Talking Points and Frequently Asked Questions
Forestry Tasmania Preliminary FSC Assessment

April 25, 2014

This document is provided to SCS Global Services personnel and duly authorized regional representatives, Forestry Tasmania (FT) and FSC Australia staff who may be contacted by stakeholders in relation to the preliminary assessment of Forestry Tasmania against the SCS Interim Standard for Natural Forest and Plantation Forest Management Certification in Australia under the Forest Stewardship Council. At SCS’ sole discretion, this document may be posted on the World Wide Web or otherwise publicly distributed, either directly or through a duly authorized designee.

The talking points also address the announcement by the Tasmanian Government of their intention to repeal the Tasmanian Forests Agreement Act 2013 and re-classify approximately 400,000 hectares of native forest currently classified as Future Reserve Land. Under the Act, this Future Reserve Land was designated to potentially transition to permanent reserves, contingent on a number of conditions, including FT achieving FSC certification on the lands under its long-term control.

Talking Points

- SCS Global Services, a Forest Stewardship Council-accredited Certification Body, was contracted by Forestry Tasmania to conduct a preliminary assessment of its forest management operations against the SCS Interim Standard for Natural Forest and Plantation Forest Management Certification in Australia under the Forest Stewardship Council, Version 1.1, and the FSC Controlled Wood Standard, FSC-STD-30-010.

- A FSC preliminary assessment is a standard first step in the certification process. Award of certification is not a possible outcome of a preliminary assessment and completion of a preliminary assessment is not a guarantee of subsequent certification. The purposes of this first step are to:
  - Enable the Certification Body to acquire a more in-depth understanding of the subject forest management operation, thereby enabling a more robust scoping and design of a full certification evaluation.
  - Inform interested stakeholders that a Forest Management Enterprise has begun to engage in the FSC process with the possibility of a subsequent full evaluation.
  - Provide the Forest Management Entity with insight as to possible areas of non-conformity in their operations relative to the certification standard, thereby providing focused opportunities to modify policies and practices as needed in order to be better positioned to undergo a full evaluation.

- The conclusions reached by a preliminary assessment audit team are conveyed to the applicant Forest Management Entity in a written report. Under FSC protocols,
preliminary assessment reports are not made publicly available. The report is the propriety work product of the applicant forest management entity, which is free to keep it confidential or distribute it as it deems appropriate or necessary.

- The forest area included in the scope of the Forestry Tasmania preliminary assessment includes approximately 750,000 hectares of native forest and plantation forest in Tasmania. It does not include the approximately 400,000 ha of forest allocated for protection under the Tasmania Forests Agreement Act.

- After receiving the results of the preliminary assessment, Forestry Tasmania may choose to proceed to a full assessment for FSC certification.

- FSC Australia is currently developing a FSC Australian Forest Management Standard. Until such time that this standard is duly endorsed by the FSC International Board of Directors, forest management entities can seek FSC forest management certification against an approved and regionally adapted FSC Interim Standard developed by an FSC-accredited certification body. There are currently interim standards from three accredited certifying bodies available and listed on the FSC Australia website.

- A full assessment of Forestry Tasmania’s operations will involve the same basic activities as a preliminary assessment, but with greater depth and detail. There will again be a broad advance public notice of the pending assessment. There will be expanded opportunities for stakeholder input. The audit team will be expanded and the field component of the audit will entail a greater number of auditor days. The audit report will be subject to peer review prior to rendering of a final certification decision.

- In the event that certification were to be awarded to Forestry Tasmania as the outcome of the assessment process, the contracted FSC certification body will prepare and release a public summary document that details the findings reached in the audit— including Major and Minor Corrective Action Requests (any Major CARs raised during the assessment must be closed prior to award of certification)—as well as the rationale for the findings.

- Certification can be awarded only if conformity to the certification standard is demonstrated through evidence gathered during the full assessment. As such, award of certification is not a guaranteed outcome of a full assessment.

**Frequently Asked Questions**

*What is the current scope (defined Forest Area) of the Forestry Tasmania application for the FSC preliminary assessment?*

The scope of the preliminary assessment is the approximately 750,000 hectares of forest under Forestry Tasmania’s long-term management control.

*Which FSC standard is Forestry Tasmania being assessed against?*

The preliminary assessment of Forestry Tasmania’s operations is being conducted against *SCS Interim Standard for Natural Forest and Plantation Forest Management Certification in*
Australia under the Forest Stewardship Council, Version 1.1 and the FSC Controlled Wood Standard, FSC-STD-30-010, applicable to plantation areas converted from native forest since 1994.

**Does anyone have a veto on the certification of an FM enterprise?**

No. Award of certification is based upon the outcome of a conformity assessment audit (full assessment) against the applicable FSC certification standard. Forest management entities that are found to be free of major non-conformities are awarded certification. Minor non-conformities detected during the audit process must be closed in a stipulated time period no longer than one year.

**Can stakeholders have a say in the assessment of Forestry Tasmania?**

Absolutely. The FSC certification protocols distinguish the FSC program from competing programs such as PEFC by the heightened focus on and requirements for transparency and public consultation. In every FSC forest management full assessment, interested stakeholders have ample opportunities to comment on the applicant forest management operations. The certification standard, itself, requires that managers of FSC-certified forests must themselves be consultative and appropriately transparent in their operations.

**Can a native forest be certified to FSC standards?**

There is no prohibition on the certification of native forest management operations. In fact, the majority of FSC certified forests internationally are native forests.

**Can a company that operates at a loss achieve certification?**

The FSC certification standard requires that a forest management entity have sufficient financial resources to manage the defined forest area in conformance with the full scope of the standard. The standard does not require that the certified forest is managed at a profit provided that other sources of working capital are available and sufficient to enable management in conformance with the standard.

**If Forestry Tasmania achieves FSC certification for its current Forest Area of 750,000 ha, would FT still be able to retain its FSC certification if it is involved in harvesting on the Future Reserve Land were that land to be re-classified and managed by another Tasmanian Government department and it becomes available for harvest in the future?**

The answer to this question depends on the impacts any harvesting would have on high conservation values (as defined by the FSC) that exist on the 400,000 hectares presently classed as Future Reserve Land. If future harvesting of portions or all of the lands were to result in destruction of high conservation values (with destruction defined by the FSC as “significant damage of the attributes that constitute high conservation values in a way that they no longer exist or cannot be repaired”), and if FT were either directly or indirectly involved in such harvesting, then the certification of the 750,000 hectares of land managed by FT could be jeopardized.

The connection between events on the 400,000 hectares of Future Reserve Land and FSC certification on the 750,000 hectares under FT’s long-term management control arises within the framework of the FSC Policy for Association (PfA); see FSC-POL-01004 V2-1 EN, available at https://ic.fsc.org/policies.338.htm. The PfA establishes 5 unacceptable
activities that all entities associated with the FSC—including those seeking or holding FSC certification—cannot be involved with if they wish to maintain their association with the FSC. One of the 5 unacceptable activities is destruction of high conservation values.

If FT was to be directly or indirectly involved in activities which result in the destruction of high conservation values, then the FSC Policy for Association (PFA) would apply and disassociation from the FSC (including decertification) would be a possible ramification. The decision to disassociate from an organization can be taken only by the FSC International Board of Directors.

How does the Tasmanian governments move to unlock 400,000 ha of forest affect Forestry Tasmania’s application for FSC certification?
An administrative action with regard to classification of these lands would have no direct implication. However, if FT is deemed to have either direct or indirect involvement in the destruction/loss of high conservation values within the 400,000 hectares, as per the FSC Policy for Association, then it is possible that certification of the 750,000 hectares would be precluded, or rescinded if this occurs after certification has been achieved.

What impact would a successful application by the Australian Government to remove 74,000ha of forest from the World Heritage Listing have on Forestry Tasmania’s application for FSC certification?
An administrative action such as reversal of the World Heritage status on the 74,000 hectares would have no direct implication. See prior responses pertaining to the implications of subsequent on-the-ground actions that result in the destruction/loss of high conservation values.

If Forestry Tasmania pays SCS Global Services to audit them how can it be a fair audit?
SCS Global Services is contracted by Forest Management Entity to undertake auditing services. This contract expressly does not guarantee award of certification. That is, SCS Global Services is contracted to conduct conformity assessments against pertinent FSC normative standards and the deliverable under the contract is a conformity assessment report; payment is due for services rendered regardless of the outcome. Only if adequate conformity is ascertained, following FSC-mandated procedures, will certification be awarded. SCS Global Services operates under strict guidelines set out by the Forest Stewardship Council and is regularly audited by Accreditation Services International (ASI) — the body responsible for accrediting certification bodies as being able to deliver FSC certification services.

Other General Questions
What is the Forest Stewardship Council?
Established in 1993, the FSC is an international non-governmental and not-for-profit entity dedicated to using the power of the marketplace to bring about improved management of the world’s forests. The FSC created and manages the world’s leading and most rigorous forest management and chain-of-custody certification program, now with over 180 million hectares of certified forests and some 27,000 certified forest products manufacturing and
trading companies around the world. For more information, go to: 

What is the relationship between the SCS Global Services and the FSC?
SCS Global Services is an independent, third-party company with 30 years of experience conducting conformity assessments against a wide array of natural resource, environmental and food safety certification standards. It has been a FSC-accredited certification body since 1995. Certification bodies carry out conformity assessments against FSC-endorsed standards employing FSC-mandated protocols.

Are clear felling and burning silvicultural practices allowed by the FSC?
The silvicultural practice of clear fell, burn and sow is not prohibited under the FSC Principles & Criteria of Forest Stewardship. All practices employed on FSC-certified forests must however be conducted in conformance with applicable, regionally-based Indicators that further elaborate upon the Principles & Criteria.

Does the FSC allow logging of old growth forests?
Logging of old growth forests is not prohibited under the FSC Principles & Criteria of Forest Stewardship. All practices employed on FSC-certified forests must however be conducted in conformance with applicable, regionally-based Indicators that further elaborate upon the Principles & Criteria. With respect to old growth harvesting, issues addressed in Principles 6 and 9 would be central in determining if such management activities would be deemed in conformance with the FSC certification standard.