

19 June 2009

Green Building Council Australia Assessment Framework for Forest Management Certification Schemes

Australian Forestry Standard Limited addresses the MAT-8 'Timber Criteria' Assessment Framework proposal - Released 19 June 2009

The AFSL supports the recognition of timber certified under an internationally recognised certification scheme in Green Star rated buildings and clearly sees the benefits to the environment of GBCA driving the Green Building agenda. It is the AFSL's view that the current approach has developed into a much more complicated process than is necessary and our concerns remain with the MAT-8 'Timber criteria' framework, the validity of the outcome of the Timber Experts Reference Panel (TERP) and the assessment process as presented in this draft document.

While AFSL has concerns with the 15 criteria underpinning the framework, our main concern relates to the objective of the process used to develop and implement the criterion framework. From the document provided, it seems that the objective of the process is to duplicate already existing internationally recognised forest management and chain of custody schemes, and there by add a costly and unnecessary layer of compliance for timber products to be included within the GBCA Green Star program.

Timber Experts Reference Panel (TERP)

AFSL would like to be assured that the process of the independent panel of experts to review and propose new Timber criteria has conformed to the governance and transparency processes, including adoption of consensus principles that is strongly advocated within GBCA's own documentation and frameworks. In particular, there is no indication that all of the Panel agreed on the content, nor is there evidence of a formal sign-off by all of the participants that this document reflects their views and recommendations.

MAT-8 'Timber criteria' framework documentation

The document presents a confusing array of information that moves between advice to the Built Environment on how they are to obtain points in the timber credit to prescriptive re-writes of sections of forestry schemes and international forestry guidelines and statements. Overall, the purpose of the criteria framework is questionable as it attempts to create a certification scheme for forest certification schemes, a process that is duplicative of existing forest management and chain of custody schemes, costly and unnecessary.

Forest Management Authority

While GBCA may consider itself an authority on 'Green Buildings' it cannot assume the role of authority on all products used, which is why, in the timber and wood products industry, there are independently accredited and internationally recognised Forestry Management Schemes and Standards already in existence.

Recognised Forest Management Schemes

There are two international Forest Management Schemes

1. Programme for Endorsement of Forest Certification scheme (PEFC), and
2. Forest Stewardship Council (FSC)

Both schemes have international guidelines that have been independently reviewed, evaluated and accredited by leading world organisations guidelines. There are differences in the degree of rigour around this process between the schemes. They also have undergone audits against individual countries own criteria for the procurement polices of certified wood and wood products.

Both Schemes have a framework that requires recognition of national Standards and/or guidelines by the majority of the world's countries. These national schemes are required to undergo further independent audits and accreditation to ensure their credibility and compliance to domestic and international guidelines.

In Australia, the Australian Forest Certification Scheme (AFCS) undergoes an independent audit and review by international consultants against the PEFC guidelines and is awarded accreditation on its compliance to that framework.

As stated above, the AFCS has as its basis two national Standards – Australian Forestry Standard for Forestry Management AS 4708 and Australian Forestry Standard for Chain of Custody AS 4707. The management and development of these Standards come under the strict controls and independent audits against the Australian Board of Standards Development Organisation (ABSDO) criteria. ABSDO is a subsidiary of Standards Australia®.

GBCA by not recognising the Australian Forestry Standards appear to be questioning Standards Australia® and all the Standards that have been developed as Australian Standards.

Furthermore, over 8.7 million hectares have been certified against the Australian Standard (77% of Australian forests); the managing organisations of these forests have complied with an Australian Standard. It is important that companies wishing to participate in the GBCA processes, through their recognised AFCS certification, are able to do so in a fair trading environment and are not discriminated against in any way or subjected to any restrictions of trade within the GBCA processes.

In the Victorian Timber Industry Strategy draft report and as the result of public consultation, the draft highlights the importance of the Government's recognition of international third-party certification. It goes on to state "Other trends have been to apply additional criteria over and above third-party forest certification to assess environmental sustainability, or place sustainable forest products at an unfair disadvantage as compared to alternative products" and "No Victorian Government department or agency will endorse any approach, including in procurement and sustainability guides and tools, that does not recognise that third party certification unambiguously demonstrates sustainable forest management."

Criteria for Compliance in the Green Star Rating Tool

In the previous MAT-8 'Timber criteria' FSC was recognised *without* any additional requirements or interpretations. The recognition of the scheme seemed to be enough to ensure compliance of a building company's use of certified timber products to achieve points in the Green Star program. It would appear to be a very simple step to add AFCS in a similar fashion, as a number of other environmental accreditation entities have already done.

In the majority of the Green Star Rating Tool products manual, compliance requirements simply refer to a Standard or international guideline to support that building company's compliance to obtain the allocated points. AFSL considers that a similar approach to the inclusion of wood products would be appropriate and would negate the requirement for the proposed Assessment Framework for Forest Management Certification Schemes.

In Summary

AFSL recommends that a similar approach to what is used for assessing other building products – recognition of compliance with Australian Standards - be adopted.

By not acknowledging the authority or credibility of an Australian Standard in this field you are challenging Standards Australia® and other Standards Development Organisations authenticity as the governing bodies of Australian Standards and thus placing the thousands of Australian Standards in industries in a less than creditable position.

AFSL also believes that the GBCA has developed an administrative nightmare for this criterion; the proposal has also introduced probable limitations on any schemes ability to financially as well as operationally achieve recognition by the Green Star program.

Finally, the Built Environment is being asked to ensure their construction is a Green Building. The complexity of the timber criteria will have an adverse effect as these organisations decide not to use timber in their buildings rather than meet the criteria. This outcome will not only impact on many Australian timber companies but will also threaten the jobs of thousands of Australian workers. On a sustainability note GBCA could be seen as implementing restrictions that undermine the positive contributions timber has to mitigating climate change and improving the environment.

- Wood is a 400 times better insulator than steel and eight times better than concrete. It is the only building material that is 100% renewable.
- By choosing wood products wherever possible in Australian house construction, greenhouse gas emissions equivalent to up to 25 tonnes of CO² per house could be saved.
- Compared to a wood 2x4, a steel stud requires 21 times more energy to produce and releases more than 15 times the sulphur dioxide. Producing concrete emits up to three times more carbon dioxide, carbon monoxide and hydrocarbons than manufacturing lumber.
- One of the best ways to address climate change is to use more wood, not less. Wood is simply the most abundant, biodegradable and renewable material on the planet.

GBCA should be promoting the use of timber and let the already recognised and independently accredited Forest Management Schemes manage the Standards and guidelines for certified timber and ongoing recognition of best practices in forestry management.

---END---

MEDIA CONTACTS

AFSL--CEO Kayt Watts: ceo@forestrystandard.org.au or +61 (0) 2 6232 5356
<http://www.forestrystandard.org.au>

NOTES

Australian Forestry Standard Limited is a Standards Development Organisation and a not-for-profit public company registered in July 2003. The company owns the standard development functions and manages the elements of the **Australian Forest Certification Scheme**. The Australian Forest Certification Scheme (AFCS) will:

- provide Australian and overseas consumers with an independent, internationally recognised third-party certification scheme for forest management in Australia
- promote a culture of 'continuous improvement' of the sustainable forest management practices in Australia
- support a market for forest products that are a result of sustainable forest management practices and value adding processes that maintain the integrity of the source forest certification and promote the broader environmental benefits of using wood-based
- products.

PEFC (Programme for the Endorsement of Forest Certification schemes) PEFC is a framework for the mutual recognition of credible national or regional forest certification schemes that have been developed based on internationally recognised requirements for sustainable forest management. Since its launch in 1999, PEFC has become the largest forest certification umbrella organisation covering national schemes from all over the world, delivering hundreds of millions of tonnes of wood to the processing industry and then on to the market place from over 200 million hectares of certified forests. PEFC has strong grass roots support from many stakeholders including the forestry sector, governments, trade associations, trade unions and non-governmental organisations.

Forest Certification Forest certification is a process, which provides an assurance mechanism to purchasers of wood and paper products that the wood used in the products comes from sustainably managed forests. Sustainably managed forests are those whose management implements performance standards based on internationally agreed environmental, social and economic requirements.