



20 January 2009

Submission: Draft Controlled wood risk assessment guidelines - FSC

To the Working Party of Experts

Prepared by the National Association of Forest Industries

The National Association of Forest Industries (NAFI) appreciates the opportunity to provide comment on the draft guidelines for controlled wood risk assessment. NAFI fully supports the important role certification and wood product traceability has in driving sustainable forestry in Australia.

Nearly all NAFI members now participate in voluntary forest management or chain-of-custody certification, either through the Forest Stewardship Council (FSC) or the Australian Forestry Standard (AFS), or both. Industry's commitment to continuous improvement and stewardship enhances Australia's credibility as a global leader in sustainable forestry and wood product value adding.

NAFI strongly endorses industry-wide participation in internationally credible certification, including FSC and AFS. However, the draft guidelines do not recognise wood products certified under any scheme other than FSC, in particular wood products that meet the requirements of the AFS. The duplicity to this is that the proposed controlled wood certification allows wood products to claim certified status when not all of the wood is supplied from FSC sources, meaning a component can be sourced from non-certified legal timber harvesting activities.

NAFI considers the lack of recognition of a supply of AFS sourced wood, whilst allowing a component of non-certified legal wood, as a fundamental flaw in the draft guideline. The inferior nature of controlled wood certification to other internationally accredited chain-of-custody certification should be detailed in the guideline, as well as recognition of AFS wood sources as having met the requirements of FSC controlled wood certification.

Capacity building of Australia's forest industry to supply sustainably sourced wood products relies on market structures that reward certification, and enable unbiased market access and acceptance of any internationally accredited certification scheme. NAFI recommends that for completeness, the guideline include explicit recognition of AFS, as it does legally sourced wood products, as this is imperative to shaping accessible and profitable market structures for the benefit of certified entities within Australia's forest industry.

In relation to risk assessment for controlled wood, NAFI sees no reason for including *unspecified* within the risk determination category, given the high level of regulation and significant transparency of Australia's production forest estate. Forestry activities at all jurisdictions, across all tenures, are underpinned by punitive environmental management based legislative measures, enabling objective risk assessment for controlled wood. NAFI recommends the removal of the *unspecified* category as a risk rating, to more accurately reflect the operational regulatory and transparency status of Australia's forest industry.

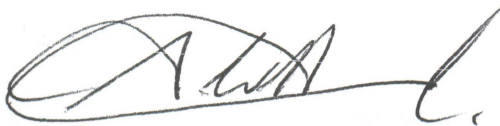
Forestry activities are not a threatening process to high conservation value forests. Existing governmental regulation and other arrangements including the comprehensive, adequate and representative reserve system and Regional Forest Agreements, ensures high levels of protection for conservation values through landscape scale planning and administration.

NAFI strongly recommends that the expert committee acknowledge the high levels of formal and informal reservation and protection of high conservation value forests, through the existing range of compliance measures and programs. NAFI considers that these management approaches adequately meet the requirements in relation to controlled wood guidelines.

Whilst NAFI has other specific concerns relating to risk assessment methodology and genetically modified tree stocks in the draft guideline, further clarity to these issues is provided by the Victorian Association of Forest Industries (VAFI) submission to this process. NAFI fully endorses the recommendations and arguments raised in the VAFI submission.

Thankyou for the opportunity to provide a submission to the draft controlled wood risk assessment guidelines prepared by FSC Australia. As NAFI is committed to building capacity in certification participation amongst the Australian forest industry, we welcome the opportunity to provide further comment or clarification as part of this important guideline development process.

Yours truly,

A handwritten signature in black ink, appearing to read 'Allan Hansard', written in a cursive style.

Allan Hansard
Chief Executive Officer