

Summary of Public Comments Received for draft AS/NZS 4708 July to October 2020

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
1.	OFO	General		<p>General comment: The standard could be considerably streamlined by just referencing the need to meet existing legislative requirements with regard to Pesticides, School Age Workers and Living Wages (and many other existing criteria). There is no need to add additional requirements when the legislation is already adequate to provide protections and just creates more paperwork and bureaucracy for Forest Managers without creating any positive change.</p>		<p>Rejected. Transparency is necessary.</p>
2.	HQP		<p>Whole document</p>	<p>Structure and numbering: whilst of no real consequence to meeting the standard, the use and structure of numbering for the various criteria throughout the standard is very inconsistent. For some areas the numbering is very specific down to every dot point element and at other times there are several related but distinct 'the forest manager shall' statements all grouped under a single criteria. Sometimes there is a two number level and sometimes three.</p>		<p>Agreed. Editorial, Fixed up during editing</p>

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				For many sections (e.g. 7.4.1 and 11.7.6) there are duplicates of a,b and c clauses under the one number. This may lead to problems in clearly defining any non-conformances against particular elements of the standard.		
3.	JAS-ANZ	General		There are a few punctuation and paragraph alignment errors throughout the draft Standard.	Full document formatting review is required. Particularly in relation to punctuation, use of semi-colons in lists, and paragraph formatting (i.e. tab alignments).	Agreed. Editorial Fixed up during final edit
4.	JAS-ANZ	General		The certification standard or the Scheme Requirements (and probably both) will need to strengthen requirements around reporting of legal and certified non-compliances, and establish a formalised process of how such matters might be recognised in the status of certification. Considerations would include public interest, evidence of non-compliance (e.g clear breach versus a legal technicality which necessitates court ruling), likelihood of successful prosecution, scale of penalties, impact on integrity and reputation of the particular certification and certification scheme.		Noted-Covered in 10.2 Minor editorial update to clarify
5.	Scion	General		Scope: The standard is comprehensive and covers the breadth of activities		Noted

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				<p>pertaining to sustainable forest management. Basing the structure on the Montréal Process Criteria which are recognised and used by both countries ensures the joint standard is well founded. The standard clearly recognises new conditions such as increasing climate change risks and impacts, and increasing concerns relating to forest management activities by stakeholders and will be a valuable framework for responses to both</p>		
6.	SCION	General		<p>Trees outside Forests: We are strongly supportive of the inclusion of a specific section in the standard on Trees Outside Forests (TOF) in recognition of the difficulties (e.g. expense) facing small forest growers and farmers and woodlot owners in gaining access to 3rd party independent certification either individually or through group schemes.</p>		Noted
7.	SCION	General		<p>Complexity and useability: The new joint standard is far more complex than the individual standards it will replace. It is double the length of the previous standards – 84 pages vs ~40. There are new sections focussing on</p>		<p>Agreed. Figure 1 clarified and additional informative information on application of the standard has been added.</p>

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				<p>process (sections 4 to 10) which are poorly introduced as to the intent of these sections. The actual sustainability audit criteria are relegated to one section (11) that covers all criteria, whereas before they were clearly separated. We suggest that the standard's structure and intent and the audit/evaluation process to be followed is better explained (page 8 and 9), better explanation of Figure 1 would help. It is currently not clear how an auditor or company would use this standard.</p>		
8.	SCION	General		<p>Sustainable Forest Management policy: It is excellent to see explicit reference to the requirement to have a Sustainable Forest Management Policy (5.2), an advance on the previous standards. We would suggest that it is enhanced slightly to require specific SFM Objectives, regularly reviewed and updated within the policy. This is not obvious currently.</p>		Noted this is covered by 6.2.
9.	SCION	General		<p>Indigenous peoples' rights: Greater than 40% of New Zealand's planted forests are owned and/or managed by Māori, Aotearoa/New Zealand's Indigenous people. This section is of</p>		Noted

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				paramount importance as the involvement and influence of Māori is increasing rapidly. The current draft covers the area well with appropriate reference to the Treaty of Waitangi, and the UN declaration on the rights of indigenous peoples and appropriate reference to culturally appropriate management throughout the draft.		
10.	SCION	General		<p>Genetically modified organisms: We note the increasing acceptability of GMO within forests and forestry and the rapid changes in technologies; for example, the opportunities to induce sterility in Douglas fir as a mitigation for one of New Zealand’s biggest environmental issues – wilding conifers; and information around risks and impacts. These trends are likely to continue in the five-year period before this standard is revised. It is therefore important to reflect current state, and these possible changes. Secondly regulations, and definitions differ between New Zealand and Australia and this is currently not reflected in the draft. Thirdly the text (11.5.6) references an old EU standard (Directive 2001/18/EC) which is old language and not now appropriate and</p>		<p>Noted. PEFC Meta-Standard does not presently permit GMOs.</p> <p>Rejected at this time.</p>

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				<p>should be deleted or revised with more appropriate text. We understand the reluctance for implementation of genetically modified trees within the PEFC but feel this standard should reflect the current state of knowledge and near-term trends in research and potential implementation.</p>		
11.	TB	General		<p>I support the revision of AS/NZS 4708 on Sustainable Forest Management to better reflect the requirements of the revised PEFC Benchmark Standard PEFC ST 1003:2018. Given that the existing Standard has focused on larger forest areas and there is considerable experience not in its application under such situations, I have focussed my comments on the aspects relevant to Trees Outside Forests. The inclusion of Trees Outside Forests is a very welcome initiative by Responsible Wood. In the future it is expected that increasing quantities of wood products are likely to come from smaller areas of forest and agroforestry systems on otherwise agricultural land. In doing so the Standard needs to try to achieve a difficult balance between maintaining the integrity of the approach to demonstrating sustainable forest management and recognising that for most small forest owners the tree component of their farming system will only be a small (and somewhat irregularly timed) focus of their agricultural systems. Therefore we need to avoid making the certification requirements too onerous and expensive for such forest owners. I have not done a complete comparison of Appendix A of the draft AS/NZS 4708 with Appendix 2 of the PEFC ST 1003:2018 benchmark standard, but it looks like it is possible that some PEFC requirements may be missing from Appendix A, so this should be carefully checked during the finalisation of the revised Standard. Worryingly, the PEFC Appendix seems to stray into the agricultural practice space in section C – we should avoid this if possible.</p>		<p>Rejected</p> <p>Considered during the review of Appendix A.</p> <p>The committee did not consider it possible to reduce certification requirements while remaining credible and comply with PEFC requirements.</p>

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12.	CFMMEU	General		<p>The CFMEU Manufacturing Division supports the AS/NZS 4708 Sustainable Forest Management review process.</p> <p>We appreciate the work that has been done by the committee in migrating the “sustainability requirements” of sustainable forest management (including those as outlined in the current iteration of the Standard (AS 4708:2013 The Australian Standard® for Sustainable Forest Management {AS4708 (2013)})) into a separate section of the public comment document with the intent that the Standard reads more like an ISO style standard. In AS 4708 (2013) much of the content which is now in Section 11 of AS/NZS 4708 was scattered in other sections.</p> <p>A consequence is that the new section referred to as “Sustainability Criteria” in section 11 now makes up a significant distinct separate part of the standard.</p> <p>The Standard defines a “sustainability requirement” a as: “need or expectation that is stated within Section 11 of this Standard. Note 1 to entry: A sustainability requirement is a specified forest management system requirement (Clause 6.1). Note 2 to entry: Sustainability requirements are obligatory.”</p> <p>Recommendation: To reflect this, Section 11 should be renamed “Sustainability Requirements” rather than Sustainability Criteria This will make it clear that the clauses in section 11 are “normative requirements that are audited to demonstrate conformance” as opposed to simply “criteria that specify the principles required for sustainable forest management”</p> <p>A breach of a Sustainability Requirement must be treated no differently as a breach of any other criterion in the Standard and result in corrective action (whereas appropriate in the specific circumstances) We support the fact that Responsible Wood promotes a culture of ‘continuous improvement’ of sustainable forest management practices in</p>		<p>Rejected- keep current wording</p>

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				<p>Australia and believe that Standards revisions are an important part of this mission.</p> <p>We are mindful to ensure that there are no important elements that are lost in the migration to ISO format and revision of the standard which would detract from the goal of continuous improvement. Some of our proposals/ suggestions below are reflective of that.</p>		
13.	WT	Preface	3 rd paragraph	Lower case use of trees outside forests. Follow PEFC capitalisation, as on page 6 of contents and always present it as Trees outside Forests	“In addition, it includes new appendices for the sustainable management of Trees outside Forests and small forest areas, and requirements for group certification.”	Agreed. Editorial- Change made.
14.	STT	Page 8	n/a	<p><i>There is duplication between page 2, the preface, the introduction, scope and general,</i></p> <p>The standard as it stands does not clearly describe the structure and naming conventions of the standard e.g. Are the requirements clauses and sub-clauses or criteria and requirements, indicators etc?</p>		Noted. Preface, introduction, scope etc has been developed to meet SA development principles. Unnecessary duplication was reviewed in the editorial process. No change necessary
15.	STT	Page-13	n/a	Figure appears a little amateurish for a published standard	Suggest getting professionally formatted.	Agreed. Editorial Fig 1 updated updated bt graphic artist.
16.	Forico	General		Due to the current structure of the document, the message being communicated is that a compliant management system is more important than actually achieving		Rejected. Structure of the document has been intentionally aligned with ISO High Level Structure and ISO 14000.

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				<p>good sustainable forest management outcomes.</p> <p>Section 11 contains the core requirements for good forest management. Strongly suggest bringing this section forward in the document, perhaps to directly after section 4. Link these Sustainability Requirements to the sections [currently numbered] 5-10 by explaining that the sections [currently numbered] 5-10 should be implemented so as to best support the forest manager to achieve the Sustainability Requirements.</p>		
17.	Forico	Process of development and revision	Para 2	Wording indicates requirements of the Standard are consistent with ISO 14001.	If a Forest Manager is certified to any of the ISO suite of Management System Standards, the Certification Body is not required to assess compliance to the sections [currently numbered] 5 – 10.	Rejected. This is outside the scope of the Standard and covered by Scheme Rules and not relevant.
18.	Forico	P13-diagram		Performance requirements	Suggest re-locating the row of Performance Requirements from the bottom of the diagram to the top to give them more prominence.	Agreed. Editorial. Fig 1 reviewed
19.	WT	1.2	Heading “Interpretations for trees outside forests	Capitalisation and acronym for small forest areas	Interpretations for Trees outside forests and small forest areas Interpretations for Trees outside Forests and small forest areas (SFAs) are outlined in Appendix A to this	Agreed. Editorial. Reviewed on final edit. Check use of term ToF.

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			and small forest areas”		document. All requirements within this Standard referring to “forest/s” are also applicable to Trees outside Forests and SFAs unless otherwise guided in Appendix A.	
20.	SCION	1.2		Note comment above on complexity and useability. Figure 1 is not well explained so the context of the whole system is unclear	Add in text to more clearly explain what is outlined in Figure 1 and how the system fits together, underpinned by Sustainability Criteria 11.1 to 11.7.	Agreed, Editorial. See comment 18
21.	CFMMEU	Section 2 Normative references		<p>Support the ILO conventions being referred to throughout the text and as normative reference in section 2.</p> <p>Support referral to ILO CFA jurisprudence and the Creighton Paper.</p>	<p>Section 2 Normative references</p> <p>The following documents are referred to in the text in such a way that some or all of their content constitutes requirements of this document:</p> <p>NOTE: Documents for informative purposes are listed in the Bibliography.</p> <p>Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) 1973, as amended, UNTS 993, entered into force July 1, 1975</p> <p>The International Labour Organization (ILO) Fundamental Conventions:</p> <p>(a) Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)</p>	Noted.

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					<p>(b) Right to Organise and Collective Bargaining Convention, 1949 (No. 98)</p> <p>(c) Forced Labour Convention, 1930 (No. 29) (and its 2014 Protocol)</p> <p>(d) Abolition of Forced Labour Convention, 1957 (No. 105)</p> <p>(e) Minimum Age Convention, 1973 (No. 138)</p> <p>(f) Worst Forms of Child Labour Convention, 1999 (No. 182)</p> <p>(g) Equal Remuneration Convention, 1951 (No. 100)</p> <p>(h) Discrimination (Employment and Occupation) Convention, 1958 (No. 111)</p> <p>NOTE 1: See https://www.ilo.org.</p> <p>NOTE 2: For conventions No 87 and 98 refer to jurisprudence of the Committee on Freedom of Association, to the extent allowed by law.</p> <p>NOTE 3: In Australia further information may be found in the report: CREIGHTON, B. The ILO Declaration on Fundamental Principles and Rights at Work 1998: A report of the Australian Compliance Prepared for the Forest</p>	

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					Stewardship Council of Australia, September 2015.	
22.	SCION	Page 14		Spelling of CITES	Change CITIES to CITES	Agreed. Editorial
23.	Forico	3	3.2	Drainage lines definition - This reads more like a definition for a stream. Provide a separate definition for stream, or if they are always referred to together, use the term 'watercourse' and define it.	<i>Low-lying, linear features in the landscape where water naturally concentrates and flows when present.</i> *Worth mentioning that both streams and drainage depressions/lines can be ephemeral and still be considered watercourses.	Agreed. Use of terms checked and made consistent. Editorial
24.	TB	3		There is no definition of emergency events (so left open to interpretation in Clause 8.2)	Insert a new definition for emergency events (limiting them to ones most relevant to forest management)	Rejected. Common understanding is acceptable
25.	Forico	3	3.6,3.7,3.8	Definitions of these 3 terms need rationalising	Group organisation seems a redundant term – these are just the group members. 3.37 would be clearer if just “group certification”. Is it actually the entity that it is certified? All a bit unclear .	Rejected. Terms considered necessary
26.	CFMMEU	3.18		Proposed change reflects the expanded changes to the clause which requires forest managers to ensure that its practices and those of its contractors and sub-contractors comply with the fundamental ILO conventions.	direct dealing conduct by the forest manager that has the effect of undermining, or is likely to undermine, the authority of the representative organization of workers which occurs when the forest manager bypasses the	Agreed. Editorial clarification

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				<p>Direct Dealing is not consistent with these conventions.</p> <p>direct dealing Conduct by the forest manager which has the effect of undermining, or is likely to undermine, the authority of the representative organization of workers which occurs when the forest manager by-passes the representative organization of workers in order to engage in discussions, bargaining or negotiations with represented forest workers in relation to matters that fall within the scope of collective bargaining without the participation of the representative organization of workers.</p>	<p>representative organization of workers in order to engage in discussions, bargaining or negotiations with represented forest workers in relation to matters that fall within the scope of collective bargaining without the participation of the representative organization of workers</p>	
27.	SFM	3	20	<p>Definition provided for drainage line sounds more like that which describes a stream. Both terms are used in the document but only drainage line is defined.</p>	<p>Define both stream and drainage line – Drainage line – is that which only carries water during or shortly after rainfall. Stream – incised channel with defined bed and bank or evidence of active erosion or deposition eg gravel, pebble, rock bed or scour.</p>	<p>Agreed. Use of terms checked and made consistent. Editorial revision.</p>
28.	CFMMEU	3.26	4.3	<p>d) Term drainage line and stream used</p> <p>No suggestion for change to wording now but flag as a need for potential further consultation particularly with</p>	<p>fair contract contract that is written and contains no unfair terms</p>	<p>Noted</p>

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				the forestry contractor sector/ their representatives		
29.	JAS-ANZ	3.33		Definitions exist for 'competent forest worker' and 'forest worker'. Cross referencing would be useful.	For each definition, include a note which provides a cross reference to the related definition.	Agreed. Added cross reference- editorial.
30.	CFMMEU	3.33		Support wider definition compared to previous standard. forest worker A person who carries out work in any capacity for the enterprise	forest worker a person who carries out work in any capacity for the enterprise and/or its contractors and sub-contractors.	Noted
31.	SCION	3.35		Note reference (EU Directive 2001/18/EC) is old and outdated. Definitions used in NZ and Australia differ.	See comments above on rapid shifts in definitions, technologies, and acceptability. This standard needs to reflect today's conditions in both countries and consider the next five years. It should be deleted or revised with more appropriate text for NZ/Aus conditions.	Rejected. This is the reference used by PEFC. GMOs are not permitted
32.	Forico	3	3.39	Hazardous activities definition - the activities listed do not pose "high/unreasonable" risks	<i>Any activity that may pose a risk of harm</i>	Rejected These activities can be high risk if uncontrolled.
33.	HQP	3	3.40 a	Please insert references to which classification system the various terms s/a Acute toxicity to mammals and birds; Chronic toxicity etc originate from.		Reject. Not necessary by the committee
34.	FPC	3.40		The definition of highly hazardous pesticides does not explicitly refer to the list of terms given (acute toxicity,	"are acknowledged to present particularly high levels of acute or chronic hazards to health and environment by exhibiting one or	Agreed. Change is editorial to provide clarity

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				carcinogenicity, mutagenicity etc.) thus they do not have context.	more of the following attributes, according to internationally accepted classification systems, ..." Remove "means" after each term.	
35.	AFPA	3	3.40	Please insert reference to which classification system – where do the terms originate from etc	chemical pesticides that – reference system is in relation to this comment	Rejected
36.	JAS-ANZ	3.40	d	Grammar. (d) are heavy metals	Insert 'are'	Rejected
37.	SCION	3.41	b	'in New Zealand individuals of Māori descent who identify as being of Māori origin'	in New Zealand individuals of Māori and <i>or Moriori</i> descent who identify as being of Māori and <i>or Moriori</i> origin'	Agree. Editorial
38.	JNL	3.47		"living wage" remuneration received for a standard work week by a worker in a particular place sufficient to afford a decent standard of living for the worker and her or his family Note 1 to entry: Elements of a decent standard of living include food, water, housing, education, health care, transport, clothing, and other essential needs including provision for unexpected events. [SOURCE: ISEAL ALLIANCE. A Shared Approach to a Living Wage. ISEAL Living Wage Group, November 2013]"	Not to be confused with the definition as per "Living Wage Movement Aotearoa NZ", which is different and hence may unnecessarily mislead. The ISEAL living wage uses localised living expense, estimating a living wage for a particular location that for most forestry regions would be less than the cities where the main population centres are. The "Living Wage Movement Aotearoa NZ" is a nationally applied hourly rate, "Living Wage", appearing to have no consideration for regional differences in living expense, and other non-time based payments.	Agreed. Note added for clarification and a link added to the source of the NZ living wage Editorial

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39.	Forico	3	3.48	Management system definition	Set of interrelated or interacting elements <i>adopted by</i> a forest manager	Agreed. Editorial clarification
40.	Forico	3	3.49	Monitoring definition	Determining the <i>effectiveness</i> of a system...	Agreed. Editorial clarification
41.	WT		3.52	Revise wording to add “areas” as PEFC foreword makes it clear a TOF area is akin to a defined forest area	Though it is exactly same as PEFC definition, I suggest that it reads “products consisting of goods of biological origin other than wood, derived from forests and Trees outside Forests areas”	Agreed. Editorial clarification
42.	Forico	3	3.55	Organisation definition	Need to use either “organisation” or “forest manager” consistently throughout – not both. Suggest capitalising the term chosen, if permissible under JAS-ANZ rules.	Noted. No change needed
43.	HQP	3	3.59	Currently reads as if an organism needs to be detrimental to all values not just one	organism detrimental to cultural, economic, environmental and or social values	Agreed. Editorial
44.	AFPA	3	3.59	Swap “and” for “or”	"organism detrimental to cultural, economic, environmental *or* social values	Agreed. Editorial
45.	Forico	3	3.67	Requirement definition	Note 1: “Generally implied” means that it is <i>customary</i> or common practice for the forest manager <i>to fulfill a given need or expectation</i>	Agreed. Editorial
46.	WT		3.67	Note 3 – is this correct? It potentially confuses the whole “conformance” and “compliance” understanding.	Can we delete Note 3?	Agreed. Removing the informative note is

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						editorial as no change made to the Standard
47.	Forico	3	3.70	Risks and opportunities	<i>Threats</i> and opportunities	Noted. Leave as is. Rejected
48.	Forico	3	3.72	Local law age	<i>local legal age</i>	Agreed. editorial
49.	Reliance	3.73	1	<p>Known or likely occurrence of threatened species and their known and potential habitat.</p> <p>The statement is too broad for example a Tasmanian Context. As it reads this statement has the potential to pick up transient / landscape level species such as Tasmanian Devils and Spotted Tailed Quolls, etc.</p> <p>The definition statement is a concern and could have an unintended consequence of capturing all plantation windrows as potential habitat.</p>	<p>Consider: Significance of Biodiversity needs to be less broad and could consider a ranking of an area according to specified values such as uniqueness, rarity, known hotspot or cluster of threatened species....</p> <p>The more critical role of an area or system plays, the more value it has in positively influencing biodiversity.</p>	See comment 50. Informative note added to clarify. Not a technical change
50.	Vic Forests	3.0	3.73	The use of the word significant in SBV's may open up risk to public interpretation of what meets the threshold to be considered significant.	Suggest including a note outlining the importance of using recognised and verified publications and regulatory frameworks etc in defining biodiversity values as "significant".	Agreed. Clarification made by adding a note. Technical content unchanged.
51.	Forico	3	3.77	3.77 number used twice.	Subordinate 3.77 stakeholder-affected and 3.79 stakeholder-	Agreed-Editorial

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					interested under the 3.77 stakeholder definition.	
52.	Forico	3	3.78	Stakeholder engagement definition	Clarify definition to include situations when forest manager responds to a stakeholder – doesn't matter who initiates contact. <i>"interaction with"</i> or similar	Agreed. Editorial clarification.
53.	Forico	3	3.80	Streamside management zone definition.	As above, stream should be defined –there is a good definition for a stream currently given for drainage line. Note 2 "is approximately synonymous with" – replace with <i>may also be referred to by terms such as...</i>	Noted. Agreed -Editorial definition has been clarified
54.	Forico	3	3.83	Sustainability requirement definition	Note 1 refers to Clause 6.1, which only requires forest managers to consider section 11 sustainability requirements when <u>planning</u> . Note 2 is clear, and should be repeated at the start of section 11. If permissible under JAS-ANZ rules, suggest capitalising Sustainability Requirement throughout to make it clear that these are specific things as defined in section 11	Noted. Rejected -No change required
55.	Forico	3	3.84	Sustainable forest management policy	Add <i>as required in 5.2</i>	Rejected -Not required
56.	Forico	3	3.88	Top management definition	Note 2: <i>If the scope of the management system covers only part...</i>	Agreed. Term changed to Senior Management. Editorial

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57.	AFPA	3	3.88	Top management should be forest management shall	<i>is a person or group of people who direct and control the management of the organisation at the forest management or operational system management level.</i>	Agreed. Term changed to Senior Management-editorial
58.	Hume	3.88		<p>Definition of “Top Management”</p> <p>The issue with the definition is the reference to “highest level” Whilst it may be a “feel good” position in the real world it is not realistic or practical where large organisations are concerned.</p> <p>Under this definition, for a State owned forest service “Top Management” would be the Premier of the State; I cannot envision Gladys’s taking part in a forestry management review process.</p> <p>Like scenarios would apply in the private sector, i.e. Top Management would be the Chairman of the Board.</p> <p>AFS has adopted the ISO definition word for word.</p> <p>“a person or group of people who directs and controls an organisation at the highest level</p>	A person, or group of people, who direct and control the management of the organisation and the forest management system at the forest management level	Agreed. Term changed to Senior Management-editorial

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59.	GTFP	3.88		<p>Definition of “Top Management”</p> <p>The issue with the definition is the reference to “highest level” Whilst it may be a “feel good” position in the real world it is not realistic or practical where large organisations are concerned.</p> <p>Under this definition, for a State-owned forest service “Top Management” would be the Premier of the State; Like scenarios would apply in the private sector, i.e. Top Management would be the Chairman of the Board.</p>	A person, or group of people, who direct and control the management of the organisation and the forest management system at the forest management level	Agreed. Term changed to Senior Management-editorial
60.	Reliance	3.88		<p>Definition of “Top Management” to broad and needs to better well defined.</p> <p>The issue with the definition is the reference to “highest level” is not realistic or practical where large organisations are concerned. (i.e.) Top Management could be the CEO or Chairman of the Board.</p>	Change: A person, or group of people, who direct and control the management of the organisation and the forest management system at the forest management level	Agreed. Term changed to Senior Management-editorial

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				ISO- “a person or group of people who directs and controls an organisation at the highest level”		
61.	FPC	3.88		Request to revise the definition of “Top management”. This could currently be interpreted as a Minister or the Premier.		Agreed. Term changed to Senior Management-editorial
62.	TB	3.90		The definition of Trees outside Forests, conflicts a bit with the definition of forest (3.28) as it states that forest is any land dominated by trees, whereas the TOF definition creates confusion by using the terms ‘recognised forest land’ and ‘small forest areas’ – which would make it difficult to understand which requirements apply when a farmer has some areas of timber woodlots or agroforestry systems within their broader farming system. Also SFA is used in Table A1 but this acronym is not included in the TOF definition.	This needs very careful thought as clearly small forest areas grade into larger plantations and larger areas of natural forest on some farms. I don’t have a ready answer, but it may either need a minimum threshold area or possibly something related to the proportion of the property covered by trees. While it also has to apply to trees in urban areas, it is much less an issue than trees on farms as it is unlikely that urban trees will be managed for commercial timber.	Noted. Term small forest area updated to farm forestry for clarity. Editorial
63.	Forico	3	3.91	Wildfire/bushfire/forest fire	Just use “unplanned fire” throughout the body of the standard– don’t need all 3 terms. Turn this around: Add a definition	Noted. Rejected-terms are unchanged.

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					for unplanned fire that defines it as Wildfire/bushfire/forest fire.	
64.	Hume	4.2	E	<p>This statement is ambiguous, does it mean “which needs and expectations align with pre-existing compliance obligations?” Or “which needs and expectations are elevated to additional compliance obligations?”</p> <p>How and why would a stakeholder need or expectation become a “compliance obligation”? Compliance relates to legal and agreed standards or codes.</p> <p>AFS has adopted the ISO 4.2.c word for word.</p> <p>However ISO goes on to explain in 6.1.3 Compliance Obligations (which AFS does not do) Compliance obligations also include other interested party requirements related to its environmental management system which the organisation has to or chooses to adopt. These can include, if applicable:</p>	<p>The forest manager shall:</p> <p>e) identify which of these needs and expectations it chooses to adopt to become its compliance obligations; and</p>	<p>Agreed. Clarification made to make the intent of the standard clear for the justification of decisions to include/exclude obligations. Technical content and intent is not changed.</p>

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				Agreements with community groups or non-governmental organisations;		
65.	GTFP	4.2	(e)	<p>How and why would a “stakeholder need” or “stakeholder expectation” become a “compliance obligation”?</p> <p>Compliance relates to legal and agreed standards or codes.</p>	<p>ISO explains in 6.1.3 Compliance Obligations</p> <p><i>Compliance obligations also include other interested party requirements related to its environmental management system which the organisation has to or chooses to adopt. These can include, if applicable:</i></p> <p><i>Agreements with community groups or non-governmental organisations;</i></p> <hr/> <p>Suggested wording:</p> <p>The forest manager shall:</p> <p>e) identify which of these needs and expectations it chooses to adopt to become its compliance obligations;</p>	Agreed. See 64.
66.	AFPA	4	4.2 (f)	What does “activities” mean? Not very clear – please clarify – is it related to needs and aspirations for a particular party?		Agreed. 4.2 (f) deleted. Already covered by stakeholder requirement. Redundant and confusing. Not a technical change
67.	FPC	4.2	f	Provide guidance on “specific cultural stakeholder related aspirations and activities”		Agreed. 4.2 (f) deleted. See 66.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
68.	AFPA	4	4.3		NOTE: Control and influence with a long-term commitment to sustainable forest management should be demonstrated by ensuring forest areas are replanted or re-established following harvest and remain in the defined forest area where practicable.	Agreed. Informative note was clarified to make the intent clear. Editorial
69.	AFPA	4	4.3	What does material changes actually mean? What triggers this point? Timing and frequency for notification or approval – do they need to go through an audit cycle before claims can be made? What does defined forest area mean – biggest issue? Do you need to include CB in second line?	The forest manager shall notify the certification body of proposed material changes to the scope of certification or defined forest area prior to bringing new areas /sites and/or activities into the defined forest area.	Reject. The forest manager shall determine materiality in their unique circumstances
70.	WT	4.3	List of points (a) to (f)	Mention could be made of the seven sustainability criteria, to bring them front and centre early on in the standard	“(g) refers to the seven sustainability the requirements identified in Section 11 of this Standard.”	Rejected
71.	WT	4.3	1 st paragraph	Misses the point that scope change needs CB approval	“The forest manager shall notify the certification body to seek approval for proposed material changes to the scope of certification or defined forest area prior to bringing new areas /sites and/or activities into the defined forest area. This includes all matters in Appendices A and B.”	Noted/Agreed A matter for the certification scheme but informative note updated for clarity/guidance
72.	JAS-ANZ	4.3	Note	‘Control and influence’ note is not a normative requirement. We believe it should be. The DFA should be under the certified management system for	Strengthen and revise the control and influence requirements.	Rejected

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<p>more than 1 certification cycle (that is, > 3 years). Suggested formula are:</p> <ul style="list-style-type: none"> • Minimum time based upon % of tree life up to harvesting (e.g. 25% of 30 years = 7.5 years in certificated management system or other recognised management regime (e.g FSC)) • Fixed duration (we suggest minimum of 2 certification cycles i.e. 6 years) • Sliding scale over time: e.g 1 certification cycle for trees harvested up to 2025, 2 certification cycles for trees harvested 2026 – 2030 etc. 		
73.	JAS-ANZ	4.3	2 nd to last paragraph	The forest manager would be required to advise the certification body, and receive CB approval, before bringing those areas into the DFA.	Strengthen requirement around authorisation of changes to the DFA. E.g. “The forest management shall notify the certification for their approval , or proposed material changes...’	<p>Reject.</p> <p>These matters should be handled in scheme rules if necessary.</p>
74.	SFM	4	3	SFM manage some small forest holdings over a short time frame. The implementation of 4.3 will effectively place our company at a market disadvantage. The suggestion that such forest areas may be treated as controlled sources through Chain Of		<p>Agreed. The informative note was worded, misleading and has been updated to clarify the intent of the Standard. Normative requirements</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<p>Custody (AS4707) does not fit our business model, with AS4707 not required to manage timber flows through our DFA. Such a change will come at added expense to the business which is currently capable of managing such forest areas through AS4708.</p> <p>The Trees outside Forests and Small Forest Areas and the requirement of a 'farm plan' or equivalent, will place a level of unnecessary bureaucracy and expense on small forest holders. In our experience, small forest holders are generally farmers, who engage forest brokers due to expertise in sustainable forest management including state legislative framework such as the Forest Practices System in Tasmania. The suggested change to the standard which requires a 'farm plan' or equivalent may push the cost of meeting scope requirements out of reach for many and potentially deny small forest holders access to certification markets. Forest Brokers play an important role in the forestry industry offering a level of support to small forest holders to enable environmental, economic, social and</p>		<p>and technical content is unchanged</p> <p>Rejected- committee agreed that ToF must be credible and requirements cannot be diminished</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<p>cultural outcomes which would otherwise be unrealised.</p> <p>It is disappointing that the 'smaller players' in the forestry industry have been singled out in the review process. Is this change suggesting that small forest holdings are not sustainably managed ? A small forest holder's wish to revert a plantation back to pasture will mean that the forest products cannot be sold as certified only as a controlled source, although the 20+ years process of growing the forest was sustainably managed ? Where does the measure of 'sustainable forest management' start / finish ? What is the definition of 'long term commitment' ? This shouldn't be measured by how long a forest area can or cannot sit in a DFA.</p> <p>Section 4.3 needs to be reviewed to ensure the mechanism determining 'sustainable forest management' are such that no individual or organisation is placed at a disadvantage.</p>		<p>Agreed. Poorly worded note amended. Technical content unchanged.</p> <p>Reject. The committee has achieved this objective. The informative note was misleading and revised.</p>
75.	SFM	4	3	'The forest manager shall notify the certification body of proposed material changes to the scope of		Agreed-See comment 71. Outside scope of Standard. Needs to be

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<p>certification <u>or defined forest area prior to bringing new areas /sites and/or activities into the defined forest area'</u> – What does this mean ? Every new area regardless of size ? Can this occur throughout the certificate cycle ? Is an audit required before a claim is made on each new area ?</p>		<p>agreed between forest manager and certification body. Note updated for clarity</p>
76.	GTFP	4.3	Note:	<p>“ensure forest areas remainfull duration of a certification cycle”</p> <p>This is a Restraint of Trade.</p>	<p>Remove the reference</p> <p>This applies limitations on sale of any sections or land owned by the business.</p>	<p>Agreed. Poorly worded note amended. Normative technical content unchanged</p>
77.	Forico	4	4.3	<p>NOTE: The important thing here is that certified areas remain forested. That they remain in a particular DFA is of lesser importance. Acknowledgment is needed that for some arrangements such as share-farms, future land use is at the discretion of the landowner, which does not detract from the fact that the forest has been grown and harvested in a sustainable way. Given the ban on conversion, proposed re-wording does not pave the way for loss of native forest.</p>	<p>NOTE: Control and influence with a long-term commitment to sustainable forest management should be demonstrated by ensuring forest areas <i>are replanted or re-established following harvest in all instances where harvested areas remain in the defined forest area of the forest manager/organisation.</i> See also section 11.1.5.</p> <p>Need to make sure that this wording does not conflict with 11.1.5</p>	<p>Agreed. Editorial</p> <p>Clause revised to align with 11.1.5. No changes to technical content.</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
78.	Forico	4	4.3	Prior notification of CB of changes to scope is onerous – unclear what “material changes” mean. Delete sentence or define “material changes” as an area figure, percentage of DFA figure, and/or radically different type of silviculture or species		Agreed-See 71.
79.	GTFP	4.3 second last para		Notification to <u>certification body</u> of proposed <u>material</u> changes Is the certification body Responsible Wood or the independent auditors or both? How do we determine the size of a material change?	Clarification of certification body? Material change be defined as a minimum of 500 ha in or out?	Reject. No definition required for certification body. Outside scope of Standard. Needs to be agreed between forest manager and certification body. See also 71. Unclear note causing this response has been amended. Technical content unchanged
80.	FPC	4.3	f	Note that f) adds ambiguity to the definition of scope		See 79 and also 71
81.	Hume	4.3		“Shall” demonstrate ...documented title or other legal arrangements. This statement is not reasonably practical; we will have auditors asking to see all our land titles which we do not hold (this has happened in the past)	Replace yellow highlighted with: “Documented legal land ownership or control arrangements”	Agree. Clause poorly worded and has been clarified. Technical content and requirements unchanged.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<p>This is above and beyond anything in ISO 4.3, and totally implausible.</p> <p>4.3 refers to determining the scope of the organisation,</p> <p>“The organisation shall consider... c) its organisational units, functions and physical boundaries”</p>		
82.	FPC	4.3		<p>Could we request more information as to the timing and frequency of when the certification body requires notification of new properties being brought into the DFA, and confirm if this is notification only, not approval being sought?</p> <p>Can this be done once a year prior to audit? If not, at what stage in the planning process is the notification required?</p> <p>Provide guidance as to whether properties must go through an audit cycle before claims can be made.</p>		Reject. Changes requested relate to certification arrangements and are not a standards matter
83.	Pentarch	4	4.3	Does TOF cater for those small landholdings where they have MIS plantations and now want to put back to pasture?	NOTE: Control and influence with a long-term commitment to sustainable forest management should be demonstrated by ensuring	Agreed. Note 1 amended to provide clarity

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					forest areas are replanted or re-established following harvest and remain in the defined forest area where practicable.	
84.	Hume	4.3	Note:	<p>“ensure forest areas remainfull duration of a certification cycle” This is not only a nonsensical requirement but a Restraint of Trade. This is above and beyond anything in ISO 4.3, and totally implausible.</p> <p>ISO talks about the boundaries and applicability of the environmental management system to establish scope, it does not apply limitations on sale of any sections of the business.</p>	<p>Remove the reference</p> <p>Strong support for removal as we need to be able to swap in and out freely</p>	Agreed. Poorly worded note amended. No changes to normative requirements.
85.	Hume	Second last para		<p>Prior Notification of acquisition of new areas.</p> <p>Why? This would be a breach of commercial confidentiality, not even our staff know this. Is not an annual update adequate unless the area is subject to a planned harvest?</p> <p>This is above and beyond anything in ISO 4.3, and totally implausible.</p> <p>The scope of the organisation would not change as a consequence of new</p>	<p>“prior to harvesting any timber products from new areasnot included in the defined forest area”</p> <p>Material change be defined as a minimum of 500 ha in or out</p>	<p>Agreed. This is a scheme matter outside scope of STD. Poorly worded and misleading guidance note amended.</p> <p>Reject. Standard applies to all the DFA</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				acquisitions, this seems to be excessive and related to revenue and excessive controls around the standard		
86.	Pentarch	4	4.3	What does material changes actually mean? What triggers this point? Timing and frequency for notification or approval – do they need to go through an audit cycle before claims can be made? What does defined forest area mean – biggest issue? Do you need to include CB in second line?	The forest manager shall notify the certification body of proposed material changes to the scope of certification or defined forest area prior to bringing new areas /sites and/or activities into the defined forest area.	Reject. Standard applies to all the DFA. But poorly worded note promoting this response amended
87.	Reliance	4.3		<p>“Shall” demonstrate ...documented title or other legal arrangements.</p> <p>This statement is not reasonably practical; we will have auditors asking to see all our land titles which we do not hold (this has happened in the past)</p> <p>This is above and beyond anything in ISO 4.3, and totally implausible.</p> <p>4.3 refers to determining the scope of the organisation,</p> <p>“The organisation shall consider.... c) its organisational units, functions and physical boundaries”</p>	Replace yellow highlighted with: “Documented legal land ownership or control arrangements”	Agreed. See 81

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
88.	Reliance	4.3	Note:	<p>“ensure forest areas remain for at least the full duration of a certification cycle”</p> <p>This is an impractical and an inflexible requirement, including a restraint of trade.</p> <p>Limits flexibility for a forest manager or group scheme member to make longer term decisions about best land use in cases of poorly performing planation’s.</p> <p>This is above and beyond anything in ISO 4.3, and totally implausible.</p> <p>ISO talks about the boundaries and applicability of the environmental management system to establish scope, it does not apply limitations on sale of any sections of the business.</p>	Remove the reference as we need to be able to swap in and out freely	<p>Agreed. Poorly worded guidance note clarified. No changes to normative wording.</p>
89.	Reliance	4.3	Second last para	<p>Prior Notification of acquisition of new areas.</p> <p>Why? This would be a breach of commercial confidentiality, not even our staff know this. Is not an annual update adequate unless the area is subject to a planned harvest?</p>	<p>“prior to harvesting any timber products from new areasnot included in the defined forest area”</p> <p>Change: Material change be defined as a minimum of 500 ha in or out.</p>	<p>Agreed. See 85</p> <p>Reject. See 85</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<p>The forest manager shall notify the certifying body of proposed material changes to the scope of certification or defined forest area prior....</p> <p>This is above and beyond anything in ISO 4.3, and totally implausible.</p> <p>The scope of the organisation would not change as a consequence of new acquisitions, this seems to be excessive and related to revenue and excessive controls around the standard</p>		
90.	Forico	4	4.4		If a Forest Manager is certified to any of the ISO suite of Management System Standards, then the Section [currently numbered] 4.4 and the sections [currently numbered] 5 – 10 will be considered compliant.	Noted. Factually correct.
91.	Forico	5	5.1	Use of term 'top management'	<i>The forest manager shall</i>	Agreed. Changed to senior. Editorial
92.	AFPA	5	5.1	For 5.1, 5.21 5.3 the sentence should start with "Forest management shall"	Forest management shall demonstrate leadership and commitment with respect to sustainable forest management by:	Agreed. Changed to senior. Editorial
93.	Hume	5		<p>Reference to Top Management</p> <p>The current definition of Top Management will not work.</p>	Fix Definition of Top Manager	Agreed. Changed to senior. Editorial

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<p>AFS has adopted the ISO definition word for word.</p> <p>And will inherit the clumsy and impractical implications</p>		
94.	Reliance	5		<p>Reference to Top Management</p> <p>The current definition of Top Management will not work.</p> <p>AFS has adopted the ISO definition word for word.</p> <p>And will inherit the clumsy and impractical implications</p>	Change: Definition of Top Manager	Agreed. Changed to senior. Editorial
95.	Forico	5	5.2	Use of term 'top management'	<i>The forest manager shall ensure the establishment, implementation and maintenance of a sustainable forest management policy, applicable to the defined scope...</i>	Agreed. Changed to senior. Editorial
96.	SCION	5.2	b	The SFM policy needs to also include clear sustainability <u>objectives</u> within the framework outlined in 5.2.b. It is not enough to just have a framework.	Additional subclause after b: <i>contains clear sustainability objectives that are periodically updated</i>	Reject. Already required by other clauses
97.	WT	5.2	List of points (a) to (f)	Mention could be made again of the seven sustainability criteria, to bring them front and centre early on in the standard	"(g) the seven sustainability the requirements identified in Section 11 of this Standard."	Reject. Unnecessary duplication.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					*** This might be better as (f) as continual improvement is best as the final point.	
98.	Reliance	5.3		<p>It is not “Top Managements” responsibility to “ensure” roles and responsibilities are communicated.</p> <p>AFS has adopted the ISO definition word for word.</p> <p>And will inherit the clumsy and impractical implications</p>	Change: top Management to “the Forest Manager”	Agree. Changed to senior management. Editorial.
99.	Hume	5.3		<p>It is not “Top Managements” responsibility to “ensure” roles and responsibilities are communicated.</p> <p>AFS has adopted the ISO definition word for word.</p> <p>And will inherit the clumsy and impractical implications</p>	Change top Management to “the Forest Manager”	Agree. Changed to senior management. Editorial
100.	SFM	6	1.1 G	Abnormal conditions – What is abnormal ? This needs to be defined.		Reject. Common terms are clearly understood-conditions that are not normal
101.	FPC	6.1.1	g	In ISO 14001, the word abnormal refers to start-up, shutdown and maintenance operations which is not apparent in this context. “Abnormal” sounds like emergency or exceptional circumstances.	Suggest “Abnormal conditions” be changed to “Conditions outside of normal operations”, or provide a definition of abnormal conditions.	Reject. See 99

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
102.	AFPA	6	6.1.1 (g)	Please provide definition for abnormal – sounds like emergency -		Reject. See 99
103.	FPC	6.1.1	h	Cumulative impacts at a landscape or catchment scale. Guidance as to how is this quantified?		Reject. Not considered necessary but clause clarified to clearly communicate intent. Editorial.
104.	PENTARCH	6.1.1	h	How do you quantify cumulative impacts?		Reject. Not considered necessary but clause clarified to clearly communicate intent. Editorial.
105.	AFPA	6	6.1.1 (h)	How do you quantify cumulative impacts		Reject. Not considered necessary but clause clarified to clearly communicate intent. Editorial.
106.	Reliance	6.1.2		<p>“The forest manager shall maintain documented information of its compliance obligations.” This is an antiquated imposition and not the position of ISO, it harks back to mind numbing registers that know body reads.</p> <p>ISO 14001 6.1.3 “The organisation determines, at a sufficiently detailed level, the compliance obligations it identified.....”</p>	<p>Add: The forest manager shall maintain a system that demonstrates its compliance obligations.</p> <p>Approaches may vary between the businesses as to how this is satisfied</p>	Reject. The Standard does not require a register but compliance obligations must be documented

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<p>Modern standards are moving away from Lists and Registers and moving to a system approach to manage Risk.</p>		
107.	Hume	6.1.2		<p>“The forest manager shall maintain documented information of its compliance obligations.”</p> <p>This is an antiquated imposition and not the position of ISO, it harks back to mind numbing registers that nobody reads.</p> <p>ISO 14001 6.1.3</p> <p>“The organisation determines, at a sufficiently detailed level, the compliance obligations it identified.....”</p> <p>Modern standards are moving away from Lists and Registers and moving to a system approach to manage Risk.</p>	<p>The forest manager shall maintain a system that demonstrates its compliance obligations.</p>	<p>Reject. The Standard does not require a register but compliance obligations must be documented</p>
108.	GTFP	6.1.2		<p>“The forest manager shall maintain documented information of its compliance obligations.”</p>	<p>The forest manager shall maintain a system that demonstrates its compliance obligations.</p> <p>ISO 14001 6.1.3</p> <p>“The organisation determines, <u>at a sufficiently detailed level</u>, the compliance obligations it identified.....”</p>	<p>Reject. The Standard does not require a register but compliance obligations must be documented</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
109.	CFMMEU	7.2		Simple change to 7.2 to reflect “forest workers”		Reject. 7.2 covers more than just forest workers
110.	SCION	7.3	a	Persons need to be aware of more than just the existence of an SFM policy	The sustainable forest management policy <i>and objectives</i>	Reject. Covered in 6.2.1
111.	PENTARCH	7.4.1			a) considering and incorporating as appropriate stakeholder feedback into the forest management system; and	Agreed. This already was required, but clarification and highlighting considered appropriate. Editorial clarification.
112.	AFPA	7	7.4.1		(a) considering and incorporating, as appropriate, stakeholder feedback into the forest management system; and	Agreed. This already was required, but clarification and highlighting considered appropriate. Editorial clarification.
113.	GTFP	7.4.1	Second (a)	“(a) considering and incorporating stakeholder feedback into the FMS” What if we do not agree, or if it’s malicious?	“considering and incorporating, as appropriate , stakeholder feedback	Agreed. This already was required, but clarification and highlighting considered appropriate. Editorial clarification.
114.	HQP	7	7.4.1	Numbering needs addressing	There are several 7.4.1 a,b,c’s	Agreed. Editorial corrections made.
115.	HQP	7.4.1			(a) considering and incorporating as appropriate stakeholder feedback into the forest management system; and	Agreed. This already was required, but clarification and highlighting considered appropriate. Editorial clarification.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
116.	Hume	7.4.1	Second a) on page, third a) for Section?	<p>“considering and incorporating stakeholder feedback”</p> <p>What if we don’t agree, its financially and physically impractical or if it’s malicious?</p> <p>ISO 14001 7.4 Communication</p> <p>Does not reference “incorporating” communications</p>	<p>“considering and incorporating, as appropriate, stakeholder feedback</p>	<p>Agreed. This already was required, but clarification and highlighting considered appropriate. Editorial clarification.</p>
117.	STT	7.4		<p><i>You cant incorporate all feedback into system.</i></p> <p><i>considering and incorporating stakeholder feedback into the forest management system; and</i></p>	<p>(b) considering stakeholder feedback</p> <p>(c) incorporating this feedback as appropriate into the forest management system;</p>	<p>Agreed. This already was required, but clarification and highlighting considered appropriate. Editorial clarification.</p>
118.	Reliance	7.4.1	Second a) on page, third a) for Section?	<p>“considering and incorporating stakeholder feedback”</p> <p>What if we don’t agree, like it or if it’s malicious?</p> <p>ISO 14001 7.4 Communication</p> <p>Does not reference “incorporating” communications</p>	<p>Add “considering and incorporating, as appropriate, stakeholder feedback</p>	<p>Agreed. This already was required, but clarification and highlighting considered appropriate. Editorial clarification.</p>
119.	SFM	7	4.3	<p>Change wording – ‘The forest manager shall provide notification to affected stakeholders prior to the commencement of any operations’</p>	<p>The forest manager shall make all reasonable efforts to identify and notify affected stakeholders prior to</p>	<p>Agreed. Improved wording accepted.</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					the commencement of any operations...	
120.	AFPA	7	7.4.3		The forest manager shall make all reasonable efforts to identify and notify affected stakeholders prior to the commencement of any operations that are likely to directly impact them.	Agreed. Improved wording accepted.
121.	HQP	7.4.3			The forest manager shall make all reasonable efforts to identify and notify affected stakeholders prior to the commencement of any operations that are likely to directly impact them.	Agreed. Improved wording accepted.
122.	Hume	7.4.3		<p>The forest manager shall provide notification to affected stakeholders</p> <p>We do this but it is not always possible, more often than not we cannot get neighbour information due to Local Government privacy policy. ISO 7.4 b)</p> <p>Communication should be appropriate, so that information meets the needs of relevant interested parties, enabling them to participate:</p>	<p>The forest manager shall use reasonable endeavours to notify affected stakeholders</p> <p>our ability to do this is limited through privacy legislation</p>	Agreed. See comments above
123.	GTFP	7.4.3		“The forest manager shall provide notification to affected stakeholders”	The forest manager shall use best endeavours to notify affected stakeholders	Agreed. See comments above

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				We do this but it is not always possible, more often than not we cannot get neighbour information due to Local Government privacy policy.	This is limited through privacy legislation; all we can do is best endeavours.	
124.	Reliance	7.4.3		<p>The forest manager shall provide notification to affected stakeholders</p> <p>We do this but it is not always possible, more often than not we cannot get neighbour information due to Local Government privacy policy.</p> <p>ISO 7.4 b)</p> <p>Communication should be appropriate, so that information meets the needs of relevant interested parties, enabling them to participate:</p>	<p>Add: The forest manager shall use best endeavours to notify affected stakeholders</p> <p>limited through privacy legislation, all we can do is best endeavours</p>	Agreed. See comments above
125.	STT		7.4.3	The forest manager shall provide notification to affected stakeholders prior to the commencement of any operations that are likely to direct impact them.	The forest manager shall make all reasonable efforts to identify and notify affected stakeholders prior to the commencement of any operations that are likely to directly impact them.	Agreed. See comments above
126.	FPC	7.4.3	e	Can Responsible Wood provide the public audit report summaries on their website and the forest manager refer to these?		Reject. Not a matter for the Standard
127.	JAS-ANZ	7.4.3	d and e	An existing certification and audit report may not be yet available and/or applicable where the forest activities	Include 'where applicable', after (d) and (e).	Reject

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				are in a new area remote from other certified forest activities.		
128.	PENTARCH	7.4.3			The forest manager shall make all reasonable efforts to identify and notify affected stakeholders prior to the commencement of any operations that are likely to directly impact them.	Agree. See comments above
129.	JAS-ANZ	7.4.3/7.4.4		The concept of 'publicly available' will need to include evaluation of the appropriate means of making the information publicly available. A website might work well in some instances, but not all.	Include a requirement for evaluation of options and determination of an appropriate means of achieving 'publicly available'. This could be agreed with the range of stakeholders.	Reject. Matter for the scheme rules, not the Standard
130.	Forico	7	7.4.1	a) considering and incorporating stakeholder feedback	considering and incorporating stakeholder feedback	Agreed. Other clauses already cover this.
131.	Forico	7	7.4.3	Notification of activities – not always possible given privacy laws and best intention	<i>The forest manager shall make all reasonable efforts to identify and notify affected stakeholders prior...</i>	Agreed. See above
132.	FPC	7.4.4	d	Provide guidance on "forest values"		Reject
133.	AFPA	7	7.4.4 (d)	Give guidance on the description of forest values		Reject
134.	JAS-ANZ	7.4.5	Final sentence	The DFA definition does not state that this solely pertains to that which is certified. Hence this sentence needs to include the concept of certification.	Change to 'The forest manager shall not make certification claims on materials sourced from outside of the defined forest area subject to certification '	Reject. Not need, adequately described in section 11.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
135.	Forico	7	7.45	Last sentence is the most important	Move “The forest manager shall not make certification claims...” sentence to the top of this section	Reject. Not need, adequately described in section 11.
136.	FPC	7.4.5	Note	Query that these claims refer to AFS and ANZFS and not SFM?		Reject. Refers to AS/NZS forestry standard
137.	FPC	8.1	a	Provide guidance on “sustainability requirements”. Does this refer to the elements in section 11?		Agree. Added “Section 11”. Editorial
138.	JAS-ANZ	8.1		Its not clear how the standard could or shouldn't be applied to matters like nurseries – which could be within or outside the DFA. A note in this section would be useful.	Consider including note for consideration of activities ancillary to the DFA activities (e.g. nurseries).	Reject. Covered by infrastructure section.
139.	PENTARCH	8.1	a	Does this refer to section 11? If so, please make it clear in standard		Agree. See 137
140.	AFPA	8	8.1 (a)	<i>Does this refer to section 11? If so please make it clear in standard</i>		Agree. See 137
141.	OFO	9.1.1		<i>The forest manager shall ensure that calibrated or verified monitoring and measuring equipment is used and maintained, as appropriate.</i> What value this add to the Standard? Is it necessary?	Suggest removing	Reject. In some circumstances accurate measurements are necessary.
142.	Reliance	9.1.1		Make available to interested parties monitoring methodology and results??? Where did this come from?	Delete: Inconsistent with ISO 14001. Also in breach of section 7.5.3 b)	Reject. Consistent with other schemes. Only on reasonable request.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<p>This is above and beyond anything in ISO 9.1.1, and totally implausible</p> <p><i>The methods used by the organisation to monitor and measure, analyse and evaluate should be defined in the environmental management system.</i></p>	<p>Breach of privacy and IP rights of individual companies to include any interested parties, suggest collaborative parties</p> <p>Scientifically valid – needs to be carefully defined so we know what we are in for</p>	<p>Agreed- delete scientifically. Editorial</p>
143.	GTEP	9	9.1.1 last para	<p>Make available to interested parties monitoring methodology and results or monitoring</p> <p>What is the intent of this?</p>	<p>Breach of privacy and IP rights of individual companies to include any interested parties, suggest collaborative parties</p>	<p>Reject</p>
144.	SFM	9	1.1	<p>'The forest manager shall make available to interested parties the monitoring methodology and results of monitoring, (excluding confidential information), upon reasonable request.' – What does reasonable request mean ?</p>		<p>Reject. To be determined by forest manager</p>
145.	AFPA	9	9.1.1	<p>The forest manager shall make available to interested parties the monitoring methodology and results of monitoring, (excluding confidential information), upon reasonable request. - <i>What does reasonable mean? Could create issue around differing opinions as to what</i></p>		<p>Reject. To be determined by forest manager</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<i>reasonable means, it would be better if it was clearer.</i>		
146.	Hume	9	9.1.1	<p>Make available to interested parties monitoring methodology and results???</p> <p>This is above and beyond anything in ISO 9.1.1, and totally implausible</p> <p>The methods used by the organisation to monitor and measure, analyse and evaluate should be defined in the environmental management system.</p>	<p>Delete</p> <p>Inconsistent with ISO 14001. Also in breach of section 7.5.3 b)</p> <p>Breach of privacy and IP rights of individual companies to include any interested parties, suggest collaborative parties</p> <p>Scientifically valid – needs to be carefully defined so we know what we are in for</p>	Reject. To be determined by forest manager
147.	FPC	9.1.1		<p>Some concern regarding monitoring methodology and results to be made available on request.</p> <p>Provide guidance on “reasonable request”</p>		Rejected. To be determined by forest manager
148.	GTEP	9.1.1	(b)	<p>Scientifically valid monitoring</p> <p>Needs to be defined</p>	<p>Scientifically valid – needs to be clearly defined</p> <p>What about <u>tried and tested methods</u>?</p>	Agree. Clarification made in the definitions. Science always included tried and tested. Not a technical change.
149.	Pentarch	9.1.1		<p>What does reasonable mean? Could create issue around differing opinions as to what reasonable means, it would be better if it was clearer</p>	<p>Remove “The forest manager shall make available to interested parties the monitoring methodology and results of monitoring, (excluding</p>	Rejected. To be determined by forest manager

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					confidential information), upon reasonable request.”	
150.	Forico	9	9.1.2	Capitalisation of Forest Manager is inconsistent between 9.1.2 and 9.2	If permissible under JAS-ANZ rules, suggest capitalising Forest Manager throughout	Reject. Corrected in 9.1.2
151.	Timberlands	9.2		Clause 9.2 could be interpreted that the company must have an audit process for every single item of the standard and the company’s own management system which is impractical – and unnecessary for some requirements.	Clarify in the wording that the expectation is to undertake auditing of ‘relevant’ requirements – or add a guidance note to that effect.	Agreed. Editorial clarification made
152.	Timberlands	9.3		Clause 9.3 suggests a single all up management review of every aspect of the system is required every year which is impractical when applied to all parts of the system (H&S, Environmental, accounting, operations BMP’s, HR, forest records systems etc). In reality for most large companies relevant parts of the system are selected for more comprehensive review at periodic intervals. An all up review of every part of the system every single year is excessive.	Again make this clear that the expectation there is a system to review relevant parts of the system each year, with overall reviews at broader intervals.	Reject The STD does not require this. Covered by note
153.	Reliance	9.3		Again reference to top management	Change to: Senior Management or “at a high level” Fixed if top management definition is fixed	Agreed. Editorial. Top management changed to Senior. Definition for senior management

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<p>We can't see the Premier reviewing FMS, or a company board for that matter</p> <p>ISO 9.3 does not refer to "Top Management" Here</p> <p>"The management review should be at a high-level; it does not need to be an exhaustive review of detailed information."</p>		included. Not a technical change
154.	Reliance	9.3	F	<p>The word "relevant" is too general, and implies Senior Management has time to review all communications – not realistic</p> <p>As above "The management review should be at a high-level; it does not need to be an exhaustive review of detailed information."</p>	Add: Review trends in relevant communications from stakeholders, including complaints	Agreed. See 153
155.	GTFP	9.3	(f)	<p>The word "relevant" is too general, and implies Senior Management has time to review all communications – not realistic</p>	<p>Review trends in relevant communications from stakeholders, including complaints</p> <p><i>"The management review should be at a high-level; it does not need to be an exhaustive review of detailed information."</i></p>	Agreed. See comments above

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
156.	Hume	9.3	F	<p>The word “relevant” is too general, and implies Senior Management has time to review all communications – not realistic</p> <p>As above “The management review should be at a high-level; it does not need to be an exhaustive review of detailed information.”</p>	Review trends in relevant communications from stakeholders, including complaints	Agreed. Text was confusing and misleading. The intent was always to review trends.
157.	Hume	9.3	Again reference to top management	<p>We can’t see the Premier reviewing FMS, or a company board for that matter</p> <p>ISO 9.3 does not refer to “Top Management” Here</p> <p>“The management review should be at a high-level; it does not need to be an exhaustive review of detailed information.”</p>	<p>Change to Senior Management or “at a high level”</p> <p>Fixed if top management definition is fixed</p>	Agreed. See 153
158.	Timberlands	10.2	b	The requirement to come up with an action to ensure a non-conformity never reoccurs is a high bar, particular when the non-conformity is the result of human error. While we understand the rationale we believe it is unrealistic.	Amend the wording to ‘minimise the chance of reoccurrence’ or similar to recognise the despite the best of intentions and systems, from time to time human error can occur.	Reject No change required.
159.	SCION	11.1		There are many ecosystem services e.g. timber, carbon, erosion control,	Reword sustainability Objective 1 to reflect the intent of the section.	Agree- ED (check wording of Meta-Std.). Wording of

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<p>reduced nutrient impacts, recreation, biodiversity, aesthetics, food, medicines. This objective purports to cover ecosystem services, but only covers carbon.</p> <p>Other ecosystem services are covered elsewhere: maintaining and increasing productive capacity is covered in 11.5 as is biodiversity in 11.3 and soil and water in 11.4. Note carbon was its own criterion in the previous standard and conversion/regeneration/genetics fitted under biodiversity.</p> <p>This Objective feels a little forced as laid out.</p>	<p><i>'Sustainability Objective 1: To maintain or increase forest health and value by maintaining or enhancing the forest resource and carbon stocks, and minimising greenhouse gas emissions'</i></p>	<p>Meta-Standard is clearer and simpler- adopted.</p> <p>No change to overall performance expectations. Editorial clarification.</p>
160.	HQP	11	11.1.1	<p>Need to allow for circumstances out of forest managers control (climate change, natural disasters s/a drought) which will impact carbon stocks. Also need to allow option for decreases to dfa (reducing carbon stocks)</p>	<p>NOTE 2: Dispensation can be allowed for reduced carbon stocks associated with clearing woody weeds and undesired tree species, disastrous events, highest and best use rationalisation and changes to silvicultural regime.</p>	<p>Agree. Clause 11.1.1 Note 2- updated for clarification. Not a technical change.</p>
161.	Timberlands	11.1.1		<p>It is a little hard to see how clause 11.1.1 can be assessed by the auditor given it is measured over the longer term (successive rotations). In reality carbon stocks will fluctuate from year to year as areas of forest are harvesting and replanted. Timberlands</p>	<p>Amend that in plantations the average long term carbon stocks should not change due to deforestation.</p>	<p>Reject-Already covered by STD.</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				is concerned it could be used to prevent legitimate changes to the forest management regime to respond to market requirements, such as reducing the average harvest age or altering stocking rates. This may also prevent creating natural areas (such as tussock, heathlands, dunelands or shrublands, riparian setbacks) from plantations to satisfy other environmental (i.e. biodiversity or stream quality) objectives.		
162.	AFPA	11	11.1.1	Consistent with the PEFC Standard	The forest manager shall aim to maintain or increase average carbon stock on the defined forest area over successive harvest cycles.	Ed. Agree. Unit was typo.
163.	AFPA	11	11.1.1	These managers should demonstrate their intention to maintain tree cover and carbon stocks across their managed area over the long term. <i>Does this relate to private landowners where we source controlled wood or just the defined forest area? For lease and freehold? Can this be clearer? Does this need to be part of the lease with landholders? What is the defined forest unit? Unit should be changed to area – a mistake in the drafting.</i>		Agreed. Ed.-See 162.
164.	AFPA	11	11.1.1		Dispensation can be allowed for reduced carbon stocks associated	Agreed. Ed-Refer 160

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					with clearing woody weeds and undesired tree species, disastrous events, highest and best use rationalisation and changes to silvicultural regimes.	
165.	JAS-ANZ	11.1		Is the objective too aspirational? The reality is that for many forests that degradation in conflict with the objective will arise.	Should the objective be re-pitched with a time scale?	Reject
166.	Pentarch	11.1.1 Second part of note 1		Does this relate to private landowners where controlled wood is sourced or just the defined forest area? For lease and freehold? Can this be clearer? Does this need to be part of the lease with landholders?	These managers should demonstrate their intention to maintain tree cover and carbon stocks across their managed area over the long term.	Agreed. See 160
167.	FPC	11.1.1		Provide guidance on “defined forest unit” in relation to this calculation of carbon stocks.		Agreed. Ed. See 160
168.	Pentarch	11.1.1			Dispensation can be allowed for reduced carbon stocks associated with clearing woody weeds and undesired tree species, disastrous events e.g. bushfires or flooding, highest and best use rationalisation and changes to silvicultural regime.	Agreed. Ed. See 160
169.	WT	11.1.1	NOTE 1	Stick to PEFC terms by replacing “urban” with “settlement”. Nowhere does PEFC use “urban”	Forests (in agriculture or settlement)	Rejected. The terms used make sense in an Australian perspective.
170.	Hume	11.1.2	B	The sentence does not make sense	The forest manager shall consider the impacts of climate change on	Accept. Editorial change made

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					<p>the forests and forest management practices.</p> <p>Add “forest management practices”, link back to change of land use point and ability to get out of trees if necessary</p>	
171.	Timberlands	11.1.2	(a)	The requirement to minimise anthropogenic greenhouse gas emissions is acceptable, but it does need to be recognised that the bulk of emissions related to forestry relate to transport, machinery and shipping, and this is well beyond the control of individual forestry companies to resolve – governments have a role and even at that level it is a significant challenge.	Add an advice note to clarify the expectations of a forestry company.	Rejected. Adequately covered elsewhere in the STD. No need to add note.
172.	GTFP	11.1.2	(b)	The sentence does not make sense	<p>The forest manager shall consider the impacts of climate change on the forests and forest management practices.</p> <p>Add “forest management practices”, link back to change of land use point and ability to get out of trees if necessary.</p>	Accept. Editorial change made
173.	Reliance	11.1.2	B	The sentence does not make sense	The forest manager shall consider the impacts of climate change on	Accept. See 170

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					<p>the forests and forest management practices.</p> <p>Add: "forest management practices", link back to change of land use point and ability to get out of trees if necessary</p>	
174.	SFM	11	1.2 B	'The forest manager shall consider the ability of forests to adapt to climate change' ? What is the measure of this ?		Rejected
175.	OFO	11.1.2	b	<p><i>The forest manager shall consider the ability of forests to adapt to climate change.</i></p> <p>Climate Positive Practices section seems tokenistic and unnecessary. The heading is unscientific given the trivial impact of plantation forestry on global carbon dioxide emissions and therefore climate. There could be practices to optimise carbon sequestration, but these are already captured in sustainable practices and do not need to be re-iterated in a separate section. 11.1.2 (b) should not be included as it does not improve the Standard.</p>	Suggest removing	<p>Reject. This is a PEFC requirement.</p> <p>Guidance will be provided at a future date.</p>
176.	Pentarch	11.1.2	b	How is this audited? By consideration of alternative species? Is that is what is meant? Long term		Reject.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				rainfall predictions. Forest management practices – examples?		Guidance will be provided at a future date if necessary
177.	AFPA	11	11.1.2 (b)	How is this audited? By consideration of alternative species? Is that is what is meant? Long term rainfall predictions. Forest management practices – examples?		Reject. Guidance will be provided at a future date if necessary
178.	SCION	11.1.3 and 11.14		'Conversion of natural ecosystems' could include degraded native forest, degraded native forests are still natural ecosystems. Both activities require very similar/common considerations – legality, biodiversity values etc. But note 11.1.3.b precludes native vegetation conversion to plantations post 2006 therefore rendering 11.1.4 not possible. 11.1.4 – as written conflicts with 11.1.3.b, but there is value in revising to consider the opportunities to enhance/restore the degraded forest through management or enrichment planting – fitting the definition of planted forest rather than plantation (intensively managed stands of only one or two species - FAO)	Consider combining these two clauses and consider the implications of classification of degraded natural forest as a 'non-natural ecosystem'. Delete 11.1.4 as it is not possible under 11.1.3.b Or, rework objective 11.1.4 as 'restoration of degraded native forest' This would fit well with new Objective 1 wording	Agreed. Change forest to vegetation Covered by 11.2.9 covers restotation Changed definition for degraded native vegetation The committee considers this a clarification.
179.	Forico	11	11.1.2(b)	Give examples of how to consider climate change	<i>e.g. species or provenance selection, changes to silviculture, rotation length, etc</i>	Reject.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
						Guidance will be provided at a future date if necessary
180.	SFM	11	1.3 iii	What is a 'recognised offset'? Not defined		Agreed. Editorial- Add "legally recognised"
181.	Reliance	11.1.3	a) 2	Affected stakeholder input into conversion. At What Scale? Landscape? Property? A few trees on a road easement?	Change: This needs to be tidied up; and should not capture under any circumstance the legal removal of native vegetation for infrastructure improvements such as fences, roads and tracks and main road access. There needs to discussion on scale as incidental scale should not need stakeholder consultation (provided it is legal), such as clearing road alignments or boundary lines and firebreaks	Reject. Adequately covered
182.	Forico	11	11.1.3(a)(ii)	Conversion of very small areas for infrastructure/operational maintenance should not need to be subject to stakeholder consult	Mention SCALE of activity in some way	Reject. Adequately covered
183.	GTFP	11.1.3	(a) (ii)	Affected stakeholder input into conversion. At What Scale? Landscape? Property? A few trees on a road easement?	This needs to be tidied up; and should not capture the <u>legal</u> removal of native vegetation for infrastructure improvements such as fences, roads and tracks and main road access.	Reject. Adequately covered

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					<p>There needs to discussion on scale as incidental scale should not need stakeholder consultation (provided it is legal), such as clearing road alignments or boundary lines and firebreaks.</p>	
184.	Hume	11.1.3	a) 2	<p>Affected stakeholder input into conversion.</p> <p>At What Scale?</p> <p>Landscape? Property? A few trees on a road easement?</p>	<p>This needs to be tidied up; and should not capture under any circumstance the legal removal of native vegetation for infrastructure improvements such as fences, roads and tracks and main road access.</p> <p>There needs to discussion on scale as incidental scale should not need stakeholder consultation (provided it is legal), such as clearing road alignments or boundary lines and firebreaks</p>	<p>Reject. Adequately covered</p>
185.	Forico	11	11.1.3(b)	<p>NOTE 1 - awkward wording ("behoven")</p>	<p><i>Where the defined forest area contains areas which have been subject to a "conversion of native vegetation to plantations after 31 December 2006", and there has been a subsequent change(s) to ownership and/or forest manager, the current forest manager should maintain documented information regarding the areas concerned and date(s) of conversion if known.</i></p>	<p>Agreed. Editorial Note clarified</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
186.	JAS-ANZ	11.1.3	b	Use of 'enterprise' is limiting.	Substitute 'enterprise' for 'organisation' as per definition at 3.55.	Agreed. Editorial. Use of consistent terminology.
187.	JAS-ANZ	11.1.3	b	How should this clause be applied by the CB. If an organisation was directly or indirectly involved in conversion after Dec 2006 does not prevent eligibility for certification?	Clarification required.	Agreed. Note updated to clarify intent. Editorial clarification.
188.	JAS-ANZ	11.1.3 11.3.2	iii d	"Recognised offsets" possibly requires a definition	Consider including definition of "Recognised offsets"	Agreed. See 180
189.	Forico	11	11.1.4	Need to link this section to the section before	The forest manager shall demonstrate that where conversion of degraded native forests to forest plantations is being considered <i>within the parameters outlined in 11.1.3</i> , it shall add economic, ecological, social and/or cultural value.	Reject
190.	Reliance	11.1.4	B	As 11.1.3. What Scale?	Change: Again This needs to be tidied up; should not capture under any circumstance the legal planting of neglected areas of forests subject to past clearing and natural regeneration. Agreed	Reject
191.	GTFP	11.1.4	(b)	As above. What Scale?	This needs to be tidied up; should not capture the legal planting of neglected areas of forests subject to past clearing and natural regeneration.	Reject

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
192.	Hume	11.1.4	B	What Scale?	Again This needs to be tidied up; should not capture under any circumstance the legal planting of neglected areas of forests subject to past clearing and natural regeneration.	Reject
193.	Forico	11	11.1.5	Need to make sure that this wording does not conflict with the NOTE under 4.3	<i>See also section 4.3</i>	Agreed. Editorial Add reference to 4.3
194.	AFPA	11	11.1.5	Note: Where the responsibility or choice to reforest rests with future land managers, the forest manager is required to comply with all other aspects of this Standard, but is not able to bind these future landowners. <i>This should reference 4.3 and 4.3 should reference 11.1.5 for consistency</i>		Agreed. Editorial Add reference to 4.3
195.	JAS-ANZ	11.1.5		The handback of land post harvesting requirements (subclause b) could be usefully strengthened. We recommend that land be retained under contractual arrangements (of which a number of configurations could be acceptable) to ensure management obligations are achieved	Strengthen post-harvest arrangements.	Agreed. Editorial Added new sentence to clarify processes where areas are not reforested. No change to intent of the clause

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<p>for a suitable period (e.g. a certification cycle, replanting, demonstration of stability). Harvesting followed by withdrawal from certification is not consistent with the overall tenor and purpose of the certification standard. This becomes more problematic where the DFA is only subject to certification for a minimum period of time ahead of harvesting.</p>		
196.	SFM	11	1.5 B	<p>If an area is to be reforested by another land manager, does the area have to remain in the forest manager's DFA for full certificate cycle before exiting and then the reforest works can commence ?</p> <p>'Reverted to former land use' – How does this comply with Section 4.3 ? This is confusing !</p>		Agreed. See 195
197.	Reliance	11.1.5	Reforestation	<p>“The forest manager shall reforest after timber harvesting.”</p> <p>This precludes the “best usage” principal of land use and would deny the ability to sell plantation back into Agriculture, lifestyle and or Urban Development.</p>	<p>Delete whole section</p> <p>Does not facilitate private forestry practicing best land use options.</p> <p>Should not apply to plantations – HBU, water licence forced reductions, freedom of private land holders to change land use could be precluded, and is not acceptable</p>	Agreed. See 195

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
198.	Pentarch		11.1.5	This should reference 4.3 and 4.3 should reference 11.1.5 for consistency	Note: Where the responsibility or choice to reforest rests with future land managers, the forest manager is required to comply with all other aspects of this Standard but is not able to bind these future landowners.	Agreed. See 195
199.	GTFP	11.1.5	Re-forestation	“The forest manager shall reforest after timber harvesting.” This precludes the “best usage” principal of land use and would deny the ability to sell plantation back into Agriculture, lifestyle and or Urban Development.	This does not facilitate private forestry practicing best land use options. Should not apply to plantations – SA water licence forced reductions and restrictions	Agreed. See 195
200.	Hume	11.1.5	Reforestation	“The forest manager shall reforest after timber harvesting.” This precludes the “highest and best usage” principal of land use and would deny the ability to sell plantation back into Agriculture, lifestyle and or Urban Development.	Delete whole section Does not facilitate private forestry practicing best land use options. Should not apply to plantations – HBU, water licence forced reductions, freedom of private land holders to change land use could be precluded, and is not acceptable	Agreed. See 195
201.	AFPA	11	11.2.2 (a)	<i>Needs to be some recognition that some weeds are beyond control</i>	(d) The forest manager shall identify invasive species and take action to manage, control or eradicate them (as appropriate) within the defined forest area.	Agreed. Added clarification- use word manage. Editorial

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
202.	Timberlands	11.2.2	(a)	Some pest species are already so widespread in the landscape that full control or eradication is well beyond the control of an individual property owner when reinvasion is constantly occurring from outside of the forest.	Add a comment that indicates this requirement applies 'where practical' or 'where necessary'.	Agreed. Added clarification- use word manage. Editorial
203.	HQP	11	11.2.2a	Needs to be some recognition that some weeds are beyond control	(e) The forest manager shall identify invasive species and take action to manage, control or eradicate them (as appropriate) within the defined forest area.	Agreed. Added clarification- use word manage. Editorial
204.	Pentarch	11.2.2	a	Needs to be some recognition that some weeds are beyond control	The forest manager shall identify invasive species and take action to manage, control or eradicate them (as appropriate) within the defined forest area.	Agreed. Added clarification- use word manage. Editorial
205.	Pentarch	11.2.2	b		The forest manager shall constrain the spread of invasive species and plantation species from within the DFA into adjacent areas.	Agreed. Added clarification- use word manage. Editorial
206.	AFPA	11	11.2.2 (b)		The forest manager shall constrain the spread of invasive species and plantation species from within the DFA into adjacent areas.	Agreed. Added clarification- use word manage. Editorial

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
207.	HQP	11	11.2.2b		(f) The forest manager shall constrain the spread of invasive species and plantation species from within the DFA into adjacent areas.	Agreed. Added clarification- use word manage. Editorial
208.	OFO	11.2.4	a	<p><i>The forest manager shall have documented risk assessments for the pesticides it uses and implement preventative measures to minimize adverse social and environmental impacts.</i></p> <p>Forest managers should just ensure they comply with existing legislation and codes. These are comprehensive and rigorously tested and developed. There is no need for further regulation through the standard.</p>	Suggest removing	Reject
209.	Hume	11.2.4	a & b	Invasive species and take action to control or eradicate...	<p>Whilst the words are very similar to the previous standard there are issues:</p> <p>a) “take action to control or eliminate”, the issue in NSW and likely other parts of Australia is that some invasive species are “beyond control”, and this is reflected in the NSW’s governments policy on biosecurity. For Example Blackberry</p>	Agreed. Editorial. See 201. Wording clarified by use of term “manage”.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					<p>is a weed of National Significance yet the NSW Guidelines for the Central Tablelands is: Regional Recommended Measure* Land managers should mitigate the risk of new weeds being introduced to their land. Land managers should mitigate spread from their land. The plant should not be bought, sold, grown, carried or released into the environment. Protect conservation areas, natural environments and primary production lands that are free of blackberry At no point is the word Control used.</p> <p>b) To be clear the following words should be inserted – “shall constrain the spread of invasive species and plantation species from within the defined forest area into adjacent areas.” Agree, add “within reasonable limits” The forest owner should not be held accountable for any spread from other lands outside the defined forest area.</p> <p>Some invasive species managed are beyond control – needs to be within</p>	

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					relevant regional and state pest animal and plant management guidelines Not practical – ecologically undesirable even in some situations.	
210.	Reliance	11.2.4	a & b	<p>Invasive species and take action to control or eradicate...</p> <p>Some invasive species managed are beyond control – needs to be within relevant regional and state pest animal and plant management guidelines Not practical – ecologically undesirable even in some situations.</p>	<p>Whilst the words are very similar to the previous standard there are issues:</p> <p>a) “take action to control or eliminate”, the issue in NSW and likely other parts of Australia is that some invasive species are “beyond control”, and this is reflected in the NSW’s governments policy on biosecurity. For Example Blackberry is a weed of National Significance yet the NSW Guidelines for the Central Tablelands is:</p> <p>Regional Recommended Measure* Land managers should mitigate the risk of new weeds being introduced to their land. Land managers should mitigate spread from their land. The plant should not be bought, sold, grown, carried or released into the environment. Protect conservation areas, natural environments and primary production lands that are free of blackberry At no point is the word Control used.</p>	<p>Agreed. Editorial. See 201. Wording clarified by use of term “manage”.</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					<p>b) To be clear the following words should be inserted – “shall constrain the spread of invasive species and plantation species from within the defined forest area into adjacent areas.” Agree, add “within reasonable limits”</p> <p>The forest owner should not be held accountable for any spread from other lands outside the defined forest area.</p>	
211.	PENTARCH	11.2.4 Note 2 (c)		Human health monitoring? Guidance on how we can actually do it? As yet there are no successful examples.		Reject. Note is guidance only
212.	AFPA	11	11.2.4 c	<i>Human health monitoring? Guidance on how we can actually do it? As yet there are no successful examples.</i>		Reject. Note is guidance only
213.	SFM	11	2.4 Note 2	c) Specific monitoring of impacts on adjacent waterways, <u>human health</u> , non target organisms or other unintended consequences – What is the monitoring around human health? How is this measured?		Reject. Note is guidance only
214.	SCION	11.2.5	a	Spelling of soil		Agreed. Editorial
215.	OFO	11.2.8		<i>the forest manager shall undertake the recovery of forest products only in circumstances where there are no</i>	the forest manager will put in place mitigation measures to minimise or remove further risks to cultural, economic, environmental, and social	Agreed. Editorial. Para 1-clarified

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<p><i>increased risks to cultural, economic, environmental, and social values.</i></p> <p>Is this section specific for native forest management? Should not be applied to Plantation Management</p> <p>While salvage can cause additional immediate disturbance, it is important for long term sustainability and should not be so strongly discouraged.</p> <p>Salvage is important to recoup what value the manager can. Salvage is also important to facilitate replanting regeneration which contributes to sustainability and the local economy. This section should be reworded.</p>	values when recovering forest products.	
216.	FCNSW	11	11.2.8	First paragraph – How would this work from a plantation perspective where salvage would require clear felling, thus increasing possibility of social and environmental impact	<i>The forest manager shall undertake the recovery of forest products only in circumstances where the risks to cultural, economic, environmental and social values have been assessed and mitigation strategies considered</i>	Agreed. Editorial. Para 1-clarified
217.	OFO	11.2.8	b	<i>the forest manager shall, where opportunities exist, retain biological legacies and stand structural elements on affected areas including variations in the intensity of salvage logging, retaining a range of growth stages to maintain biodiversity values</i>	the forest manager shall, where opportunities exist, retain biological legacies and stand structural elements on affected areas. In <u>native forest</u> areas will be left undisturbed from salvage operations	Agreed. Editorial. Clarification made.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<i>within the affected area, and minimizing the level of physical disturbance on regenerating areas.</i>	to retaining a range of growth stages and maintain biodiversity values within the affected area.	
218.	JAS-ANZ	11.2.8		Salvage operation provisions have been suggested for use in recovery of sunken logs and swamp timber. The Clause 11.2.8 is not a good fit for these activities. Has this been considered by the committee?		Noted. Yes it was considered
219.	M. Kadlec	11	11.2.11	<p>The forest manager shall ensure that hydrocarbons and other non-biodegradable waste and litter from forest management activities shall be cleaned up, collected and stored in designated areas and removed in an environmentally responsible manner.</p> <p>The two significant streams of hydrocarbon waste generated by forestry operations are:</p> <p>1] Total-loss lubricating oils used in machines with an open cutting system e.g. chainsaws, harvester heads.</p> <p>2]Accidental discharge of hydraulic fluids</p> <p>Total-loss lubricating oils are fully emitted into the environment.</p>	The forest manager shall ensure to protect the forest from pollutants. Where applicable hydrocarbons and other non-biodegradable waste and litter from forest management activities shall be cleaned up, collected and stored in designated areas and removed in an environmentally responsible manner. Only readily biodegradable oils to lubricate open cutting systems (chainsaw chains, harvester heads) and readily biodegradable hydraulic fluids shall be used to avoid operational discharge.	Agreed. Ed. Note added recognising benefits of biodegradable oils

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<p>Accidental and operational spillages of hydraulic oils are technically very difficult to be cleaned up, collected and removed in the forest environment .</p> <p>As proposed the 11.2.11 Waste disposal provides limited guidance to waste disposal of hydrocarbon derived lubricating oils and is technically extremely difficult, if not impossible, to adhere to.</p>		
220.	Pentarch	11.3		Whole section very prescriptive.		Reject . No change necessary
221.	AFPA	11	11.3.1	<i>Hard to understand – entire section should be re-written</i>	(g)The forest manager shall identify significant biodiversity values (SBVs) within and in the vicinity of the defined forest area.	Agreed. Editorial revisions made to simplify
222.	STT	11	11.3.1 (a)	<p>Overly wordy/prescriptive for a criteria.</p> <p>The notes are confusing and unnecessary.</p>	(a) The forest manager shall use best available information to identify significant biodiversity values (SBVs) within and in the vicinity of the defined forest area.	Agreed. Editorial. New note added to clarify
223.	Hume	11.3.1	b)	The whole paragraph needs to be re-phrased into logical English	<p>What biota? All or Significant</p> <p>How do you define scientific expert?</p>	Agreed. Editorial. New note added to clarify

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					<p>If the forest manager believes no adverse risk exists due to normal forest practice, then no assessment is required; correct?</p> <p>Need to narrow down to unique biodiversity areas, hotspots, clusters within known localities</p>	
224.	VicForests	11.3	11.3.1 (a)	Use of the word 'vicinity' is vague. The identification should be kept within the DFA where forest manager has the ability to influence SBV outcomes	The Forest manager shall identify Significant Biodiversity Values (SBV's) within the Defined Forest Area.	Agreed. Editorial. New note added to clarify
225.	STT	11	11.3.1 (a) NOTE	Could remove some to a note if must be kept.	NOTE: The forest manager shall use regulatory frameworks, recognized databases, published scientific information, expert knowledge and current research, complemented as needed by inventory and mapping of forest resources, field assessments and other relevant forest planning instruments.	Agreed. Editorial. New note added to clarify
226.	AFPA	11	11.3.1		NOTE: The forest manager shall use regulatory frameworks, recognized databases, published scientific information, expert knowledge and current research, complemented as needed by inventory and mapping of forest resources, field assessments and other relevant forest planning instruments.	Agreed. Editorial. New note added to clarify

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
227.	Forico	11	11.3.1(a)	Overly prescriptive	<i>Keep first sentence only</i>	Agreed. Editorial. New note added to clarify
228.	HQP	11	11.3.1 a	The second sentence onwards should be a note	NOTE: The forest manager shall use regulatory frameworks, recognized databases, published scientific information, expert knowledge and current research, complemented as needed by inventory and mapping of forest resources, field assessments and other relevant forest planning instruments	Agreed. Editorial. New note added to clarify
229.	Reliance	11.3.1	b)	The whole paragraph needs to be re-phrased into logical English	What biota? All or Significant How do you define scientific expert? If the forest manager believes no adverse risk exists due to normal forest practice, then no assessment is required; correct? Need to narrow down to unique biodiversity areas, hotspots, clusters within known localities	Agreed. Editorial. New note added to clarify
230.	GTFP	11.3.1	(b)	Needs clarification	What biota? All or Significant How do you define scientific expert? If the forest manager believes no adverse risk exists due to normal forest practice, then no assessment is required; correct?	Agreed. Editorial. New note added to clarify

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					Need to narrow down to unique biodiversity areas, hotspots, clusters within known localities	
231.	VicForests	11.3	11.3.1 (b)	Re-wording to be more precise. Remove use of within the vicinity due to vague approximation of distance	SBV's (found in forest and non-forest native vegetation communities in both terrestrial and aquatic ecosystems) at risk of adverse impacts from forestry management practices within and within the defined forest area shall be determined through a risk assessment process involving scientific experts (e.g. ecologists, species specialists, foresters). The risk of both short-term and long-term impacts will be determined and considered.	Agreed. Editorial. New note added to clarify
232.	STT	11	11.3.1 (b)	Point (b) <i>biota and habitats</i> basically replicates what SBVs are likely to be. Is this section really necessary? Which bit of PEFC meta-standard is it tied to? Biota and habitats - SBVs or all biota and habitats here? Also, sentence is overly long, recommend trimming to actual requirement of identification.	Prefer removal. Biota and habitats, at risk of adverse impact from forestry activities, shall be identified by experts.	Agreed. Ed. Deleted biota and habitat. Context is and outcomes are unchanged
233.	Pentarch	11.3.1	a	Second sentence should become a note.	NOTE: The forest manager shall use regulatory frameworks, recognized databases, published scientific	Agreed. Editorial. New note added to clarify

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					information, expert knowledge and current research, complemented as needed by inventory and mapping of forest resources, field assessments and other relevant forest planning instruments.	
234.	Forico	11	11.3.1(b)	Too long. Biota and habitats unclear- is this broader than SBVs?	<i>The forest manager should identify other biota and habitats and habitats</i>	Agreed. Editorial. Deleted biota and habitat. Context is and outcomes are unchanged
235.	Pentarch	11.3.1	b	Biota and habitats - Significant or all biodiversity values here? Also sentence is very long		Agreed. Editorial. Deleted biota and habitat. Context is and outcomes are unchanged
236.	HQP	11	11.3.1 b	Does this refer to all biota and habitats or just SBVs – we think it should be SBVs	Biota and habitats with SBVs (found in forest and non-forest native vegetation communities in both terrestrial and aquatic ecosystems) at risk of adverse impacts.....	Agreed. Editorial. Deleted biota and habitat. Context is and outcomes are unchanged
237.	AFPA	11	11.3.1 (B)	Biota and habitats - <i>Significant or all biodiversity values here? Also sentence is very long</i>		Agreed. Editorial. Deleted biota and habitat. Context is and outcomes are unchanged
238.	Pentarch	11.3.1		Hard to understand – entire section should be more concise.	The forest manager shall identify significant biodiversity values (SBVs) within and in the vicinity of the defined forest area.	Agreed. Editorial. New note added to clarify
239.	Forico	11	11.3.2	NOTE not needed	<i>Remove NOTE</i>	Reject. Note relocated to Section 6. General principle for planning. Precautionary principle

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
						already in STD not a new req.
240.	Pentarch	11.3.2	a	Sentence overly prescriptive. Could be made more precise.	NOTE: Strategies may include protection areas, set asides, connectivity maintenance or other spatial or temporal measures as appropriate.	Agreed. Editorial change made
241.	AFPA	11	11.3.2 (a)	<i>Sentence overly prescriptive. Could be made more precise.</i>	NOTE: Strategies may include protection areas, set asides, connectivity maintenance or other spatial or temporal measures as appropriate.	Agreed. Editorial change made
242.	VicForests	11.3.2	11.3.2 (a) (b) (c) (d)	Again, additional wording to clarify that the maintenance/enhancement of SBV's should remain within the forest managers Defined forest Area.	<p>Maintain or enhance significant biodiversity values</p> <p>(b) The forest manager shall develop and implement effective strategies to maintain or enhance SBVs and control potential adverse impacts within the defined forest area</p> <p>NOTE: Strategies may include protection areas, set asides, connectivity maintenance or other spatial or temporal measures as appropriate.</p> <p>(c) The forest manager shall develop and implement a</p>	Agreed. This is implied through whole standard. Editorial change made to simplify.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					<p>plan where SBVs exist and have been diminished or degraded, to maintain or enhance the capacity of the forest to support SBVs.</p> <p>(d) The forest manager shall map areas within and where appropriate adjacent to the defined forest area for active management, protection or conservation.</p> <p>(e) The forest manager shall conduct forest operations in a manner that minimizes the risk of damage to areas managed for biodiversity and/or retained habitat features, and other protected areas, conservation reserves, or areas of native vegetation that are part of a recognized offset</p>	
243.	STT	11	11.3.2 (a) NOTE	Sentence overly prescriptive. Could be made more precise.	NOTE: Strategies may include protection areas, set asides, connectivity maintenance or other spatial or temporal measures as appropriate.	Agreed. Editorial change made to simplify and clarify
244.	STT	11	11.3.2	Remove note. The 'precautionary principle' is applied to the standard as a whole and is too open to	Strongly oppose inclusion of precautionary principle in body of standard.	Reject. Note relocated to Section 6. General principle for planning.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				interpretation when applied to a specific criteria.	<p>Different auditors (and stakeholders, and forest managers) will have different opinions on what the implementation of this requirement means.</p> <p>The metastandard only refers to the precautionary principle with respect to GMOs.</p> <p>The introduction of the standard alludes to the standard “promoting the concept of the principle” and this should be sufficient to demonstrate the standard is built on a precautionary approach.</p>	Precautionary principle already in STD not a new req.
245.	Pentarch	11.3.2	b	Add in maintain	b) The forest manager shall develop and implement a plan where SBVs exist and have been diminished or degraded, to maintain or enhance the capacity of the forest to support SBVs.	Agreed. Editorial clarification
246.	STT	11	11.3.2 (b)	Add in maintain	(f) The forest manager shall develop and implement a plan where SBVs exist and have been diminished or degraded, to maintain or enhance the	Agreed. Editorial clarification

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					capacity of the forest to support SBVs.	
247.	AFPA	11	11.3.2 (b)	Add in maintain	(g)The forest manager shall develop and implement a plan where SBVs exist and have been diminished or degraded, to maintain or enhance the capacity of the forest to support SBVs.	Agreed. Editorial clarification
248.	Pentarch	11.3.2		Remove precautionary note at end of clause		Agreed. Relocated. See Section 6.
249.	AFPA	11	11.3.2	Remove note		Agreed. Relocated. See Section 6.
250.	Timberlands	11.3.3		Is this requirement intended to apply to native production forestry? In NZ the indigenous vegetation remnants are protected in their current state, with typically the only control to manage any introduced threats (plant or animal pests). We do not undertake any action that alters the genetic diversity, vegetation types, structural elements or growth stages of reserves – which implies we would have to take active management to change the composition of the reserves which generally would not be allowed.	Clarify the intent of clause 11.3.3 – intended to apply to native production forest areas?	Agree. Editorial change made to clarify

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
251.	Timberlands	11.3.4	(b)	The same comments as for 11.3.3 apply.		Agree. Editorial change made to clarify
252.	STT	11.3.3 , 11.3.4 & 11.3.5		A general observation is that this section has some duplication in it.	Combine 11.3.3. and 11.3.4. – they are both landscape management approaches. The metastandard does not refer to stand level management—why has the Aus standard?	Reject. Need to demonstrate management at multiple scales
253.	STT	11.3.4		Remnants are SBVs. They don't need to be covered twice.	Remove maintain/enhance remnants	Reject
254.	Timberlands	11.3.5	(a)	We are unclear how this requirement is intended to apply to exotic plantation forest areas. Typically in NZ all standing production forest is harvested and fallen dead wood is left. Dead wood is only removed where it is considered a risk of debris movement. Generally there is no requirement to leave wood within exotic production forest stands.	Clarify the intent of clause 11.3.5 as it applies to productive exotic forest stands.	Agreed. Editorial Clarification made
255.	JAS-ANZ	11.3.5	Note	“Coupe” is used and this term is not universally used.	Consider including definition for ‘Coupe’	Agreed. Editorial. Changed to harvest unit
256.	STT	11.3.5		Propose addition of safety to note.	Note: Maintenance may involve retention of habitat features around the edges of harvested areas where regeneration and/or safety is compromised by retention of in-coupe features.	Agreed. Req in other parts of STD, but added for clarity. Editorial.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
257.	STT	11.3.7		This is duplication with the invasive species section... and damage agents....	Not required	Agreed. Editorial. Relocated to 11.2.2
258.	Pentarch	11.3.8	a	Remove stakeholders	(a) The forest manager shall monitor biodiversity priorities, using a scientifically based monitoring methodology developed in consultation with relevant experts, to determine if values are being maintained or enhanced within the defined forest area. Biodiversity priorities for monitoring will be clearly described and quantified, and be drawn from general biodiversity, structural elements and/or SBVs.	Agree. Changed to relevant experts to remove ambiguity. Editorial
259.	SFM	11	3.8	Change wording - 'The forest manager shall monitor biodiversity priorities, using a scientifically based monitoring methodology developed in consultation with stakeholders and relevant experts...' – Remove stakeholders. This task should be left to forest manager and relevant experts in this field.	The forest manager shall monitor biodiversity priorities, using a scientifically based monitoring methodology developed in consultation with relevant experts.	Agree. Changed to relevant experts to remove ambiguity. Editorial
260.	GTFP	11.3.8	(a)	Developing monitoring methodology in “consultation with stakeholders and relevant experts”	Why should the Forest Owner be forced to take the development of biodiversity monitoring methodology to a public consultation process?	Agree. Changed to relevant experts to remove ambiguity. Editorial

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					<p>Change to: “The forest manager shall monitor biodiversity priorities using a scientifically based monitoring methodology developed in consultation with relevant specialists ”</p> <p>Require a definition for scientifically based again.</p>	
261.	Hume	11.3.8	a)	<p>Developing monitoring methodology in “consultation with stakeholders and relevant experts”</p> <p>This is above and beyond anything in ISO 9.1.1, and totally implausible</p> <p>The methods used by the organisation to monitor and measure, analyse and evaluate should be defined in the environmental management system</p>	<p>Why should the Forest Owner be forced to take the development of biodiversity monitoring methodology to a public consultation process? This will simply add cost, delay the process and muddy the outcomes of this process. Change to:</p> <p>“The forest manager shall monitor biodiversity priorities using a scientifically based monitoring methodology developed in consultation with relevant specialists ”</p> <p>We don’t need to talk to stakeholders on our monitoring, this</p>	<p>Agree. Changed to relevant experts to remove ambiguity. Editorial</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					extends and complicates the process. We need a definition for scientifically based again.	
262.	STT	11	11.3.8 (a) Monitor biodiversity	<p><i>In point a) prioritise Science over stakeholders. Remember section 9.1.1</i></p> <p><i>“The forest manager shall make available to interested parties the monitoring methodology and results of monitoring, (excluding confidential information), upon reasonable request.</i></p> <p><i>And stakeholder section:</i></p> <p><i>The forest manager shall address relevant communications from stakeholders on its forest management system. This will include:</i></p> <p><i>(a) considering and incorporating as appropriate stakeholder feedback into the forest management system; and</i></p>	The forest manager shall monitor biodiversity priorities, using scientifically based monitoring methodologies developed in consultation with relevant experts where required, to determine if values are being maintained or enhanced within the defined forest area. Priorities for biodiversity monitoring will be drawn from general biodiversity, structural elements and/or SBVs.	Agree. Changed to relevant experts to remove ambiguity. Editorial
263.	HQP	11	11.3.8a	Should only be relevant stakeholders and experts (with a focus on science first)	(a) The forest manager shall monitor biodiversity priorities, using a scientifically based monitoring methodology developed in consultation with relevant stakeholders and experts, to	Agree. Changed to relevant experts to remove ambiguity. Editorial

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					determine if values are being maintained or enhanced within the defined forest area. Biodiversity priorities for monitoring will be clearly described and quantified, and be drawn from general biodiversity, structural elements and/or SBVs	
264.	AFPA	11	11.3.8 (a)	Science first	(b) The forest manager shall monitor biodiversity priorities, using a scientifically based monitoring methodology developed in consultation with relevant experts, to determine if values are being maintained or enhanced within the defined forest area. Biodiversity priorities for monitoring will be clearly described and quantified, and be drawn from general biodiversity, structural elements and/or SBVs.	Agree. Changed to relevant experts to remove ambiguity. Editorial
265.	Reliance	11.3.8	a)	Developing monitoring methodology in “consultation with stakeholders and relevant experts” This is above and beyond anything in ISO 9.1.1, and totally implausible	Why should the Forest Owner be forced to take the development of biodiversity monitoring methodology to a public consultation process?	Agree. Changed to relevant experts to remove ambiguity. Editorial

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<p>The methods used by the organisation to monitor and measure, analyse and evaluate should be defined in the environmental management system.</p>	<p>This will simply add cost, delay the process and muddy the outcomes of this process. Change to:</p> <p>“The forest manager shall monitor biodiversity priorities using a scientifically based monitoring methodology developed in consultation with relevant specialists”</p> <p>We don’t need to talk to stakeholders on our monitoring, this extends and complicates the process. We need a definition for scientifically based again.</p>	
266.	STT	11.3.8 (b) Document biodiversity objectives		<p>There is an overall requirement to maintain required documented information.</p> <p>The last sentence is redundant as the description of how this needs to be done is captured by the management review requirements (refer 9.3 c, d(ii),g, and and the outputs of management review</p>	<p>Remove. 11.3.8a provides enough sufficient information with regard to what is required in biodiversity monitoring. Note: clause 6.3 does not exist.</p>	<p>Agreed.</p> <p>Reference to 6.3 removed to remove duplication as covered by other requirements.</p>
267.	JAS-ANZ	11.4.1	B	<p>Expand examples: e.g. fishing resources, water bodies (e.g. lakes), downstream amenities (e.g. lakes,</p>	<p>Expand examples of ‘water functions for society’.</p>	<p>Rejected</p> <p>Not considered necessary</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				beaches, swimming spots). And also consideration of contribution to cumulative impacts upon resources and catchment.		
268.	AFPA	11	11.4.2 (d)	<i>Native animals in here?</i>		Reject. Relates to both native and introduced animals
269.	FPC	11.4.2	d	Clarify this refers to native and non-native species		Reject Relates to both native and introduced animals
270.	STT	11	11.4.2 (d)	Does this include native animals e.g. rampaging populations of wallabies?		Reject Relates to both native and introduced animals
271.	FCNSW	11	11.4.2(d)	Further clarification required. Grazing impacts?, large volume of native animals impact (e.g. kangaroos) or pest animal impact?		Reject Relates to both native and introduced animals
272.	AFPA	11	11.4.3 (d)	<i>No definition for stream – there should be one. Maybe add in section three and ensure the definition works with the one of drainage lines. Sometimes widths are mandated by legislation</i>	(c) implementing, maintaining and/or restoring protective management zones (of legally mandated widths or appropriate science-based widths) on drainage lines, streams and other waterbodies; and	Accept. Term waterbody now used to avoid confusion. Editorial in nature.
273.	Pentarch	11.4.3	d	No definition for stream – there should be one. Maybe add in section	implementing, maintaining and/or restoring protective management	Accept.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				three and ensure the definition works with the one of drainage lines. Sometimes widths are mandated by legislation	zones (of legally mandated widths or appropriate science-based widths) on drainage lines, streams and other waterbodies; and	Term waterbody now used to avoid confusion. Editorial in nature.
274.	VicForests	11.4.3	11.4.3 (d)	It would be useful to include a reference to legally mandated width for stream protection width. These were developed with appropriate scientific consultation	'implementing, maintaining and/or restoring protective management zones (of appropriate legal or science-based widths) on drainage lines, streams and other waterbodies; and	Agreed. Added for clarity. Editorial clarification.
275.	GTFP	11.4.3	(d)	Protective management zones of appropriate science based widths. The Codes of Forest Practice mandate this	Make "(of appropriate science based widths), a sub note and rephrase the sub note to: <i>(in the absence of regulatory buffers an appropriate science based width should be applied)</i>	Agreed. See 272 and 274
276.	Hume	11.4.3	d)	Protective management zones of appropriate science based widths. The Codes of Forest Practice mandate this	Make "(of appropriate science based widths), a sub note and rephrase the sub note to: <i>(in the absence of regulatory buffers an appropriate science based width should be applied)</i>	Agreed. See 272 and 274
277.	Reliance	11.4.3	d)	Protective management zones of appropriate science based widths.	Make "(of appropriate science based widths), a sub note and rephrase the sub note to:	Agreed. See 272 and 274

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				The Codes of Forest Practice mandate this	(in the absence of regulatory buffers an appropriate science based width should be applied)	
278.	Reliance	11.5.2	a) & b)	Annual allowable cut	<p>In a plantation environment this represents a “Restraint of Trade”</p> <p>Should not apply to plantations – is just not commercially appropriate or acceptable.</p>	<p>Agreed</p> <p>Clarified-Term changed to harvest rate representing long-term term productive rate which allows annual and short-term variation. This was the intent of this clause, but poorly worded.</p>
279.	Hume	11.5.2	a) & b)	Annual allowable cut	<p>In a plantation environment this represents a “Restraint of Trade”</p> <p>Should not apply to plantations – is just not commercially appropriate or acceptable.</p>	<p>Agreed</p> <p>Clarified-Term changed to harvest rate representing long-term term productive rate which allows annual and short-term variation. This was the intent of this clause, but poorly worded</p>
280.	Forico	11	11.5.3	If the activity is within the DFA of a given forest manager, it is inherently their responsibility, except in rare circumstances such as fish catch/deer shooting levels or similar being regulated by a permit issued by an external party	<i>Delete “where it is their responsibility”...could replace with “except where subject to regulation by a third-party”</i>	<p>Agreed.</p> <p>Clarification made.</p>
281.	OFO	11.5.6	e	<i>The forest manager shall not use genetically modified trees.</i>		Reject.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				The ability to stifle genetic innovation where it has a positive benefit should be considered. This should apply to sections a,b, and d.		Conflicts with PEFC endorsement criteria.
282.	SCION	11.5.6	e	'the manager shall not use genetically modified trees'	This should be deleted or revised with more appropriate text that takes into context current legislation and definitions of genetic modification across both countries. Also changing levels of acceptability of the technologies.	Reject Conflicts with PEFC endorsement criteria.
283.	STT	11	11.5.7	Stocking rate section confusing	(d) The forest manager shall implement silvicultural systems, and identify stocking rates, appropriate for the forest type, site conditions and management objectives.	Agreed Editorial. Wording simplified
284.	SFM	11	6.1	a) The forest manager shall identify, protect and maintain cultural, religious, spiritual and social heritage places and values – How is 'spiritual' defined ?		Reject Noted. Unable to do so. Commonly understood term and is considered acceptable.
285.	CFMMEU	11.6.2		Urge targeted consultation with indigenous communities and land councils about proposed changes. Suggested re-inclusions are preliminary, based on limited initial consultation by CFMEU and taking a	11.6.2 Indigenous peoples' rights, responsibilities and values The forest manager shall recognize the rights, responsibilities and values of Indigenous people based on their recognized prior ownership of the	Agreed.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<p>precautionary approach to ensuring that the Standard represents “continuous improvement</p>	<p>forests and land including but not limited to the established framework of legal, customary and traditional rights such as outlined in ILO 169, the Treaty of Waitangi and the UN Declaration on the Rights of Indigenous Peoples. These rights shall not be infringed upon without free prior and informed consent. The forest manager shall identify and respect the rights, responsibilities and values of Indigenous peoples. This shall include:</p> <p>(a) providing for Indigenous peoples’ input into decision making. In New Zealand, this shall include the rights of tangata whenua in decision making to ensure continued protection of those values;</p> <p>(b) acknowledging and applying Indigenous peoples’ knowledge of sustainable development and management of forests with informed community consent;</p> <p>(c) applying practices and protocols that are consistent with Indigenous peoples’ cultural and spiritual values</p>	<p>Change is editorial. Application of the STD is unaffected</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					<p>that support and endorse sustainable development and management of forests;</p> <p>(d) communicating to the wider community Indigenous peoples' rights, interests and knowledge;</p> <p>(e) supporting Indigenous peoples' economic and social aspirations in sharing benefits from the management of forests; and</p> <p>(f) respecting Indigenous peoples' cultural and traditional customs.</p>	
286.	Forico	11	11.6.3(b)	In some circumstances it may be hard to directly engage with Indigenous peoples	The forest manager shall consult with the relevant Indigenous peoples or representative bodies to:	<p>Agreed.</p> <p>Editorial clarification made.</p>
287.	STT	11	11.6.3 (b)	It is not always an option to consult directly with Indigenous communities e.g. Tasmanian context. This requirement is probably a bit onerous.	(e) The forest manager shall consult with the relevant Indigenous peoples or <i>representative bodies</i> to:	<p>Agreed.</p> <p>Editorial clarification made.</p>
288.	AFPA	11	11.6.3 (b)		(f) The forest manager shall consult with the relevant Indigenous peoples or representative bodies to:	<p>Agreed.</p> <p>Editorial clarification made.</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
289.	SFM	11	6.3	b) Change wording - The forest manager shall consult with the relevant Indigenous peoples	The forest manager shall consult with the relevant Indigenous peoples or representative bodies -	Agreed. Editorial clarification made.
290.	CFMMEU	11.7.2	(a)	<p>These changes ensure that there is no weakening compared to previous standard and that the ILO's guidelines for labour inspection in forestry are picked up by requiring the development of a system which ensures that work is carried out in a safe and healthy manner.</p> <p>9.5 HEALTH AND SAFETY 1. The forest manager shall foster a safe working environment by: a. complying with relevant workplace health and safety legislation and regulations; b.; c.; and d. co-operating and consulting with forest workers and their representative organizations where they exist, on workplace health and safety.</p>	<p>11.7.2 Health and safety</p> <p>a) Forest managers shall foster safe working environments, develop a system* which ensures that work is carried out in a safe and healthy manner and ensure health and safety management conforms with relevant laws and codes of practice. This means that a forest manager shall, amongst other things as appropriate are required to:</p> <p>(i) identify hazards and risks;</p> <p>(ii) apply reasonable measures to protect workers from work-related risks;</p> <p>(iii) provide guidance and training in safe working practices; and</p> <p>(iv) inform workers about the risks involved with their work and about preventive measures.</p>	Agreed. Clause expanded for clarity, but no changes to requirements

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					<p>(v) cooperate and consult with forest workers and their representative organizations where they exist, on workplace health and safety.</p> <p>(vi) comply with relevant workplace health and safety legislation and regulations.</p> <p>(vii) facilitate improvements in workplace health and safety and</p> <p>(viii) only adopt working conditions that do not endanger health or safety</p> <p><i>*The system should accord with The ILO Guidelines on occupational safety and health management systems: ILO-OSH 2001¹</i></p>	
291.	CFMMEU	11.7.2	(b)	Requiring the forest manager to require forest workers and their representatives to cooperative and actively participate may be beyond a reasonable expectation of the forest manger in some instances.	<p>11.7.2 Health and safety</p> <p>(b) The forest manager, shall provide opportunities for forest workers and their representative organizations, where they exist, shall to cooperate</p>	<p>Agreed.</p> <p>Clause 6.2 expanded to clarify the intent of the Standard. Also a legal</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				co-operating and consulting with forest workers and their representative organizations where they exist, on workplace health and safety (not this is captured in the proposed 11.7.1)	and actively participate on workplace health and safety to identify risks, develop workplace health and safety protocols, and make decisions.	requirement enforced in other clauses. Ed
292.	CFMMEU	Proposed new requirements 11.7.2 (and renumber the other requirements in 11.7 accordingly)		reinstatement of requirements for skills development as a sustainability indicator/ criterion and to cover of skills and forest workers not covered off in criteria 7.2 (competence) 9.4 SKILLS DEVELOPMENT 1. The forest manager shall: a. identify opportunities to support employment and skills development of forest workers including, but not limited to, nationally endorsed and or recognized competencies and qualifications where appropriate; and b. implement identified opportunities for forest workers through appropriate development actions.	11.7.2 Skills Development The forest manager shall: b. identify opportunities to support employment and skills development of forest workers including, but not limited to, nationally endorsed and or recognized competencies and qualifications where appropriate; and b. implement identified opportunities for forest workers through appropriate development actions.	Agreed. Clarifies the intended outcome of training. Editorial
293.	Reliance	11.7.3	a)	Practices of sub-contractors	Under Australian law the actions of a Forest Grower's contractors' sub-contractors are the responsibility of the contractor – whilst the grower can structure contracts with the contractor, and imply in contract any	Rejected

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					<p>subcontractor's requirement to comply with the head contractor, the grower cannot "ensure" subcontractor compliance.</p> <p>PEFC talks about "forest workers".</p> <p>Practical issues of how this is done (examining records of sub-contractors) and is audited. Legal compliance is all that is needed.</p>	
294.	Hume	11.7.3	a)	Practices of sub-contractors	<p>Under Australian law the actions of a Forest Grower's contractors' sub-contractors are the responsibility of the contractor – whilst the grower can structure contracts with the contractor, and imply in contract any subcontractor's requirement to comply with the head contractor, the grower cannot "ensure" subcontractor compliance.</p> <p>PEFC talks about "forest workers".</p> <p>Practical issues of how this is done (examining records of sub-contractors) and is audited. Legal compliance is all that is needed</p>	Rejected
295.	STT	11.7.3a		It is impossible to <i>ensure</i> that contractors and subcontractors	We can do checks on their performance and audit their	Rejected

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				comply with fundamental ILO conventions.	documentation, but we cannot ensure that they comply all the time.	
296.	STT	11.7.3		There is duplication between 11.7.3 b(ii) and c.	Suggest slimming down of 11.7.3 b(ii) to participate in collective bargaining	Rejectd
297.	CFMMEU	11.7.3		<p>Support the improvements in the draft</p> <p>1. The forest manager shall recognize the rights of forest workers to:</p> <p>a. join a union or organization of workers;</p> <p>b. participate in collective bargaining; and</p> <p>c. associate freely.</p> <p>3. The forest manager shall demonstrate that;</p> <p>a. where it engages in collective bargaining, such bargaining:</p> <p>i. takes place with representative workers' organizations where they exist; ii. does not involve direct dealing; iii. takes place in good faith; and iv. involves the forest manager's best efforts to reach agreement;</p> <p>b. representatives of organizations of forest workers have access to employees in the workplace and have the use of such facilities in the workplace as are necessary for the</p>	<p>11.7.3 Workers' rights</p> <p>(a) Forest managers shall ensure that its practices and those of its contractors and sub-contractors comply with the fundamental ILO conventions.</p> <p>(b) The forest manager shall recognize, respect and support the rights of forest workers to:</p> <p>(i) join a union or organization of workers;</p> <p>(ii) participate in collective bargaining amongst the industrial parties which is consistent with this Standard and the fundamental ILO conventions; and</p> <p>(iii) associate freely.</p> <p>(c) Where it engages in collective bargaining, such bargaining is</p>	Noted

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				proper exercise of their functions as workers representatives;	<p>consistent with the fundamental ILO conventions by ensuring that it:</p> <ul style="list-style-type: none"> (i) takes place with representative workers' organizations where they exist; (ii) does not involve direct dealing; (iii) takes place in good faith; and (iv) involves the forest manager's best efforts to reach agreement. <p>(d) Representatives of organizations of forest workers shall be provided with appropriate (and facilitated upon reasonable request) access to forest workers in the workplace and have the use of such facilities in the workplace as are necessary for the proper exercise of their functions as workers representatives.</p>	

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
298.	STT	11.7.3 and 11.7.6		These requirements probably need to be next to each other as opposed to being between 11.7.4 and 11.7.5.	Re-order For 11.7.6, not sure “monitor and demonstrate” are the appropriate verbs.	Rejected
299.	CFMMEU	11.7.4		Support 2. The forest manager shall: a. support equal employment opportunities and use qualifications, skill, experience and merit as the basis for recruitment and advancement of forest workers; and b. ensure that all forest workers are afforded equal treatment.	11.7.4 Equal employment The forest manager shall: a) commit to, promote and ensure that all forest workers are afforded equal treatment, non-discrimination and freedom from workplace harassment; b) use qualifications, skill, experience and merit as the basis for recruitment and advancement; and c) give special consideration to opportunities for training and employment of local people, including Indigenous people.	Noted
300.	Pentarch	11.7.5			Where school-aged workers are engaged, the forest manager shall ensure that their employment,	Agreed. Editorial change made to wording

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
301.	HQP	11	11.7.5	Employment of school aged workers in the forest industry can provide great work experience and skill development opportunities. Listing the acceptable exemptions is helpful, but the clause still starts with the assumption that this is a fundamentally a negative outcome.	Where school-aged workers are engaged, the forest manager shall ensure that their employment, A B C	Agreed. Editorial change made to wording
302.	CFMMEU	11.7.5		Query: Does school aged mean workers younger in age than completion of compulsory school attendance or all "school aged"? d. all forest workers are greater in age than the completion of compulsory school attendance age;	11.7.5 School-aged workers School-aged forest workers shall not be engaged, unless that engagement: (a) complies with legal requirements; (b) formally contributes to or does not affect their education; and (c) is not harmful to their health or development.	Rejected. Discussed-OK as is
303.	AFPA	11	11.7.5		Where school-aged workers are engaged, the forest manager shall ensure that their employment,	Agreed. Editorial change made to wording
304.	SFM	11	7.6	Remuneration and conditions are addressed in Australia by relevant laws / regulations. Is this section relevant to New Zealand only ? This should be made clear.		Rejected Both Aust and NZ- Joint AS/NZS Standard.
305.	OFO	11.7.6		<i>living wages, where these are higher than the legal minimum wages.</i>	Suggest removing	Reject.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				Object to the concept of living wages. What does this mean in an Australian context?		Living wage stays, but clarification added to list the origin in NZ.
306.	GTFP	11.7.6	(a)	Para a) is all that was in the previous standard in relation to compensation	<p>Old and new standard <i>a) All forest workers are engaged freely and are duly compensated</i></p> <p>The issue is that this has now “blown out” to a), b), c), d) and e) – most of which is covered by <u>Fair Work Australia</u>.</p> <p>The only additional PEFC requirement is <i>The forest manager shall ensure that all competent forest workers are paid at rates that meet or exceed:</i> <i>(a) minimum forest industry standards;</i> <i>(b) recognized forest industry wage agreements</i></p> <p>There are practical issues of how this can be done and how it is audited.</p>	Rejected
307.	Hume	11.7.6	a)	Para a) is all that was in the previous standard in relation to compensation	<p>Old and new standard a) All forest workers are engaged freely and are duly compensated</p>	Rejected

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					<p>The issue is that this has now “blown out” to a), b), c), d) and e) – most of which is covered by fair work Australia anyway.</p> <p>The only additional PEFC requirement is</p> <p>The forest manager shall ensure that all competent forest workers are paid at rates that meet or exceed:</p> <p>(a) minimum forest industry standards;</p> <p>(b) recognized forest industry wage agreements</p> <p>Again the standard refers to “Contractors” and “subcontractors”, instead of forest workers under PEFC.</p> <p>As per 11.7.6 practical issues of how this can be done and how it is audited</p>	
308.	STT	11.7.6		<p>Suggest separate heading for accommodation provision.</p> <p>There is also too much guff here.</p>	<p>Where forest workers are required to stay away from home, the forest manager shall ensure that accommodation is adequate, does not restrict the worker’s rights and</p>	<p>Agreed.</p> <p>Editorial tidy up was done.</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					freedoms or financially disadvantage them. Or maybe dot points?	
309.	JAS-ANZ	11.7.6		Meaning is unclear: 'Workers' accommodation arrangements should not restrict workers' rights and freedoms and provide suitable transport.'	Reword.	Agreed. Editorial
310.	CFMMEU	11.7.6		<p>Support improvements note query about whether we need better word than "attain"</p> <p>The forest manager shall demonstrate that;</p> <p>c. all forest workers are engaged freely and are duly compensated;</p> <p>e. it is in compliance with legal obligations creating minimum employee entitlements including but not limited to those set out in national legislation and collective bargaining agreements.</p>	<p>11.7.6 Remuneration and conditions</p> <p>The forest manager shall monitor and demonstrate that:</p> <p>(a) all forest workers are engaged freely and are duly compensated;</p> <p>(b) it, and its contractors and subcontractors are in compliance with legal obligations creating minimum employee entitlements including but not limited to those set out in national legislation and collective bargaining agreements;</p> <p>(c) wages of forest workers shall meet or exceed at least legal, industry minimum standards or,</p>	Noted

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					<p>where applicable, collective bargaining agreements;</p> <p>(d) wages, salaries, superannuation and other entitlements and employment contracts are paid on time; and</p> <p>(e) working hours and leave shall comply with state or national legislation, or applicable collective agreements.</p> <p>The forest manager shall ensure that all competent forest workers are paid at rates that meet or exceed:</p> <p>(a) minimum forest industry standards;</p> <p>(b) recognized forest industry wage agreements; or</p> <p>(c) living wages, where these are higher than the legal minimum wages.</p> <p>Where living wages exceed minimum forest industry standards and/or recognized forest industry wage agreements, the forest manager shall seek to attain</p>	

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					<p>increased wages towards a living wage over time in addition to increases for inflation, through engagement with forest workers and representatives of organizations of forest workers.</p> <p>When none of these exist, the forest manager shall develop mechanisms for determining living wages through engagement with forest workers and representatives of organizations of forest workers.</p> <p>NOTE: Where unit rates are paid, an operation cost model can convert piece-rate productivity into an equivalent annual, daily or hourly rate of pay.</p> <p>Where workers or contractors are required to live away from home, the forest manager or its contractors shall ensure that accommodation is adequate and decent.</p>	

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					<p>Accommodation must not cost the worker more than a reasonable proportion of their income and must be consistent with equivalent commercial market rates. Forest workers shall enjoy their fundamental human rights and freedom of association in particular. Workers' accommodation arrangements should not restrict workers' rights and freedoms and provide suitable transport.</p> <p>NOTE: Accommodation standards should include sufficient minimum space per person, supply of safe water, adequate sewage and garbage disposal systems, heating, cooling, cleanliness and adequate sanitary conveniences, washing facilities, privacy, a separate bed for each worker, and separate gender accommodation.</p>	
311.	HQP	11	11.7.6	Numbering needs addressing	There are several 11.7.6 a,b,c's	Accept. Editorial check on numbering completed

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
312.	Reliance	11.7.6	a)	Para a) is all that was in the previous standard in relation to compensation	<p>Old and new standard</p> <p>a) All forest workers are engaged freely and are duly compensated</p> <p>The issue is that this has now “blown out” to a), b), c), d) and e) – most of which is covered by fair work Australia anyway.</p> <p>The only additional PEFC requirement is</p> <p>The forest manager shall ensure that all competent forest workers are paid at rates that meet or exceed:</p> <p>(a) minimum forest industry standards;</p> <p>(b) recognized forest industry wage agreements</p> <p>Again the standard refers to “Contractors” and “subcontractors”, instead of forest workers under PEFC.</p> <p>As per 11.7.6 practical issues of how this can be done and how it is audited</p>	Rejected

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
313.	JNL	11.7.6		<p>JNL disagrees with the citing of the living wage as a minimum requirement proposing alignment to the PEFC Meta standard as more tenable.</p> <p>The PEFC Meta Standard (PEFC ST 1003:2018) as below is more acceptable. The Meta doesn't appear to define living wage, referencing International Labour Organisation in terms of principles and rights of workers.</p> <p>6.3.4.3 The standard requires that wages of local and migrant forest workers as well as of contractors and other operators operating in PEFC-certified areas shall meet or exceed at least legal, industry minimum standards or, where applicable, collective bargaining agreements.</p> <p><i>Note:</i> Where wages are below the living wage of a country, steps should be taken to attain increased wages towards a living wage level over time in addition to increases for inflation.</p>	<p>11.7.6 Remuneration and conditions <i>The forest manager shall monitor and demonstrate that:</i> <i>(a) all forest workers are engaged freely and are duly compensated;</i> <i>(b) it, and its contractors and subcontractors are in compliance with legal obligations creating minimum employee entitlements including but not limited to those set out in national legislation and collective bargaining agreements;</i> <i>(c) wages of forest workers shall meet or exceed at least legal, industry minimum standards or, where applicable, collective bargaining agreements;</i> <i>(d) wages, salaries, superannuation and other entitlements and employment contracts are paid on time; and</i> <i>(e) working hours and leave shall comply with state or national legislation, or applicable collective agreements.</i></p> <p><i>The forest manager shall ensure that all competent forest workers are paid at rates that meet or exceed:</i> <i>(a) minimum forest industry standards;</i> <i>(b) recognized forest industry wage agreements;</i></p> <p><i>Note Where wages are below the living wage (defined in clause 3.47) of a country, steps should be taken to attain increased wages towards a living wage level over time in addition to increases for inflation.</i></p>	<p>Reject- living wage stays in std.</p> <p>Ed. Added reference to source of the living wage.</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
314.	Pentarch	11.7.6		Already legally obliged to do so.	Remove points b – e. Remove from “Where living wages exceed minimum forest industry standards...” Only include notes	As above
315.	NZMPI	11.7.8		Standards 11.7.8. and 11.7.10 contain elements that may be inconsistent with New Zealand’s trade law obligations. New Zealand has obligations not to favour domestic goods and services providers. Standard 11.7.8.(a) could be inconsistent with this obligation as it encourages forest owners/managers to use domestic rather than foreign goods and services. New Zealand also has obligations not to restrict or disincentivise exports (including through voluntary export restraints). Standard 10.7.10(b) could be inconsistent with this obligation as it encourages forest owners/managers to offer logs to local processors rather than exporting them. We note that we have not had time to fully consider the extent to which the voluntary nature of the standard impacts on these trade risks. In order to mitigate these risks we suggest that the standards be amended as set out below.	<p>11.7.8 - Local procurement</p> <p>Where cost, quality and capacity of non-local and local options are at least equivalent:</p> <ul style="list-style-type: none"> a. <u>consider using local goods and services are used</u>; or b. reasonable attempts are made to support and encourage establishment of capacity where local goods and services are not available. 	Reject. Some editorial change to clarify wording

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
316.	CFMMEU	11.7.8		<p>Changes includes previous wording and outlines that supporting local options where there is cost, quality equivalent is a minimum requirement.</p> <p>1. The forest manager shall:</p> <p>b. support regional industry and regional communities, including commitments to local procurement where possible and fair contracts with suppliers of goods and services.</p>	<p>11.7.8 Local procurement</p> <p>The forest manager shall support regional industry and regional communities, including commitments to local procurement where possible.</p> <p>At the minimum, the Forest manager will ensure that where cost, quality and capacity of non-local and local options are at least equivalent:</p> <p>(a) local goods and services are used; or</p> <p>(b) reasonable attempts are made to support and encourage establishment of capacity where local goods and services are not available.</p>	See 315
317.	AFPA	11	11.7.9	<p><i>Need scope here to optimize value (which doesn't always result in minimising waste). Optimal use may also relate to maintaining contractor capacity or fulfilling supply contracts – its not always about max volume and max \$.</i></p>	<p>The forest manager shall harvest forest products in a manner that aims to optimize value recovery and minimizes waste.</p>	<p>Agreed. Updated wording to simplify-editorial</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
318.	Forico	11	11.7.9(a)	Recovery optimisation may not always be possible due to other business constraints/objectives	The forest manager should, where possible, harvest forest products in a manner that optimizes value recovery and minimizes waste	Agreed. Clarification made.
319.	HQP	11	11.7.9a	Need scope here to optimize value (which doesn't always result in minimising waste). Optimal use may also relate to maintaining contractor capacity or fulfilling supply contracts – its not always about max volume and max \$.	The forest manager shall harvest forest products in a manner that aims to optimize value recovery and minimizes waste.	Agreed Clarification made
320.	OFO	11.7.10	b	<i>offer supply to local processing and value added facilities, where commercial viability including price of non-local and local options, are at least equivalent.</i> Would prefer that b) is drop for being unclear	Suggest removing	Reject. Editorial. Tidy up was undertaken
321.	NZMPI	11.7.10			11.7.10 - Local industry support and development Subject to forest product supply constraints, the forest manager shall: a. engage proactively with local and regional forest products processors and consider their needs for supply;	Rejected. The committee agreed that a more proactive requirement is necessary.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					<ul style="list-style-type: none"> b. consider offering supply to local processing and value-added facilities, where commercial viability including price of non-local and local options, are at least equivalent; and c. make reasonable attempts to establish or support and encourage the establishment of local processing and value-added activities where not currently available. d. attempts are made to support and encourage establishment of capacity where local goods and services are not available. 	
322.	CFMMEU	11.7.10		<p>Support</p> <p>identify opportunities that allow the forests within the defined forest area to play an environmental, economic, social, and cultural role in rural and regional development;</p>	<p>Local industry support and development</p> <p>Subject to forest product supply constraints, the forest manager shall:</p> <ul style="list-style-type: none"> (a) engage proactively with local and regional forest products processors and consider their needs for supply; (b) offer supply to local processing and value-added facilities, where commercial viability including price of non-local and local options, are at least equivalent; and 	Noted

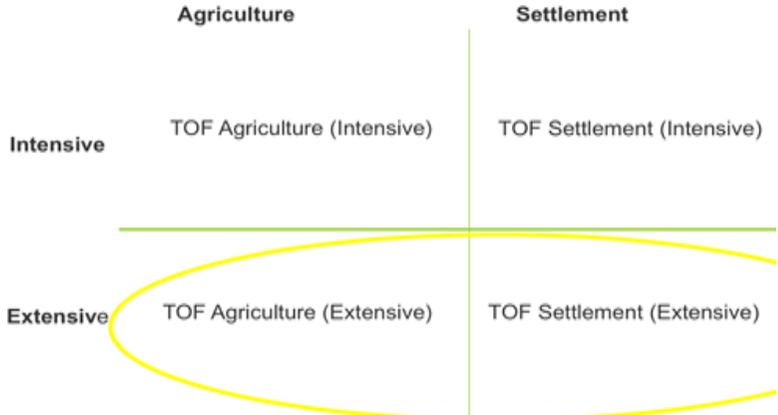
No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					(c) make reasonable attempts to establish or support and encourage the establishment of local processing and value-added activities where not currently available.	
323.	CFMMEU	11.7.11		<p>Support.</p> <p>identify opportunities that allow the forests within the defined forest area to play an environmental, economic, social, and cultural role in rural and regional development;</p>	<p>11.7.11 Sound economic performance</p> <p>(a) The forest manger shall operate on sound economic principles, taking into account possibilities for new markets and economic activities in connection with all relevant goods and services of forests.</p> <p>(b) The forest manager shall:</p> <p>(i) identify opportunities that allow the forests within the defined forest area to play an environmental, economic, social and cultural role in rural and regional development; and</p> <p>(ii) give due regard to the role of forestry in local economies.</p>	Noted

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
324.	Forico	11	11.7.12(a)	Don't think public access warrants a "shall" statement on all tenures – forest manager needs more discretion	The forest manager should consider allowing public access to forests, provided it does not conflict with ownership rights, safety and the rights of others, the effects on forest resources and ecosystems, and other functions of the forest.	Agreed. Clause poorly worded clarification made
325.	AFPA	11	11.7.12 (a)		Where compatible with requirements of the forest management organisation, the forest manager shall allow public access to forests taking into account respect for ownership rights, safety and the rights of others, the effects on forest resources and ecosystems.	Agreed. Clause poorly worded clarification made
326.	Hume	11.7.12	Public Access a)	"Shall" allow	This should be "may" allow, in a private freehold estate open public access is not desirable on any grounds due to illegal activities and persons safety. On private land this entirely at our discretion and there are many very legitimate reasons why public access should be limited including safety (of both the public and forest workers), managing environmental and biosecurity impacts, prevention of theft, wildfire and rubbish dumping	Agreed. Clause poorly worded clarification made

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
327.	Pentarch	11.7.12	a		(a) Where compatible with requirements of the forest management organisation, the forest manager may allow public access to forests taking into account respect for ownership rights, safety and the rights of others, the effects on forest resources and ecosystems.	Agreed. Clause poorly worded clarification made
328.	GTFP	11.7.12	Public Access (a)	"Shall" allow	<p>This should be "may" allow, in a private freehold estate open public access is not desirable on any grounds due to illegal activities.</p> <p>On private land this entirely at our discretion and there are many very legitimate reasons why public access should be limited including safety (of both the public and forest workers), managing environmental and biosecurity impacts, prevention of theft, wildfire and rubbish dumping</p>	Agreed. Clause poorly worded clarification made
329.	Reliance	11.7.12	Public Access a)	"Shall" allow	<p>This should be "may" allow, in a private freehold estate open public access is not desirable on any grounds due to illegal activities.</p> <p>On private land this entirely at our discretion and there are many very legitimate reasons why public access should be limited including safety (of both the public and forest workers),</p>	Agreed. Clause poorly worded clarification made

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					managing environmental and biosecurity impacts, prevention of theft, wildfire and rubbish dumping	
330.	JAS-ANZ	Table A1	Clause 4.3	There is an incongruity in 4.3 by not requiring a similar provision as per body of the standard regarding minimum duration within the management system. The same matter applies to post harvest management of the land.		Agreed and Noted. Clause had been updated 4.3 updated
331.	JAS-ANZ	b.2.3		Allowing group members to participate in the group management system whilst entering and exiting in less than a certification cycle is a risk to integrity of the scheme.		Reject. No change is necessary
332.	WT	A.1	2 nd paragraph	Language all of a sudden introduces “small forest owners” rather than SFAs	“Owners or managers of TOF and/or SFAs may use different types of plans (farm plans, or urban forest plans) to indicate their objectives for managing their trees.”	Agreed. Term changed to farm forests to clearly describe the intent of the Appendix.
333.	TB	A1	Preamble	The relevant table from FAO 2019 is not attached, so it is impossible to know what it covers. Here, the text says these requirements apply to planted woodlots and small areas of native trees less than 10 ha (contradiction to definition of forest)	Include the FAO Table (as another Appendix or in the preamble text) Paragraph 2: Amend text: ‘management of trees differs from that in other organisations’	Agreed. FAO table included, rather than referenced.
334.	WT	A.1	3 rd paragraph	Replace “timber” and “wood” with “products”	“Small forest managers can be incentivised to retain and grow trees by selling by selling their products, to local or export markets. Sale of	Agree. Editorial

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					products from TOF and SFAs is often secondary to their primary business objectives of the owners and, usually, done infrequently. Capacity to market their products can be enhanced if the owner can demonstrate their products are produced legally and that tree management meets the required standard for sustainable forest management.”	
335.	WT	A.1	4 th paragraph	Language all of a sudden introduces “small forest owners” rather than SFAs	“This Appendix provides a guide to TOF and SFAs on the relevant elements of the Standard on which they need to document conformance (see Clause 7.5.1).”	Agreed. See 332
336.	WT	A.1	New heading & paragraph slotted in after current 3 rd	<p>The PEFC concept of a matrix of agriculture and settlement by extensive and intensive is lost.</p> <p>The PEFC guidelines have not been followed that it is only “within TOF-agriculture extensive and TOF-settlement extensive that select PEFC ST 1003:2018 requirements may not be applicable.”</p> <p>Table A1 appears to intend to apply to both extensive and intensive TOP areas. This would seem to go against PEFC guidelines.</p>	<p>Reject- the committee considers this unworkable and incomprehensible.</p> <p>A.2 Concept and threshold for extensive and intensive TOF systems in Australia and New Zealand</p> <p>“Specific AS/NZS 4708 requirements may not be applicable to certain TOF systems as outlined in Table A2. To identify such exceptions, AS/NZS 4708 adopts four categories that PEFC defines to objectively distinguish between different TOF systems. The categories are based on land classification and management intensity: TOF-agriculture (intensive and extensive) and TOF-settlement (intensive and extensive). It is within TOF- agriculture extensive and TOF-settlement extensive that certain AS/NZS 4708 requirements may not be applicable. This is depicted in Figure Two.”</p>	

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response									
					<p>“Figure Two – Overview of the matrix of agriculture and settlement systems with either</p>  <p>“Agriculture and settlement land classifications are self-explanatory. However, in order to differentiate intensive and extensive categorisation of TOF systems, a table of thresholds has been developed that considers five types of factors across both agricultural and settlement. ”</p> <p>Table A1- Matrix to establish threshold between the intensive and extensive categorisation of TOF systems for Trees Outside Forests (TOF)</p> <table border="1" data-bbox="1368 1161 2157 1380"> <thead> <tr> <th data-bbox="1368 1161 1637 1198">Factor</th> <th data-bbox="1637 1161 1899 1198">Agriculture</th> <th data-bbox="1899 1161 2157 1198">Settlement</th> </tr> </thead> <tbody> <tr> <td data-bbox="1368 1198 1637 1310">Size of management unit</td> <td data-bbox="1637 1198 1899 1310">If individual site ≤100 hectares then extensive.</td> <td data-bbox="1899 1198 2157 1310">If individual site ≤20 hectares then extensive.</td> </tr> <tr> <td data-bbox="1368 1310 1637 1380">Tree cover/hectare</td> <td data-bbox="1637 1310 1899 1380">If crown foliage projection cover</td> <td data-bbox="1899 1310 2157 1380">If crown foliage projection cover</td> </tr> </tbody> </table>	Factor	Agriculture	Settlement	Size of management unit	If individual site ≤100 hectares then extensive.	If individual site ≤20 hectares then extensive.	Tree cover/hectare	If crown foliage projection cover	If crown foliage projection cover	
Factor	Agriculture	Settlement													
Size of management unit	If individual site ≤100 hectares then extensive.	If individual site ≤20 hectares then extensive.													
Tree cover/hectare	If crown foliage projection cover	If crown foliage projection cover													

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording		Committee Response
						<10% then extensive.	<10% then extensive.
					Economic value of production	If TOF provides less than living wage for this location then extensive.	If TOF provides less than living wage for settlement location then extensive.
					Intensity of management	If trees once established largely left to themselves with virtually no inputs of chemicals or treatments, then extensive.	If trees once established are mostly managed only for aesthetics and human safety, then extensive.
					Scale of cultural, ecological and conservation value	If no bioregional cultural, ecological and/or conservation values of the TOF areas then extensive.	If no bioregional cultural, ecological and/or conservation values of the TOF areas then extensive.
					Overall threshold	If ≥ 3 of the above factors apply then extensive.	If ≥ 4 of the above factors apply then extensive.
					The determination of whether a particular TOF area qualifies as extensive can be estimated by its owner and/or manager. However, the owner and/or manager will need to make an application to the certification body on the TOF scope of certification and accept that the ultimate decision on whether a particular TOF area qualifies as extensive is up to the certification body."		

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
337.						Rejected. Concepts suggested are not relevant to Australian conditions and add significant complication and confusion.
338.	WT	A.1	Existing 4 th 5 th & 6 th paragraphs	Create a new Section as the focus of its content changes to one of interpretation of requirements	Create a new Section as: A.3 Interpretation of Requirements for Trees outside Forests	Reject. Committee agreed to leave unchanged
339.	WT	A.1	Existing 4 th paragraph	Replace “timber” and “wood” with “products”. Language all of a sudden introduces “small forest owners” rather than SFAs	“Given the scale of their activities and frequency of product removal, these managers are not required to fully document conformance with all aspects of the standard. This Appendix provides a guide to TOF and SFA managers on the relevant elements of the Standard on which they need to document conformance (see Clause 7.5.1). This can reduce the cost of demonstrating responsible management.”	Agreed. See 332
340.	WT	A.1	Existing 5 th paragraph	Language all of a sudden introduces “small forest owners” rather than SFAs	“All requirements within the Standard referring to “forest/s” are also applicable to Trees outside Forests and SFAs unless otherwise indicated in this Appendix.”	Agreed. See 332
341.	WT	A.1	Existing 6 th paragraph	The focus on “auditors” is missing the point. Focus should be on the organisation able to interpret and implement the Appendix.	“Notes are provided on interpretation and implementation of requirements for landowners and/or managers. This would also provide guidance for auditors on assessing conformance.	Agreed. Informative note expanded for guidance.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					Owners and/or managers of TOF may generally be relatively small-scale and as such might be likely to participate in the standard through a group scheme, where in such a case the requirements for group certification will also apply."	
342.	WT	Table A1	Title	It indicates only TOF yet heading row indicates "TOF and SFAs".	"Table A1- Interpretation for Trees Outside Forests (TOF) within agriculture extensive and settlement extensive systems. This also applies to SFAs."	Agreed. Changed to farm forestry
343.	WT	Table A1	All	Apply heading row repeat across pages. Change wording to include proper definition "documented information".	This will be obvious – apply heading row repeat. "Minimum documented information and/or demonstration required to demonstrate conformance for TOF and SFAs"	Agreed. editorial
344.	WT	Table A1	All	The sub-committee provided a fine effort here. It seems to go beyond PEFC Appendix 2 Sections B & D. This makes it difficult to map how it meets PEFC standard.	Rows that follow have attempted to take the table and address any areas where it might fall short of the PEFC standard. A table format with extra columns might be a better presentation. For example, one column headed "AS/NZS 4708 requirement applies in full" and another "AS/NZS 4708 requirement not applicable". Where these apply or are not applicable	Rejected. The committee noted and agreed no change was necessary

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					then there could be a tick in this place. Where not then the existing second column would seem to apply.	
345.	TB	A1	4.2	There is currently no limits around who might be 'stakeholders'	Managers of TOF and SFAs shall document who are considered stakeholders in relation to their TOF/SFAs.	Rejected. Comment noted. No action necessary
346.	WT	Table A1	Clause 4.4 Forest management system	This is interpreted as "Not applicable" yet I would suggest that it is – see suggested wording	PEFC Appendix 2 Section B may apply = "Managers of TOF and SFAs shall establish a management system, including inventory and planning, implementation, monitoring and evaluation with an appropriate assessment of the social, environmental and economic impacts of TOF management practices, which forms a basis for a cycle of continual improvement."	Agreed. Guidance note corrected
347.	WT	Table A1	Section 5. Leadership, policy, organisation roles and responsibilities	This is interpreted as "Not applicable", yet I would suggest that it is – see suggested wording	PEFC Clauses 5.1 to 5.3 appear to apply, as they are not listed in Section B or Section D. "TOF and SFAs organisations shall demonstrate leadership and a focus on continual improvement of their management system through and a publicly available commitment with respect to conformance with the principles of AS/NZS 4708 and other	Agreed Guidance note corrected

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					applicable requirements of the certification system. TOF and SFAs organisations shall ensure that the responsibilities and authorities for relevant roles are defined and assigned.”	
348.	TB	A1	6.1	Current table does not cover PEFC Appendix 2 requirement 6.3.1.1 on identifying and having access to relevant legislation (this could include Codes of Practice	Consider whether additional wording is needed (it is confusing whether this would only apply if there is a FLEGT). But surely demonstrating understanding of relevant forestry and environmental legislation is necessary for any SFM activity?	Agreed Guidance note corrected
349.	TB	A1	6.1	PEFC Appendix 2 clause 6.2.5 requires that management plans specify ways to minimise the risk and degradation of and damages to natural ecosystems	Add new point (e) ways to minimise risk of degradation to natural ecosystems	Agree- covered by note d.
350.	WT	Table A1	Clause 7.2 Competence Clause 7.3 Awareness	The “Note” appears centred on Australia at expense of NZ	Ask our NZ colleagues what examples should be listed.	Agreed. No new examples were provided.
351.	TB	A1	7.3	Is it really essential that they demonstrate current knowledge of science-based practices? This is much broader than the requirements under 7.3	Managers of TOF and SFAs shall document their knowledge of appropriate management practices for their TOF or SFA. Alternatively look at modified words from 7.2.1 in Appendix 2 of the PEFC benchmark standard.	Agreed and Noted. Revised definition for science based strengthens this requirement.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
352.	WT	Table A1	Clause 7.4 Stakeholder communication and engagement	This is interpreted as “Clause 7.4.2 to Clause 7.4.4 are not applicable”, yet I would suggest some parts are – see suggested wording	<p>PEFC Clause 4.2 appears to need a little more input here.</p> <p>“Managers of TOF and SFAs shall document with respect to affected stakeholders:</p> <ul style="list-style-type: none"> a. maintenance of constructive relationships with neighbours and others who may be impacted by the management of their land and trees b. communication and engagement with them about their tree management c. availability of their plans to such stakeholders d. any consideration of the relevant needs, expectations and interests such stakeholders may have in their management plan and activities.” 	<p>Agreed</p> <p>Guidance note corrected</p>
353.	TB	A1	7.4.1	Point (a) may be challenging in some situations for small forest owners. The requirement is actually about striving to build constructive relationships with stakeholders (4.2), so perhaps what they need to document is their efforts to do this rather than ‘maintenance’ of constructive relationships. Also why should it cover everything else going on within their land (other than the forestry part)?	<ul style="list-style-type: none"> a. Efforts made to maintain relationships with neighbours and others who may be impacted by the management of their TOF. 	<p>Agreed.</p> <p>Guidance note updated</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
354.	WT	Table A1	Section 8. Operation	Inconsistent use of acronym	"Managers of TOF and SFAs shall document:"	Agreed. Check for consistency. Editorial.
355.	WT	Table A1	Section 8. Operation	Focus on "timber" alone	"Note: Management activities include: • tree harvesting (including salvage) • product transportation"	Agreed. Editorial
356.	TB	A1	8.2	The wording for this requirement is now much broader than the general wording in Clause 8.2	Suggest deleting the Second sentence beginning "This included injuries etc". For small forest owners the key emergencies are bushfire and chemical spills.	Agreed. Simplification made. No change to requirements.
357.	WT	Table A1	Section 9. Performance evaluation and Section 10. Improvement	Why is section in italics? Punctuation	"(i) document monitoring of conformance with the sustainability requirements identified in Section 11 to ensure health, vitality and sustainability of trees , plus adherence to the associated compliance obligations, and conformance associated with other risks and opportunities."	Agreed. Editorial
358.	TB	A1	11.1	This really needs to be time bound and focus on extent rather than cover as in small forest areas the cover may decrease for periods following harvesting. Not sure that documenting ecosystem services is really practical for SFA organisations and the word landscape is somewhat a problem for small areas (unless it is intended to mean that you don't need to do	a. Document maintenance of or an increase in extent and/or diversity of trees within the defined forest area.	Agreed. Guidance note updated

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				anything on your property if there is plenty of these values in the region!) PEFC benchmark standard allows carbon to be considered at a landscape level. This section needs a bit of a rethink.		
359.	TB	A1	11.1	Points b. and c. are probably too ownerous for owners of SFAs Point e. goes well beyond what is required in the main Standard under 11.2 which does not mention protective functions.	Replace existing b. and c. with new point b. "document efforts made to limit impacts from invasive and pest species, including the use of integrated pest management approaches". Delete point e.	Agreed. No technical changes
360.	WT	Table A1	11.2 Forest ecosystem health	Might go too far in "a. where degraded, restoration of, the health and vitality of their trees"	PEFC Clauses 8.2.1 is deemed to not apply as is listed in Section D. Reword as = "a. maintenance of the health and vitality of their trees."	Rejected
361.	WT	Table A1	11.3 Biodiversity values	Inconsistent use of acronym	"c. native forest, TOFs or SFAs have not been converted unless legal and justified though regulated arrangements that require offsets that result in no net less loss of biodiversity values."	Agreed Editorial
362.	WT	Table A1	11.3 Biodiversity values	Might go too far in "h. genetic, species and structural diversity to enhance the stability, vitality and resilience and functions of their trees are considered"	PEFC Clauses 8.2.1 is deemed to not apply as is listed in Section D. Reword as = "h. genetics to enhance the stability, vitality and resilience and functions of their trees are considered."	Agreed -small change made

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
363.	TB	A1	11.3	I think this section covers far too much detail for what is appropriate to TOF and SFAs (in comparison to large forest areas). It should not be mandatory to that trees have been planted to contribute to ecological connectivity or that genetic, species and structural diversity are considered (though the latter may be necessary under PEFC). The focus should be limited to the expected biodiversity values within these small areas and (in some situations) the values any other sites of ecological significance located in the defined forest area. In many situations it won't be possible to demonstrate "that biodiversity values have been conserved or enhanced"	<p>This section needs a lot more careful thought. These are initial 'thought-starter' ideas.</p> <p>Knowledge of the existing biodiversity values located within and close to the defined forest area, including whether or not any 'significant biodiversity values' or 'ecologically important non-forest ecosystems' exist</p> <p>Document any measures taken to protect or enhance the identified biodiversity values, including any areas of non-commercial tree planting</p> <p>Any remnant or hollow bearing trees are protected</p> <p>Demonstrate that any stream crossings (if relevant) minimise adverse impacts on biodiversity</p> <p>Some relevant words covering forest conversion and afforestation of non-forest ecosystem issues</p>	Rejected- noted
364.	TB	A1	11.4	Again I think this section covers far too much detail and too high expectations for what is appropriate to TOF and SFAs (in comparison to large forest areas). Minimising bare soil erosion may not be possible for TOFs that are integrated into broad acre cropping systems	<p>"Some suggestions on more appropriate requirements"</p> <p>Have identified whether or not any sensitive soil and water values in the defined forest area</p> <p>Have taken appropriate measures to protect any identified sensitive soil and water values</p>	Rejected- Noted. Leave as is

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					<p>Demonstrate that the protective functions of trees within the agriculture (or settlement) landscape have been maintained or enhanced</p> <p>Demonstrate that effective soil and water conservation measures have been implemented during and after forest management activities</p> <p>Cooperation with other land owners to reduce soil erosion and improve water quality in degraded catchments</p>	
365.	TB	A1	11.5	<p>There is quite a bit of overlap under this criteria with requirements from other criteria. For TOF/SFAs we should keep the approach as simple as possible. And then the simple things are missing!</p>	<p>A suggested alternative approach</p> <p>Identify the range of existing wood and non-wood forest products provided within the defined forest area</p> <p>Demonstrate that allowable cut is appropriate to the area and productive capacity of the forest and undertaken in a manner that recognises commercial constraints and available markets</p> <p>Demonstrate that efforts have been made to minimise damage to growing stock during forest operations</p> <p>Demonstrate that there is an appropriate reforestation program</p>	<p>Rejected- Noted. Leave as is</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					following final harvest, involving tree species, provenances and silvicultural practices appropriate to the current and expected future site conditions	
366.	WT	Table A1	Cultural values	11.6 is missing. Might go too far in "e. allowance of existing legal and traditional uses and practices"	PEFC Clauses 8.6.2 is deemed to not apply as is listed in Section D. Left column = "11.6 Cultural values" Right column = delete "e. allowance of existing legal and traditional uses and practices."	Rejected. Leave as is but clause numbering corrected
367.	WT	Table A1	Social and economic benefits	11.7 is missing. Might go too far in "e. That procurement of supplies locally and offer timber to local processors" & "g. contributions to the health and well-being of local communities"	PEFC Clauses 8.6.6 is deemed to not apply as is listed in Section D. Left column = "11.7 Social and economic benefits " Right column = delete "e. That procurement of supplies locally and offer timber to local processors" & "g. contributions to the health and well-being of local communities."	Rejected
368.	TB	A1	11.6	I think this section should just focus on 11.6.1 and 11.6.3. I don't think the other aspects are relevant to TOF/SFAs. In both cases the requirements should stick to demonstrating/protecting existing recorded and publicly available values. Beyond that it is not realistic to expect		Rejected- Noted. Leave as is

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				them to take actions on the other sub-criteria		
369.	TB	A1	11.7	Again this approach covers quite a lot of things that probably are not realistic/appropriate for SFAs eg, contributions to local communities, sending timber to local processors, access for research etc. Key focus should be on WHS and treatment/payment of workers and possibly point (f) though this is usually done by a contractor and the owner may know very little about these matters	Demonstrate identification of Health and Safety risks and application of safe working systems for forest management activities Points b. and c. are probably OK Point f. is conceptually sound but may be beyond the ability of SFA owners so the words probably need amendment Rest of the points are a problem for SFA owners.	Rejected. Noted. Leave as is.
370.	TB	A2		While PEFC benchmark has similar wording, if we go down this track then we will need to provide a lot more guidance on how this is to be done, so that both the SFA owners and the auditors understand what is required. In my view it opens up a big can of worms that is really outside the remit of SFM. Are we going to check that quad bikes have roll cages etc or that non GMO canola has been planted?		Agreed. Wording amended to clarify. Intent is unchanged
371.	Timberlands	Appendix C		Appendix C is not particularly clear from the heading what it is actually intended for?	Clarify the intent of Appendix C – a guide to finding the threat categories that relate to the definition of ‘threatened’.	Agreed. Editorial clarification made.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
372.	HQP	Appendix c	Table c.1	Queensland nature conservation Act 1992 threatened categories are incorrect in the table	A) critically endangered, B) endangered, C) vulnerable, and D) near threatened.	Agreed
373.	Timberlands	Appendix C		<p>The nation guidance for NZ includes reference to the Draft NPS for Indigenous Biodiversity. There are two issues with that. The document is still in draft and may change before it is adopted. And secondly even the draft does not include the terms referred to in NZS4708 ('threatened areas' and 'threatened environments'). The NPS only refers to threatened species.</p> <p>As far as we are aware there is no national dataset of threatened ecosystems in NZ. The Threatened Environment Classification is somewhat relevant but it just gives broad brush classification of NZ depicting how much of a certain original ecosystem type remains – which doesn't necessarily provide an accurate classification of what remains.</p>	Delete the reference to the Draft NPS Indigenous Biodiversity and replace it with an appropriate reference.	Agreed References corrected
374.	HQP	Appendix D	Table D.1	States consumer products can be used in domestic quantities. e.g. warfarin and brodifacoum, for rodent control in	Coloumn 1: Consumer products for pest control . e.g. warfarin and brodifacoum	Agreed Clarification made.

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				built environment. We use large quantities of these at our nursery to manage rat and mouse damage to germinating seeds and I'm concerned this may be out of the scope of definition for "domestic quantities"		
Submissions sent by correspondence						
375.	SATPA			<p>An extensive submission citing concerns over FM practices of forest growing companies.</p> <p>No specific comments on changes to the draft.</p>		<p>All comments noted.</p> <p>Matters to be referred to certification bodies, not a matter for the Standard</p>
376.	WPMA	11.7		<p>11.7 Social and economic benefits (Objective) <i>Forest management shall maintain and enhance long-term social and economic benefits.</i></p> <p>WPMA fully supports this objective as it reflects the key role of social and economic dimensions of sustainable forest management.</p>		Noted

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
377.	WPMA	11.7.6		<p>11.7.6 Remuneration and conditions The WPMA supports the inclusion of remuneration and conditions standards in the revised AS/NZS 4708. It however does not support the reference to the living wage as the basis for setting the minimum rate of pay because:</p> <p>The “Living Wage” is not set by government but by an arbitrary method of a community of interest, grouped within a New Zealand Incorporated Society¹⁰. As a result it is unpredictable as it is not regulated or influenced by the New Zealand Government.</p> <ul style="list-style-type: none"> ○ It is anticipated that NZS 4708 will likely be cited, in sections, by government as a means of demonstrating legality of exported wood products, logs and timber. So it also has the potential to become cited in law. ○ The WPMA is unclear how this will be audited and, it could create a source of confusion over whether non-primary sectors of the labour force are included as forest workers. 	<p>11.7.6 Remuneration and conditions <i>The forest manager shall monitor and demonstrate that:</i> (a) all forest workers are engaged freely and are duly compensated; (b) it, and its contractors and subcontractors are in compliance with legal obligations creating minimum employee entitlements, including but not limited to those set out in national legislation and collective bargaining agreements; (c) wages of forest workers shall meet or exceed at least legal, industry minimum standards or, where applicable, collective bargaining agreements; (d) wages, salaries, superannuation and other entitlements and employment contracts are paid on time; and (e) working hours and leave shall comply with state or national legislation, or applicable collective agreements. <i>The forest manager shall ensure that all competent forest workers are paid at rates that meet or exceed:</i> (a) minimum forest industry standards; (b) recognized forest industry wage agreements; or (c) living wages, where these are higher than the legal minimum wages. <i>Note Where wages are below the living wage of a country, steps should be taken to attain increased wages towards a living wage level over time in addition to increases for inflation.</i></p>	<p>Rejected. The committee supported the living wage, including the ISEAL definition.</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				The WPMA suggests the <i>PEFC Benchmark Standard</i> is used to guide the replacement of the reference to a living wage.		
378.	WPMA	11.7.10		Add new sub-clauses	<p>11.7.10 Local industry support and development</p> <p>a) engage proactively with local and regional forest products processors and consider their needs for supply over a time period needed to justify domestic investment in processing;</p> <p>b) take account of documentary evidence of tariff and non-tariff influences applying in log importing countries by proportionate adjustment of the export-parity price of logs sold domestically;</p> <p>c) supply local processing and value-added facilities, where commercial viability including price of non-local and local options, are at least equivalent; and</p> <p>d) establish or support and encourage the establishment of local processing and value-added activities where not currently available. Support mechanisms such as the establishment of long-term wood supply contracts with local</p>	Rejected

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					wood processes is a good example of an appropriate response.	
379.	WPMA	Guidance Note 01 to AS NZ 4708:2014		Requests that the Guidance to NZ AS 4708 be updated	<p>WPMA recommend that the Guidance Note (01- AS/NZS 4708 - 2014)13 is updated to reflect the changes resulting from the revision of AS/NZS 4708. In relation to the current Guidance Note section 01 Requirement 9.1 Regional Development (Draft revised version 11.7 Social and Economic Benefits) this should include;</p> <ul style="list-style-type: none"> o Type of verification requirement <p>Currently this is based on a document-based evaluation and consultation with relevant regional bodies. It is suggested that in relation to establishing compliance with section 11.7.10 a) evidence of activity in relation to supporting local wood processing is also obtained through seeking information on tariff and non-tariff distortion in global log pricing and consultation with:</p> <ul style="list-style-type: none"> o Government agencies such as the Overseas Investment Office, MPI, NZ Forest Authority and MBIE; 	<p>Noted.</p> <p>The review of guidance is outside the immediate scope of this revision, guidance will be considered as separate project. This request will be considered at that time.</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
					<ul style="list-style-type: none"> o Wood Industry organisations such as the WPMA; o Indicators o The WPMA recommend the annual reporting against standard quantitative measures including the total volume of wood supplied to New Zealand added value wood processing (as a % of the total annual wood volumes harvested). o Report on the value, volume and term of long-term supply contracts that the company has entered into for wood processing to be undertaken in New Zealand. 	
380.	IFA	Appendix A		<p>We would ask that those conducting this review are mindful of farmers and small private growers who would like to have their commercial trees covered by the updated Standard. We ask that further consideration is given to the criteria and activities that are required to meet the Standard to ensure that they are both practical and reasonable for small forest growers, because we consider that some of the proposed requirements (in Table A1) may be either very difficult for small forest growers to undertake on their</p>		<p>Noted-considered and rejected</p> <p>TOF needs to be consistent with PEFC requirements. IFA concerns were noted, but adopting the IFA request would cause significant treat to international endorsement and recognition of AS/NZS 4708.</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<p>own or potentially be requiring a higher level of requirement than what is required for Trees Outside Forests under the PEFC's Benchmark Standard for Sustainable Forest Management (Appendix 2 of PEFC ST 1003:2018). We also request that the reviewers consider if updates to the Standard's requirements including the technical guidance requirement could be beyond the small forest grower who has a mixed crop farm (minimise bare soil exposure) or may only be a small component of their overall farming activities that only involves tree harvest every 10 - 20 years.</p> <p>In addition, there appears to be some lack of clarity with the definitions of 'forest' and 'trees outside forest' regarding small woodlots or multi-row linear tree plantings as the definition of forest does not include any minimum area. We think this needs further consideration so it is clearer when the reduced set of the requirements would apply to commercially grown timber.</p>		<p>Rejected. Overlap in definitions are noted. No change agreed.</p>
381.	GBCA			<p>The Green Building Council of Australia (GBCA) wishes to acknowledge the engagement process you have followed in the drafting of the</p>		<p>Noted</p>

No.	Submitted By	Clause	Sub-Clause	Comment	Suggested Wording	Committee Response
				<p>standard. We are also thankful for receiving our earlier feedback on our members' increasing concern on the sourcing of timber, and to allow us to provide it directly to the Standard Reference Committee.</p> <p>We also wish to note the improvements in this standard compared to its earlier version. Improvements that we strongly support include:</p> <ul style="list-style-type: none"> • The inclusion of language acknowledging climate change, and its impacts on your industry. • The expansion of sustainability criteria in the standard. • The alignment and standardisation to ISO with regards to management policies, planning, and review. <p>We want to acknowledge the additional clarity in the standard on how to identify the situations where native forests and ecosystems may be responsibly converted. The standard setting preconditions around maintaining positive impact on long-term carbon sequestration and requiring safeguards for significant biodiversity values is welcome.</p>		

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				<p>We commend Responsible Wood for the improvements of the sustainability criteria. In particular:</p> <ul style="list-style-type: none"> • The requirement for maintaining or increasing carbon stocks in the forest, rather than the old language. • The requirement to consider climate change impacts on forest ecosystem health. • The additional clarity to maintaining biodiversity values, cultural value, and social and economic benefits. 		
382.	GBCA			<p>In our previous communication we noted our members concerns that the timber used in the construction of buildings does not come from native forests, particularly viable old growth forests, or from areas which provide habitat for endangered species. While the standard provides significant changes that would reduce the risk of these outcomes happening, and ensures a higher level of protection than before, we believe the standard would benefit from additional provisions to enhance / safeguard the protection of native forests, or forest areas where threatened species reside. It is unclear in the standard what actions must be taken should these species be identified, and</p>		<p>Rejected. Noted and considered at length. No change required.</p> <p>New definitions and requirements for managing significant biodiversity values achieve all the outcomes requested by the GBCA</p>

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				<p>whether and how they need to be protected, beyond just compliance with local legislation. The standard is also not clear on whether old-growth forests require any additional management to maintain their value, something of importance to our members.</p>		
383.	GBCA	11.1		<p>It would also be beneficial to highlight the importance of forest carbon stocks for addressing climate change impacts and the potential of forests to serve as carbon sinks. The standard should also highlight, in line with its revised, and welcome, acknowledgement of climate change, the role that forests will play as a potential contributing solution to address climate change. We would also encourage additional clarification around maintaining or increasing carbon stocks. While the intent can be inferred, the term carbon stock is not defined. We would also encourage defining the term 'scientifically justified', as it is unclear what that means in the context of identifying carbon stocks. The standard should describe recognised methods rather than leave it to the forest manager to decide.</p>		<p>Rejected. Noted and considered at length. No change required.</p> <p>Carbon stock is well understood in the context of forest management, as is scientifically justified.</p>

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384.	GBCA	7.4		<p>Section 7.4 should clarify how the public summary must be made available. We would recommend the statement be made available on their website and would encourage Responsible Wood to maintain a register as well online.</p> <p>Section 7.4 should also require that the summary:</p> <ul style="list-style-type: none"> o Describe how it meets the sustainability criteria o Outline their greenhouse gas emissions reduction plan o Describe any conversion activities and any justifications. 		<p>Noted. Rejected</p> <p>This is a matter for certification scheme rules, not a National Standard. Referred for consideration to the scheme rules working group.</p>
385.	GBCA			<p>We also recommend the standard encourage, though not require, the forest manager to develop an Environmental Product Declaration for their product. The standard should also encourage the forest manager to take account for of their non-renewable carbon emissions and look to eliminate them in a manner that is not through the carbon sink in the forest, as that could result in double counting.</p>		<p>Noted.</p> <p>Outside the scope of this Standard. Referred to the CoC SRC.</p>
386.	GBCA			<p>On a separate note, while the standard does define the term 'shall'</p>		<p>Rejected</p>

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				as a requirement and differentiates it from 'should' (a recommendation), we would encourage the standard adopt 'must' for requirements as that would clarify intent more strongly.		Terms are aligned with terminologies used in SA standards.