

Public Synopsis

Comments received on the review of AS 4708:2013

Introduction

The public comments for the review of AS 4708:2007 were conducted over two rounds from April – May 2012 and August – October 2012. The comments received and their treatment is summarised in the tables below.

Submissions

During round one (1), 540 individual comments were received in 28 submissions from individuals, forest growers, industry associations, other organisations and forest companies.

During round two (2), 503 individual comments were received in 31 submissions including environmental organisations.

The tables below list the material issues included in the submissions. The summary of comments lists the issue raised by one or more submissions and the AFS Ltd discussion and treatment of the issue. There were many comments providing support for a requirement that have not been summarised. Comments on issues that were considered and addressed have been listed either as a statement of the point raised in multiple submissions or an abridged version of the comment or the actual comment. Similarly, comments on issues that were considered and rejected for inclusion are summarised, abridged or included in the synopsis. Issues of an editorial nature are not listed although where they were included in the revised standard they did improve its readability without affecting the technical content. The synopsis, using this methodology, becomes a summary of the issues raised and their treatment.

The section numbers refer to the current standard criteria and requirement numbers. The consultation drafts had slightly different numbers as they were rearranged and re-aggregated based on the comments received and the review processes.

Round 1

Section	Comments Received	Discussion by AFS	Decision
Preface	The scope of the standard should be expanded to include trees planted for any purpose.	The standard scope should be expanded to include the management of forested lands for all purposes.	Agree and change made.
Introduction	The application of the standard to forest owners is ambiguous for public land and for the complex private arrangements.	The standard should apply to forest managers as defined.	Agree and change made.
Introduction	The application of the standard to plantations and native forest will be problematic for plantation growers.	The requirements for both types of forest should be the same wherever possible. Exemptions can be applied on a case by case basis where one requirement for both would not achieve the objectives of the standard.	Agree but only change where appropriate.
Introduction	Definition of environmental sustainability should not apply to plantations.	The principles of sustainability apply to all forest types only the scale and actual values will vary between forest types and size.	Disagree.
Introduction	The principle of independence is compromised by having a JAS ANZ representative on the Standard Review Committee.	The JAS ANZ representative was able to provide input from certification bodies as a whole and considerably improved the ability to audit to the standard.	Disagree.
Introduction	Suggest you introduce the concept of attaining a social licence through open transparent and democratic processes.	Social licence is not a concept that can be audited. Openness and transparency can be set as requirements.	Disagree in part.
Introduction	Concerns were raised with the definition of Cultural Sustainability as being poorly understood and impossible to measure.	An improved definition was proposed in the next draft	Agree and change made
Definitions	Add a definition for enterprise.	Enterprise is the preferred word to describe the collective of types of forest managers so should be defined.	Agree
Definitions	Aspects and impacts; activities and risks are poorly understood.	Use the definitions from ISO 14004-2004	Agree
Definitions	Delete use of the term "aspects".	The term is common in environmental standards	Disagree.
Definitions	Improve the definition of "assessment".	Agree.	Change made.
Definitions	"Damage agents" to include cyclones.	Agree.	Change made.
Definitions	"Damage agents" to exclude endemic species.	Endemic species can act as damage agents in some cases.	Disagree
Definitions	The term "Defined forest area" needs consistent treatment.	The definition and application of the term throughout the standard was revised to fit the new layout of requirements and scope.	Changes made to all relevant sections.
Definitions	Recognise there are two types of stakeholders.	Agree.	Changes made to all relevant sections.
Definitions	Improve the definition of "forest activities" and include site preparation.	Agree.	Change made.

Section	Comments Received	Discussion by AFS	Decision
Definitions	Add a definition for crown cover.	Agree.	Change made.
Definitions	Adopt the IPCC definition for greenhouse gases.	Agree.	Change made.
Definitions	Local communities need to be defined.	The term was replaced with affected stakeholder as this was a better description of the entire cohort to be engaged.	Change made.
Definitions	"Plantations" should include stands established by sowing as well as planting.	Agree.	Change made.
Definitions	For the definition of "Rotation" replace the word "final harvesting" with "subsequent harvesting".	Agree.	Change made.
Definitions	Add indigenous peoples interests to the types of stakeholders. Include cultural heritage as a social value.	The definition of stakeholders includes all cultural interests irrespective of their origin. Cultural management is separated from social management in contemporary definitions of sustainability.	Disagree and no change.
Definitions	Include in the definition of "Genetically Modified Organisms" those genetic processes that are excluded from the definition.	Agree.	Change made.
Definitions	Add a reference to the relevant legislation to the definition of "threatening process".	Agree.	Change made.
Definitions	Replace the term Forest Conversion with Native Vegetation conversion.	Agree.	Change made.
Definitions	The definition of Significant Biodiversity Values (SBVs) is too prescriptive and may not apply to all states.	The list of values is required to be comprehensive to ensure the requirements can be quantified adequately and the best standard can be applied nationally.	Disagree and no change.
Definitions	Define the Forest Management Unit to assist forest managers with dual certification.	The term defined forest area is adopted throughout the standard so Forest Management Unit is redundant.	Disagree and no change.
Definitions	Add definitions for selective logging and clearfelling.	There is no requirement to prescribe silvicultural systems other than to set their requirements for sustainability.	Disagree and no change.
Definitions	Provide a definition for sustainable yield.	A comprehensive definition of sustainable yield is required and is now provided.	Agree and change made.
Definitions	There is a need to define structural elements of habitat.	Agree.	Change made.
Definitions	The definition of non-wood products should include a list of examples.	A definition should be able to stand alone without the need for a list of examples.	Disagree and no change.
Definitions	There is no need to define old growth forests.	This term needs to be defined as there are alternative definitions available.	Disagree and no change.
General	Change the name from the Australian Forestry Standard.	The name has been changed to the Australian Standard - Sustainable Forest Management.	Agree and change made.

Section	Comments Received	Discussion by AFS	Decision
General	The standard should include all of the normative requirements in one document and not refer to other normative standards. The requirements of the scheme should be removed from the requirements for the forest manager.	Agree.	Changes made.
General	The informative content of the previous standard should be retained.	The informative material was removed because it is inconsistent with the content expected in an Australian Standard. Background and context for forestry should be provided in other documents by other organisations.	Disagree and no change.
General	The Standard states that it sets out specific forest management performance requirements for operations and activities. However, in many cases, requirements are specified in very general, vague ambiguous terms in the Standard.	The requirements need to be clear and precise but are not to be prescriptive. They are to define the outcome required not the method of achieving the outcome.	The wording of the requirements was checked for precision and clarity.
1 Systematic Management	Include the normative material from the JAS ANZ requirements.	Agree.	Changes made.
1.1	Add a commitment to harvest in accordance with the sustainable yield of the forest which must be reviewed every year.	This is not realistic given how stable the sustainable yield is compared to markets.	Disagree and no change.
1.2	ISO 14001 does not require objectives and targets for all significant impacts. These should be limited to a range of impacts.	If an impact is rated as significant it should then have objectives and targets set even if this is above the ISO standard.	Disagree and no change.
1.2	It is an unnecessary requirement to have both a Forest Management Plan and a public summary of the plan.	The both requirements are needed to improve transparency and understanding for stakeholders.	Relevant sections retained.
1.2	Public summaries should be free.	The standard should not specify a price for information that has involved a cost to prepare.	Not included.
1.2	Who should carry out the reviews of the Forest Management Plan?	The forest manager is responsible for the review of the plan.	Section 1.5 updated.
1.3	Propose the section heading be changed to Implementation.	Agree.	Change made.
1.3	Why has inventory been added to the standard plan implement, monitor and review cycle?	This is a PEFC requirement and upfront knowledge in the form of an inventory is required before the planning process begins.	No change required.
1.3	List the legal requirements for implementation first.	It was decided not to list the requirements at all and just require the entire Forest Management Plan to be implemented.	Changed to better reflect the requirement.
1.4	Delete the reference to scientifically-rigorous in the monitoring requirement.	The term is required to ensure monitoring is more than superficial.	No change required.

Section	Comments Received	Discussion by AFS	Decision
1.4	Define the term sufficiently powerful.	This term replaces a statistical power reference in the former standard guidance notes. It is up to the forest manager to demonstrate that monitoring has the power to detect issues of significance.	No change required.
1.4	The MERI process should be adopted for the design of the monitoring process.	The elements of MERI are included within the standard and there is no requirement to aggregate them. The notion of Continual Improvement is to be retained and highlighted.	No change required.
1.5	The requirement to review plans is overkill.	The review of plans would be considered as essential to any management system that had continual improvement imbedded within it.	No change required.
1.5	Add research findings for inclusion in the review process.	Agree.	Change made.
1.6	Data collection should not be identified as a separate requirement for research, qualify the requirement to the scale and nature of the forest and forest operations and the relevance of the research.	Allowing plots within the Defined Forest Area was considered important enough to be retained. None of the requirements are to be qualified within the standard as this is assumed to apply any way. Irrelevant research need not be considered.	No change required.
1.6	Given the current levels of investment in Research & Development in Australia, many forest managers will find this hard to meet.	Research is fundamental to continual improvement and must be included. Research contributions can be achieved by subscription to R&D Corporations very easily.	No change required.
1.6	Limit the requirement to consider research to peer reviewed science.	Local and simple research should also be considered.	No change required.
1.6	Research is not part of the do plan do review cycle and should be removed as a requirement.	Disagree.	No change.
2 Stakeholders	It is too verbose a criterion in the context of the issue – consider slimming down by amending or deleting the latter part of the text.	Disagree.	No change.
2.1	This is open to being very narrowly interpreted.	Disagree.	No change.
2.2	Consider adding, 'd. Have a focus on affected stakeholders'.	Disagree.	No change.
2.2	Require regular review of the stakeholder engagement plan.	Agree.	Include in the plan review requirement
2.2	Question requirement for the Stakeholder Engagement Plan to include an evaluation of environmental, economic, social and cultural impacts of forest management activities. Already covered by the forest management plan requirement 1.2 c).	Agree.	Change made.
2.2 & 2.3	Qualify the requirement according to the scale and nature of the forest enterprise.	Disagree, small low impact forest enterprises will by their nature have fewer stakeholders.	No change.

Section	Comments Received	Discussion by AFS	Decision
2.3	Stakeholders should be provided with ongoing feedback upon reasonable request free of charge.	Overly prescriptive.	No change.
2.4	The requirement reads “environmental, economic, social, and cultural impacts and benefits....” Impacts can be either positive or negative, suggest removal of the words “and benefits”.	Agree but have rewritten the requirement to separate impacts and benefits.	Changes made
2.5	A single register for all communication is unworkable for forest managers with regional offices.	Agree.	Removed prescriptive elements of the requirement.
2.5	Only register significant communication.	The determination of significance is not possible without records of all correspondence.	No change.
2.5	Resolution of Issues and Concerns. There needs to be some language here to address and sanction situations where resolution has not been able to be reached, and or disputes and grievances have not been resolved - i.e. if the certificate holder has evidence of ongoing effort and good faith to engage and resolve, credit should be given.	The prescriptive elements should be removed and require a process and records kept without specifying an outcome.	Relevant changes made.
3 Biodiversity	Simplify the Criterion name and definition.	Agree.	Changes made.
3	The scale and extent of the defined forest area can play a significant role in the determination of significant biodiversity values (SBVs) and the management of those principles. Therefore, the criteria should include reference to scale and context in the determination of SBVs. Alternatively, clarification of scale and context should be provided in the guidance notes. European PEFC endorsed national certification systems typically refer to Natura 2000 (i.e. broad-scale [multi-country] biodiversity regions) in the context of assessment of significance of biodiversity. Therefore, caution should be taken in applying SBVs on the smaller-scale bio-regions used in Australia (i.e. the 85 IBRA regions - interim biogeographic regionalization of Australia).	SBVs are used within the planning frameworks for Australia and the scale and extent of the Defined Forest Area will make the Criterion applicable to all forests.	No change required for this comment although changes were made.
3.1	Need to be careful about what the term ‘actively’ implies. This should not require field surveys etc. which would be beyond that capacity of many private growers, and excessive for low volume per hectare operations.	Requirement should just require identification without specifying how.	Change made.
3.1	Use consistent terminology for biodiversity through out the requirements.	The agreed terminology is to identify all biodiversity, assess biodiversity priorities that can be included in objectives and targets and to maintain or enhance Significant Biodiversity Values.	Changes made.
3.1	Identify important biodiversity.	This is not consistent with the agreed hierarchy of biodiversity values.	Not used.
3.2	Change the term Significant Biodiversity Values to significant biodiversity.	Disagree. SBVs have been used in the current standard and the term is widely understood.	No change.

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3.2	Add more context to the evaluation of biodiversity.	The requirements under this criteria were reorganised so that there was a logical flow from identification and management of biodiversity priorities and then the requirements to maintain or enhance SBVs.	Requirements rearranged and made more logical.
3.3	Include recent research as a means of identifying SBVs.	Agreed.	Change made.
3.3	Over what unit should SBVs be assessed. The current definitions are too broad and imply that it is optional to choose a level.	Agree, assessment should be at the bioregional level.	Change made.
3.3	The silvicultural system to be used when SBVs are present should be prescribed.	Disagree, the maintenance of the SBVs can be achieved by any means including the choice of silvicultural system provided the objectives can be achieved.	No change.
3.4	The requirements for protection of values should be reinstated.	Protection was not considered to be adequate and can include taking no action while the values are in decline. The term maintenance is preferred because it includes active management to prevent the decline of values.	No change.
3.5	Monitoring should be commensurate with the scale and intensity of forest operations and should not be made available to the public.	Monitoring should be commensurate with the priority of the value and reporting will be integrated with the processes for the Forest Management Plan	Relevant changes made.
3.5	This requirement will be onerous and out of reach of small forest managers.	The requirement is not prescriptive but establishes the principles required to achieve the required monitoring objectives. The scale and cost of monitoring is not specified and can be achieved at any scale.	No change.
3.6	Add prescriptive elements about the timing of reviews.	It is not possible to prescribe timings that will suit all circumstances so it should be left to the forest manager and their auditor to determine if the review processes meet the requirement.	No change.
3.6	The review should be only of the SBVs.	Disagree, where no SBVs are present the biodiversity priorities need to be reviewed and because many SBVs are reviewed by processes outside the control of the forest manager.	No change.
3.7	Make the requirement applicable only to the managers of commercial native forest.	The requirement should apply to anyone that is regenerating native forest for any purpose.	No change.
3.8	Why are GMOs to be prohibited? They have been assumed to have negative impacts whereas they could have positive impacts for the other elements of the standard.	The GMO requirement is within the PEFC standard and although no GMOs are available for use in Australia now or into the foreseeable future the issues can be raised and discussed again in the future.	Retain the new requirement as is.

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3.8	Add the qualification statements that are in the PEFC standard over the potential use of GMOs in the future and under prescribed considerations.	As no GMOs are available or proposed in Australia the qualification is unnecessary and creates ambiguity over the objective which is to adopt the socially acceptable principle of no GMOs.	No change.
3.8	The effect of this requirement will be to encourage the establishment of plantations of exotic species where the risk of genetic pollution is negligible.	The choice of species for plantations should consider the issues of genetic pollution and seedling escape along with all of the other issues including profitability and markets.	Acknowledged as a risk but no change made.
3.9	The draft requirement is not clear as to when offsets are required and its applicability to large and medium enterprises.	The requirement was re-written to improve clarity. Offsets are required for any of the allowed conversion and it applies to all forest enterprises.	Relevant changes made.
3.9	The requirement is very prescriptive and should defer to state and local planning arrangements.	The prescriptive elements are required to provide detail on when conversion can and cannot occur. The requirements are additional to any local planning requirements.	No specific change.
3.9	Does the requirement apply to pioneering species that are native and are reinvasive cleared land such as wattle?	Native vegetation is defined to include young stands of regenerating forest. The amount of offset required for allowed conversion can be determined according to local planning requirements and the value of the vegetation. Native species regenerating within the plantation area is not considered native vegetation for the purposes of this requirement.	No specific change.
Indigenous clearing	The first draft contained a requirement, flagged in the 2007 standard, that forest conversion for plantation development on indigenous lands be allowed. This was not supported by many of the submissions.	The general requirement for the prevention of conversion was applied to all forests irrespective of the owners or enterprise.	Draft requirement deleted.
4 Forest Productive Capacity	The draft text does not contain any normative elements and is simply a statement.	Agree	Change made.
4.1	The underlying soil and site productivity should be referred to.	Disagree. The requirement is worded to consider these values without the need to state them.	No change required.
4.3	The selection of species for plantations should include markets.	The requirement is compatible with the selection of plantation species based on markets without a specific reference.	No change required.

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4.6	Regeneration should be achieved at a landscape level and to prescribed conditions for stocking.	It is expected that the requirement will apply at a site and the stocking achieved will be to the appropriate standards for that site. National prescriptions would be too broad to be included in the standard given the enormous range of forest types expected to be covered by the standard.	No change required.
4.6	Split the requirements for plantations and native forest.	Disagree. The principles for re-establishment apply equally to both. The requirements were however re-arranged according to the function to be achieved.	No specific change required.
4.6	High intensity burning for regeneration should be prohibited.	Site preparation should be allowed by any means that is consistent with all elements of the standard.	No change.
4.7	The forest manager should ensure damage to growing stock is minimised.	Agree.	Change made.
4.9	Non wood products can be controlled by other enterprises on public land. Limit the requirement to case where it under the control of the forest manager.	Agree.	Change made.
5 Forest Ecosystem Health	Include the supportive explanatory text in the previous standard.	Disagree. The standard should generally be limited to normative material with explanatory information provided by other sources.	No change.
5.1	The term damage agent is in conflict with the other requirements for pests and the requirement to assess potential is ambiguous.	Damage agents are a broad category that includes pests and physical agents. The potential of damage agents needs to be considered in a process to ensure impacts are manageable and sustainable. Prescription on required assessments could not be broad enough to cover all situations and locations.	No change.
5.2	Ensuring damage is within tolerable levels that are set by the forest manager or the auditor could lead to disagreements and is open for interpretation.	The forest manager can justify the objectives and targets set for impacts to the satisfaction or other wise of the auditor. Prescriptive levels of tolerance are impractical to set at a national, all forest level.	No change.
5.2	The term forest vitality is poorly understood and impossible to measure.	The requirement was changed to emphasise forest health which is better understood and measurable but to retain vitality as a concept.	Relevant changes made.
5.3	Qualify the requirement to where required by state and territory legislation, or where it is the responsibility of the forest manager or to where it is possible or practical.	Disagree. The requirement should apply unqualified and can be in addition to legislated responsibilities. Forest managers can use evidence of actions undertaken by others as compliance with the requirement, such as fox control programs undertaken by state agencies.	No change.

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5.4	The use of high intensity fires is inconsistent with this requirement to maintain forest ecosystem health.	Disagree. The scientific evidence is that fires of all intensities are part of the natural regime for many forest ecosystems especially those containing eucalypts.	No change.
5.4	Add a requirement for the prohibition of the inappropriate use of fire.	The review and revise elements of the requirement will ensure that the objective of ecosystem health can be achieved given the stochastic nature of fire occurrence.	No change.
5.5	The rehabilitation of degraded forest could be very expensive and an unnecessary burden on forest managers. Its application should be qualified to apply to sites degraded by the current forest manager, where it is the forest manager's responsibility, where practical, and over an appropriate time scale. Degraded forest is not defined.	Some qualifications were recognised. Degraded forest is now defined and the actions are required within the Defined Forest Area and as part of a prioritised program.	Relevant changes made.
5.5	This requirement is already covered by the requirement 3.4.3 to restore degraded SBVs.	Disagree. Degraded forest is rehabilitated for productivity restoration as well as SBVs maintenance or enhancement.	No change.
5.6	The draft requirements are overly prescriptive and poorly worded. The application of fertilizer should be treated separately. The banning a certain chemicals that are legal in Australia should not be included.	The requirement was rewritten as a more simple statement of principle. The requirements included in the PEFC standard were retained.	Relevant changes made.
5.6	The requirement should ban aerial spraying, the use of 1080, use of chemicals with 500m of a waterway, and incendiary chemicals. The standard should specify the use native species that require less chemical use.	The prescription of controls at this level is inappropriate.	No change.
Draft section on Forest Vitality	The standard required by PEFC is vague, ambiguous and impossible to audit.	The wording of the requirement was clarified and simplified and included in requirement 5.2.	Relevant changes made.
6 Soil and Water Resources	Change the name of the criteria to Soil and Water Resources	Agree.	Change made.
6.1	Identify resources at a landscape level.	Disagree. Resource should be identified within the Defined Forest Area.	No change.
6.2	The standard should prescribe the use of Central Tyre Inflation to protect water values.	The prescription of methods to achieve the required outcomes is generally avoided in the standard.	No change.
6.3	Regulated catchment goals can be specified where they exist.	The requirement was changed to recognise that catchment goals must have been set before adherence is required.	Change made.
6.3	The requirement to liaise with catchment management authorities was onerous and did not guarantee better outcomes especially considering most forest operations are at a scale that does not affect catchment water yields.	Agree. The requirement for liaison did not improve outcomes. Catchment authorities can communicate with forest managers without direct liaison.	Change made.

Section	Comments Received	Discussion by AFS	Decision
6.4	Soil properties are damaged by high intensity burns which should be prohibited.	Protection for soil properties can be achieved by a variety of means and there is no need to prescribe those means.	No change.
6.4	Soil protection measures are adequately covered in codes of practice and should not be repeated in the standard.	The protection of soil is a Montreal criterion and can be specified above the minimum code requirements.	No change.
6.5	Forest managers should be required to publically disclose the types and quantities of chemicals used annually.	This additional requirement would not prevent pollution.	No change.
6.5	Specify that chemical use must be in accordance with manufacturer's instructions.	This is an existing legal requirement and does not need to be restated in the standard.	No change.
7 Carbon	In light of the increased understanding of carbon and GHG since the current AFS was developed, this is quite disappointing and astonishing that there is no further movement on this criterion apart from creating two requirements from the one in the current AFS. You should seek external advice on this criterion to bolster this emerging issue.	Although carbon has become an increasingly important public issue it is still unclear what expectations are required for a forest manager. Until mature markets exist for forests as a carbon store there cannot be reliable tradeoffs between carbon and other competing values. Forests are recognised as a carbon sink and this can occur irrespective of any requirements in the standard.	Draft requirements are retained.
7.1	Change the requirement name to carbon cycle and ask forest managers to do more than just acknowledge the role of their forests in the carbon cycle.	Agree. The requirement was changed to maintain or enhance the contribution of the forests in the carbon cycle.	Relevant changes made.
8 Cultural Values	The criterion looks like a political statement and not a requirement for forest management.	The criterion was reworded to make a simple statement of expectation.	Relevant changes made.
8.1	This requirement should only apply to native forest and not plantation.	Disagree. The rights of indigenous peoples are not determined by forest type.	No change.
8.1	Strengthen the economic aspirations for indigenous peoples to derive benefits from their forests on their traditional lands.	Requirement 8.1 d was strengthened.	Change made.
8.1	Requirement parts c, d and f are not a management of forest issue but a statement of political intent.	Disagree. These requirements are about respect and social licence and can be included in a forest management standard.	No change.
8.1	The requirements should be different where native title exists, where it is in dispute and where it is no longer relevant.	Agree. The requirements are split to provide more outcomes where native title exists.	Relevant changes made.
8.2	Merge the requirements for indigenous heritage with other heritage protection.	Disagree. Indigenous heritage requires special treatment because of the legislated requirements and the expectations of the community.	No change.
8.4	Traditional uses should exclude illegal activities.	Agree, traditional uses should also be legal.	Change made.

Section	Comments Received	Discussion by AFS	Decision
9 Social and Economic Benefits.	A further criterion should be added recognising that forest management operations such as planned burning, logging traffic etc. can have an adverse effect on the health, safety and amenity of the local community and other industries such as viticulture. The forest manager shall therefore make every effort to consult and collaborate with stakeholders with a view to avoiding such impacts wherever practicable.	The criteria are based on the Montreal Criteria and these issues are covered in criterion 2.	No change.
9	Retain the existing numbering for requirements to minimise the system changes for certified forest managers.	This will be done wherever possible but some numbers will have to change to make them more stand alone and to allow for improved clarity and new requirements.	No change wherever possible.
9.1	Qualify regional development requirements to where feasible and from within the defined forest area.	Agree.	Changes made.
9.2	Some Government policy prevents the adequate utilisation of waste.	The requirement can still apply.	No change.
Mine sites.	The draft had requirements for the salvage of timber from land being cleared for mining that received comments about its applicability.	The requirement was deleted and included in the conversion requirement 3.9.	Changes made.
9.3	Forest managers are not law enforcement agencies and may have limited power or capability to control illegal activities.	The requirement was further qualified to make it more feasible.	Relevant changes made.
9.4	A definition of forest worker is required.	Agree.	Definition added.
9.5	Why is safety included in a standard for forest management?	Meeting social responsibilities is a key to the three (or four) legs of sustainability.	No change.
9.6	Existing laws protect worker's rights.	The PEFC standard includes international conventions that may or may not be included in current industrial law.	No change.
9.6	More detail is required to ensure the protection of workers.	The requirement was re-worded to improve clarity and to ensure all important terms are defined.	Relevant changes made.
Chain of Custody Requirement.	The draft includes an economic requirement for traceability of certified produce sold. Submissions questioned the need for these requirements when a separate Chain of Custody Standard exists.	The requirement is needed to match the two standards and to include requirements from the JAS-ANZ normative material. The requirement is now number 0.2.	Relevant changes made.

Round 2

Section	Comments Received	Discussion by AFS	Decision
Definitions	Remove the definition for benign chemicals.	Agree.	Change made.
Definitions	Add definitions for carbon cycle, forest products, forest services, precautionary principle, and Stakeholder Engagement Plan.	Agree.	Change made.
Definitions	Add definitions for carbon sink, biological damage agents, offset process, forest management unit, IBRA, erosion, and natural habitat.	Disagree.	No change.
Definitions	Define a damage agent as an event or a vector.	Disagree.	No change.
Definitions	Include the JAS ANZ requirements in the definition of define forest area.	Agree.	Change made.
Definitions	Make the definition of degraded forest specific to a site.	Agree.	Change made.
Definitions	Change degraded forest to modified forest.	Disagree.	No change.
Definitions	Add a reference to the Australian legislation in the definition of GMO.	Disagree. In general references to legislation are avoided.	No change.
Definitions	List the tree breeding actions that do not create a GMO.	Agree.	Change made.
Definitions	The definition of greenhouse gasses is to long and complex.	Disagree. The chosen definition is from the relevant policy documents.	No change.
Definitions	Remove the reference to reintroduction from the known and potential habitat definition.	The notion of reintroduction is critical to the notion of potential habitat.	No change.
Definitions	The three main types of monitoring should be defined here – implementation (compliance), effectiveness and trend.	Agree.	Change made.
Definitions	Give a web address reference for the Montreal Process.	Agree.	Change made.
Definitions	Several submissions called for changes to the Significant Biodiversity Value definition by removing elements within the definition.	The preferred definition aligns with the definition used in the Regional Forest Agreement process and is in common use for forest planning.	No change.
Definitions	Where the defined forest area is private land the interested stakeholders are irrelevant.	The requirement is still important irrespective of land ownership. The issue will be self regulating because if no one is interested in the defined forest area then the requirement can be easily achieved.	No change.
Definitions	Several submissions raised concerns about the definition of sustainable yield in terms of its relevance to plantations, normal forest, disturbance regimes, planning periods and sustained management.	The final definition was carefully chosen to apply to all forests and to all applications.	No change.
General	There are concerns that compliance with the standard will be too expensive for forest managers or it will price timber out of competitive markets with other building products that are not subjected to such strong environmental codes.	The standard is voluntary and the economic sustainability of forest enterprises was considered in its development and review.	No change.
General	A new logo will be required to go with the new name.	AFS Limited will retain the current logo.	No change.
General	Some of the requirements are more stringent than those set by FSC. This is inappropriate.	The requirements are referenced against the PEFC standards and not against Forest Stewardship Council interim standards. Each requirement is stand alone and set at an appropriate level for Australian conditions and expectations.	No change.

Section	Comments Received	Discussion by AFS	Decision
General	The standard should include a grievance and dispute process.	The Stakeholder Engagement Plan is required to provide a grievance process for stakeholders. Disputes over the running of the certification scheme are provided in the JAS ANZ procedures.	No change.
General	There are several systemic flaws related primarily to a lack of meaningful and equitable participation of stakeholder groups, deficiencies in the governance structures, transparency in decision making and weak requirements around field verification. Other examples of where the Draft Standard lacks clarity on crucial certification requirements or interpretations include: the recognition and protection of Indigenous rights; identifying critical forest areas; exceptions to the ban on land conversion to plantations; and criteria for demonstrating that management plans and monitoring programs are appropriate to the scale and intensity of operations.	Stakeholder engagement has been strengthened by the requirement to have a Stakeholder Engagement Plan. Indigenous rights are explicitly considered. Conversion of native vegetation to plantation has exemptions limited to the practical management of a plantation estate. Conversion for purely production reasons is disallowed. The list of SBVs is comprehensive and complete. The requirements for management planning and monitoring are explicit and thorough. Governance and field verification procedures are not required in a forest management standard but need to be considered in the certification frameworks that apply.	Relevant changes made.
General	The AFS has inherent problems in the structure and composition of its normative requirements. First, the relative small number of requirements can ignore the wider complexities involved with forest management and result in the certification of forestry operations that are widely recognised as threatening key forest values. Second, the abstract and general language of the requirements can result in wide interpretation of what practices are considered compliant and those that are not. This can result in inconsistencies between certified operations and fail to capture the complexities involved with forest management. Third, the AFS, from its inception, was structured around the Montreal Process Criteria. While this process has been adopted by Australian federal, state and territory governments, it has not been widely accepted by the broad range of stakeholders who are affected by or hold an interest in forest management. In effect, the structure of the AFS was predetermined by a select group of stakeholders with a specific interest in forest management and it remains unchanged. For the AFS to gain wide stakeholder acceptance, it needs to undergo a thorough review and be reconstructed from the 'ground up.'	The complexity of forest management across Australia cannot be treated with complex prescriptive requirements. The AFS strategy to deal with complexity is to keep the requirements simple but comprehensive and define the objective of the criterion without specifying in detail how it is to be demonstrated. This strategy is delivered by using simple language in the requirements. Given the breath of certified forests inconstancies are not problematic. The Montreal Process is an international agreement with broad acceptance and national reporting. No important elements are excluded from its criteria. This review is fundamental and the standard has been extensively reviewed to align the wording of each requirement with the intent of the criterion.	Relevant changes made.
General	The documentation of the Draft Standard and of the Australian Forestry Certification Scheme (AFCS) in general, fails to provide complete information on the structure of the AFCS and the relationship of key documents to different elements of the scheme. This weakness in documentation compromises the accessibility, comprehensibility and reliability of the AFCS to stakeholders.	The standard is for Sustainable Forest Management it is not for the operation of a certification scheme. This is a strength because it allows the standard to be adopted by any certification scheme.	No change.
General	The Draft Standard is a relatively cursory document, providing a high degree of flexibility in relation to definitions and the interpretation of its provisions. While flexibility to respond to local conditions and circumstances is required for any forest management standard, the scant guidance given in the AFS is an inadequate basis on which to verify performance and conformity.	Auditors have been able to verify performance to the previous standard and are expected to be able to verify to the reviewed standard. Many of the difficult to interpret elements have been removed based on the advice of auditors and certified forest managers.	Relevant changes made.

Section	Comments Received	Discussion by AFS	Decision
General	The draft Standard needs substantial amendment if it is to reflect sustainable, responsible and accountable forest management which can be supported by the general public.	The review process has resulted in substantial amendment.	No change.
General	The normative requirements of the draft AFS are abstract and general. This can allow for wide interpretation of what auditors may consider to be compliant and non-compliant in the assessment of forest management against the standard. Furthermore, the relative small number of normative requirements risks the wider complexities around forest management to be missed in an audit. It remains uncertain as to whether the AFS in its current draft form will exert statistical rigour in capturing the complexities involved with forest management and recognise where forest values are either protected or threatened by forest management operations.	Adding more normative requirements is considered unnecessary given that all of the required performance elements are present.	No change.
General	The requirements for and practice of public disclosure of summary reports of certification decisions was found to be lacking in scope. For example, no clear statement of requirements for the public release of summary reports by Certification Bodies is identified in the Draft Standard, which compromises the ability of the AFCS to demonstrate the rationale for certification decision.	Public disclosures are now a stand alone requirement of the standard.	Relevant changes made.
General	The Standard does not address the issue of certified organisations being responsible for only part of the long-term forest management cycle, and non-certified organisations being responsible for the remainder. There is potential for the requirements of the Standard to not be met by the non-certified organisation for the period when they are 'in control' of the forest, and certainly there is no provision to determine if the requirements are being met during the period when the non-certified organisation is the responsible entity.	The requirements require demonstration of compliance without allocating responsibility. Where third parties have responsibility for elements these must be demonstrated to the satisfaction of the auditor. Where third parties fail to comply the forest manager must intervene and demonstrate compliance to achieve certification.	Relevant changes made.
General	The Standard would benefit significantly from the separation of native forests and plantations into different sections of the Standard. This could be addressed through separate planted and native criteria, where applicable, as many criteria seem irrelevant to plantations. Additionally, given the lack of the guidance notes, it is impossible to ensure the appropriate criteria are being looked at for each of native forests and plantations.	Disagree. As a general rule the same requirements should apply to all forest types. Specific qualifying references are made where necessary. The scale of the processes to demonstrate compliance will vary only to the risk to the values to be protected or maintained and not to the forest type.	No change.
General	The triple bottom line approach of social, economic and environmental values is the standard approach. Why introduce "Cultural" values? Surely these are picked up under social values, and leaves us with a quadruple bottom line.	The international literature generally now includes four pillars for sustainability with either culture or governance added to the former three pillars. Cultural values can include elements from the other three pillars.	No change.

Section	Comments Received	Discussion by AFS	Decision
0.1	Why should private forest managers have to make their maps, records and whatnot publicly available? It should be made available for requesting appropriate authorities review to ensure compliance with applicable standards and legislation. If managers were required to open themselves up to scrutiny of their every decision by untrained and unqualified, potentially vexatious individuals then there would be no point getting said certification. The whole idea of independent certification is to provide consumers with piece of mind that unrelated individuals with adequate knowledge and understanding have checked to ensure all is above board. Forest managers work hard to attain said certification along with paying to maintain such, the threat of being audited and losing such would be enough to mean they would hardly cut corners and use illegally sourced wood. There are government agencies and officers whose job it is to keep an eye on all this and with remote sensing it would appear more documentation is simply superfluous duplication. It seems more duplication and a simple cut and paste of the international standard here where as a nation we already have adequate checks and balances in place.	Maps of the defined area are required to be made available to the public for transparency and traceability. Commercial information can be excluded from the public disclosure. This was an existing requirement of the JAS ANZ procedure that has been included in the standard to improve the communication of the expectations on forest managers.	No change.
0.2	Not sure why this is included in the standard.	Traceability of forest products is good practice and helps to prevent illegal logging.	No change.
1 Systematic Management	Criterion 1 is 'designed to be compatible with' the International Standard ISO 14001 Environment; however it is not sufficiently clear what the requirements are. For example, how much of ISO 14001 is required to be an effective measure for the revised Standard?	ISO 14001 is not normative and the standard includes only those elements of the international standard that are required.	No change.
1.1	I would re-instate that the policy should commit to the environmental, economic, social and cultural benefits to local communities.	It is considered that this is in part covered by the commitment to stakeholders and that the forest manager can prioritise the benefits to themselves.	No change.
1.2	Provide only a summary description of the forest estate including current condition and inventory results and forecasts. If you do not specify the level of detail in the description, some auditors will issue non-conformances for summaries. It is unreasonable & virtually impossible to require managers of large native forest estates to describe each forest in detail.	It is expected that the description of the forest will be considerate of the size and scale of the defined forest area. This also applies to all of the requirements and is considered reasonable.	No change.
1.2	The need to evaluate aspects and impacts is unclear and there is no guidance on which are significant.	Aspects and impacts are the mechanism for the treatment of risks specified in ISO 14001. The process of determining significance will be tested by an auditor.	No change.
1.3.1	Remove the requirement for inventory from the planning/review cycle.	Inventory is an important element of forest planning and needs to be retained.	No change.
1.3.2	Point 'e' is related to 'native forests' referring to 'making the best use of natural structures and processes...genetic, species and structural diversity'. Plantations are a monoculture and do not support genetic, species and structural diversity. This would be the case for all (most) plantation managers in Australia.	Plantations are still an ecosystem although very much simplified. Natural processes such as litter decomposition and coppice regeneration can be used in plantations. The scale of the treatment within the Forest Management Plan can be consistent with the simplified nature of the natural processes.	No change.

Section	Comments Received	Discussion by AFS	Decision
1.4	Concerns were raised with the use of scientifically rigorous and sufficiently powerful as terms to describe the approach to monitoring. These are not well defined and need to be qualified.	The qualifiers of possible and practical are in the final standard.	Relevant changes made.
1.5	Concerns were raised about reviewing all plans and in the consideration of stakeholder interactions.	All plans need to be part of the continual improvement process. The controls on which stakeholder interactions are included in reviews can be controlled with the Stakeholder Engagement Plan.	No change.
1.6	Research is given the same status as policy, plan, implementation, monitoring and review. This does not conform to the management system model espoused by EMS and other standards. We recommend that the universal management system approach, the basis of EMS and many different standards, be preserved. The inclusion of research in the Standard is legitimate, but should be introduced into the individual criteria of the management system. For instance, Criterion 1.1 should reference the need for a policy commitment for research to support continual improvement. Criterion 1.2 should specify that research should be considered in the development of forest management objectives to address significant aspects etc. It is noted that the 'review of research findings' is already referenced in Criterion 1.5. This proposed approach is the same as that adopted to address legislation/legal requirements – which are referenced in several criteria. The emphasis should be on requiring that practices are based on research, not requiring an on going research program that may not serve the forest manager any purpose. Small private growers should not be required to contribute to research.	Research is considered important enough to have its own requirement. Investment in research is seen as fundamental to achieving a continual improvement framework. The burden finding funds for research should be shared by all enterprises.	No change.
2 Stakeholders	The criterion intent is too long and simply repeats the requirements.	Agree.	Change made.
2	There needs to recognition that the Stakeholder Engagement Plan can be separate from the Forest Management Plan and for it to be defined in the definitions.	Agree. Both documents can be composites of plans or co-presented depending on the needs of the enterprise as long as the requirements are included somewhere.	Relevant changes made.
2.1	Identify the requirement applies to both interested and affected stakeholders.	The definition of stakeholder includes both types.	No change.
2.2	There is no mechanism within 2.2 for forest management to be altered based on the views of stakeholders. While 2.4c identifies taking actions to mitigate adverse impacts on stakeholders, this does not constitute active participation or recognition of stakeholder input, expertise or knowledge as contributing to improved forest management. 2.2c seeks to 'identify the ways in which stakeholder feedback is sought and considered'. For meaningful participation, this should be changed to, at a minimum to: 'identify the ways on which stakeholder feedback is sought, considered and incorporated into forest management' and there would need to be an additional 2.2f 'management planning and operations should incorporate stakeholder feedback'.	Stakeholder input is also recognised in requirement 1.2. The requirement was edited to ensure meaningful participation can be achieved.	Relevant changes made.
2.3	This indicator is based on process not performance - there is no prescription or process for how stakeholder input may influence the granting of a certificate or a forest management outcome. The Indicators detail what process is supposed to happen but not what the outcome of that process will be.	The outcome required is meaningful engagement and it is achieved by following the processes specified. There is no way to prescribe a level of happiness for stakeholders.	No change.

Section	Comments Received	Discussion by AFS	Decision
2.5	Concerns were raised about the level of records that will need to be kept by a large regionally based forest manager.	The level of record keeping can be controlled by the Stakeholder Engagement Plan	Relevant changes made.
2.6	The forest manager should be required to give adequate consideration to reasonable requests from affected stakeholders. Interested parties again already have appropriate channels to pursue if they are of the opinion something untoward has transgressed.	Some of the public disclosure requirements were moved to the Stakeholder Engagement criterion.	Relevant changes made.
3 Biodiversity	We would like to reiterate the importance of scale and context in the determination, and management, of significant biodiversity values (SBVs). In the review of the Australian Standard, caution should be taken when identifying and managing relevant SBVs in the context of the small-scale bio-regions used in Australia (i.e. the 85 IBRA regions - interim biogeographic regionalization of Australia). As a point of comparison, in the European context, PEFC endorsed national certification systems typically refer to Natura 2000 (i.e. broad-scale [multicountry] biodiversity regions) in determining the significance of biodiversity. We recommend that Criteria 3 include references to scale and context, and favour assessing SBVs at the national and State/Territory level. Specifically, the guidance notes should recognise the potential for boundary effects, as a value that has low representation at the boundary of one IBRA region may be appropriately represented in neighbouring IBRA regions.	To adequately protect biodiversity values some form of geographic representation is required. Bioregions are widely used in forest planning. Boundary effects may require additional protection for old-growth forest and ecosystems under represented in the reserve system. Boundary effects may help to protect outliers and refugia. The use of bioregions was considered a suitable compromise between the needs of very large forest managers and small growers who will largely be in one bioregion.	No change.
3	Criterion 3 is unclear. Implementation and auditing will be compromised. Protection of biodiversity must be determined initially by describing Significant Biodiversity Values for a DFA, then the potential impacts of forest management on these biodiversity values, and subsequently develop, implement and monitor controls designed to minimise impacts. This needs to be the essence of the revised Standard.	The standard wanted biodiversity to be considered in the planning of forest management even when no SBVs are present. The process across the requirements is to find the actual biodiversity values that are present and prioritise them for maintenance. Then SBVs are identified and maintained and monitored. This ensures the protection of biodiversity across the defined forest areas.	Relevant changes made.
3	Should include a statement that maintaining or enhancing biodiversity can depend on addressing threatening processes beyond the defined forest management areas or unrelated to forest harvesting. It is important that the standard does not put undue emphasis on forest harvesting as a threatening process, while ignoring other threats.	The standard does not put an emphasis on forest harvesting impacts but on all forest activities. Threatening processes only need to be considered if they affect or may affect the define forest area.	No change.
3	We believe that this criterion should differentiate between businesses undertaking commercial plantation management activities and commercial native forest management activities. In the case of plantation operations, requirements should be less onerous in situations where the surrounding or adjacent native vegetation is not subject to disturbance or harvesting and is essentially being maintained for the existing biodiversity values. The existing standard under section 4.3 acknowledges that the criterion is largely focussed on native forest management.	Biodiversity is still important across all forest types. The processes specified will limit themselves if biodiversity values are not present.	No change.
3.1	This is confusing and requires extensive reworking. A strict interpretation of Criterion 3.1 by an auditor would require a forest manager to assess all biodiversity, which is not practical nor feasible nor workable.	All biodiversity should be identified in some form otherwise important values could be missed. The form of the identification assessment can vary according to the risks to the potential values.	No change.

Section	Comments Received	Discussion by AFS	Decision
3.1	As currently worded, this statement is requiring that a forest manager identify all forms of biodiversity. Impossible for a native forest situation. Perhaps the Guide might explain how this might be done. Private native forest managers couldn't do it. This goes beyond what FSC requires. Criterion 3 is confused, it is not workable and requires rethinking and reconfiguration. The basis of protection of biodiversity should be to identify the Significant Biodiversity Values on the DFA, assess the potential impacts of forest management activities on those Values, then develop, implement and monitor strategies and controls to minimise impacts. FSC says much the same.	Biodiversity aggregations and assemblages can be identified. Small private native forest managers should still be able to produce a simple list of the birds and animals present and the ecosystems present. It is not necessary to identify every insect, microbe and fungi. Without an identification process the maintenance of values will be hap-hazard.	No change.
3.2	Forest cover, stand structural elements and growth stages' need to be expanded to include broader "attributes" that contribute to the maintenance of forest diversity such as species diversity, biological legacies, and ecological processes. It should be explicitly stated that ecological processes (e.g. fire, critical species interactions such as pollination and predation, hydrological cycles, accumulation of organic debris) are a significant attribute which needs to be considered in tandem the more structural elements.	These elements are largely included in other criteria.	No change.
3.3	The AFS standard is intended to deliver sustainable forest management and is higher than a verified legal standard. Simply relying on existing regulatory frameworks and forest planning instruments are not sufficient to satisfying biodiversity maintenance for a third party certification standard.	The planning instruments are used only in the identification of SBVs. Forest managers then have to maintain or enhance those values, requirements that are above the regulatory framework which only requires harm minimisation.	No change.
3.4	There should be the identification of specific measures that will be undertaken to ensure conformance with the standard, these should be publicly available. There should also be explicit mention of exclusion of areas from harvest in order to support maintenance and enhancement of values, and implementation of safeguards for threatened species. There also appears to be an inconsistency between 'implement effective strategies and practices to support the maintenance, and/or enhancement of Significant Biodiversity Values' and 'minimise adverse impacts on Significant Biodiversity Values'. Minimising impact is a very different framework and outcome to maintain or enhance.	The specific measures are expected to be included in the Forest Management Plan. The maintain or enhance applies to the values themselves. Whereas the minimise adverse impacts applies to forest operations. The requirement also covers all aspects of forest activities and not just harvesting.	No change.
3.5	The forest manager should only have to undertake surveys where there is to be operations conducted which may have a detrimental affect on known or likely said values. Again there are government agencies in place throughout Australia who have specialist knowledge in this area and legislative means of protecting such, duplication.	Monitoring by the forest manager can be integrated with other monitoring programs so this is cooperation rather than duplication. Monitoring is critical to continual improvement.	No change.
3.6	The biodiversity review should also include a review of SBVs.	Biodiversity priorities with the defined forest area can be reviewed by forest managers. The process of review of many of the SBVs will be done external to the forest manager in other processes.	No change.

Section	Comments Received	Discussion by AFS	Decision
3.8	<p>It is not appropriate to ban outright the use of genetically modified trees unless there is scientific evidence that GM trees pose potential risk to human health or the environment. Recommend the adoption of the PEFC Precautionary Principle approach by adding the Note from PEFC ST 1003:2010 Sustainable Forest Management section "5.4.7. Genetically-modified trees shall not be used."</p> <p>Note: The restriction on the usage of genetically-modified trees has been adopted based on the Precautionary Principle. Until enough scientific data on genetically-modified trees indicates that impacts on human and animal health and the environment are equivalent to, or more positive than, those presented by trees genetically improved by traditional methods, no genetically-modified trees will be used."</p>	The note from the PEFC standard can be considered in future reviews of the standard. The inclusion of the note would make the requirement in the standard less clear.	No change.
3.8.3	We question the commerciality and practicability of this requirement for some species and are of the view that it unnecessarily discriminates in favour of exotic species plantings, to avoid potential genetic pollution impacts of native species plantations on adjacent native ecosystems. It also disregards one of the benefits of genetically improved plantation production, namely significantly improved production from a reduced forest area. Recommend removing this entire paragraph as it is covered (with more reasonable requirements) under paragraph 1.	The requirement is suitably qualified to ensure that plantations of native species can continue to be established but at the same time address the important but hidden problem of genetic pollution.	No change.
3.8.4	Suggest removing the words "prevent escape and" from the last paragraph. It is not possible to prevent the escape of pine wildlings into other areas, particularly without any future use of genetically modified trees. This criterion is contradictory. GMO presents one of the few viable alternatives to prevent pines producing viable seeds and thus potentially preventing escape of pine wildlings. However, at present, it is not possible to prevent this happening. Suggest, The forest manager shall implement measures to control non-endemic plantation species into areas outside the defined forest area.	Agree, measures to control escape are more practical than "to prevent" escape.	Relevant changes made.
3.9	The draft allows for some conversion to occur in Northern Australia which received limited support but strong recommendations to remove the clause on the grounds of equity and environmental impacts.	The application of the ban on native vegetation conversion to plantations was applied uniformly to all lands.	Relevant changes made.
3.9	The qualifications of when limited conversion can occur were questioned for applicability and coverage.	The qualifications were reviewed and modified to improve application and clarity.	Relevant changes made.
4.1	The criterion is about 'forests and land' but only 'land' is referred to in this requirement – should it reflect the criterion?	The requirement refers to the defined forest area which is a land unit and should refer to the productive capacity of the forests.	Relevant changes made..
4.2	Add the ability to manage regeneration or replanting program as a consideration.	Agree.	Change made.
4.2	We believe this statement is referring to Native Forests rather than clear fell operations in plantations. As such the statement should reflect that.	The consideration of harvest rates applies to all forest types and we believe that the requirement as presented can apply to all forest types and all scales including defined forest areas that contain one stand of one age.	No change.

Section	Comments Received	Discussion by AFS	Decision
4.2	There is a need to shift the emphasis on sustainable yield wording in section 4.2 so that "sustainable yield" is not mentioned as an add on but as a primary outcome of the process. <i>The rate of harvest shall not exceed levels which can be permanently sustained.</i> This wording places the right emphasis that should be reflected in a standard designed to deliver sustainability of the resource.	These changes would restrict the application of the requirement to plantations and small growers. Periodic as well as sustained harvesting need to be catered for.	No change.
4.2 & 4.3	When considering long term productive capacity – need to consider species selection.	It is preferred to cover this in requirement 4.3.	No change.
4.3	Does a reference to monitoring double up on requirement 1.4? Should monitoring be of all the elements from requirement 4.2?	The requirement 1.4 is monitoring the management system, the outcomes of activities and general specifications for monitoring programs. This requirement is about monitoring the natural systems around forest condition and the affect activities especially harvesting are having on them.	No change.
4.4	A submission suggested that road and track maintenance could be improved if the standard prescribed the use of Central Tyre Inflation.	The prescription of methods to achieve the required outcomes is generally avoided in the standard.	No change.
4.4	Snig tracks should not be considered as part of infrastructure.	Agree.	Relevant change made.
4.4	This new requirement was added without notification.	This requirement is required to ensure compatibility with the PEFC standard and was included in the draft put out for public comment. This process is considered to be adequate notification.	No change required.
4.5	Suggest the addition of context to this criterion. It is impractical for plantation silviculture to consider biodiversity. It would be more important to consider soil and water values in plantation silviculture than biodiversity. Suggest, The forest manager shall use silvicultural systems that have been demonstrated to be appropriate for the forest type, the specific stand and site conditions, forest management, market or product requirements and, for native forests, biodiversity objectives.	It is considered important for plantation managers to consider biodiversity priorities in the selection of silvicultural systems so as to have a full range of options available for the maintenance of the identified priorities.	No change.
4.6	Editorial changes were suggested and there was support for the requirements to be targeted specifically at native forest and plantations separately.	This is one of the few requirements that separate the forest types appropriately.	Relevant changes made.
4.9	Qualifications are required to the applicability of this requirement.	Agree.	Relevant changes made.
5.3	A number of submissions asked for this requirement to be qualified. Reasonableness was requested for the costs of control, the extent of control for major pest outbreaks with the Canadian mountain pine beetle given as an example beyond the scope of actions by one forest grower, practicality of control and the legal requirements to control weeds.	Some further qualifications were added.	Relevant changes made.
5.4	A number of submissions asked for this requirement to be clarified as to the extent of expectations and to ensure the proper use of fire.	Agree.	Relevant changes made.
5.5	Additional qualifications were requested to ensure the costs of rehabilitation were not onerous and the extent of activities could be managed.	Clarity is required as to the application of the qualifications.	Relevant changes made.

Section	Comments Received	Discussion by AFS	Decision
5.6	The requirement has become confusing and jumbled.	A simplified statement of the requirement was adopted.	Relevant changes made.
6 Soil and Water Resources	Geodiversity can either be included with Soil and Water, or have its separate short section; protection of significant geological features like karst, caves, and landforms (independent of associated soils and biodiversity values) needs to be included somewhere in the Standard.	Natural Heritage Values are included in SBVs. These sites are also to be considered in the Forest Management Plan processes either as environmental, social or cultural values.	No change.
6.2	The words "maintaining riparian zone....etc" does not mean anything. The Standard needs to specify in what state the riparian zone needs to be maintained, or what processes need to be maintained in it. Could rewrite as "maintaining the buffering capacity of riparian zones to minimise sediment and chemical entry into streams."	The requirement was adjusted to better define the required outcome but with different words to those suggested.	Relevant changes made.
6.3	One can't minimize adverse effects on hydrological [stream?] flows by "considering" anything (see a and b) - one has to "do" something. Consider rewriting as: (a) Forest operations will be planned to ensure that long and short-term disturbances to large-catchment (>250 ha) stream flows depart as little as practically feasible from those existing before commencement of forest operations (b) Both the environmental impacts of increased and reduced stream flows will be taken into account.	The requirement was rewritten to consider these views but with different text.	Relevant changes made.
6.3	The term 'hydrological flow' needs defining. Is it flow at catchment/landscape scale?	The flow is to be considered at a scale relevant to the defined forest area. For this reason it is impractical to provide an exact definition.	No change.
6.4	This section seems to be too prescriptive. For example in point b.) it refers to relevant codes, then point c.) specifically discusses rehabilitation of extraction tracks etc which would be have been described in the code of practice referred to in the previous point. Why not leave it at point b.)?	The level of detail is considered appropriate for the importance of the requirement.	No change.
6.5	The wording 'inadvertent spills' excludes any deliberate spills (lets hope this wouldn't happen but in case it did) and therefore we suggest this point should read 'any spills'.	Agree.	Change made.
7 Carbon	We are particularly concerned about the revisions to criterion 7 Forest Carbon included in the second draft of Australian Standard for Sustainable Forest Management (DR2 AS4708). Although we manage to maximise the productive capacity of our plantations and appreciate our role in the carbon cycle, changing our practices to manage and account for carbon will add considerable cost to our forestry operations.	The cost of the compliance activities are considered to be excessive.	No change.
7	There were a number of other submissions with concern about the presence of the criterion and its content as being: above normal practice, greater than required by PEFC, threatening harvesting, not recognising the uncertainty in current carbon markets, favouring carbon production above other products, and to prescriptive.	The requirements were revised to increase the focus on the important elements.	Relevant changes made.

Section	Comments Received	Discussion by AFS	Decision
7.1	Current wording does not take into account that in a number of jurisdictions ownership of carbon rights across the full DFA has not been legally resolved, or carbon rights (and in turn management control) resides either in part or fully with the land owner, not the forest manager. In addition, it is still early days for forest carbon assessment, accounting and valuation. It is inappropriate to require organisations to have a 'scientifically justified, quantitative estimate of the current and future carbon storage on the defined forest area.' There needs to be more resolution of the issue at the national and international level before more detailed requirements are included in the Australian Standard. Recommend deletion of Requirement 7.1 paragraph 2 and Requirement 7.3.	The recommendation was not accepted however the requirement was simplified to retain just the important elements.	Relevant changes made.
7.1	Sustainably managed native forests should not be regarded as a carbon store or sink. Carbon levels will fluctuate at a site level because of harvesting, but will be essentially 'steady state' at a broad scale level. It is a complex situation. In native forests, the emphasis should be on the maintenance of the carbon cycle.	References to carbon sinks and stores were removed.	Change made.
7.2	The issue should be on the use of fossil fuels rather than greenhouse gases.	Agree.	Changes made.
7.3	There were many submissions concerned about the onerous and costly proposal to estimate carbon stocks in the forest of the defined forest area. This expense could not be justified for commercial operations.	There are tools available to allow reasonable estimates of carbon stocks that are not that expensive. Once linked to the required inventory processes estimates could be relatively cheap and regular. Given the uncertainty in carbon markets it was thought that the best first step was to at least know how much carbon is involved.	No change
8 Cultural Values	Completely unnecessary as they are all cultural values and those covering other values would similarly cover indigenous. As far as I am aware although they may have employed the use of wildfire as a management tool, the forests themselves were not actively managed until post European settlement. Therefore they would not have any traditional forest practices, just uses to be considered like all else.	Disagree, there is evidence that indigenous peoples had complex management arrangements that controlled hunting seasons, used fire, protected water sources and these were imbedded in cultural practices and dream time stories.	Retain the criterion.
8.1	It will be difficult to measure the elements of the requirements.	In most cases demonstration is required without measurement.	No change.
8.2	What if indigenous people do not want to engage?	The requirement is to consult which can reasonably be expected to include attempt to consult.	No change.
8.3	Consider and protect significant values.	Agree, the term significance is adopted to describe the values that are of concern for the requirement.	Relevant changes made.
8.4	Include recognized parties.	Agree.	Change made.
9	We are particularly concerned about the revisions to Criterion 9.7 Worker's Rights included in the second draft of Australian Standard for Sustainable Forest Management (DR2 AS4708). The requirements that go beyond current regulations dealing with workplace relations, which are already very restrictive, will place an extra and unwarranted burden on our operations. Much of this section is already enshrined in Australian law, and doesn't need to be repeated here.	The need for worker's rights is a pivotal social responsibility expected of sustainable enterprises.	No change.
9.1	Remove the requirement to have fair contracts.	Disagree.	No change.

Section	Comments Received	Discussion by AFS	Decision
9.1	The availability of local suppliers varies enormously and cannot be guaranteed. This requirement should be further qualified.	Agree.	Change made.
Salvage logging	This draft requirement that prescribes conditions under which salvage logging is completed is unnecessary as normal planning restrictions should apply.	Agree.	Relevant changes made.
9.3	The wording of this requirement should be adjusted to make it more practical, more widely relevant to all enterprises and simpler.	Agree.	Relevant changes made.
9.5	Best practice approaches to occupational health and safety recognise the need for co-operation and consultation between forest managers and workers in giving effect to the overriding obligation of provision of a safe workplace. Recognition of the need for such co-operation and consultation in the Standard is both consistent with Australian national laws and with our international obligations as contained in the ILO Occupational Safety and Health Convention, 1981 (No. 155) which Australia has ratified. Insert the following new clause 9.6(d) after the existing clause 9.6(c) "d. co-operating and consulting with workers and their representative organisations on all aspects of occupational health and safety, including any steps necessary to comply with items a. – c. above."	Generally agree.	Relevant changes made.
9.6	Many submissions were made that complain about the prescriptive nature or the elements of the requirements and that these are unnecessary under Australian law. The elements are too onerous and give workers an unfair advantage by threatening the enterprises certification status.	The final elements were carefully considered and are considered to be fair and workable.	Relevant changes made.