

The Institute of Foresters of Australia

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Forest Stewardship Council - Australia
GPO Box 152
MELBOURNE VIC 3001

Framework for Assessing High Conservation Values in Controlled Wood Risk Assessments in Australia

The Institute of Foresters of Australia is a professional body with over 1350 members engaged in all branches of forest management and conservation in Australia.

The Institute is strongly committed to the principles of sustainable forest management and the processes and practices which translate these principles into outcomes.

The Institute welcomes the opportunity to comment on FSC Australia's '*Framework for Assessing High Conservation Values in Controlled Wood Risk Assessments in Australia*'.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Peter Volker', with a stylized flourish at the end.

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The Institute of Foresters of Australia (IFA) offers the following comments on FSC Australia's "Framework for Assessing High Conservation Values in Controlled Wood Risk Assessments in Australia" to assist in developing cost-effective, practical, science-based tools and rules for Australian conditions.

Overriding Comment:

The Institute of Foresters Australia (IFA) supports a diversity of certification systems to provide choice for Australian forest owners. This is reflected in IFA Forest Policy Statement No.2.1 on Forest Certification reproduced below.

The Institute of Foresters of Australia (IFA) advocates the use and promotion of independent third party forest certification schemes and associated chain of custody schemes as the most effective way to demonstrate to consumers that forest products have been sourced legally from sustainably managed forests.

The IFA supports and encourages:

- *forest certification schemes that are based on the best science and knowledge of forest management and which foster best practice management in native forests and plantations.; and*
- *appropriate stakeholder engagement in the development of the forest certification standard.*

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 development, implementation and promotion of forest certification schemes within Australia will promote continuous improvement in sustainable forest management; and*
- *the IFA has a key role to play in promoting these 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 will support both the AFS and FSC where they embody the above key criteria and do not impose arbitrary restrictions on forest use and management. They should also:

- *be scientifically based, consistent with relevant legislation, practical and cost effective to implement, focused on desired outcomes rather than processes and recognise the diversity of forest types and ownership; and*
- *promote mutual recognition of other Australian forest certification schemes and relevant international schemes.*

Further information on IFA policy No. 2.1 can be found at: <http://www.forestry.org.au/pdf/pdf-public/policies/Statement-v2-1-Certification.pdf>.

The IFA is concerned that the current stance of FSC Australia is dominated by its Environment Chamber and its stakeholders, particularly those whose primary aim is to stop native forest timber harvesting.

This is pushing FSC Australia down a path whereby Australian native forests are likely to be effectively excluded from certification by a High Conservation Values framework that is almost insurmountable regardless of the quality of forest management practices.

To overcome this, the IFA believe FSC Australia needs to realign itself with its mission:

"FSC, as an international network to promote responsible management of the world's forests, brings people together to find solutions to the problems created by bad forestry practices and to reward good forest management."

General Comments on Public Consultation Document

Issue 1: Reinventing the wheel & extending the scope of HCVF

Given the controversy surrounding High Conservation Value Forests (HCVF), it is odd that FSC Australia has not utilised internationally recognised methods for assessing HCVF, the ProForest Toolkit, as supported by WWF, or waited for FSC International whilst they finalise development of a new HCVF Toolkit.

Critically, the Proforest HCVF Toolkit Part1 begins its Executive Summary ...

“All forests contain environmental and social values, such as wildlife habitat, watershed protection or archaeological sites. Where these values are considered to be of outstanding significance or critical importance, the forest can be defined as a High Conservation Value Forest (HCVF).”

The ProForest HCVF Toolkit Part 2: *“Defining High Conservation Values at a national level - a practical guide”* is designed for FSC national standards setting groups who need to interpret the global HCV definitions for use in a particular country, region, or forest type.

The current process, set out in the submission process document strongly suggests that FSC Australia has not carried out sufficient work as a national standard setting body on the application of HCVF in Australia.

ProForest guidance in Part 2 page 11 states:

“The HCVF working group should always consider the parameters and thresholds used by existing prioritisations to decide whether they are consistent with the HCV in question.

- *Quality*. The quality of an existing prioritisation has several aspects:
 - Resolution – only schemes that identify individual forest areas are suitable for direct use in defining HCVs. Many approaches identify parts of the country as being important for a value but do not distinguish which individual forests within this area contain that value and which forests don't.”

For controlled wood and a national standard, HCVF is intended to identify those ‘concentrations’ of ‘significant’, ‘critical’, ‘threatened’ or ‘fundamental’ values that at an international, regional or national level identify landscape elements that warrant separate consideration and protection¹. The current draft framework focuses on values, rather than forest areas meeting certain thresholds, and has expanded the scope to such an extent that this distinction has been lost.

Issue 2: Framework for controlled wood exceeds FSC-STD-40-005 (V2-1) EN

The intent of the High Conservation Value Forests (HCVF) concept is to capture what are considered, in an international context, to be “high” values. However, the proposed Australian framework has extended this to include a wide array of social and environmental values which go well beyond the definitions in the controlled wood standard, more aligned with a full FSC certification. The practical implication of this approach is that it opens up for detailed national stakeholder examination, a wide array of very local issues and thereby risks making the controlled wood certification process unavailable to most forest managers within any practical context of time or cost.

There are a number of CW certificates currently awarded to companies (but not forest managers) sourcing products from Australian native forests, including the AP Maryvale (ex VicForests), Mitsubishi Paper Mills (ex FT/Gunns Tasmania) and Chuetsu Pulp and Paper (ex Forests NSW/Boral, Newcastle). It is difficult to see how these certificates would be awarded under the more detailed and expansive definitions now being proposed.

¹ For example see HCVF Toolkit Part 2: Defining High Conservation Values at a national level: a practical guide (<http://www.proforest.net/publication/pubcat.2007-01-19.4709481979>) “FSC Criterion 6.2 already deals in a general way with individual rare, threatened or endangered species present. HCV element 1.2 adds further protection for forests that contain outstanding *concentrations* of rare and endangered species.” p19

- For both controlled wood and a national standard, the Framework brings the level of analysis down from a regional/national, broad area, or “concentration” of values, to a more local, IBRA-region, and single value level. The ability to discriminate between high and moderate/low values potentially disappears or narrows so significantly as to become meaningless. For example, there are few areas of native forest in Australia for which there are no threatened species either recorded, or for which potential habitat would not be easily demonstrated. This means that there is in fact no discrimination between areas on this factor.

Similarly, for controlled wood there is limited ability to discriminate if local interests in bushwalking, 4 wheel driving and field naturalists are indicative of HCV as suggested in the framework.

- The Framework expands the concept of HCV to include a wide range of social and potential economic interests under HCV 4 and 5. This essentially means that the full range of issues normally captured in a complete certification exercise, are now encompassed within this single concept.

Issue 3: Transparency of FSC Australia in wide stakeholder acceptance

A principle issue for FSC Australia is obtaining wide stakeholder acceptance. Through this call for submissions, FSC Australia’s handling of stakeholders will be critical. Uniquely for an FSC national initiative, FSC Australia has publicly acknowledged that a number of its members and ENGO stakeholders completely oppose the harvesting of native forests yet, it is proposing “tools” to determine whether native forests designated for timber production can be harvested under a yet to be developed national standard.

Significantly, this issue clashes directly with FSC International’s goals and statements viz:-

Global Strategy, Goal 2 is to “*Ensure equitable access to the benefits of the FSC system*”. This states “.... *FSC will also become a more viable and attractive solution to forest owners*

http://www.fsc.org/global_strategy.html

- FSC International also states “*To withdraw from applying the FSC standards to logging in natural forests, would only sacrifice a tool to promote equitable consideration of social and environmental issues in forestry, where it matters most. It is in natural forests where FSC standards can result in substantial social and environmental improvements and ultimately support the conservation and long-term maintenance of these forests.*”

<http://www.fsc.org/380.html>

In requiring transparency, FSC Australia needs to publicise its methodology for accounting for “substantial acceptance by stakeholders” i.e. environmental, economic, social and cultural interests. For example, if a stakeholder opposes native forest harvesting, do their views on HCVF have as much weight as stakeholders who do not? If they do, then FSC certification of Australian native forests is unlikely to gain traction, with customers preferring to source imported FSC-certified hardwood products or low quality pulp material derived from plantations.

Issue 4: HCVF = bioregional framework = CAR

The IBRA bioregional framework forms the geographical basis of a comprehensive, adequate and representative (CAR) reserve system².

FSC Australia appears to be rejecting the CAR system (FSC-CWRA-001-AUS) as one of the measures for HCVF but adopting the IBRA, which is the foundation of the CAR system. As FSC Australia is, by proxy, using the CAR process, why reduce the potential for native forests to gain FSC certification by adding complexity and cost for no purpose in areas which already have a Regional Forest Agreement? Is the issue of wide stakeholder acceptance, especially amongst those opposed to native forest harvesting, preventing a pragmatic and precautionary principle-based solution?

² (<http://www.environment.gov.au/parks/nrs/science/ibra.html>)

Issue 5: Certainty of outcomes

The CWRAT has decided to tackle the task with a ‘tools not rules’ approach. However, such an approach provides little guidance to parties seeking to use the Controlled Wood or national Standard, and gives rise to considerably uncertain outcomes, contrary to best practice³. The approach puts all decisions at the behest of ‘stakeholders’ rather than whether or not a forest is actually of high conservation value, and whether the management approach appropriately addresses its defining values.

The assessment process needs to be simple and certain. For operational purposes the Controlled Wood or national Standard needs to move towards a more definitive identification of the forest areas that:

- have HCVs that are likely to be incompatible with timber harvesting;
- those where HCVs can be accommodated through management; and
- those forests that are not considered to be of HCV.

The Framework blurs the distinction between HCVF classification and management. The net result of this is that there is no focus at all on the delineation of areas that meet HCVF thresholds, and in the alternative those areas that can be excluded from further consideration. The effect of this is to essentially capture the total forest estate in any instance, and require the management approaches outlined in the Framework to be applied across the landscape. This is contrary to the intent of the HCV. It also places unnecessary burden on forest managers, and reduces their certainty and increases their risk, with multiple points for disagreement and argumentation on an ongoing basis. International guidelines note that ‘HCVFs are, by definition, the most outstanding or critical forests’⁴ and consistently emphasize the importance of classification, or identifying the ‘concentrations’, the ‘critical’ or ‘particularly critical’, the ‘fundamental’ etc, so that forest management is not unnecessarily burdened.⁵

Issue 6: Controlled wood or forest certification?

The Discussion Paper notes that the CWRAT was seeking to identify HCVFs for two purposes - the National Forest Certification Standard and the Controlled Wood Standard. The approach proposed may be more suitable for forest certification purposes, where the forest area is clearly defined and stakeholder views can be reflected by the grower in the forest management system. This relates back to Issue 1, page 1 of this submission, where the proposed framework by FSC Australia does not meet FSC-STD-40-005 (V2-1) EN

The setting up of a National Standard should be more a more inclusive and consultative process than a simple submission call, so that workable pragmatic solutions are found.

Currently in Australia the controlled wood system, is managed by the purchaser rather than the grower. Under these circumstances, the purchaser buys from a large number of growers, and has limited capacity to respond to stakeholder views about the forest management systems that they have implemented. The lack of clearly defined HCVs and constant reference back to stakeholders makes the system almost unworkable.

Issue 7: Legislation should be the basis of a standard

The 2nd paragraph of section 5 of the document indicates that the working group has some issues with legislation as a means of compliance within an FSC National Standard. This is somewhat incongruous

³ see HCVF Toolkit “The process of national interpretation should aim to make the defined HCVs as clear, detailed and straightforward to interpret as possible, so that they can be understood by non-specialist users, and their presence unambiguously assessed at the forest level.” And hence ““HCVF working groups should rely wherever possible on previous reviews and studies” pp6/7

⁴ HCVF Toolkit, p60

⁵ see HCVF Toolkit referenced as above. “Setting thresholds that are too low will lead to excessive areas of forest being defined as HCVF and place an unnecessary burden on forest management.” p6 and “Even within habitat types and regions of the country that are known in general to contain outstanding concentrations of rare, threatened or endangered species, not all forests will actually do so.” p22, and again “...excluding forests that are important but not critical (ie when normal best forest management practices are sufficient for maintaining watershed functioning.” p44.

with the ideals of the FSC where it strives to ensure compliance with the laws of the country that the National Standard operates within.

In an Australian context, compliance with the regulatory environment of the country and/or state/territory must be a fundamental driver of any FSC National Standard.

Issue 8: Low intensity operations & size-based criteria

One of the relevant applications of the Controlled Wood Standard would be for operations in privately-owned native forests.

A significant proportion of Australia's hardwood timber comes from private land harvesting of a generally very low intensity, using selective logging regimes. These operations are likely to meet the SLIMF criteria, despite affected areas often being 500 – 1,000 ha or larger. Most of the proposed assessment tools and success criteria would be unworkable in these situations.

The identification of HCVF for private land needs to rely on readily available data sets to identify those forests where timber harvesting would not be consistent with HCVs and those where special measures may need to be taken. Consultation with a broad range of stakeholders in relation to each property should not be required for controlled wood for SLIMF

In most cases, HCV 1 forests will be the only values requiring identification, with other values being met through compliance with the Forest Practice Code and meeting legal cultural heritage requirements.

The Discussion Paper identifies the need for assessment to be somewhat based on scale and suggests that SLIMF forests may require a lower level of assessment than larger forest areas. Given that controlled wood certification in Australia is only currently achieved by the purchaser / processor rather than the forest grower, there may be some opportunity to scale the assessment level to the size of the harvest. For instance, companies harvesting less than 10,000 m³pa should have less onerous assessment requirements than companies harvesting more than 100,000 m³pa. This would better align the assessment requirements with the risk of impacting on HCVFs.

Issue 9: CWRAT Working Group

It appears that the CWRAT does not include any practicing foresters with real, current, practical experience where HCVF may exist to ensure that the interpretation and accompanying guidance are appropriate, implementable and accessible to forest managers. This is a fundamental shortcoming of the process and directly contradicts accepted best practice.⁶ This needs to be rectified, and in the meantime significant weight should be given to comments received from those with such practical experience.

⁶ HCVF Toolkit Part 2: Defining High Conservation Values at a national level: a practical guide (<http://www.proforest.net/publication/pubcat.2007-01-19.4709481979>) "Practical Experience: It is very important that the group or team included people with real, current, practical experience to ensure that the interpretation and accompanying guidance are appropriate, implementable and accessible to forest managers." p5

Specific Comments on “Classes of HCV in Australia and Rationale (sic)”

It needs to be recognised that native forest timber harvesting is not a key threatening process⁷ despite the tone of the FSC Australia document and the core beliefs of a number of FSC stakeholders.

HCV 1: Forest areas containing habitat for national or state-listed threatened species/ecosystems of high significance at the bioregional level (defined as IBRA)

The FSC-STD-40-005 (V2-1) EN definition⁸ encompasses a) and b) in the standard. However the framework proposed by FSC Australia goes well beyond the definition by now referring to any listed species, rather than “concentrations,” thereby introducing a significantly lower threshold for compliance.

The introduction of the IBRA bioregional level also significantly lowers the threshold, with the international definition⁹ clearly indicating by its hierarchy a region of potential supra-national extent (i.e. between global and national), and not the very detailed bio-regional context now introduced.

Virtually by design, all native forests in Australia will be captured by the definition as they all contain listed species, and so there is no basis on which “high significance” can be ascertained. This is an unworkable situation,

HCV 2: Forest areas containing globally (includes World Heritage), nationally or bioregionally significant large landscape-level forests, contained within or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.

Again the threshold has been lowered by the reference to bioregional level. The notes define “large” as encompassing >10,000 ha for intact forest landscapes. The CW Standard defines “intact forest landscapes” as:

An intact forest landscape is a territory within the forest zone which contains minimally disturbed by human economic activity, forest and non-forest ecosystems with an area of at least 500 sq. km and with a minimal width (diameter of the inscribed circle) of 10 km.

On this basis, “large” should be at least 50,000 ha, with a minimal width of 10 kms.

Also, the inclusion of “mosaics” and “refugia” less than 10,000 ha is inconsistent with the focus on “large” forest landscapes, and the intent is adequately dealt with under HCV 1. The reference to “remnant” vegetation is also confusing in the context of this value

HCV 1 & 2: The Comprehensive Adequate and Representative Reserve System is both at a landscape and forest management unit level. For example, Forests NSW is legislated to utilise forest management unit level zoning derived from the CAR process, to map and protect areas within compartments.

See: http://www.dpi.nsw.gov.au/_data/assets/pdf_file/0007/268063/managing-our-forests-sustainably-forest-mgt-zoning-in-nsw-state-forests.pdf

⁷ <http://www.environment.gov.au/biodiversity/threatened/ktp.html>

⁸ The definition of HCVF is set out in the “STANDARD FOR COMPANY EVALUATION OF FSC CONTROLLED WOOD FSC-STD-40-005 (V2-1) EN” as follows: High conservation Value Forests are those that have one or more of the following attributes: a) forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g. endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance; b) forest areas that are in or contain rare; threatened or endangered ecosystems; c) forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control) ; d) forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health) and/or critical to local communities’ traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities

⁹ see HCVF Toolkit referenced above “[an individual species would constitute a HCV] ...only for species of exceptional international concern (eg mountain gorilla, giant panda, Javan rhinoceras) where existing legislation and current protected area network does not provide sufficiently for their protection.” p21

In Tasmania the Forest Practices Code¹⁰ outlines a basic approach of planning for flora and fauna conservation at a regional level. It also specifies that areas of retained vegetation should include localised features associated with:

- threatened species;
- species with disjunct or unusual distributions;
- inadequately reserved communities;
- forests that have old growth characteristics;
- other significant biological values.

The Tasmanian Code also defers to the Commonwealth *EPBC Act 1999*, *Tasmanian Threatened Species Act 1995*, the *Tasmanian National Parks and Wildlife Act 1970*, The *Tasmanian RFA 1997* and subsequent *Tasmanian Community FA 2003* on this matter.

HCV 3: Forest areas that provide basic services of nature in critical situation

This is consistent with international definitions. Carbon is a potential consideration in all forests, but it is unclear whether it is being proposed that it should form a basis for the recognition of HCVF. If so, what are the criteria? The inclusion of carbon at this stage is not consistent with current standards, and should await clarification at that level and not be pre-empted in subsidiary documentation.

Additionally, there is growing scientific evidence can show that harvesting native forests locks-up more carbon dioxide in timber products, landfills and regrowth compared to un-harvested forests¹¹. Recent literature reviews¹² published by ANU have selectively cited information but have not actually undertaken any scientific studies to support the proposal that unharvested native forests contain more sequestered carbon than managed forests.

Criticality is dependent on context. Water flows maybe seen as critical in Melbourne with a perceived effect from native forest harvesting, but are not seen as critical or a consequence of native forest harvesting in other regions. It should be appreciated that any claims that water could be saved by stopping the tiny amount of annual timber harvesting in Melbourne's catchments have always been contingent on the absence of fire in perpetuity, a totally unrealistic expectation.

Studies have shown¹³ that if forest disturbance is below 20% by area, the effects of hydrological yield are difficult to extract from background variability. As no known native forest catchments have harvesting areas that approach anywhere near 20%, defining native forest harvesting as a critical process is unscientific and reflects a 'green' political agenda. Legislation is the best measurement of criticality in that such issues have been subjected to public, intra- and inter-governmental consultation and ultimately governmental approval.

HCV 4: Forest areas fundamental to meeting basic needs of local communities

While this is consistent with international definitions, the intent to include "interested parties" into this criterion goes well beyond any reasonable interpretation of "basic" needs in an Australian context where recreational, amenity and related needs are have already been well catered for in national, state and local land-use planning.

Furthermore, the "interested parties" criterion opens the door for national groups to object even when local communities and groups do not. Even "basic" needs in terms of affected parties need to be carefully determined. It is considered that this criterion has limited application within an Australian context, and ought not to be a determinant of HCVF. Any national standard would accommodate these attributes

¹⁰ Forest practices Code 2000 (see pages 58-64). Forest Practices Authority. www.fpa.tas.gov.au

¹¹ <http://whitepaper.climatechange.gov.au/ncas/reports/tr47final.html>

¹² http://www.nafi.com.au/userfiles/publication/Green%20carbon%20report%20summary_120808.pdf

¹³ Cornish, P.M. (1993). The effects of logging and forest regeneration on water yields in a moist eucalypt forest in New South Wales, Australia. *Journal of Hydrology*, 150: 301-322.
Cornish, P.M. and Vertessy, R.A. (2001). Forest age-induced changes in evapotranspiration and water yield in a eucalypt forest. *Journal of Hydrology* 242: 43-63.

elsewhere It is appropriate for these matters to be considered in the broader context of certification, but not as part of HCVF. Compliance with legislation should be sufficient to verify the management of this HCV in all Australian states.

The terms ‘critical’ and ‘fundamental’, for example in HCV 4 refer to forests that are ‘fundamental to meeting basic needs’, or as alternatively stated by the CWRAT ‘vital to human wellbeing’. These criteria would appear not to be relevant to developed countries such as Australia. Of the four main values identified by the CWRAT, water is probably the only value that could be considered fundamental to basic needs, and this is already captured in HCV 3. The proposed measures are more relevant to a country without a strong regulatory regime that has not considered the need for an extensive forest reserve and associated management system. This is not the case in Australia.

HCV 5: Forest Areas critical to local communities’ traditional cultural identity both indigenous and post colonisation).

This is consistent with international definition, and it is considered that compliance with legislation should be sufficient to verify the management of this HCV in all States of Australia.

Specific Comments on FSC Australia’s Framework for assessing HCVF

HCV 1: Forest areas containing habitat for national or state-listed¹⁴ threatened species/ecosystems or species/ecosystems of high significance at the bioregional level (defined as IBRA)

Example of assessment tool	Example when tool is used appropriately	Example when tool is used inappropriately
<p>Level 1 - Use of CAR¹⁵ outcomes or Expert¹⁶ assessment¹⁷.</p> <p>Use for controlled wood and when endangered species or ecosystems are recorded and there is a low risk to them from the management activity</p>	<p>CAR outcomes or expert assessment is incorporated into management plans and implementation monitored</p>	<p>No change in management as a result of expert assessment or implementation monitoring</p>
<p>Level 2 – Use of CAR outcomes or proxy / secondary species mapping and databases. Use when endangered species or ecosystems are recorded and their habitat requirements understood but there are uncertain risks to them from the management activity. Potential to breach of the Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act).</p>	<p>Outcomes are incorporated into management plans and implementation monitored</p>	<p>No change in management despite outcomes showing substantially unacceptable impacts.</p>
<p>Level 3 – Use of CAR outcomes or Statistical modelling and mapping of wildlife habitat requirements. Use when endangered species or ecosystems are poorly recorded or mapped and their habitat requirements are not understood with uncertain risks to them from the management activity. Risk of breaching the Commonwealth <i>EPBC Act 1999</i>.</p>	<p>Outcomes are incorporated into management plans and implementation monitored</p>	<p>No change in management despite outcomes showing substantially unacceptable impacts.</p>
<p>Level 4 – Use of CAR outcomes or Population viability analysis and scenario evaluation. Use when endangered species are reliant on undisturbed habitat from the management activity. Risk of breaching the Commonwealth <i>EPBC Act 1999</i>.</p>	<p>Outcomes are incorporated into management plans and implementation monitored</p>	<p>No change in management despite outcomes showing substantially unacceptable impacts.</p>

¹⁴ This will be from Commonwealth and/or State/Territory lists in defined legislation

¹⁵ HCVF= bioregional framework = CAR

¹⁶ Qualified & practicing ecologists

¹⁷ Stakeholders are not required to assess this by FSC International nor do they usually possess the expert skills. Elicitation is only likely to generate emotional responses rather than rational science.

HCV 2: Forest areas containing globally (includes World Heritage), nationally or bioregional significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in perceived natural patterns of distribution and abundance.

Example of assessment tool	Example when tool is used appropriately	Example when tool is used inappropriately
Level 1 - Use of CAR¹⁸ outcomes or other Regional surveys. Surveys of viable populations of most if not all naturally occurring species exist in perceived natural patterns of distribution and abundance	Management plans encompass such attributes and reviewed / updated on a 5 to 10 year basis dependant on values apparent.	Plan that does not address values or is out of date.

HCV 3: Forest areas that provide basic services of nature in critical situations

Example of assessment tool	Example when tool is used appropriately	Example when tool is used inappropriately
Level 1 – Compliance with code of practice & legislation for the management of slope, soils and water values.	Compliance demonstrated through appropriate plans, policies, procedures, guidelines, etc and monitoring or auditing	No compliance demonstrated
Level 2 (water)¹⁹ – Compliance with legislation and catchment level monitoring of water quality	Compliance with legislation and catchment level monitoring of water quality	No compliance or monitoring demonstrated
Level 2 – (carbon)²⁰ - N/A		

HCV 4: Forest areas fundamental to meeting basic needs of local communities

Example of assessment tool	Example when tool is used appropriately	Example when tool is used inappropriately
Level 1 – Agreements and consultation with local communities & groups	Agreements or measures are in place	No agreements or measures demonstrated

¹⁸ HCVF= bioregional framework = CAR

¹⁹ FSC Australia draft has a Melbourne centric view relevant to Victorian native forests and not applicable to many forests outside of this jurisdiction, therefore the tools suggested are site specific and at a general level would be a waste of time and money to no benefit. Compliance with legislation should be the bedrock.

²⁰ As there is no FSC International ruling it should be decided in the future.

HCV 5: Forest areas critical to local communities' traditional cultural identity (both indigenous and post colonization)

Example of assessment tool	Example when tool is used appropriately	Example when tool is used inappropriately
Level 1 – Compliance to Commonwealth, State, Territory and Local Legislation	Evidence of Compliance	Non-compliance
Level 2 – N/A – Legislation present throughout Australia		

-End-

