

# The Institute of Foresters of Australia

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Dear Ms Gervassi,

**Re: Submission on the Forest Stewardship Council (FSC) Draft Interpretation of Principle 5.6 (Sustainable Yield).**

Thank you for the opportunity to comment on the Draft Interpretation of Principle 5.6 (Sustainable Yield).

The Institute of Foresters of Australia (IFA) is the peak professional body for forest scientists, forest educators and forested land managers in Australia. We are a non-profit organization with over 1350 member who are committed to the principles of sustainable forest management and the processes and practices which translate these principles into outcomes.

### **Forest Certification**

The community is increasingly seeking assurance that forest products are obtained from legal and sustainable sources. Certification schemes can provide a powerful incentive for sustainable forest management and continuous improvement.

The development and application of these schemes should be based on the best science and knowledge of forest management and recognize and reward best practice management in native forests and plantations.

The IFA has a key role to play in promoting the key criteria within 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 supports the certification scheme where it embodies the key criteria as listed in IFA Policy Statement 2.1 – Forest Certification and does not impose arbitrary restrictions on forest use and management.

*(Extract from IFA Policy Statement 2.1 - Forest Certification. This policy statement is available in full from [www.forestry.org.au](http://www.forestry.org.au))*

### **Sustainability**

The Institute of Foresters has at its very core the concept of sustainability. Thus the IFA supports the development of Australian National Standard/s by the Forest Stewardship Council Australia (FSC). We offer the following advice in addressing the draft of its Principle 5.6 in the Australian context.

Underlying this concept there are fundamentals such as – balancing soil loss with soil-forming processes; the maintenance of soil nutritional status from one rotation/harvesting cycle to the next; the prevention of all types of significant or

[1]

naturally present or their partial restoration on formerly cleared land; the use of “guided ecology” (silviculture) in assisting nature to the benefit of humanity.

During such activities we are mindful of the dynamics within natural and anthropogenic ecologies containing natural and exotic species of all types including diseases, pests and weeds; biogeographical, geological, landform and climatic effects. This includes fluctuations in the frequencies of floral and faunal species.

The Draft Interpretation proposes a mixture of direct definitions and ‘tools not rules’ approach to identifying and subsequently managing Sustainable Yield in different forest types. The proposed approach gives some guidance to potential applicants but still entails continued uncertainty as it broadens the intent of Sustainable Yield and prescribes additional decision making processes rather than clearly defining when a forest area is managed for sustainable yield, and whether a management action appropriately addresses the identified aspect. Codes of practice already exist that promote sustainability taking into account e.g. the size of generally mature-age trees of various species and in various climatic zones, minimum size harvestable limits, prevention of erosion by engineering means, buffering of waterways and streams (including no-go zones), arboreal and terrestrial habitat protection, conservation of rare flora and fauna, individual tree fire-protection as well as safety internally and peripherally. Mere basal area or individual tree size cannot be allowed to exclusively govern activities since crown structure and health need consideration to ensure formerly suppressed stems are not left to stagnate and so lower productivity and perhaps forest health.

It must be recognised that the concept of sustainability is fraught with controversy in that virtually anything that is done to forests within the above circumscriptions is sustainable, given time and facilitation/protection e.g. many of the seemingly virgin native forests, especially near areas of early settlement and intensive exploitation, are the result of natural regeneration and its interactions with human activities within the last 200+ years not to mention the previous millennia of aboriginal history. Can we judge whether this was a sustainable process in retrospect or indeed what constitutes the primeval bench-marking example especially considering the dynamic nature of ecology? This makes the job of auditing extremely difficult and over-prescription is to be deplored since it could, in itself, lead to non-sustainable outcomes. Spatial considerations also arise when the whole gamut of silvicultural systems is considered e.g. overall uniform mild treatment c.f. the resilience of mosaics subjected to temporally isolated, more intensive harvesting, especially when contrasting forestry activities with disasters such as natural fire, flooding or cyclone interrupted seres, seres that may be hundreds of years long and fluctuating with climatic changes.

An overall plan of development for an Australian National Standard (yet to be developed) is required to enable scoping of the full task since Principle 5.6 should agree with it: thus it is not clear why this process is being undertaken for Criterion 5.6 in isolation from where it sits in relation to the other Criteria, nor how it meets the FSC’s own requirements for the development of standards.

Definitions of key concepts need to be possible before guidelines or rules may be imposed e.g. rate of harvest, permanently sustained, forest classification, ecological maturity (How can the following be assessed “approaching the end of their life span”?), individual tree maturity (a tree may be mature for hundreds of years before it becomes over-mature/senescent and senescence may last a hundred or more years), functional recovery. Regardless of forest class, general principles are the same and this segregation is not comprehensive e.g. enrichment planting to make up for lack of regeneration (presumably genetics would need to be examined).

Stand structure need be retained only to the extent that natural disasters might alter it e.g. mixed-age forest razed and regenerated as single-age stand but with islands of remnant structure; understorey destroyed by fire or flooding. Putatively natural stand structure is often the result of human intervention e.g. former non-harvesting or, on the other hand, thinning of less economically desirable species. Not all forest types are best managed as selection forests but some suit the creation of mosaics of virtual clear-felling e.g. the Australian Group Selection system.

[2]

To fit better with the intent of the FSC International structure, the definition of Criteria 5.6 should be confined to the production of forest products, not a broader interpretation that covers environmental and social products. These other products are more appropriately dealt with under other criteria within a draft FSC Australian National Standard (such as 5.1 and 5.5).

[*Differentiation between Criterion* (please note typo – should be *Criteria*)] The interpretation of Sustainable Yield should detail a clear process separate from those other services (such as for watersheds or carbon emissions) which can in turn be dealt with under other Criteria within the draft Standard. The proposed Draft Interpretation expands the scope and complexity of the original definition of Criterion 5.6 detailed in the FSC International Standard. With suitable management systems, even areas of HCV or of desirable ecosystem functions can and in some cases should be tended and harvested.

The absolute prescription of rotation lengths/harvest cycles is not a practical or desirable way of defining a sustainable yield of forests products, as it may actually work against the intent of the Criterion by being too prescriptive and potentially entrenching a management regime that isn't sustainable e.g. The arrival of an exotic disease or reduced rainfall may require an increase in rotation/cycle length. In any event, a review of assumed rotation length or harvest cycle should be made at least once in each term. Good records of removals in adequate samples of the forest, stratified by type, must be kept for future planning purposes as well as for justification or the systematic critique of management practices.

In the end, the core of sustainability lies not in prescribing rules or standards: the core lies in the process of weighing inter-generational equity. That is a process that no absolute rules or standards can prescribe given that the decision-making process must remain ill-defined in this context because it depends on the 'for whom' and 'how' and 'when'. How can we give unborn citizens a say, other than by us attempting to weigh their interests in the here and now of our own?

Yours sincerely



**Dr Peter Volker** FIFA RPF  
President