

Australian Environmental NGOs

FROM:

Sean Cadman
National Forest Campaign Coordinator
The Wilderness Society
PO Box 188 Civic Square ACT
2601 Australia
sean.cadman@wilderness.org.au

TO:

Mark Edwards
Executive Officer
Australian Forestry Standard Ltd
PO Box 7031
Yarralumla ACT 2601

14-06-2007

RE: Failings in PEFC/AFS/Standards Australia accreditation processes

Dear Mark

I acknowledge receipt of your letter sent to our former CEO Russel Hanson dated 16th May 2007. I am replying on behalf of all the signatories below. I have been asked to do this both by the original participants (who withdrew from the AFS process in 2002) and a number of other environmental NGOs who, like The Wilderness Society, have been observing AFS activities.

All of the signatories reject the Australian Forestry Standard and associated documentation. This correspondence should not be seen as fulfilling any of your obligations to meet process requirements for either Standards Australia or PEFC.¹

We all feel that it is important to once again put the record straight in respect of claims you are again making that your process includes representation from environmental NGO interests. Your process does not have environmental representation. You have two scientists on your TRC, one of whom represents the Ecological Society of Australia. The ESA has never claimed to be an environmental non-government organisation nor claimed to have a mandate to represent environmental NGO interests; the other scientific representative is participating in an independent capacity. We understand these individuals have commented on various aspects of the standard, including the conversion of native forests. We commend the efforts of these individuals. However, we must stress that scientific sectoral representation cannot act as surrogate for environmental NGOs.² AFS – a franchised standard setting body – cannot simply

¹ AFS' ability to meet its participatory requirements ceased several years ago with the complete withdrawal of participating environmental NGOs. This was the original reason for the AFS only being published as an interim standard.

² Scientific/technical representatives constitute an entirely different category under the ISO International Statutes, under which Standards Australia also operates. Environmental NGOs belong to an entirely different category. They must as such participate in the consensus-building phase that AFS – a franchise of Standards Australia – is obligated to undertake in the development of standards. Environmental NGOs withdrew from the process because of AFS Ltd's failure to meaningfully include them in the standards setting. It failed to include them during the development of the AFS' terms of reference, and on the Steering Committee. The Technical Reference Committee process did not fulfil the requirements of consensus under ISO's Statutes, since there was sustained opposition from environmental NGOs to the structures and processes of the AFS, in addition to their specific sectoral concerns regarding the standard's shortcomings in terms of environmental sustainability.

swap the views of one stakeholder category for another in order to create a perception of legitimacy.

For your information, the amendments you have proposed merely give the appearance of action against forest conversion while providing a mechanism that will see the continued clearance of areas up to 40 ha to 'tidy up' plantation blocks. The unit you are applying this to is not the Defined Forest Area but rather forest management units defined by you as "paddocks", coupes or properties. In Tasmania where this practice has been so controversial this could amount to thousands of additional hectares of clearing of what are now absolutely crucial remnants in landscapes requiring significant restoration.

We are further appalled that you appear willing to even canvass support for the kind wholesale environmental destruction being perpetuated on the Tiwi Islands against the wishes of many in that community. We do not believe you are seeking to support development opportunities for Indigenous peoples but rather you are seeking to support development opportunities for large plantation MIS companies in Northern Australia.

We reject the claims that you have made in your correspondence that your definitions of high conservation value forest are 'equivalent to FSC' and the thoroughly discredited and outdated Indufor report, which like everything associated with the development of the AFS, represents a one sided and self-serving view. The SmartWood and Woodmark Standards you referred to were not developed for use in native forests. FSC Australia has commenced work on a National Standard. Preliminary consultations have already shown that the identification of HCV forest is a critical issue and is extremely unlikely to be based on status quo assumptions drawn from the scientifically bankrupt Regional Forest Agreement processes.

Our colleague from the Australian Conservation Foundation restated the cross-sectoral consensus of ENGOs regarding the AFS in correspondence dated 21st of April 2006, and put a proposition that AFS Ltd should effectively go back to the beginning if it wanted a standard that was capable of being endorsed by ENGOs. The Wilderness Society has put the same position to PEFC in its yet unresolved grievance with that organisation.

As you have chosen to respond to neither the original nor subsequent reasonable requests, we can only assume that you remain uninterested in the necessary stakeholder participation required for the proper accreditation of your standard. We of course remain open to a dialogue but the opportunity will be severely limited if this standard is endorsed without the participation and consensus building that Standards Australia required of you in 2001.

Your Sincerely

The Undersigned

Sean Cadman The Wilderness Society (Australia)

Lindsay Hesketh Australian Conservation Foundation

Stephen Campbell Greenpeace (Australia – Pacific)

Jeff Angel Total Environment Centre (NSW)

Peter Robertson The Environment Centre of the Northern Territory

Cam Walker FOE Australia (including FOE WA and FOE Melbourne)

Dr Leonie van der Maesen Western Australian Forest Alliance / Native Forest Network

Susie Russell North East Forest Alliance (NSW)

Andrew Cox National Parks Association of NSW

Craig Woodfield Tasmanian Conservation Trust

Cc:

ISO:

Mr. Alan Bryden,
Secretary General,
International Organization for Standardization (ISO)_
1, ch. de la Voie-Creuse,
Case postale 56_CH-1211
Geneva 20,
Switzerland
Fax +41 22 733 34 30

Ms Ziva Pati Vice-President,
Chair, ISO Technical Management Board
patir@sii.org.il

Mr. Michael A Smith,
Secretary,
Technical Management Board
tmb@iso.ch

PEFC

Michael Clark
Chairman
info@pefc.org

Standards Australia,
Susan Streeter_
Executive Manager_
Standards Accreditation Board
susan.streeter@standards.org.au

Mr John R. Owen,
Corporate Secretary IAF,

53 Manuka Circle,
Cherrybrook, NSW 2126,
Australia
secretary@iaf.nu

CPET

Mr Bob Andrew
Principal Procurement Advisor
Department for Environment, Food and Rural Affairs
Floor 5E
3-8 Whitehall Place
London SW1A 2HH

cpet@proforest.net

MCPFE

Liaison Unit Warsawul. Bitwy Warszawskiej 1920 r. Nr 3_00-973 Warsaw,
POLAND _Tel: +48 22 331 70 31, +48 22 331 70 39 _Fax: +48 22 331 70 32_E-mail:
liaison.unit@lu-warsaw.pl
m.buszko-briggs@lu-warsaw.pl
m.gaworska@lu-warsaw.pl