



IFA/AFG proposed changes to the revised Australian Standard for Sustainable Forest Management (AS/NZS 4708:202X)

31 May 2021

This comment and three proposed amendments are made with reference to the Public Comment Draft released by Responsible Wood in 2020. Proposed amendments are made in blue text. The IFA/AFG acknowledges there may have been subsequent changes to working drafts or a Ballot Draft, since the Public Comment Draft, and these proposed amendments would need to fit accordingly.

Introduction:

- 2nd paragraph, replace sentence: "The Standards promotes the concept of the precautionary principle for minimising adverse environmental impacts whilst providing benefits from the forest." with: "The Standard adopts the precautionary approach and incorporates its application to sustainable forest management."

Notes for Responsible Wood and IFA/AFG members:

- See comment under Section 3 below, in which IFA/AFG proposes a definition for the precautionary approach. This proposed change in the Introduction is aligned with the new definition and is intended to recognise the importance of adopting a precautionary approach, right up front in the Standard.

Section 3 – Terms and Definitions:

- Section 3.61, replace definition for the "precautionary principle" with "**precautionary approach**":
"The application of a risk-based methodology, recognising that where there are threats of serious or irreversible damage to Significant Biodiversity Values, a lack of full scientific certainty should not be used as a reason for postponing measures to minimise adverse impacts.
Note 1: Threats of serious or irreversible damage to Significant Biodiversity values should be considered at the landscape or species-level scale.
Note 2: A precautionary approach, proportionate to the scale and risk of forest management operations, requires:
 - identification of likely threats of serious or irreversible damage resulting from forest management activities;
 - application of clear measures aimed at prevention of environmental degradation; and
 - monitoring of effectiveness of measures taken over time, consistent with this Standard (per Section 11.3.8)."



Notes for Responsible Wood and IFA/AFG members:

- The IFA/AFG is mindful of the challenges presented by the inclusion of a definition and normative requirements for application of the precautionary principle in a forest management standard; due to the range of definitions that exist in regulatory and non-regulatory instruments, and the apparent differences in interpretation by stakeholders that have differing views about what it means and how it should be applied in practice.
- Given this, the IFA/AFG understands there has been calls to remove references to the precautionary principle from the standard; and we note that some IFA/AFG members have called for this as well. However, following a consultative process of engagement with the membership, the IFA/AFG considers that it is more prudent for the Responsible Wood standard to directly address the requirements for a precautionary approach, with clear guidance for how it should be applied and audited.
- Given the range of definitions of the precautionary principle and the scope for subjective interpretation, the IFA/AFG is proposing the definition of a precautionary approach, while maintaining consistency with the clear intent of the principle.
- Note also that Significant Biodiversity Values is a defined term in the Standard, hence the capitalisation of the term and the specific focus in this definition.

Section 11.3 - Biodiversity:

- Section 11.3.2 (a) Insert an additional sentence, after: "The forest manager shall develop and implement effective strategies to maintain or enhance SBVs and control potential adverse impacts. [This shall involve the application of the precautionary approach, where triggered.](#)"
- Delete the Note to this clause, as this now becomes redundant.

Notes for Responsible Wood and IFA/AFG members:

- This proposed addition is intended to incorporate a clear normative requirement for application of the precautionary approach, in that section of the Standard that relates to developing and implementing effective strategies to maintain or enhance SBVs and control potential adverse impacts.
- In the Public Comment Draft, there was a Note that stated the precautionary principle applies to this requirement. The IFA/AFG considers this section is strengthened by including reference to the precautionary approach within the main text, as a normative requirement.