at Boral's mill would also have known the timber was illegally sourced.

Currently, and for the past 13 years, the NSW Environment Protection Agency (EPA) has been little more than an apologist for Forests NSW and the industry, clearly unwilling, or unable, to apply meaningful penalties for breaches of the regulations.

Five years of investigations and audits of logging operations by our members and other groups have uncovered systemic, and seemingly uncontrollable illegal logging activities in our state forests, and have reported literally hundred of breaches to the EPA. However only a hand-full have resulted in any action by the regulator.

Nevertheless, despite this widespread 'turning a blind eye' to illegal logging activities, in the 2011 – 2012 financial year, the NSW EPA did identify that Forests NSW had breached its Threatened Species Licence 634 times at just 39 audited logging sites, a mere handful of the total logging operations carried out across the state. However, professional audits undertaken by citizens groups, including the Clarence Environment Centre, have identified far more than the average 16 breaches per site identified by the EPA, and estimate that tens of thousands of breaches occur annually across the forest estate. **Only one of those breaches resulted in a prosecution.**

Where to from here?

So it is in this industrial climate that we are now asked to comment on FSC's certification of Controlled Wood and frankly, while the FSC concept has great merit, it is hard to see how it can be managed without “sustainability” being place first and foremost, and with the whole-hearted support of government regulators such as the EPA.

In terms of sustainability, this is well defined in the IFOA as: ***“Ecologically Sustainable Forest Management is defined as the management of forests so that they are sustained in perpetuity for the benefit of society, by ensuring that the values of forests are not lost or degraded for current and future generations.”***

Given our experiences to date, which indicate that:

- the industry simply cannot be trusted to comply with regulations;
- native forest logging is having a devastating impact on biodiversity;
- native forest logging is sustaining huge economic losses which are subsidised by taxpayers;
- it is damaging other profitable sectors such tourism;

- it is promoting weeds and disease;
- is reducing stored carbon at a time when climate change demands more carbon storage, and
- is increasing sedimentation of our river systems,

the Clarence Environment Centre strongly believes that native forest logging should cease.

Having said that, it is important that we attempt to provide some guidance to those attempting to improve standards in forestry generally, particularly in the plantation sector, which we see as the future for the timber industry

1. The ecological values of native forests are greatly enhanced by tree hollows that develop in 200 year old Eucalyptus trees, which large numbers of native fauna species have adapted to take advantage of for nesting roosting and shelter. At the present time almost half of all threatened terrestrial fauna species are actually tree-hollow dependent. In that respect, we believe every hollow-bearing tree has high conservation values.

With current regulations only requiring 10 hollow-bearing trees to be protected in each 2 hectares, we are seeing widespread destruction of these old trees using an array of excuses such as occupational health and safety. With a 200 year growth period, it is crucial that any certification scheme protect all hollow-bearing trees, and that includes not removing surrounding trees that provide physical support against wind etc. Likewise an effective recruitment habitat tree program must be developed, unlike the current method that allows any tree to be protected on one logging event, and then logged at the next.

2. Current logging cycles are less than 15 years, often only 10, and take an average of 40% of basal area. This is clearly unsustainable, and is also supporting the spread of disease such as Bell Miner Associated Dieback which is triggered by a canopy reduction above 35% (NSW Scientific Committee).

While acknowledging that logging cycles that ensure the forest values are not degraded over time, depend on growth rates, and that growth rates vary greatly depending on rainfall, soils, tree species, and more, we believe that sustainable logging can allow no more than 20% basal area removal, and without the use of industrial machines that cause enormous collateral damage. At the same time logging cycles must be significantly extended to at least 20 – 30 years.

3. Post logging management, particularly of weeds must be a major component of any certification.
4. Every attempt possible should be made to ensure certifiers have local expertise, or that they employ accredited experienced local ecologists to provide that knowledge.
5. The assessment of the chain of custody must be robust. We cannot have a situation, such as with the Boral case, where uncertified “cowboy” operators are responsible for the forest management and logging operations.
6. We also believe that serious thought should be given to removing the Controlled Wood category altogether. It was clearly designed to cater for a lower standard of forestry operation and, in our opinion, simply damages the FSC brand.

Thank you for the opportunity to comment.

Yours sincerely
 John Edwards
 (Honorary Secretary)
 for Clarence Environment Centre

become increasingly alarmed about the credibility of FSC Controlled Wood as State run forestry agencies or their key companies have sought CW for their native forest woodchips. In WA our colleagues are devoting considerable time to provide the certifying body with evidence that High Conservation Values as defined by the FSC Principles and Criteria, are routinely destroyed and/or damaged by logging.

In NSW we too were peripherally involved when the main customer of the State Forest logging agency, Boral Timber Fibre Exports, sought CW. Our organisation has spent decades trying to get the forest agency to adopt ecologically sustainable forest management practices. We have engaged many times over the years, in good faith, in various reviews and consultations. In each of these our contribution has been largely ignored. Timber quotas have been set at unsustainable levels and shrouded in secrecy. It took us years to finally get a judicial review of the refusal to supply the timber volumes under a Freedom of Information request, to even get this basic information. Our efforts to have them reduced have been unsuccessful. We have commissioned reports to document the breaches of the logging codes and had regular meetings with the Environment Protection Authority in an effort to induce them to act to enforce the Codes, again with no success.

So there seem to be a number of problems with the interpretation of the CW standard if environmental vandals think they have some chance of obtaining the FSC tick.

High among them is the issue of company self-assessment. FSC processes seem to provide numerous opportunities for companies to self-assess the impacts of their activities. Having been a stakeholder in thousands of development proposals with environmental impact statements... we are yet to see one where the proponent of the development acknowledges that their proposal will have a significant environmental impact.

Without significant improvement to the CW system, FSC will lose credibility. While those with an understanding of certification may make distinctions about CW being a lesser standard, to the public who pick up a book with the logo FSC Mixed Sources means 'while the sources are mixed the standard was high and the logging responsible'. If the logging can be shown to be destroying koala habitat say, is that responsible? Is that what FSC considers to be responsible.

We watch with interest the outcome of the WA Forest Products Commission attempts to get CW. These large native forest State-run agencies have been logging old-growth and other HCV forests with impunity. Our organisation does not believe that industrial logging is compatible with the protection of the extraordinary conservation values that are intricately interwoven in the native Australian forests.

If FSC processes can demonstrate otherwise we will be surprised. The more likely outcome is that we will see more FSC certificates issued by CBs that have an economic incentive to do so, and fail to take the concerns of environmental and social stakeholders seriously. This will lead to FSC being continually embarrassed by photos and news from Australia, showing dead animals (numbats and gliders and fairy possums are as cute as koalas although not as well known).

With respect to the revision of standards 40-005 and 30-010

We strongly endorse the approach that company risk assessments be phased out as soon as possible. Where there is no credible National Risk Assessment that has **significant support among social and environmental stakeholders, there should be no Controlled Wood.**

Companies should not be allowed to develop their own Control Measures which can then be signed off by the CB on their payroll.

For native (natural) forests there should be no FSC certified logging UNTIL (i) there have been fauna and flora surveys conducted according to agreed norms re amount of survey effort, seasonality etc, preferably by independent surveyors, (ii) the results of those surveys made available to stakeholders as part of the consultation process, (iii) results of other HCVs identified in those other methods made available to stakeholders (iv) evidence provided as to how all HCVs will be protected from damage by logging.

Only the 30-010 can potentially provide this assurance. The 40-005 is riven with conflicts of interest and should be done aware with entirely. If the forest manager is not prepared to undertake FSC assessment and guarantee logging in accordance with FSC standards, then a customer of that manager is in no position to do so.

From evidence we have seen in Australia and has been gathered overseas, Controlled Wood 40-005 has been abused and has failed as a credible FSC standard.

Also the consultation requirements in FSC standards should be aligned. Recently we were informed that under 40-005, the CB was not required to give notice to stakeholders of field verification visits and thus stakeholders were effectively given a week to prepare information for the CB that under 30-010 would have been a month.

The FSC system is meant to provide an ongoing dialogue between logging companies/agencies and stakeholders. A one off call for comment is not consultation. There needs to be clear two-way communication about what information stakeholders would like in order to inform their views, effort by the company/agency to meet that, and sufficient time to consider and analyse. There also needs to be feedback to the stakeholder from the company/agency about how their data has been considered and what changes if any have been made as a result.

There should also be information about whether or not the company/agency was successful and if not why not. Stakeholders put considerable effort, time and resources into providing information to companies/agencies. The company benefits, but the stakeholder often gets nothing- not even information as to the outcome, for all the effort they put in.

If a company/agency participates in the FSC system they should be prepared to inform those who provide them with information about the outcome.