

**Comments on the report and outputs of the 4th meeting of the
FSC Plantations working group.**

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Summary of Key Points

- The basis of our comments is to ensure that FSC uphold an **Effects Based** system rather than focussing on thresholds that often do not result in the desired outcomes.
- Certification must also be based on sound science else risk market distortions and exclusion under world trade agreements (e.g. WTO)
- The review should not lose focus of the need to keep plantations **economically viable**. Without economic viability environmental and social expectations cannot be achieved.
- Forest managers operating in countries with **robust legal, environmental and social welfare systems** should have this recognised. The bar should be raised for forest managers operating in countries where these systems are absent.
- Plantations should **not be expected to mimic nature**, but be able demonstrate a contribution to natural biodiversity.
- The **use of appropriate chemicals and a full array of application methods** (including aerial) offers the best balanced outcome for integrated pest management.
- **Sphere of influence** should be adopted as a term to better reflect the concept of the landscape in which a FMU is managed.

Introduction

The NZ Forest Owners Association is a non government organisation that represents the majority of forest owners in New Zealand. Its members' forests comprise more than 70 per cent of the country's 1.8 million hectares of plantation forestry. The Association adds value to the businesses of its members by undertaking activities, which could not be handled easily or efficiently by individual growers working alone. Its credibility also relies on the fact it has the support of the majority of New Zealand's production forest owners.

The NZ Forest Owners Association appreciates the opportunity to make comments on the plantation working group recommendations. There has been significant interest in New Zealand throughout the process. All certified New Zealand companies have taken part throughout the process either individually or by way of a group response and will of course continue to be active participants and give a considered response.

Like other respondents, NZ Forest Owners Association has decided not to use the on line response but submit instead this written response.

This is because we are not comfortable with the use of hedonic scales, and the flexibility to comment, on some of the questions. We would be extremely concerned if the hedonic scale is used to make or justify decisions in this review. The decisions must be based on sound science and be effects based. If not FSC risk market exclusion and will become a "boutique certification system" with very little influence on international forest management.

Our responses follow

Please note the PWG Questions are presented in *Italics* and our reply in normal font with [blue colour](#). Where we have made no comment, we neither agree nor disagree and reserve the right to comment on these matters in the future.

Policy

1. Within ten years, the Policy Working Group (PWG) wants to see a certification system and process which sets a new paradigm for forest and plantation management practice, by:

- 1. Establishing the FSC Principles and Criteria (P&Cs) as the forest and plantation management standard of choice.*

Agree. This needs to be an important goal for FSC. To achieve this FSC needs to ensure that appropriate economic recognition is afforded to our business. This is not currently the case. Companies need to see an economic advantage or benefit, to at least balance the significant costs of FSC. We would in principle also support any other reputable and recognised sustainable forestry standard that we feel achieves the same objectives and standards as FSC.

- 2. Creating a significant public demand for certified forest products*

Agree – providing the certification is based on sound science and is effects based.

- 3. Ensuring there is demonstrable improvement of the environmental values in the plantations estate.*

Agree but we feel that this should be just one of the outcomes of commitment to well managed plantations by certified companies.

- 4. Promoting community-based ownership so that a significant proportion, circa 25%, of FSC-certified plantations are community operated.*

Disagree. We question the intent and the practicality of enforcing. How will this be achieved? It could be as extreme as reduce or stopping the certification of non-community forest owners so that the 25% can be met?

We are also concerned over what would be considered community based? Would the ownership apply to the forest or the management organisation, which are often independent of each other? Is community ownership need to be local, national or even international as many forests and management companies are multiply owned, by across a broad spectrum of ownership.

FSC should be about good forest management from which social benefits flow and should not have a role in prescribing the ownership structures of how that good management is provided. If this is aimed at addressing inequity caused by the displacement or inequitable employment situations attributed to plantations in countries around the world then this should not be applied to countries like New Zealand where this simply has not happened.

Also, is this to apply to companies with chain of custody? If not it is inequitable since the grower is already footing almost the entire FSC bill and this will represent another cost?

5. *Promoting harvested wood and non-timber products from well managed forests and plantations*

Agree. However, we submit that FSC should have greater focus on ensuring economic viability through balancing economic, environmental and social components. Without economic viability environmental and social expectations cannot be achieved.

6. *Promoting the maintenance of ecosystem functioning at the landscape level, and ensuring this at the FMU level*
7. *Building national consensus in order to resolve conflicts surrounding forestry*
8. *Providing a well recognised system for social dialogue and improvement in community relations*
9. *Contributing to the reduction of poverty and supporting a more balanced distribution of wealth*

How can FSC give effect to this? We appreciate that is aimed at addressing significant social issues in some countries, but in New Zealand and many other nations these issues are within functioning legislation and welfare systems.

10. *Ensuring social issues such as worker health and welfare are dealt with as systematically as environmental and economic issues*
11. *Guaranteeing to halt the expansion of those plantations within its system which are poorly managed.*
12. *Working to prevent the expansion of poorly managed plantations worldwide*

We agree with the “raising the bar” vision in concept, however, we believe FSC needs to address the inequality of the certification process. Our view is that initially there needs to be a “levelling of the bar”, getting those poor managed certified forests up to a common set of FSC standards irrespective of international locations. FSC is creating market distortions by allowing sub-standard managers to be certified, while expecting managers in countries with robust legal and social systems to raise their standards well beyond the international norm. This may mean raising the bar for sub-standard forests and de-certifying non-complying companies, whilst accepting managers operating under robust legal and social systems such as are present in New Zealand.

Draft Recommendations

2.1 Social Management System

The Group recommends that managers introduce Social Management Systems to use to address social issues in forest and plantation management, which certification bodies would then be able to audit.

The social management system, which will need to be appropriate to the scale and intensity of the operation and the local context, should include:

- A detailed mapping of the social landscape, identifying its important features
- The social objectives of the FMU in relation to employees (including contractors and sub-contractors), the local community and indigenous peoples
- A personnel management system, including local employment policies and actions
- A detailed, participatory social assessment which clearly shows the impacts of the FMU on the local community, both positive and negative
- A clear strategy for preventing, eliminating, mitigating and/or compensating local communities in the event of negative impacts
- Explicit actions to participate in, and strengthen, the local economy

Agree with the concept but it needs to be done sensibly. For example, in the context of local scale and context e.g. in a national initiative. The social management system must recognise robust legal and social welfare systems in the country of operation, else risk market distortions.

The social management system must apply to all forest types as this is not a plantation specific issue.

2.2 Interpretation of Criterion 6.3 for plantations in the absence of national standards

With the intention of clearly distinguishing operations that qualify for FSC certification from those that do not, the Group recommends that Criterion 6.3 should be interpreted in the following way:*

An FSC certified plantation will take an active approach to optimising its conservation strategy. The focus of maintaining ecosystem integrity is on the landscape and FMU level.

Forest managers cannot be held responsible for effects at the landscape level that they cannot control. Responsibility should only apply to the forest manager's sphere of influence. Our belief is that as long as the on plantation and immediate off plantation impacts are mitigated at the FMU level the integrity at the landscape level will be preserved. This is consistent with an effects based approach.

Optimising the conservation strategy at this level includes optimising the design of:

- *Areas of representative ecosystems, HCV (High Conservation Value) areas, rare ecosystems and species*

This already occurs in our well managed plantation.

- *Streamside zones of native vegetation and other elements of landscape connectivity*

This already occurs in New Zealand. Regional and District plans may specify this, or company environmental rules and guidelines address this, when appropriate. In particular when compared to the economic alternative of pastoral farming, well managed plantations offer considerable streamside and biodiversity benefits. Thus the local context of land use alternatives must also be considered.

Design of conservation corridors

In many cases, an expectation for corridors is unreasonable. For example, New Zealand plantations are often established on farm land where there is little or no remnant vegetation to link. Plantation forests very nature of being forests, provide substantial wildlife corridors when compared with other competing (pastoral) land uses.

*At stand level, the focus is on maintaining streams and wetlands at various scales. **Appropriate to its size and scale, a certified operation or a cluster of operations will undertake research aimed at advancing its understanding of how best to optimise its conservation strategy.** Such research might include:*

- *Experimenting with various levels of structural and native tree species retention at stand level in areas where the natural vegetation is forest*
- *Experimenting with various conservation area [set-aside] designs*
- *Retaining structures and properties characteristic of natural ecosystem dynamics*

All of the above currently happen anyway in a well managed stand. However, it is not logical to legislate that it must happen for each unit. Often one plantation, or a location within a plantation, is very different to another therefore it is not practical or logical to expect it to happen by a formula. Work at the FMU level will happen on well managed plantations on a needs basis. Maybe the criteria should be "appropriate to the size, scale and situation of the FMU". There is also the nature of existing plantations some of which have been through 3 rotations in 100 years. Many of which have developed their own particular contribution to natural biodiversity through boom bust cycles. A very good example is the success of the endangered NZ falcon in plantation cutover.

We submit that rather than being expected to “mimic nature” plantations should be shown to contribute to biodiversity, either from dynamic systems in the plantations themselves and/or through natural set asides. Also they may need to demonstrate that management is not detrimental to biodiversity. This is consistent with the effects based approach.

- *Adapting the size and spatial distribution of managed stands within the plantation management unit*

This may not be possible in many cases. It needs to be remembered that Plantations are not native forests; they are a crop to be planted managed and harvested. In this context we can minimise the environmental footprint but we do not always have the luxury of being able to alter the size and spatial distribution of managed stands. Many existing plantations have been established to meet best practice economic outcomes, which must also be considered. Providing the size and distribution does not adversely affect biodiversity and the plantation can demonstrate a contribution to natural biodiversity.

There is also the nature of existing plantations some of which have been through 3 rotations in 100 years. Many of which have developed their own particular contribution to natural biodiversity through boom bust cycles. A very good example is the success of the endangered NZ falcon in plantation cutover.

The research is continuously monitored and assessed and where relevant, the knowledge gained is integrated in the management of the FMU.

**Criterion 6.3 = Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem*

2.3 Stakeholder Consultation

The Group recommends FSC to ensure that consultation is properly addressed by the manager applying for certification, and/or re-certification. To that end, the responsibility for engaging affected parties clearly rests with the manager.

Agreed but it needs to be realised that sometimes, despite best efforts, parties will not engage with the managers. However it is fairly clear to the CB when this happens.

This needs to be consistent across all forest management types as it is not just a plantation issue.

At the same time, the Group interprets consultation as being one aspect within a broader context of participation, recognising that ‘engaging’ implies a level of involvement between the plantation or forest managers and affected communities

The subject of consultation may surface in several of the Principles, and their Criteria. Nevertheless, the aggregated parts must result in a whole that translates into a demonstrable commitment to stakeholder involvement and dialogue.

The Group would judge commitment to have been demonstrated when, according to the size of the operation:

- *The manager has implemented a clear and robust consultation process which covers pre- and ongoing certification**

Agreed, however there needs to be standards of ‘reasonableness’ and ‘timeliness’ applied as some stakeholders will use the process to stifle or subvert progress. Occasionally vexatious objectors are encountered and there needs to be a process to ensure they are appropriately managed. It should also be recognised that not all stakeholders want to be consulted and in particular they may only require consultation to occur when their interests are likely to be effected. In NZ many stakeholders have expressed this opinion and some have requested that certified companies stop pestering them.

- *There is a similarly recognised conflict resolution process in place**

There needs to be a “agree to disagree” clause within conflict resolution. Sometimes agreement cannot be reached for a host of reasons. The key point is a formal process has been undergone, with best efforts made and there has been a satisfactory resolution outcome with the caveat that some disputes have to be recognised as intractable despite the best efforts of the managers. Obvious effort towards a resolution on the part of the manager should be the arbiter of compliance, how you get to resolution should be your own business.

**large scale operations might adopt internationally recognised processes such as ISO 14001*

The Group recommends that CBs evaluate certification applicants according to whether they are fulfilling all the requirements of the consultation/conflict resolution processes they have adopted. The evaluation evidence will go a long way to ensuring the manager retains the confidence of everyone involved in those processes. Further, the Group also recommends that FSC provides practical guidance on how managers’ consultation and conflict resolution processes can be improved.

Agreed. At some point FSC need to take an active part in resolving a dispute.

In the absence of a National Standard, the manager is responsible for demonstrating how the concerns of other interested parties have been taken into account.

Agreed

The PWG recommends that further technical elaboration of Guidelines include investigations of established international models for stakeholder consultation (e.g. ISO14001).

Some of the issues a good process would pick-up on include whether:

- *The manager has identified and documented any significant conflict*

Agreed

- *The manager is able to demonstrate what action they have taken to resolve the conflict and communicate with the affected parties*

Agreed

- *The CB is able to evaluate the managers actions against the P & C's and standards, documents, guidelines*

Agreed. Surely this is a given and what the audit is all about. This is certainly what occurs in New Zealand assessments.

- *The CB is able to determine if consent has been 'manufactured'*

We understand the sentiment but have no idea how this can be objectively done. We would be nervous of any prescription in the P and C in this respect. This should be up to the judgement of the CB. FSC has procedures for complaints against assessments if stakeholders do not consider they have been treated fairly in respect of the P & C. Whilst a protracted process we believe this works.

- *The manager is being sufficiently proactive in reaching out to the community e.g., going to them at the operation's cost, rather than expecting the community to come to the manager, at the community's cost.*

Disagree as a generalisation. Determining what is sufficiently proactive may be problematic. We agree that plantation forest managers should have proactive mechanisms in place they cannot be expected to identify and address all issues. Obviously, the community will raise some issues as they may not be apparent to the forest owner.

The manager's research into the local community has identified all affected parties.

Disagree as a generalisation. Whilst the managers should have some proactive mechanisms in place they cannot be expected to identify all affected parties. In reality affected parties come and go and there are different affected parties for different issues. Many do not announce themselves and some have a policy of not engaging but rather seeking other routes such as media or civil actions to further their case. In the case of indigenous groups there can be multiple claims by members of a group each claiming to have the mandate for that group. There are also interested parties whose motivations may conflict with the affected parties or worse seek to subvert them. We urgently need guidance from FSC as to what point we can ignore the claims of interested parties where they do not coincide with those of affected parties.

- *Delegations of rights by indigenous peoples and local communities are based on prior, informed consent.*

Agree that consent should not be based on coercion or inaccurate information. However, there needs to be safeguards to ensure that commercially sensitive information remains confidential, whilst undertaking consultation in good and open faith.

2.4 Use of Chemicals

The Group recommends that certified operators adopt a best practise approach, which will include:

Once again we are bemused by the inclusion of Chemicals in this review when there is an FSC process in progress to look at the pesticides policy. We would ask for urgent clarification as to who is conducting the chemical review and which review process we should relate to.

We agree with the comment in the report that pesticides are an inherent component of good plantation management and are unlikely to be phased out through the introduction of alternatives.

We do however have strong views on a ban on aerial spraying. Comments follow in the relevant section.

- *Integrated Pest Management*

We agree that chemical use should be through robust and considered integrated pest management (IPMS). We also submit that FSC should consider robust national legislative systems for pesticide management. The basis of chemical management must be effects based where chemical use and application should be acceptable providing there are no significant adverse environmental or social effects.

The IPMS approach should provide for all methods of application that are then only undertaken in the appropriate circumstances. There are many tools to ensure that aerial application has adverse no environmental or health effect – Best Management Practices, buffers, weather condition restrictions, no

application on non-target areas, selective chemicals, GPS, flow metering, nozzle sizing for droplets, etc, etc. This is consistent with the EFFECTS based approach.

- *Phasing out aerial spraying*

Disagree. A more appropriate and realistic goal may be to define when aerial spraying is allowed. Aerial spraying is a basic requirement for all plantations within New Zealand. There are many reasons for this. They include the following:

1. Where cost and logistics prevent other methods being viable.

In New Zealand the only economic method of controlling weeds for the majority of the plantation is using aerial spraying. Manual methods are expensive as New Zealand has high labour rates, and are unable to cope with the intensity of the timing of the operation. There are narrow windows of time to control weeds and it is almost impossible to get adequate numbers of well trained and suitable labour to hand weeding or spot work. Missing the window of opportunity will lead to perverse outcomes such as more chemical required to treat pests outside the optimum time. This may result in several more treatments.

The workforce perceives this sort of work as dirty and dangerous. Hand spraying is difficult in New Zealand hill country where blocks can be difficult to access. Imagine carrying a backpack of spray with a hand pump over a recently logged, steep terrain area, where weeds have hidden the slippery branches and logging debris. The spray sloshes around all day, with the real opportunity of slips and spills. The picture is compounded if workers are using manual methods with slashers.

Some targets of pesticides, which may require total control determine a necessity for aerial application 1080 for possums in New Zealand is agreed with ENGOs. Also copper-oxychloride for *Dothistroma pini* can only be applied by aerial method. In NZ there are also weed species than can only be treated effectively by aerial application, else they will grow from outside a spot and lean into the tree, smothering it, i.e. gorse and broom.

2. When OHS considerations and OHS legislation prevent ground spraying

Forestry companies in New Zealand as employers, have a very clear statutory duty of care to "provide and maintain a safe working environment" (Part 2, section 6 (a)) for its employees and contractors under the Health and Safety in Employment Act, 1992.

In New Zealand's steep, rugged hill country where large tracts of plantations occur, aerial spraying is a far safer and legally more viable option as well as the only feasible economic method.

3. Where the ground based methods available would deliver less controllable environmental outcomes.

In many cases, of the effective methods available none may offer a safer outcome environmentally than aerial spraying. Modern aerial spraying techniques with GPS, droplet control, variable flow metres, etc, which are used in NZ offer the applicator a toolkit that can produce an extremely accurate result, more so than many ground application methods. Used appropriately the outcome will be the best balance of economic, environmental and social factors.

4. Environmental Factors

In New Zealand there are often environmental factors such as frosting that require aerial spraying rather than spot release treatment. Spot spraying in frost prone areas enhances the effects of frosting on the seedling and often results in severe mortality. The only alternative is to aerial treat the area.

5. When compelled to control a pest by an external authority.

In the event of a biosecurity emergency or regional pest management response companies may have no choice but to use aerial spraying or allow aerial spraying on their estate. For example in New Zealand the Animal Health Board apply aerial 1080 to control possums which are a serious vector of bovine tuberculosis (they are also a serious biodiversity threat). Land owners / managers are obliged by law to allow the operation to be undertaken on their property.

Another example is that some councils require oversowing of grass species in high erosion risk cut over areas. Successful oversowing under these conditions can only be achieved through aerial herbicide treatment prior to oversowing.

In these circumstances the reason (e.g. legal instruction/order to spray) will demonstrate to the CB that the company had no alternative.

6. Where IPM timeframes do not afford adequate time frames for success.

In some cases pest populations can suddenly and inexplicably get out of control, in these cases immediate aerial application is required.

- *The adoption of safety, health and quality controls covering workers and the environment*

Agree – this is a key area that needs to be addressed. It is simply unacceptable that workers in some countries can be expected to apply

chemicals without the appropriate protective clothing such as boots, gloves, vests, leggings, etc.

- *The monitoring of, and reporting on, such safety, health and quality controls*

Agree, this already occurs in NZ.

- *Managers having to demonstrate the programme of efforts they have made to avoid or reduce pesticides use*

Agree to an extent. It is good forest management to consider all options. However, much work has already been achieved and this needs to be recognised. There is also a diminishing return on such work as we exhaust the readily available and practical methods.

- *The demonstrable ongoing investigation into, and evaluation of, chemical free alternatives to pest control*

Agree to an extent. It is good forest management to consider all options. However, much work has already been achieved and this needs to be recognised. There is also a diminishing return on such work as we exhaust the readily available and practical methods.

In addition, the PWG recommends that FSC develop Guidelines for integrated pest management

Agree – this should take into account countries with existing robust legal and social systems that deal with chemical assessment and use, and must focus on an effects based system

As a further step, the PWG recommends a review of the FSC chemicals policy to ensure it is in keeping with the vision in this document.

Agree **ONLY** providing that this review should take into account countries with existing robust legal and social systems that deal with chemical assessment and use, and must focus on an effects based system. Certificate holders from Australia, Canada, New Zealand and the United States have recently requested a review as the Pesticide Policy and highly hazardous rankings are flawed.

2.5 Practically Improving the Certification Process

*The Group's understanding is that the majority of certification controversies have occurred in the absence of national standards which indicates the absolutely vital importance of balanced, well-functioning National Initiatives within the FSC system. **Where they are absent, FSC National Initiatives must be established as a matter of urgency. Where they exist, their role needs to be significantly upgraded, and this implies a need for substantial additional resources and support.***

This upgraded role should include:

- Supporting, advising and assisting in the resolution of CB-related disputes that arise during the certification process
- An obligation to monitor complaints, perhaps through an independent body. To achieve this the NI needs both to be notified of complaints, and to have a mechanism through which it can be involved.

Agreed in principle. Most importantly FSC must come off the fence in disputes that could derail a national initiative or standards process.

The Group also judged there was a role for the FSC IC in relation to the establishment of National Initiatives including:

- To ensure there is up to date standard procedures, guidance and documentation for NIs (some of which already exists).
- Ensuring mediation processes are initiated promptly, wherever they are required, either directly or through an independent body such as an ombudsman.

Furthermore, there is an important role for the FSC accreditation unit in ensuring that future CB performance supports the vision in this report.

The Group judged that the following actions are necessary to achieve this:

- CB Rotation – no two five year re-evaluations should be undertaken by the same CB.

Disagree – This seems predicated on the fact that CBs are not to be trusted or not competent. The FSC accreditation process should be up to detecting inconsistent performances by a CB.

- Ensure the CB has a good understanding of the economics of the industry in which certified companies are operating.

Agree this is essential to achieve a balance that results in the desired economic, environmental and social outcomes.

- Ensure the CB has just as good an understanding of social issues/social management system

Agree as long as there is a clear understanding of local context and they don't try to impose social management systems applicable to other countries, and not New Zealand, where they are not applicable.

- Review and evaluate whether the FSC accreditation audit procedures are sufficiently robust

Agree. Why not look at similar accreditation models around the world eg JAS-ANZ (Aus and NZ), RvB (Holland), IQA (UK) or better still use them rather than FSC duplicate the process.

- *Review how accreditation audit procedures can best ensure the certification process gives sufficient weight to the understanding of local circumstances and issues.*
- *Ensure CB's are briefed on, understand and apply the 'Consultation' and 'Social Management System' policies proposed in the report from the 4th PWG meeting*
- *Monitor the variation in CB performance and set targets for their continuous improvement*

All three of the last points should be taken up with the CBs.

3.1 Conversion

*The PWG recognises and affirms the critical importance of the issue of conversion to all three FSC Chambers. At the same time, because the issue relates to the whole of the FSC's work and not just plantations, the Group concludes it does not fall completely within their terms of reference. Therefore **the PWG proposes that the Board of Directors instructs the Secretariat to design and instigate a separate review process to address the issue of conversion, including Member and Chamber consultation**, as soon as is practicable. Such a process however, must not delay implementation of other recommendations provided by the Policy Working Group.*

We are disappointed that the PWG could not decide on this issue. It is our opinion that this one issue that truly relates to plantations, whereas other issues addressed such as social management systems are applicable to all forest management types and should be considered as a separate review matter by FSC.

The Group intends to continue discussions about conversion in its final meeting in order to speed up and provide a plantation perspective to the wider review process. The following specific points have been raised so far:

- *The rules around conversion should extend to other ecosystems as well as forests*

Providing these systems have significant values that would be effected by the conversion.

- *FSC needs to clarify the rules in situations of potential contradictions within the P&Cs themselves, e.g. as where interpretations of Criterion 6.10 may contradict indigenous people's rights to use and manage their lands and resources as outlined in Principle 3*

The 1994 rule needs to stay. Certified forests will not appreciate having to meet the 1994 rule only to have it relaxed for new entrants. However we accept that a rare exception could be where local or indigenous owners decide to convert as part of a plan for economic self sufficiency. There are examples of this in New Zealand with Maori owned land.

The group seeks further input on these points, as well as on the following questions:

- *Is there a need to review the definitions of forests not to be converted?*

No, the P and C are robust in this area.

- *Should there be references to the environmental / social value of lands not to be converted?*

No, this is covered in the P and C in respects to environment and cultural heritage.

- *Is there a need for FSC to be more flexible in some situations, e.g. in relation to conversion resulting from local community decisions or national / regional development plans?*

Yes but sparingly. See above

Are there potential approaches to the 'cut-off date problem' that avoid some of the drawbacks of the current approach? (converted areas can enter the system through managers not responsible for the conversion, cut-off dates may be perceived as arbitrary and unfair etc.)

The current system is sufficiently robust.

3.2 One Common Set of Principles & Criteria?

A separate process for reviewing the FSC P&Cs will be initiated over the coming years, and the PWG is keen to contribute some input from a plantation perspective.

One key question considered by the Group is whether there should be one, integrated and common set of P&Cs that would apply to all types of managed units. While this is partly a purely technical issue, the PWG considered it from the perspective of the message inherent in the current structure of a separate Principle for plantations as this may lead to questions about whether plantation managers are truly welcome within the FSC community.

While the Group has not yet made a final judgement, discussions so far have been in favour of one integrated set of common P&Cs for all management units. However, concern has been voiced in the Group about:

- *Losing a clear distinction between forests and plantations*
- *Whether a common set of P&Cs would lead to 'conversion through management' of FSC-certified natural forests, whereby small areas of the natural forest are systematically converted by manipulating management plans and/or actions.*

Members of the PWG look forward to receive more input on this issue before making specific recommendations at the final meeting in Bonn in September 2006.

We agree with the move to 9 principles. This will overcome the debate on the definition of a plantation and allow FSC to focus on an effects based system. This will also work where natural forests are managed away from a natural state through intensive silviculture. Such a scenario is likely to cause a significant adverse effect on biodiversity and thus not comply with an effects based system.

Final Comment

We are disappointed that the review has made no mention of an effects based system, despite many supporting submissions.

By not considering sound science and an effects based system, FSC face the risk of market exclusion and in particular implications under international trade agreements such as the WTO.