**Submission regarding - Draft Interpretation FSC-STD-AUS001-2018**

### About us

* [Gippsland Forest Guardians](http://gippslandforestguardians.org.au) is a community lead, environment focused not for profit organisation in the Strzelecki Ranges, Victoria Australia.
* Our complaint to SCS Global in December 2024 regarding Hancock Victoria Plantations (HVP) and Fella’s Coupe, and the subsequent issuing of a significant non-conformance to HVP regarding 10.1 by SCS Global possibly led to the request for this draft interpretation.
  + In short, HVP are planning to replant this high biodiversity site that was previous native species (Mountain ash, E. Regnans and Bluegum, E. globulus) with Pinus radiata.
  + Almost all gullies on the site contain high quality HC, iincluding rainforest.
  + Some points in this submission relate specifically to this particular coupe in order to demonstrate the context and importance of regenerating to ‘pre-harvest conditions’.
* Gippsland Forest Guardians have a strong, evidence based advocacy and research record relating to the protection of Rare and Threatened Species and Communities (RATSACs) and *High Conservation Value (HCV)[[1]](#footnote-0)* that live in, or adjacent to native species plantations.
* We have a direct understanding of the impacts for RATSACs and HCV when plantations are converted from native species to exotic, invasive species such as Pinus radiata.
* In our view, native species plantations in Australia, including many that exist in High Conservation Value areas, are being systematically replanted by FSC certified organisations with exotic and invasive species such as Pinus radiata as a matter of *Certificate Holder* (*CH*) company policy and preference, and without sanction from Conformity Assessment Bodies (*CABs*).
* This is of great concern to us as it seems to have been occurring with the explicit or implicit consent of the FSC, in spite of the clear requirements of Principle 10, at least up until now.
* We are in strong support of the draft interpretation.

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### Feedback

#### 1. We strongly support the Draft Interpretation, as written, and believe it to be an accurate reflection of Indicators 10.1.1 and 10.1.2

* Both Indicators 10.1.1 and 10.1.2 reference a requirement to *regenerate* harvested sites to ‘*pre-harvest*’ condition, a term that is well defined in the Glossary of Terms.In the case of a *native species plantation*, the only ecologically sound way to *regenerate* to *‘pre-harvest’* condition is to replace ‘*native species*’ with ‘*native species*’; a term that is also well defined in the Glossary of Terms.
* FSC Indicators can only be fully understood within the context of the Criteria and the overall objectives of Principle under which they sit. In this case, the wording of the Indicators, and the Draft Interpretation are completely and fully consistent with, and reflective of, the intention of Criterion 10.1.
* Pinus radiata, the example used in the Draft Interpretation, is an *exotic species* and therefore, by definition, could not be used as a *regeneration* species to recover the overall ‘*pre harvest’ condition* of a *native species plantation* in Australia.
* Not only is Pinus radiata an *exotic species*, it is also invasive[[2]](#footnote-1) and is therefore inconsistent with the requirement to protect *environmental values* in Indicator 10.1.1,; in particular ‘*biological diversity*’ as defined in the Glossary of Terms.

#### 2. We believe the Draft Interpretation to be entirely consistent with the fundamental objectives of the FSC Standard

* The overall intention of Principle 10 seems to be to ‘Prevent further degradation of forests’. All twelve of the Criteria that are listed under Principle 10 identify different ways to ensure forest degradation is eliminated, reduced or mitigated.
* Criteria 10.1 outlines, very clearly, the obligation of CH’s to leave harvested sites in no worse ecological condition, and perhaps in an even better ecological condition as a result of *regeneration* methods that ‘*shall’* be used to recover vegetation cover.
* It is clearly not the intention of 10.1 to create an outcome where environmental values and biodiversity are diminished by a poor choice of regeneration method.
* *Exotic* and *invasive plantation* species, including Pinus radiata, are inconsistent with the intention of Principle 10, and very specifically Criteria 10.1.; as a species for planting where previously there was *native species*.

#### 3. The Draft Interpretation is right to have specifically identified Radiata-pine as an exotic species and to state that it is therefore an unacceptable species choice for plantations where previously there were native species

* *Native species plantations* in Fellas coupe, the origin of Gippsland Forest Guardians complaint, are similar to and in parts, indistinguishable from native forest.[[3]](#footnote-2) Native forest plantations have functional, structural, and ecological characteristics that support a broad range of native wildlife[[4]](#footnote-3), greater than that of *exotic plantation*s.[[5]](#footnote-4)
* Converting *native species plantation*s to Pinus radiata will negatively impact biodiversity[[6]](#footnote-5) including, native flora and fauna[[7]](#footnote-6); understorey and ground flora[[8]](#footnote-7), invertebrates[[9]](#footnote-8) [[10]](#footnote-9), native mammals[[11]](#footnote-10),[[12]](#footnote-11) bird species[[13]](#footnote-12), soils and rare and threatened flora and fauna[[14]](#footnote-13).
* Pinus radiata is recognised as a highly invasive environmental weed in the State of Victoria[[15]](#footnote-14) and poses higher invasive risk than native species[[16]](#footnote-15).
* Introducing Pinus radiata into a sensitive landscape increases off-site weed pressure and undermines the integrity of nearby high conservation value areas[[17]](#footnote-16), [[18]](#footnote-17) and can provide refuge for invasive species such as deer and foxes, while offering poor habitat for native predators.[[19]](#footnote-18)
* Given the inadequate buffer zones currently being applied by Certificate Holders for *HCV*, and also the high levels of fragmentation and small patch sizes of native forest throughout the Strzelecki ranges, there is a high risk that edge effects would have a highly detrimental effect on the integrity of these *High Conservation Value* areas[[20]](#footnote-19).
* Native Eucalyptus species (e.g. Bluegum) even when found outside of their pre-1750 distribution share more functional and ecological similarities with *native forest* than with exotic Pinus radiata. Eucalyptus species should be considered native and not equivalent to exotics. All Eucalyptus species are more natural than Pinus radiata in the Australian landscape.

#### 4. The Draft Interpretation aligns with community expectations thereby safeguarding the community’s trust in the FSC certification system

Consumers in Australia expect their FSC certified products to come from sources that do not degrade forests and that meet the Scheme’s Standard, not from coupes where native species have been logged and replaced with invasive Pinus radiata.

* The Draft Interpretation makes an already easy to understand Principle (10) even more accessible to all stakeholders and less reliant upon expert or legal interpretation. This is important for the ongoing accessibility and trust of the FSC Scheme in Australia.
* Any plain language and/or ‘average person’ reading of Principle 10, the Criterion of Principle 10.1 and the Indicators, along with the relevant definitions from the Terms of Reference would agree with Draft Interpretation as being consistent with the definitions.

Community concerns in Australia about the negative biodiversity impacts of Pinus radiata include:

* Wide recognition that Pinus radiata, as non-Australian species, are less ecologically appropriate in the Australian landscape. Replacing more natural vegetation with pines would not be viewed by the public as aligned with the overall intent of the Standard.
* That grouping Australian native Eucalypts (such as blue gums) with exotic pine species is likely to be seen as an attempt to bypass ecological concerns.
* Any claim that Pinus radiata offer similar biodiversity value to Eucalypts would be met with public scepticism.
* 96% of Australians believe that more action is needed to look after the natural environment and 79% are concerned about the impact of weeds and feral animals on the environment[[21]](#footnote-20) and would therefore be unlikely to find replacement of Eucalypts with invasive Pinus radiata acceptable.
* Long standing community opposition to the introduction of pine trees[[22]](#footnote-21) and specifically into the Strzeleckis[[23]](#footnote-22), due to the detrimental ecological effects of native plantations being replanted with Pinus radiata.

### Suggestions for improvement

1. **The second verifier for 10.1.2 should be amended as per below.**

“Documentation of pre-harvest conditions ~~for native forests”~~

Our rationale is that documentation of *pre-harvest condition* should be undertaken for all certified land and that this amendment would make the verifier more consistent with Criteria 10.1.

1. **The definition of ‘native species’ should be nuanced for the Australian Standard**

The current FSC Glossary definition of ‘native species’ (FSC-STD-AUS-01-2018 EN) does not adequately reflect the important nuance, in the Australian context, between Eucalypts within their natural range and dispersal potential and those outside their natural range and dispersal potential but that are nonetheless native to Australia.

These ‘non local’ but ‘native to Australia’ eucalypt species are more ‘functionally similar’ than other exotic species introduced from other continents such as Pinus radiata, that are functionally very different and also *invasive*.

These ‘non local’ but native eucalypt species have higher conservation value for ‘*environmental values*’ in and around plantations.

Future versions of the Standard should consider prioritising these Australian genus plantation species over and above species that have been introduced from other continents, such as Pinus radiata.

Pinus radiata, was introduced into Australia in the 19th century and is *invasive* in most environments, so much so that it now threatens numerous Australian ecosystems.[[24]](#footnote-23)

1. **Retrospective consideration**

We ask the FSC to retrospectively restore the numerous native species plantations that have already been systematically replanted with exotic species (particularly Pinus radiata) under the watch of FSC accredited and audited CABs.

* Principle 10, including Indicators 10.1.1 and 10.1.2 have been in the Australian standard for what we believe to be in excess of 8 years.
* It is inexplicable that CHs have not been aware of their obligations in relation to Principle 10.1. It is plainly written, logical, and the definition of ‘pre-harvest condition’ is clear in the Glossary of Terms.
* It is inexplicable that CABs have seen fit to certify and recertify CHs who have clearly not been conforming with this Criterion of the Standard, for almost a decade.
  + In the case of Hancock Victoria Plantations - a significant CH in Australia, it is their policy and practice to replant all plantations (including those that have been ‘native species’) with Pinus radiata. How is this possible?
  + How is it that CABs have not identified multiple, major CH non-conformances whilst auditing over this 8 year period?
* How is it that the Country FSC Team has not picked this up earlier?

### In closing

Gippsland Forest Guardians is well placed to understand the forest health and biodiversity impacts that this Draft Interpretation will have on the plantation forest environment, particularly in the Strzelecki Ranges of Victoria Australia.

We express our clear and specific support for the FSC in formalising the implementation of this Draft Interpretation, as written, as quickly as possible.

The enactment of this Interpretation will be a clear demonstration of the FSC’s commitment to “Protecting forests for all forever” and will close an apparent loophole whereby Certificate Holders and CABs have, for unexplained reasons that should, in themselves be investigated, not been conforming to or enforcing the requirements of the Standard.

We thank you for taking the time to consider our submission.

1. Terms in italics are as defined in the Glossary of Terms from the FSC-STD-AUS001-2018. [↑](#footnote-ref-0)
2. White, M., Cheal, D., Carr, G. W., Adair, R., Blood, K. and Meagher, D. (2018) *Advisory list of environmental weeds in Victoria*. Arthur Rylah Institute for Environmental Research Technical Report Series No. 287. Department of Environment, Land, Water and Planning, Heidelberg, Victoria. ISBN 978-1-76077-001-3 (pdf/online). <<https://www.ari.vic.gov.au/__data/assets/pdf_file/0027/125919/ARI-Technical-Report-287-Advisory-list-of-environmental-weeds-in-Victoria.pdf>> [↑](#footnote-ref-1)
3. Frood, D (undated) *Inspection and checking identification of Slender Tree-ferns at Turtons Creek*, Pathways Bushland and Environment. [↑](#footnote-ref-2)
4. Lindenmayer, DB, Hobbs RJ, Montague-Drake R, et al (2000) The ecology and management of plantations as wildlife habitat. *Biological Conservation*, 91(2), 155–165. [↑](#footnote-ref-3)
5. Lindenmayer, D B, Hobbs R J, & Salt D (2003) Plantation forests and biodiversity conservation. Australian Forestry, 66(1), 62-66. [↑](#footnote-ref-4)
6. Lindenmayer, D B, Hobbs, R J, Montague-Drake R, et al. (2000) The ecology and management of plantations as wildlife habitat. *Biological Conservation*, 91(2), 155–165. [↑](#footnote-ref-5)
7. Brockerhoff EG, et al. (2008) Plantation forests and biodiversity: oxymoron or opportunity? *Biodiversity and Conservation*, 17, 925–951. [↑](#footnote-ref-6)
8. Andreas, CB, Troeger, D, Garcia, R, Aguayo, M, Barra, R & Vogt, J (2017) Assessing the impact of plantation forestry on plant biodiversity: A comparison of sites in Central Chile and Chilean Patagonia,*Global Ecology and Conservation*, 10. [↑](#footnote-ref-7)
9. Robson T C, Baker, AC, Murray, B R (2009) Differences in leaf-litter invertebrate assemblages between radiata pine plantations and neighbouring native eucalypt woodland. *Austral Ecology.* [↑](#footnote-ref-8)
10. Kanowski, J, Catterall, C. P, Wardell-Johnson, G W, & Lamb, D (2005). *Consequences of broadscale timber plantations for biodiversity in cleared rainforest landscapes of tropical and subtropical Australia.* [↑](#footnote-ref-9)
11. Lindenmayer, D B, Mccarthy, M, Parris, K & Pope, M L (2000) Habitat fragmentation, landscape context, and mammalian assemblages in southeastern Australia. *Journal of Mammalogy* 81, 787–797. [↑](#footnote-ref-10)
12. Lindenmayer, D B, Cunningham, R B, Pope, M L, Donnelly, C F (1999) A large-scale experiment to examine the effects of landscape context and habitat fragmentation on mammals. *Biological Conservation* 88, 387–403. [↑](#footnote-ref-11)
13. Castaño-Villa, G J, Estevez, J G, Giovany, G, Bohada-Murillo, M, Fontúrbel, FE (2019) Differential effects of forestry plantations on bird diversity: A global assessment, *Forest Ecology and Management*, 440 202–207. [↑](#footnote-ref-12)
14. Department of Energy, Environment and Climate Action (2025) *Action Statements*, DEECA, Vic <https://www.environment.vic.gov.au/conserving-threatened-species/action-statements> [↑](#footnote-ref-13)
15. White et al. 2018 Advisory list of environmental weeds in Victoria. [↑](#footnote-ref-14)
16. Calviño-Cancela, M, & van Etten, E J B (2018) Invasive potential of *Pinus radiata* in Western Australia, *Biological Invasions*, 20, 2485–2500. [↑](#footnote-ref-15)
17. Richardson, D M, Williams, P A, & Hobbs, R J (1994) Pine invasions in the Southern Hemisphere: Determinants of spread and invadability. *Journal of Biogeography*, *21*(5), 511–527. [↑](#footnote-ref-16)
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19. Lindenmayer et al. (2000). The ecology and management of plantations as wildlife habitat. *Biological Conservation*, 91(2), 155–165. [↑](#footnote-ref-18)
20. Farmilo, B J, Nimmo, D J & Morgan J W (2013), Pine plantations modify local conditions in forest fragments in southeastern Australia: Insights from a fragmentation experiment, *Forest Ecology and Management*, 305, 264–272, [↑](#footnote-ref-19)
21. Biodiversity Council (2025) *2024−2025 Biodiversity Concerns Report: A survey of community attitudes toward nature conservation*, March 2025. <<https://biodiversitycouncil.org.au/admin/uploads/2025_Biodiversity_Council_Community_Concerns_Report_ee239c6469.pdf>> [↑](#footnote-ref-20)
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