The Institute of Foresters of Australia
ABN 48 083 197 586

8 June 2011

Mr Michael Spencer
FSC Australia
GPO Box 152
MELBOURNE VIC 3001

Email: hcv@fscaustralia.org

Dear Michael,

The Institute of Foresters of Australia (IFA) welcomes the opportunity to provide comments on the Draft 2.1 (Dated 13 April 2011) of the High Conservation Values (HCVs) Evaluation Framework of the Forest Stewardship Council Australia.

Our submission is attached.

The IFA is a professional body of approximately 1250 members who are engaged in all branches of forest management and conservation, forest industry, academia, research and sustainable natural resource management in Australia and overseas.

IFA is a member of FSC Australia, AFS and IUCN. We have an ongoing interest in maintaining the productive and ecological capacity of Australia's forests and managing them for the full range of economic, social and environmental values.

The Institute would be pleased to make a member available to discuss the comments and any other issues the Council may wish to raise.

Yours faithfully

Peter Volker PhD FIFA RPF MAICD
National President

National Office   1 of 4   (e) ifa@forestry.org.au
PO Box 7002   (p) 02 6281 3992
Yarralumla ACT 2600   www.forestry.org.au   (f) 02 6281 4693

Comments by the Institute of Foresters of Australia (IFA)
on

Draft 2.1 (Dated 13 April 2011) of the **High Conservation Values (HCVs) Evaluation Framework of the Forest Stewardship council of Australia (FSCA)**

Background to the framework

This draft framework aims to provide "a definition of each HCV class together with a list of values that are considered under each class in the Australian context as far as they are known." The framework is intended to be used for both natural forests and plantations in all bioregions in Australia. There are 6 HCV classes designated, consistent with the FSC international classes.

It is proposed that the framework be used "to support FSC Chain of Custody holders and Forest Managers on the implementation of the Controlled Wood standards, specifically focused on HCV requirements." The Forest Manager must present evidence that any identified HCVs are not threatened within the evaluated Forest Management Unit (FMU) by the proposed management activities.

Within each HCV, the framework consists of definition/clarification of terms used, a list of possible specific values, and the suggested assessment process (with recommended tools).

Introductory comments

The IFA's policy on "Conservation of Australian native forest and woodlands" states that '… *they need to be covered by a comprehensive, adequate and representative (CAR) reserve network and that their management should sustain ecological processes, environmental services and economic and social outcomes in a balanced way.'*   Our comments should be seen 'through the lens' of this policy.

We believe that the framework should closely follow the HCV Forest Toolkit (by ProForest) which says that HCV areas must be of 'outstanding significance or critical importance'. However, the draft framework devalues this aim, by defining key terms too broadly and loosely.

The IFA suggests that the next draft of the framework, before it is finalised, be given a test-run in a region within Victoria or Tasmania, to assess how workable it might be for all parties.

Comments on individual HCV classes

HCV 1. Forest areas containing globally, nationally and regionally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).

Comment

- Guiding FSC documentation uses "regionally" in the **world** sense, not as national regions, as implied above. Thus the above statement should be changed to reflect the international intent.   It should read "globally and/or regionally and/or nationally".

- The suggested definition of 'significant concentrations…' is highly subjective and thus likely to be interpreted differently by different assessors.

- Statistical modelling and mapping of wildlife habitat requirement (Level 3 of the suggested assessment tools) are unlikely to lead to realistic outcomes for many species, precisely because habitat requirements are poorly known. Indeed, if determination of HCVs requires such a complex and costly process, the area is unlikely to be sufficiently 'outstanding' to be eligible for this value.

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PO Box 7002   (p) 02 6281 3992
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HCV 2. Forest areas containing regionally 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.

Comment

- The suggested definition of 'significant' and the description of possible values within such areas are highly subjective and thus likely to be interpreted differently by different assessors.

- Given that most invertebrate and fungi species are not described/named, how can an assessor be sure that "populations of all naturally occurring species…" exist or not?

- The definition of 'large landscape-level forests' argues that 'large' is a relative term so that forest areas under this HCV may even be smaller than a few thousand hectares <u>and</u> be fragmented or be narrow corridors. The IFA believes that this is completely contrary to the intent of HCV2, and thus the definition should be extensively revised.

- Under 'Values', the very broad description of this class would not only include all or most 'old growth' forests but also the large areas harvested using low impact selection silvicultural systems. This would surely be an unintended result. In addition, 'roadless areas' needs much better definition.

- Reference to (the ill-defined) 'conservation organisations' essentially nominating areas for HCV2 is entirely inappropriate here and should be deleted.

- The role of CAR reserves within or near the FMU has been relegated to a footnote, but such reserves (where they exist) have been created to specifically address conservation requirements. The regional CAR process and outcomes should be thus included under 'Assessment Tools'.

HCV 3. Forest areas that are in or contain rare, threatened or endangered ecosystems.

Comment

- This HCV is very similar to HCV 1 and possibly should be included in that HCV.

- We are unaware of a consistent national system that categorises ecosystems as 'rare threatened or endangered'.

- There is a need to recognise that all ecosystems are dynamic (both in the short and long terms) such that what may seem unhealthy or threatened now, may recover health in the future.

HCV 4. Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).

Comment

- The 'guidance' given on watershed protection is useful in limiting the extent of this HCV, as all forest is in a catchment of some sort and will be protecting soil, etc. However, whole-of-catchment 'protection' is rarely required, as stream buffers and coupe erosion control systems are recognised as sufficiently effective in all Australian codes of forest practice.

- The Value "Areas that are critical as carbon stocks" should be deleted until we know much more about the C stocks in forests. Some studies have argued that cycles of harvesting and regrowth will result in more CO_2 being sequestered in timber products - over several rotations- than reserving old forests which may produce more CO_2 through decay, or when burnt, than they sequester.

- Setting an arbitrary level of 300 t/ha as 'high' is totally unrealistic as it would include much of Australia's native forests in high rainfall areas.

- Generally, observance of the relevant code of forest practice will ensure that forest management operations do not deleteriously impact on water and soil quality, so that delineation of forest under HCV 4 would be unnecessary.

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HCV 5. Forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health, well-being).

Comment

- "Well-being" is an ill-defined, vague term, which should be deleted.

- This HCV overlaps with HCV 4 in relation to water supplies, so this should be clarified.

- The IFA accepts the definitions of 'fundamental' and 'basic human needs', but suggests that the words 'on which they are critically dependent' be added after 'communities' in the title. Unless this is done, the type and scale of the 'dependency' is too open to debate, e.g. large areas which provide domestic firewood for people could be erroneously included in this HCV.

HCV 6. Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such communities).

Comment

- Most significant areas are already reserved in Australia, but there is a risk that claims could be made over additional large forest areas with little supporting evidence.

Summary

- The framework should be consistent with the likely new FSC Principles and Criteria, and with international assessment processes.

- HCVs 1, 2 and 4 require major re-definition as suggested, and the remaining 3 HCVs need clarification before they could be effectively and efficiently used in most Australian forest situations.

- There is insufficient attention given to the use of existing processes and results (such as the CAR reserve network to identify conservation values) that would aid an efficient assessment by forest managers.

- This broad and complex draft framework tends to blur the difference between an HCV assessment and a full certification process. It also has the unfortunate potential to raise stakeholder expectations and increase the risks and costs to forest managers.

- The IFA suggests that the next draft of the framework, before it is finalised, be given a test-run in a region within Victoria or Tasmania, to assess how workable it might be for all parties.

Prepared by the Institute of Foresters of Australia

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