Invitation to participate in stakeholder consultation: Timberlink Australia

DNV GL has issued a certificate according to FSC® Controlled Wood (FSC-STD-40-005) to Timberlink Australia. The standard covers PURCHASE of timber that is not FSC certified. It does NOT cover forest owners but the organizations that buy timber.

DNVGL is conducting a FSC controlled wood (CW) evaluation audit for wood harvested from third party suppliers in South West Victoria and East South Australia. As part of the evaluation, DNVGL is seeking stakeholder input regarding the relevance, effectiveness and adequacy of the Timberlink Australia Due Diligence System (DDS) to avoid material that is controversial. A copy may be obtained from the DNVGL Contact named below.

What is controlled wood?

Controlled wood is the name for timber that has been assessed as having low risk of being controversial. The standard objectives are for the organization to have a system to avoid purchase of timber which is considered as controversial according to FSC requirements. The FSC definitions of controversial sources can be found in the FSC standard for Controlled Wood, FSC-STD-40-005. The definitions are international and are supposed to be the same globally. At the bottom you find the definitions as they are stated in the standard, in English. The risk of controversial timber entering the FSC Chain of Custody has been assessed.

Risk Assessment

The applicable risk assessment is a National Risk Assessment (Australia). The result of the risk assessment for controlled wood is:

- Low risk for the category 1, 2 and 5 for Controlled wood: and
- Unspecified risk for category 3 wood harvest from forests in which high conservation values are threatened by management activities; and category 4 wood harvested from areas being converted from forests and other wooded ecosystems to plantations or non-forest use. Explanation of the categories can be found at the bottom of this text.
- There are no risks in the supply chain.
- There is a procedure for filing complaints available from the organization, by contacting them via http://www.timberlinkaustralia.com.au/contact-us/.

Timberlink Australia DDS Risk Controls

Control measures in place for unspecified risk above include:

- Timberlink Australia only sources controlled material from already established pine plantations.
- All harvesting operations must have an approved FPP prior to commencement, which identifies significant ecosystems (Tasmania).
- TA ‘approval process’ of suppliers and issuance of an operation / licence number.
- Systems Audit to determine measures in place to identify HCVs.
- Field Audits of Supply Units.
- Stakeholder consultation.
- Expert Opinion.
- Small landholders in South Australia and Victoria that do not have the resources to adequately identify HCV’s, Timberlink Australia will undertake a Pre-Harvest Assessment.

Timberlink Australia has contacted Bryan Haywood in South Australia and Mark Wapstra from Tasmania to provide expert opinion on the adequacy of Timberlink Australia’s control measures.

Bryan Haywood is a Senior Ecologist with the Nature Glenelg Trust. Bryan has been involved in a broad range of biodiversity related work in the Limestone Coast/Green Triangle region for 20yrs and has provided field based and planning advise to forest growers and harvesting contractors on HCV sites during establishment, thinning, tending and clearfall operations for Blue Gum and Radiata Pine plantations.

Mark Wapstra is a Senior Scientist/Manager with Environmental Consulting Options (ECOtas). Mark has been providing advice to various forestry companies in Tasmania, including expert opinion on risk mitigation measures under the FSC controlled wood standard.

The Audit

DNV GL Business Assurance will conduct the audit during the last week of June 2017. This invitation to participate in stakeholder consultation is about the forestry in general in the geographical area: South Australia, Victoria and Tasmania, Australia.

DNV GL Business Assurance wishes to get your comments on the forestry sector in this region, for some specific issues, see the questions below. Send your comments preferably by e-mail to the contact person below. You have to include your name and how we can contact you. We do not handle anonymous comments.

All comments will be handled confidentially, if you do not state explicitly otherwise, and your name / the name of your organization will not be included in the reports and other documents.

It is voluntary to send comments, and if you do not wish to make any comments, you can disregard this invitation.

Questions regarding controlled wood (for all questions we need to receive both your comments and the evidence that is available):

- Is it your opinion that there is evidence that the forestry sector in this region harvest timber illegally which threatens forests, people or communities?
• Is it your opinion that there is evidence that forestry in this region harvest timber in violation of traditional and human rights, i.e. the rights of indigenous people?

• Is it your opinion that there is evidence that the forestry in this region is managed in such a way that high conservation values have an uncertain chance of continued survival or presence at the eco regional level? This shall be understood as a threat to values of national importance, as e.g. Biodiversity Hotspots, Global 200 Ecoregion, Frontier Forest, Intact forest landscapes?

• Is it your opinion that there is evidence that within this region, there is significant conversion of natural forests to other land use? Natural forest means a forest that is not continuously managed.

• Is it your opinion that there is evidence that within the region Genetically Modified plants are used within forestry?

We need to receive comments at least 3 weeks prior to the commencement of the audit.

The FSC standard is available from the following web-site.
Search for FSC-STD-40-005 ver 3.1.

If you are not satisfied with how DNV GL handles your comments, you can make a complaint, see our website https://www.dnvgl.com/services/fsc-r-chain-of-custody-certification-3281

DNVGL Contact Person:

The contact person for this audit is Judy Alexander, phone 0418 138 125, e-mail judy.alexander@y7mail.com

FSC definitions:

Controlled wood category 3 – Wood harvested from forest in which high conservation values are threatened by management activities

Threat in the context of this standard means having an uncertain chance of continued survival or presence of HCVs at the ecoregion level. This standard requires the identification of threats to HCVs caused by forest management activities.

There is no difference in the definition of HCVs and their different categories between the FSC Principles and Criteria (FSC-STD-01-001) and this standard. The difference relates to the objectives of both standards. While the FSC Principles and Criteria require the maintenance and enhancement of HCVs at the management unit level, this standard requires the organization to avoid timber from forests where HCVs are being threatened at the ecoregional level.
Controlled wood category 4 – Wood harvested from areas being converted from forests and other wooded ecosystems to plantations or non-forest uses

The intent of the risk assessment for this category is to reveal risk in regions where there is a significant occurrence of deforestation of natural forests. The organization is encouraged to seek for guidance from FSC network partners and regional offices on the interpretation of ‘significant rate of loss’ for forests in their countries and regions.