

**Institute of Foresters of Australia**  
**Submission to the Green Building Council of Australia**  
**on the**  
**Proposed GBCA Sustainable Timber Credit – Public Review January 2008**

The Institute of Foresters of Australia (IFA) supports the GBCA in ensuring that timber supplies are sourced from sustainably managed forests. To this end, the IFA has supported the development and implementation of forest certification such as the AFS and the FSC. The purpose of these internationally recognised forest certification schemes is to ensure the long term sustainability of Australia's native forests and plantations, including the maintenance of high conservation values and significant biological diversity.

In relation to your proposal, the IFA makes the following comments:

### **1. Conversion of Native Forest to Plantation**

The IFA supports the general thrust of the GBCA's intent on the conversion of native forest to plantation. The IFA's Forest Policy Statement No. 2.4 on Clearing of Native Forests for Plantations makes clear that the IFA supports and encourages the protection of regionally significant areas of native vegetation and the conservation of appropriate areas of native vegetation within plantation developments, including riparian zones, steep slopes and conservation corridors. IFA members have been instrumental in implementing this policy over many decades.

Broadscale clearing of native forest for plantation development has, to all intents and purposes, ceased within Australia, with the exception of two specific forest policy exemptions. These are the Tiwi Island Indigenous Forestry Project and the Tasmanian Permanent Forest Estate Policy. However, other existing State and Territory legislation forbid the specific clearing of forests for plantation establishment and both the Australian Forestry Standard (AFS) and the Forest Stewardship Council (FSC) specifically disallow the conversion of native forests to plantation under their respective schemes.

Notwithstanding the existing legislative framework or the requirements of the third party certification schemes the IFA strongly disagrees with GBCA's proposal that 1994 be adopted as the critical date for compliance. This form of retrospective policy development will penalise plantation managers who have achieved compliance under all existing forms of legislation and regulation to date. The IFA is concerned that the adoption of the FSC criteria places the GBCA at risk of being viewed as displaying bias towards one certification standard over another. This could result in the GBCA being seen by consumers to lack a fair and transparent policy setting process, undermining the intent of the commitment to continuous improvement of the Green Standard.

#### Recommendation #1.

***The IFA recommends that the adoption of new criteria for the M8STC must be consistent with the principles of continuous improvement and commence operation only from the date of formal adoption by the GBCA.***

This approach would be consistent with the policy framework that exists within Australia and with the standards promoted by the AFS and the FSC.

The IFA recognises the importance that is placed on the maintenance of the native forest estate and the desire by the GBCA to ensure that wood products are sourced from demonstrated sustainably managed forests.

## Recommendation #2.

***The IFA recommends the adoption of forest certification standards as the only criteria for determining compliance with the GBCA M8STC.***

The adoption of, what may be termed, ad-hoc criteria that fall outside the boundary of either AFS or FSC certification will be difficult to achieve and is unlikely to be the simple mechanism that architects, designers and specifiers are seeking. It further raises the question of compliance auditing. The GBCA has not indicated the process by which compliance auditing will be carried out.

Reference: [IFA Forestry Policy Statement No. 2.4 Clearing of Native Forests for plantations](#)

## **Chain of Custody**

The IFA supports the development, implementation and promotion of forest certification schemes within Australia and the adoption of chain of custody certificates as a means of demonstrating to consumers that the forest products that they are seeking are sourced from sustainably managed forests.

The IFA considers that efforts should be enhanced to ensure that all Australian forests which are used for timber production achieve forest certification and all Australian forest industries achieve Chain of Custody certification.

The IFA promotes the key criteria within Australian forest certification schemes as this is critical to sustainable forest management and the long-term role of forests in delivering wood and non-wood benefits.

The IFA believes that the provision of additional criteria, as proposed by the GBCA to determine the sustainability of a forest product, is in conflict with the chain of custody requirement of the M8STC. Architects, designers and specifiers require a method of sourcing materials that are produced using sustainable forest management practices that are verifiable, based on well defined and documented standards that are independently third party verified.

## Recommendation #3.

***The IFA recommends that Chain of custody certification from the AFS or FSC be applied to meet consumer expectations and demonstrate that these products have been sourced from sustainably managed forests.***

Reference: [IFA Forestry Policy Statement No. 2.1 Forest Certification.](#)

## **Protection of old growth forests**

The IFA notes the GBCA's intent of specifying forest products that are not sourced from old growth forests. The removal of forest products from old growth forests has long been a contentious issue in Australia and has been the subject of much debate.

Since the inception of the National Forests Policy Statement in 1992 public debate regarding both the management and definition of old growth forests has continued. Notwithstanding the ongoing debate the changed legislative and regulatory regimes arising out of the Regional Forest Agreements (RFA) have resulted in approximately 75% of Australia's old growth forests being managed exclusively for nature conservation purposes alone. Where timber production is permitted legislation, regulation and codes of practice are ensuring that a further 21% of old growth forest is conserved. These policy and regulatory outcomes have resulted in less than 4% of Australia's old growth forests, within RFA areas, being available for timber production. In Tasmania, where much of the political debate about conservation of old growth forests is concentrated, more than 1 million hectares (out of a total land mass of 6 million hectares) or 85% of old growth forest existing at 1997 has been permanently placed in reserves in which timber

production is not a permitted use.

The IFA recognises old growth forests as being essentially comprised of over-mature or senescent trees that are approaching the end of their life. These trees do provide habitat for some wildlife, particularly arboreal marsupials and hollow nesting birds, but they are also subject to reduced fertility and vitality, and are less able to recover from high intensity fire. As a result old growth trees, even when subject to a regeneration event such as fire, are less likely to successfully reproduce themselves and are at risk of being replaced by other unrelated species within the forest. Timber harvesting with planned regeneration is one method that is available to ensure that old growth trees can be successfully regenerated and again grow into old growth forest. Indeed in the State of Victoria alone there is more than 1.6 million hectares of mature (80+ years old) forest in formal reserves that is growing into old growth forest. In addition to this a further 1.5 million hectares of mature forest is located in State Forest yet is unavailable for timber production. In the absence of disturbance events, such as fire, these forests will also continue to grow into old growth forests.

The IFA recognises the importance of maintaining all seral stages and the importance of ensuring the existence of old growth forest. Policy that does not take into account the dynamic nature of Australia's forests and their regeneration requirements may result in adverse outcomes for forest structure and species distribution that will prove detrimental for future generations of Australians.

#### Recommendation #5.

***The IFA recommends that the GBCA remove its reference to old growth forests from the MBSTC and adopt certification through the AFS and FSC as the sole determinant on sustainability of forest management.***

#### **Protection and maintenance of biodiversity**

The IFA supports the GBCA's inclusion of criteria for the protection and maintenance of biodiversity. The IFA considers that biological diversity is an important component of sustainable forest management and can be achieved in native forests and plantations managed for timber production through the application of scientifically based forest management plans, forest certification standards and codes of practice.

The IFA supports the adoption of the relevant principles under the Convention of Biological Diversity, to which Australia is a signatory, and the relevant objectives and actions under the National Strategy for the Conservation of Australia's Biodiversity in the sustainable management of native forests and plantations.

All Australian States have legislation and policies that provide for biodiversity conservation. These include legislation and policies dealing with vegetation management and the protection of endangered and threatened species, old growth and high conservation value forests, and riparian areas. In addition the establishment and effective management of a comprehensive, adequate and representative conservation reserve network together with the complementary management of biodiversity outside of forest reserves is making a significant contribution to the protection and maintenance of biodiversity values, including threatened species, by the application of scientifically-based management prescriptions. The suite of healthy, productive, growing forests being managed for all outcomes including, timber production, will ensure that all environmental niche's are maintained and contribute to desired biodiversity outcomes.

The IFA is of the view that the policy and legislative frameworks that exist within Australia and the regulations and codes of practice that underpin them has resulted in Australia's forests being well managed for biodiversity conservation. In addition the application of forest certification under the AFS or FSC provides consumers with an assurance that these forests are being managed

sustainably, including for the protection and maintenance of biodiversity.

Recommendation #6.

***The IFA recommends that the GBCA adopt independent third party certification through the AFS and FSC as the means of ensuring the sustainable management of Australia's forests.***

Reference: [IFA Forestry Policy Statement No. 1.4 Timber Production and Biological Diversity.](#)

### **Attachments**

IFA Forestry Policy Statement No. 1.4 Timber Production and Biological Diversity

IFA Forestry Policy Statement No. 2.1 Forest Certification.

IFA Forestry Policy Statement No. 2.4 Clearing of Native Forests for plantations

### **Concluding remarks**

An increasing proliferation of individual procurement requirements will make it very difficult for producers to either meet them or to be able to verify that they meet them. Moreover these requirements are not always transparent and it is unclear how the assessment of compliance has been, or will be carried out. The added value of introducing new "own terms" in requirements should be carefully considered before introducing them as they often represent unnecessary additional costs or other hurdles for suppliers. Furthermore there is no alignment in the criteria with other more systematically considered approaches such as is embodied in certification standards. These latter, including AFS/PEFC and FSC have been legitimised through transparency and participation of stakeholders, and therefore offer a more useful reference for private sector policies avoiding additional individual costly assessment work already embodied within existing certification systems. The GBC proposals suffer from this defect. The IFA considers that the terms are ill-defined, and there is no mechanism for verifying and tracking compliance that would not involve a supplier in enormous expense.

The IFA supports the existing certification requirements provided by the AFS and FSC, recognising that they provide an efficient and transparent way of ensuring sustainable outcomes. The proposed arrangement will present a structural hurdle to the use of timber in circumstances where it would clearly represent the better environmental choice.

It is unclear how the GBCA will assess the sustainability of alternate building products (e.g. concrete and steel) and the sustainability standards that apply to them. The IFA is concerned that without transparent sustainability standards it is difficult for consumers to make informed decisions about the building products that they are choosing and that unintended environmental outcomes may be forthcoming where such transparency is lacking.



Dr Peter Volker FIFA RPF  
President  
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