

Response to Stakeholder comments to Australian HCV Framework (v2.2)

Forest Stewardship Council Australia

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Background

In early 2008, the Board of FSC Australia instigated a working party of experts selected by the three Chambers (Social, Environmental and Economic) to develop a formal Risk Assessment for 'Controlled Wood' in the Australian context. The final Controlled Wood Risk Assessment Matrix for Australia, published in July 2009, provides guidance to both companies and certification bodies seeking to identify risks in accordance with the FSC Standard for Company Evaluation of FSC Controlled Wood (FSC-STD-40-005 Version 2-1 and FSC 30-010), hereafter referred to as the CW Standards.

Importantly, the treatment of high conservation values (HCV) in the Controlled Wood Risk Assessment, and the resulting need for an Annex 3 determination by the company purchasing the Controlled Wood required a guidance document to be developed. A first draft (D1-0) of the guidance document, produced by a 3-chamber committee, was submitted for stakeholder consultation during a consultation period that lasted 6 months. More than 30 comments were received during the consultation period with a balance of stakeholder input from the social, environmental and economic chambers.

The second draft (2-0) addressed issues raised during the stakeholder consultation process and provided the critical elements to be considered in a last round of consultations. One of the main concerns during the first stakeholder consultation process was the use of the framework within FSC full certification and its use for the implementation of the Controlled Wood standard. The latter does not require consideration of other principles and criteria as it specifies a set of international indicators that are applied universally.

For this reason, the current framework is restricted to support implementation of Annex 3 of the FSC Controlled Wood standards. However, it is envisaged that the framework will serve as a basis for interpretation of HCV definition for Principle 9 in the context of the Australian National standard.

Following the consultation, draft (2-0) framework was developed using the HCV Assessment Framework within the FSC US Forest Management Standard. Further detailed advice was also provided by FSC International regarding the revised draft.

Draft (2-0) was made available to stakeholders and presented to a public forum attended by over 40 people in Melbourne in April 2011. Richard Robertson, Policy and Standards Manager of FSC International attended the forum to provide an overview and advice on key issues from a FSC International perspective, and Rod Knight presented an overview of how the *Directory of Information Sources* would work.

Issues of concern raised at the Forum resulted in revised Draft (2.1). This Draft was placed on the FSCA website for a 60-day stakeholder comment period. Nineteen submissions were received containing over 70 separate comments, mostly from the economic chamber though all chambers contributed. The 3-chamber Policy & Standards Committee reviewed the comments, with assistance from Pina Gervassi, and incorporated where possible stakeholder concerns into the Final Draft (3.0).

This document provides in detail the FSC Australia Response to Stakeholder comments regarding the *Australian HCV Framework (version 2.1)*.

FSC Australia would like to thank to all those that took the time to comment.

Draft 3.0 has been submitted to FSC International for approval and details, including the FSC International response, will be placed on the FSC Australia website shortly.

	Stakeholder Comment	FSC Australia Comment	Rectification
1	Approach to HCVs within Controlled Wood		
1a	Please Insert clear statement re: the identification of high conservation values does not preclude timber harvesting.	(see rectification column)	The following statement will be included in the CW framework: "While the identification or presence of HCVs does not automatically exclude harvesting, it is the responsibility of the forest manager to demonstrate that the HCVs will be maintained and/or enhanced as a result of management activities, and the precautionary principle has been applied. In some cases the presence or identification of some HCVs, will not be compatible with logging."
1b	Could you clarify "stakeholders" – as in "Expert/stakeholder elicitation methods"? Two submitters suggest assessment should only require stakeholders with technical expertise.	The FSC system requires that the views of <i>all</i> stakeholders are considered.	A definition of stakeholders is included in the glossary.
1c	There is some inconsistency throughout the document in the way "Values" are used. Are Values a complete list of values or are these simply examples of some values?	Examples of values are provided in the framework which is a living document and will change over time as a result of feedback and workability.	The following statement will be included in the Framework in the introductory section: "This is not intended as a comprehensive list of values. Stakeholders may provide additional values". (see 1.4)
1d	Regarding Levels: As Level 1+2 are required for HCVs 1, 3+6 (and should be required for 2+5) it would be simpler to merge these for all HCVs.	FSCA agreed that the levels section was cumbersome and needed changing. (see rectification)	The term "levels" will be replaced by "steps". The steps will be changed so that the first step is to consult the <i>Directory of</i>

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			<i>Information Sources</i> and prepare lists and maps of HCV, with the second step being to consult stakeholders.
1e	If affected stakeholders agree that their basic needs are met but interested stakeholders do not, the matter is considered to be agreed for the purpose of meeting HCV 5. Why is this principle not applicable across all HCV classes, especially HCV6?	HCV 5 specifically refers to basic needs of <i>communities</i> which are <i>local</i> . Other HCVs are concerned with natural values (ecosystems, species, etc) and with values which have significance to a wide range of communities (local, regional and national), for example nationally significant cultural sites.	No change
2 Process and stakeholder consultation			
2a	The <u>Risk assessment</u> did not have adequate stakeholder input.	The Risk Assessment was subject to extensive public consultation for an extended period and has been by approved FSC_IC.	No change
2b	Controlled Wood <u>Risk Assessment Team</u> does not include any “real, current or practical experience” within forest management, (as recommended in the HCVF toolkit.)	The purpose of the Risk Assessment was to determine risk (rather than forest management practicalities) and therefore expertise regarding risk was sought. The process was initiated, managed and endorsed by a multi-stakeholder group (FSC A Policy and Standards Committee) that includes a person with extensive Forest Management experience. The process was approved by FSC-IC. See the FSCA website for details of the process.	No change
2c	A pilot test of the Framework was requested.	Yes, FSCA is keen to test the Framework in the field. Should modifications be required once it is being used in the field this will occur as part of a regular process of review. Given the extent of consultation and length of the development process we feel it should not be delayed any further.	See comment
2d	Will FSCA provide an analysis of the impacts of these requirements?	FSCA will track impacts through the ongoing evaluation of the performance of the Framework and feedback from auditors and others participating in the process.	See comment
2e	Describe in detail the process from here including: <ul style="list-style-type: none"> • A review date of the final standard 	The process for finalising the CW Framework will be as follows: <ol style="list-style-type: none"> 1. An Update will be provided in the FSCA on-line 	Stakeholders will be asked to provide comments regarding the <i>Directory of</i>

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	<ul style="list-style-type: none"> Feedback to stakeholders who have responded to this submission on the next steps in the process Will it be possible for Australian stakeholders to have access to the feedback from the FSC International representatives who review this Framework? 	<p>newsletter,</p> <ol style="list-style-type: none"> The <i>Final Draft</i> will be lodged on the website, together with the <i>Response to Stakeholders</i> and the <i>Draft Directory of Information Sources</i>, At the same time all documents and tools will go to FSC-IC for approval. If approved they will go into effect immediately, All FSC-IC feedback will be made public. 	<p><i>Information Sources</i>, especially regarding its design, within 30 days for changes to be included in the first Version. The <i>Directory of Information Sources</i> is a living tool which will continue to be updated regularly.</p>
3. Problems with formatting			
3a	Remove examples especially those which are State specific.	The aim of the examples is to enhance understanding, and some stakeholders have asked for them.	Examples will be integrated with the <i>Directory of Information Sources</i> and replaced where necessary.
3b	The “Australian HCV Framework Overriding notes” should be given emphasis as they underlie all that follows.	Agreed	There will be a new page for “Australian HCV Framework-overriding notes”. The Background section will be placed at the end of the introductory section.
3c	It would make the Framework clearer to reiterate in the introduction that the assessment tools are to be used for the <u>identification</u> of HCV’s .	Agreed	This will be included in the introduction.
4. Using FSC International definitions			
4a	Many submissions showed broad support for the FSCA’s use of the 6 HCV definitions and Proforest Toolkit- FSC P+C (v5-draft4) and also the FSC-US framework.		None required
4b	Several submitters raised a concern that changing the order of 'global, regional, national' to 'global, national, regional' changed	Australia is a continent. Regional in the Australian context means one of two things: either the Asia-Pacific region, or regions as sub-national areas. The committee chose to interpret regions as the	No change

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	the intent of the definition.	sub-national units known as the IBRA bio-regions. This scale had previously been identified as appropriate as it was used for the Regional Forest Agreements and much of the data about species, ecosystems, communities etc was collected at this scale. Were we to have used the Asia-Pacific as the definition of regional most Australian species, ecosystems etc would be identified as rare as they would occupy an infinitesimal area within the region.	
4c	Distinguishing aspect of high not always clear.	Agreed. If it is threatened, rare or endangered, it is 'high'.	No change
5. Plantations and natural forests			
5a	Regarding "plantations and natural" forests: There should be different criteria for evaluation of HCVs in plantations and in natural forests. One submitter suggested following the Chilean example.	There are a range of views about this issue.	FSCA supports further discussion about whether Plantation Standards should be developed. It is expected that in most cases the issues will revolve around remnant vegetation and water management.
5b	Plantations should not be unspecified risk under HCV.	The Risk Assessment was applied to the whole landscape and was both tenure and management use blind as per the terms of reference.	No change
5c	Can we <i>not</i> use US terminology of "natural forests" versus "managed forests", with the latter not referring to plantations.	Agreed	The terms "native forests" /"plantations" will be substituted for "natural /managed" forests. We will include an over-arching statement noting that this HCV has precedent in US framework.
6. Clarification about how the <i>Directory of Information Sources</i> is to be used			
6a	Is use of the <i>Directory of Information Sources</i> mandatory?	Yes, use of the <i>Directory of Information Sources</i> is required and represents a minimum set of requirements of information. However, the <i>Directory</i> should not be seen as the only source of	This clarification will be included in the Framework.

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		information and at all times people need to be aware of the precautionary principle.	
6b	What happens in regions where data is lacking?	Data needs to be gathered. Absence of evidence is not evidence of absence. Surveys and vegetation mapping must be done if they haven't been done previously. If data is old it must be updated.	6b- 6g Information about how the <i>Directory of Information Sources</i> should be used will be included in the introduction to the <i>Directory of Information Sources</i> webpage.
6c	Can pre-harvest surveys be used where data is lacking? What other data could be used/not be used?	For site specific HCVs pre-harvest survey must be done. For non site-specific values, data base interrogation, etc will need to be done.	
6d	How is the <i>Directory of Information Sources</i> updated and data added?	New data will be accepted by the FSCA Policy and Standards Manager.	
6e	How is data judged as valid - 3 chamber approval/ peer review?	Data will be judged valid that is produced by government agencies, approved by 3 chamber committee or peer-reviewed.	
6f	Will the <i>Directory of Information Sources</i> undergo period of stakeholder consultation?	The <i>Directory of Information Sources</i> will undergo a 2- stage process to become operational. Stage one: Draft 1 of the <i>Directory of Information Sources</i> , as a component of the Framework, will be submitted for approval to FSC International. At the same time it will be placed on the FSCA website for comment and people invited to identify gaps. During this time a suitable interface will be developed. Stage two: The requirement for mandatory use will come into force. A process will be established for ongoing feedback.	
6g	Does the <i>Directory of Information Sources</i> consider/provide clear guidance relating to scale of the FMU and intensity of management? (eg SLIMF guidance on biodiversity for HCV)	No. It has not been designed for this purpose.	

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7. Relationship between CW standard and the FSC National Standard			
7a	Can the link between the CW standard and the National Standard be removed?	FSC Advice 40 005 13 addresses this and makes it clear that HCV is defined the same under both CW and the National Standard.	No change
7b	What is the difference between the risk approach (CW) and precautionary approach (full standard)?	CW is also meant to be pre-cautionary- the only difference is in the monitoring requirements.	
8. The relationship between the Framework and national regulations and processes			
8a	The CW Framework should recognise national regulations.	It does, it requires compliance with all legal regulations.	
8b	Why can't CAR National Criteria be used as FSC criteria for HCVs?	They can be used as far as they apply but this framework goes beyond CAR criteria.	
8c	Why can't CAR processes be included as FSC "Assessment tools" ?	Many CRA datasets are included in the <i>Directory of Information Sources</i> .	
8d	Why not assess where RFA falls short and add to this?	FSCA is not in a position to undertake a gap analysis between RFAs and the FSC HCV requirements. The primary objective of the Standard and the Framework is to ensure HCVs are not endangered by forest management practices.	
9	Can FSC recognise AFS certification for HCV1 and 3?	FSC and AFS have different approaches. FSC requires HCV to be maintained and/ or enhanced and requires a precautionary approach.	
10	Certification (and presence of HCVs) should not be used as tool for determining land use.	It is the FSC approach that HCVs should play an important role in forest land management decisions.	
11	There were concerns with Carbon especially: <ul style="list-style-type: none"> the measure used as an HCV 	This issue is being considered by FSC-IC as a result of motion number 17 of the 2011 FSC General Assembly. Any changes flowing out of this will be reflected in this framework if appropriate.	References to carbon will be removed from the Framework at this time.

HCV 1

	Stakeholder Comment	FSC Australia Comment	Rectification
HCV1a	Why Use IBRA as the scale?	IBRA bioregions were used during the RFA processes and agreed to by all parties as the scale for assessment during the first rounds of the consultation for this framework.	IBRA will be included in the Glossary and links provided in the Framework.
HCV1b	Concern about “significant concentrations” Submitters in summary said that this remained difficult to interpret.	FSC Australia agreed with this criticism. The language of the definition is not consistent with the criteria itself (HCV1), confusing issues of scale with the use of the word region ; making it appear as though a sub-regional scale of analysis is required. This is clearly not the intent of the criteria. Native forest in IBRA in Australia where native forest logging was occurring met this test during the RFA. If the VALUES identified under HCV 1 are present within the FMU the threshold for a requirement of management of the values has been met.	Replace the Definition of ‘significant concentrations of biodiversity values’ with: Areas of native forest containing one or more of the VALUES identified are deemed to meet the threshold for significant concentrations of biodiversity values. Plantations are generally unlikely to meet this test other than where significant species are present in remnant forest areas or transiting plantations.
HCV1c	How does the company auditor/CB determine if species are well recorded or poorly recorded?	The data audit should provide this information.	
HCV1d	Could you provide more detail about what is meant by statistical modelling and mapping of wildlife habitat? (Level 3)	We will include a link in the <i>Directory of Information Sources</i> .	
HCV1e	The cost of statistical modelling will be high for small/low intensity FMUs - is there a way to adjust for this?	The more uncertainty there is in the quality of information available the more detailed the assessments need to be to meet the requirements of the precautionary principle. If it is necessary to proceed to step 4 then potential risks to values will be very high and the determination of and implementation of appropriate methodologies may well be expensive.	

HCV 2

	Stakeholder Comment	FSC Australia Comment	Rectification
HCV2a	<p>Submitters raised the question of a threshold for 'large' under HCV 2.</p> <ul style="list-style-type: none"> • concern about lack of number of hectares specified (and indication that it could be "thousands") • Also concern about what spatial extent constitutes "stands" • "rare at the regional or finer scale". 	<p>The Controlled Wood Risk Assessment Team discussed this issue and while a consensus was not reached the ecological perspective was that large was very context dependant. For example, for IBRA that are highly fragmented (eg the Northern Midlands in Tasmania) the importance for maintaining HCV 2, ecological intactness, is dependent on the maintenance of all the large remnants. FSC Australia has adopted as a suitable precedent the US approach to defining large landscape level forests.</p> <p>A good surrogate measure for the identification of context when applying this is the protection level in the IBRA. This analysis can be found at: http://www.environment.gov.au/parks/nrs/science/pubs/ibra_regions.pdf</p> <p>The use of specific size thresholds is always going to be arbitrary. Some areas of forest in Australia have been identified as globally significant intact forest landscapes¹ - these are areas of >50,000 ha. These are obviously significant. However this scale is not appropriate to a regional (IBRA) scale of analysis.</p> <p>If after the framework becomes operational forest managers stakeholders and certifiers still require further guidance FSC Australia will undertake work to set size thresholds for 'large' by the protection status of the IBRA.</p> <p>1 http://www.intactforests.org/concept.html</p>	None at this stage
HCV2b	Concern about inclusion of "fragmented forests".	See above 17a	

HCV2c	Will our current work to create wildlife corridors or revegetation projects add up to a large intact area and restrict forest practices?	It is difficult to see such a set of circumstances amounting to a large intact forest area. A wildlife corridor is at the FMU scale and not at the regional scale.	No change
HCV2d	“IBRA regions represent a landscape approach to classifying attributes and characteristics such as flora and fauna, where as one bioregion often contains one forest type which is not present within other bioregions. If HCV 2 is assessed at an IBRA region scale, it is difficult to define a rarity of forest of this size and quality within the region at a small scale”.	HCV does not deal with rarity but with intactness.	No change
HCV2e	Request that we include “forests that have the potential to regain these values if recently lost or degraded from logging activity”.	We cannot look at this in the context of this CW Framework. In a full forest management certification context this may be an issue.	
HCV2f	Reference to (the ill-defined) “conservation organisations” essentially nominating areas for HCV2 is inappropriate here and should be deleted. (Values #3).	This reference was adopted from the US Framework. We agree it needs qualifying.	The following will be added to the reference to conservation organisations: “published in formally recognised reports or peer reviewed journals”

HCV 3

	Stakeholder Comment	FSC Australia Comment	Rectification
HCV3a	The statement (under the heading) “Include rare, threatened and other ecosystems that are considered ‘rare’ at a global, national or regional level” is confusing.	Yes, agreed	Change to: Ecosystems that are rare and/or threatened at a global, national or regional level.
HCV3b	Can we remove reference to old growth types 1 and 2 as they are not used in the Australian context?	There are different approaches and use of terms in each state. It was decided to adopt this terminology as it provides a nationally implementable approach. There has been general support in using these terms.	We are retaining these terms but will provide the following definition in the Glossary : ‘Old growth 1+2 refers to undisturbed and negligibly disturbed as defined as part of the CRAS.’
HCV3c	Is there a national system which has the 3 categories: rare, threatened and endangered“?	These are now recognised under the act. Regional, national and state systems vary in their use of these terms and each uses different categories – the framework requires that all relevant systems are used and assessed at the bioregional level.	
HCV3d	<i>Please define</i> spatial extent of “Remnant vegetation”.	This is context specific.	

HCV 4

	Stakeholder Comment	FSC Australia Comment	Rectification
HCV4a	The role of forests in protecting water quality are covered in Principle 6 and do not need to be covered here.	Watershed protection is part of the FSC definition for this HCV. The emphasis here is that it is a critical situation.	
HCV4b	Areas with highly erodible soils and areas with steep slopes within a catchment are not “Values”; water quality is the value.	Agreed there is lack of clarity and consistency in the Values for HCV 4+5. The list of HCV 4values has been revised and a list of critical situations added.	<p>Replace the current Values section with:</p> <p>VALUES - forest which provide:</p> <ul style="list-style-type: none"> • protection from flooding • protection from erosion, • barriers from destructive fire • clean water catchments <p>Critical situations encompass:</p> <ol style="list-style-type: none"> 1. Areas with highly erodible soil 2. Areas with steep slopes 3. Clean water for local drinking water and/or irrigation supply systems 4. Areas protect against flooding 5. Vulnerable areas which support or maintain rare or endangered ecosystem functions.
HCV4c	The emphasis in the framework is on critical <i>for people</i> but should include also critical <i>for natural systems</i> .	Agreed. Proforest 2.4.2 and 2.4.3 includes damage to ecosystems (and species).	Add section, “critical situations” as above 4b
HCV4d	Does this include plantations/ forests where drinking water catchments have their headwaters? Does it mean you cannot have plantations in these areas?	Yes this HCV applies to all forests/ plantations.	
HCV4e	Several submitters thought there was	There is a relationship between these HCVs.	Increase clarity by extending the

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	confusion between HCV4 and HCV5.	The distinction between HCV4 and HCV5 is between safeguarding forests which <i>protect vulnerable natural systems</i> - ie. are <i>critical</i> (HCV4) and the role of a forest <i>for</i> local communities (HCV5). The apparent overlap in Draft 2.1 lies in that water for 'local communities' was used as an example and discussed at length for both HCVs. (The guidance in 2.1 on 'critical situations' was directly from the US framework).	<p>examples used: see also HCV5a</p> <p>For HCV4 note the role that forests play in</p> <ul style="list-style-type: none"> • protecting from flooding • protecting from erosion, • providing barriers from destructive fire <p>Remove the word "local" from HCV 4 and rephrase.</p> <p>Change the Guidance on 'critical situations' in FSC-STD-01-001 V5-0 D4-9 p115</p>

HCV 5

	Stakeholder Comment	FSC Australia Comment	Rectification
HCV5a	Clarify the overlap between this HCV and HCV 4 in relation to water supplies.		<p>In addition to the changes made to HCV4 (see above)</p> <p>For HCV5: Change the sentence: “These may include water catchments.....crops.” to “Potential fundamental basic needs include, but are not limited to: unique sources of water for drinking and other daily uses; food, medicine, fuel, building and craft resources; protection of “agricultural” plots against adverse microclimate (e.g., wind) and traditional farming practices. (This is <i>based</i> on Proforest, <i>Defining HCVs at a national level</i>, p53).</p>
HCV5b	Use of the term “well-being” is difficult to measure.	The term was adopted from US framework in the HCV and to define “fundamental”. It is also used as an indicator of ‘fundamental’ in Proforest <i>Defining HCVs at a national level</i> , p55: “a community would suffer diminished well-being”.	Wellbeing should be removed from the HCV5 Attribute (Heading) as this is not in the FSC definition of HCV (d) Attribute. It should be retained in the definition of fundamental. A definition will be added to the Glossary.
HCV5c	Use of the term “viable alternatives” The HCV is not dependent on whether there are “viable alternatives” for forest resources but whether the resource is <i>fundamental</i> to the local community.	FSC Australia agreed with this criticism. The term was adopted from the Draft-US HCVF Assessment framework but does not appear elsewhere. It is likely to confuse rather than clarify.	Remove “where no viable alternative exists”.
HCV5d	Add the words critically dependent” after “communities “in the title.	It is not possible to change the title as the title defines the HCV in FSC standards – it is the condition against which the presence of	No change

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		HCVs is assessed. However, “the words “critically dependent” are included directly below in the definition of “basic human needs” so should meet this concern.	
HCV5e	Stakeholder “engagement” should be replaced with an approach which will structurally encourage active participation.	It is not possible to assess HCV5+6 without involving local communities.	Change “stakeholder engagement plan” to “stakeholder participation plan”. FSC Australia intends, as soon as feasible, to develop stakeholder guidelines and tools.
HCV5f	“Basic human needs” is confined to food crops - expansion to cash crops should be considered.	This is valid and was included in an earlier draft. It will be important to distinguish between cash crops on which communities are critically dependent and “commercial harvesting”. Cash crops could include bee keeping, collection of berries, seeds, grasses etc for bush foods, medicines, artworks. The point here is to identify this as a HCV –the management must ensure neither this value nor any other HCV is at risk due to satisfying this need.	Add the phrase “subsistence cash crops” to the Definition of ‘basic human needs’ in the Framework.
HCV5& HCV6	HCV 5 + 6: Issue: Several submitters thought these values do not exist in some areas of Australia and that such areas should be removed from HCV5+6.	This is not the view of all stakeholders. It is a requirement of the Standard that all HCVs be dealt with. If they do not apply, the assessment will need to demonstrate that.	No change

HCV 6

	Stakeholder Comment	FSC Australia Comment	Rectification
HCV6a	HCV 6 should deal with aboriginal and postcolonial heritage. A submitter requested that the wording used in an earlier draft: “that HCV six deals with aboriginal and postcolonial heritage” be reinserted.	The Framework Draft 2.1 did retain the note that HCV6 deals with Indigenous and non-Indigenous heritage but it is poorly placed and perhaps hard to find. The word ‘postcolonial’ was replaced with non-Indigenous as Postcolonial does not address colonial heritage and implies Indigenous people do not share this heritage. The term non-Indigenous is used by the heritage community in Australia, for example in <i>Australia Icomos’ Statement on Indigenous Cultural Heritage</i> .	Improve placement and formatting of this note in the Framework.
HCV6b	That the definitions used do not acknowledge the definition recognised in Australia.	Stakeholders recommended that the FSC Australia HCV Framework use the ICOMOS Burra Charter to define and assess Cultural Significance. The Burra Charter is the definition recognised at all levels of government and in legislation in Australia. We agreed this is the most appropriate definition.	Definition of ‘cultural significance’ has been revised in the Framework (Draft 3.0) to acknowledge and adopt the ICOMOS Burra Charter definition of Cultural Significance.
HCV6c	Some stakeholders questioned whether amenity and aesthetic values constitute cultural significance.	Use of the Burra Charter definition (from 20b above) clarifies this issue.	‘Aesthetic values’ which are fundamental to the Burra Charter definition will be retained but ‘amenity’ will be removed.
HCV6d	The dynamic nature of cultural identity needs to be recognised.	Agreed.	Include a definition of cultural identity in the framework.

<p>HCV6e</p>	<p>Concern about the level of consultations required.</p>	<p>While some submitters thought that it would be difficult for small enterprises to carry out local consultations and cultural agreements, other submitters were concerned that specifying only the local level limited the necessary consultation required for some sites which were significant to the wider community (eg Uluru). As with other concerns mentioned above, the reference to the local level in the Attribute (Heading) cannot be changed as it is the Standard to be assessed against – and the function of this attribute is to protect the cultural identity of local communities. The standard clearly states that values must be “identified in cooperation with such local communities” so irrespective of size of the forest unit such communities must be consulted and in a participatory manner. This view is further supported by the Proforest document, “Defining HCV at a National Level: a practical guide” which says that identification of High Conservation Values is dependent on consultation with local communities for HCV5 and 6.</p> <p>It should be noted though that the local community which identifies with a forest site may not necessarily reside in the local area.</p> <p>Sites which have significance beyond the local community will be identified primarily through State and National inventories (the <i>Directory of Information Sources</i> to be produced alongside the Framework should list these) and these stakeholders will be able to contribute as ‘interested’ rather than ‘affected’ parties as discussed earlier in this document.</p>	<p>No change to the use of the word ‘local’ in the Attribute (Heading) or in the text where it appears. The <i>Directory of Information Sources</i> will provide assistance in identifying sites of significance.</p>
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HCV6f	Resources cited are incorrect and/or inadequate.	Agreed	The <i>Directory of Information Sources</i> will provide a comprehensive resource list when finalised. Stakeholders are asked to identify relevant reports, tools and datasets to support HCV6 and these will be included in the <i>Directory of Information Sources</i> .
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