



SUBMISSION

Draft interpretation of FSC Principle 5.6 (Sustainable Yield) in the Australian national standard

September 2010

Background

The National Association of Forest Industries (NAFI) is a member of both the Forest Stewardship Council (FSC) and Australian Forestry Standard Limited (AFS) and endorses the important role certification has in supporting sustainable forest management in Australia. Most NAFI members participate in voluntary forest management or chain-of-custody certification, either through the FSC or AFS, or both. The forest industry's commitment to forest stewardship and adaptive management enhances Australia's credibility as a global leader in sustainable forest management and further wood processing and value adding activities.

NAFI is committed to the principles of credible and transparent certification systems for sustainable forest management, given the growing expectations of consumers and market opportunities for sustainable wood products compared to other non-renewable materials such as steel and concrete. In this regard, NAFI has called for a public review into voluntary environmental rating schemes in Australia, to improve public accountability and reduce the risks for perverse environmental and economic outcomes from ill-defined certification schemes.

In summary, NAFI recommends the following with respect to sustainable yield and the development of an FSC national standard:

- that FSA Australia develop as soon as possible a strategic plan for the development and consultation of the full national standard, encompassing the full suite of FSC principles and criterion;
- that FSA Australia use the FSC principles developed in the United States for sustainable yield as an initial starting point; with further consultations with relevant experts and stakeholders in Australia; and
- the proposed criterion apply to the normal range of forest products (including timber and non-timber products), but does not include other broad values and services more appropriately addressed elsewhere in the multi-criteria framework.

Development process for FSC Australian national standard

At a broad level, NAFI is concerned about the ad hoc process adopted by FSC Australia in the development of a national standard. The consultation paper states that FSC Australia seeks input on an interpretation of Principle 5.6 in the ‘context for use in an Australian Standard’.

It is unclear why the development and consultation for Principle 5.6 is being undertaken in isolation of the other principles and criteria, which should be considered in a strategic manner. This would provide greater transparency in standards development and allow for more integrated feedback and comment from relevant stakeholders and improve the overall development of the standard given its multi-criteria framework.

It is recommended that FSA Australia develop as soon as possible a strategic plan for the development and consultation process underlying the full national standard, encompassing the full suite of FSC principles and criterion.

FSC Principle 5.6 draft interpretation

NAFI appreciates the opportunity to provide comment on the draft interpretation of FSC Principle 5.6 (sustainable yield). As stated in the consultation document, FSC Criterion 5.6 stipulates:

“The rate of harvest of forest products shall not exceed levels which can be permanently sustained”.

NAFI acknowledges that Principle 5.6 (sustainable yield) is a fundamental element of sustainable forest management that is historically linked to the development of modern forestry science and the inherent renewability of forests that, if managed appropriately, can provide a sustained flow of products in perpetuity.

As such, the principles and methods of applying sustainable yield have a long history of development in Australia which is inherently recognised at the forest management unit scale as well as at the highest policy level. For example, the Australian Government through the Department of Agriculture, Fisheries and Forestry, defines sustainable yield as:

“...the quantity of timber or other product that can be harvested from a forest while ensuring that the functioning of the forest ecosystem as a whole is maintained and the flow of products is continuous in perpetuity”.

Within this context, the FSC consultation paper adopts a very simplistic approach to the treatment of sustainable yield, by prescribing a number of conditions for a select number of specified forest types (listed under points 1, 2, 3, 4 and 5) and rotation lengths. This approach is flawed by failing to recognise the diversity of forest types in Australia, environmental variation and the role of adaptive forestry management systems in calculating and applying sustainable yields over time.

NAFI would agree with the recommendation put forward by the Victorian Association of Forest Industries (VAFI) that the United States (US) FSC national standard be considered as an initial starting point for the development of Principle 5.6 in Australia. The US definition is as follows:

“C5.6 The rate of harvest of forest products shall not exceed levels which can be permanently sustained.

Indicator 5.6.a *In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan.*

The sustained yield harvest level calculation for each planning unit is based on:

- *documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions;*
- *mortality and decay and other factors that affect net growth;*
- *areas reserved from harvest or subject to harvest restrictions to meet other management goals;*
- *silvicultural practices that will be employed on the FMU;*
- *management objectives and desired future conditions.*

The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.

The method used to calculate the sustained yield harvest level for timber products is commensurate with the size and intensity of the forest management operation.

Indicator 5.6.b *Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.*

Indicator 5.6.c *Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.*

Indicator 5.6.d *For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a*

depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.

Guidance: If the intent is to change the species balance in a stand or planning unit, or to achieve a desired age class structure, or to manage a catastrophic or natural event such as fire or pest outbreak, a particular species might be harvested at a higher-than-sustainable rate until its optimal stand occupancy could be achieved (e.g., by restocking via planting, etc).

Intent: The term “sustained yield harvest” refers to harvest levels and rates that do not exceed growth over successive harvests, that contribute directly to achieving desired future conditions, and that do not diminish the long term ecological integrity and productivity of the site.

For FMUs in which harvesting occurs infrequently, harvest levels and/or re-entry frequencies are set consistent with achieving and/or maintaining desired future conditions.”

The US approach recognises the diversity of forest types and the role of adaptive management when dealing with sustainable yield and environmental variation, while maintaining the core principles of ensuring a continuous flow of harvested products without impairing the long term productivity and health of forest ecosystems.

NAFI recommends that the FSC use the US definition as an initial starting point and consult more widely with industry and relevant sustainable yield experts in an Australian context.

Proposed broadening of FSC Principle 5.6 (sustainable yield)

The other key problem with the proposed framework put forward by FSC Australia for Principle 5.6 (sustainable yield) revolves around the broadening of the criterion to include a range of other FSC principles and criterion. For example, the consultation paper makes explicit reference to water supply catchments and high conservation values (HCV) with respect to sustainable yields and prescribed conditions. It is unclear why these values are included in the FSC consultation document for sustainable yield. As these values are appropriately addressed under a range of other FSC principles and criterion (e.g. Principle 9), their inclusion is unnecessary, duplicative and confusing.

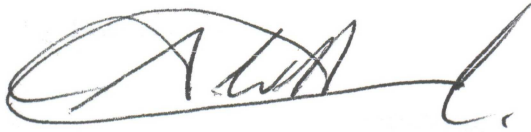
Accordingly, the criterion for Principle 5.6 should apply to the normal range of products that are ‘harvested’ from the forest, including conventional forest products (e.g. sawlogs, pulplogs, poles, firewood) as well as non-timber forest products (e.g. honey, tree ferns).

Further contact

NAFI appreciates the opportunity to make a submission to the draft interpretation of FSC Principle 5.6 (sustainable yield) and looks forward to working constructively

with FSC Australia and related stakeholders in the further development of transparent and credible sustainable forest management certification frameworks.

For further information or queries regarding this submission, please contact myself or Mr Mick Stephens, NAFI Deputy Chief Executive Officer, on (02) 6285 3833.

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

Allan Hansard
Chief Executive Officer