To the Plantation Review Committee,

BACKGROUND INFO

I am a member of the FSC (since 1998) and operate a small forestry and GIS consultancy business in New Zealand.

My work involves some work in plantation management but is mostly focussed on indigenous (ie. natural) forest and ecosystem management.

New Zealand is somewhat unusual in that it has a comparatively large area of exotic plantation forest. Of the 1.8 million hectares of exotic plantation, approximately 90% is radiata pine and a further 9% is Douglas fir (Oregon).

The majority of this is managed by large and medium sized corporate forestry companies. Some 300,000 ha is owned/managed by small forestry ventures, individuals, or farmers. A significant proportion of the large and medium-sized corporate plantations are already FSC certified. (But the quality and rigor of some of these plantation evaluations is questionable.)

There are also about 6.5 million hectares of natural forest left in New Zealand (23% of the land cover). Of this, about 4.5 million hectares is permanently reserved in the Crown (government) Conservation Estate. Low altitude indigenous (natural) forest is poorly represented having been converted to grassland in pre-European times and cleared for agriculture in the 19th and 20th century. There is very little conversion of tall natural forest to other land uses happening now but the conversion of small areas of second growth and seral forest to agriculture and exotic plantations continues.

A further 1.3 million hectares of natural forest is privately owned. About half of this private estate (600,000 ha) is suitable for Sustainable Native Forest Management under the New Zealand Forests Act and Maori (the indigenous people of New Zealand) own about half of this. Approximately 15% (90,000 ha) is already approved by the Ministry of Agriculture and Forestry for sustainable productive management.

Gowan Hills Forest was the first New Zealand natural forest to gain FSC certification but this forest has recently changed hands and is not presently certified. The Waitutu forests managed by Lindsay and Dixon Ltd (11,000 ha) is currently the only FSC certified natural forest in New Zealand.

KEY COMMENTS for the PLANTATION REVIEW

Comment 1 Identification of Stakeholders and Stakeholder Participation

It is important that ALL forestry stakeholders, particularly economic chamber stakeholders involved in natural forest management, are provided with the same opportunities to participate in the development of Plantation Standards as all other stakeholders. In many instances (eg. New Zealand), the process to develop Plantation Standards is driven by larger commercial interests. These parties often see natural forest management as somewhat irrelevant and yet a Plantation Standard needs to (and often does) include references to natural forests.

The FSC National Initiative Guidelines need to make it clear that participation in ANY forest standards development process should be open to ALL stakeholders and not differentiated by forest type.

Comment 2 Relationship between Natural and Plantation Standards

I believe that FSC should 'strongly recommend' that any National (or Regional) Plantation Standard be part of a ***single*** National Forest Management Standard. Plantation Standards should therefore be a subset of a forest standard which covers both natural and plantation standards and not separate from a Natural Forest Standard.

However, if stakeholders in a country or region do decide to produce separate Plantation and Natural Forest Standards (as New Zealand has chosen to do) then natural forest management standards should form the baseline or primary reference for the development of any plantation standard. As is reflected in the FSC P&C, Plantaion Standards should be complementary to Natural Forest Standards, not the other way round.

Notwithstanding the 'strong recommendation' above, I believe ***FSC should REQUIRE that any National Plantation Standard must be developed AFTER (or during) and certainly NOT before a National Standard for Natural forest management is developed***. Furthermore, any Plantation Standards ***must be specifically INTEGRATED*** with the National Natural Forest Standard. If Plantation Standards are developed prior to Natural Forest Standards, it is very difficult to set meaningful performance standards in a Plantation Standard which take account of natural ecosystem elements, functions and thresholds. Furthermore, it is almost impossible to effectively integrate the two Standards if the development of Plantation Standards precedes development of Natural Forest Standards.

In essence, I do not believe the FSC Board should accept or endorse draft Plantation Standards for any country or region before a draft Natural Forest Standard for that country has been endorsed by the Board.

Comment 3 Definition and Delineation of FMU

There is a need to clarify what defines the Forest Management Unit (FMU) for a Plantation. In some situations (eg. New Zealand), plantations invariably contain stands and remnants of natural forest within the plantation matrix. I believe these stands and remnants must be defined as part of the FMU and be part of the assessible estate. The management of these natural forest remnants must also be included in the forest management evaluation in any certification process and that a Plantation Standard should not necessarily preclude productive management of such remnants.

In situations where there are two separate Standards - one for Natural Forest and one for Plantations - and where an exotic plantation FMU includes areas of existing natural forest, certifiers must evaluate forest and plantation management under both sets of Standards.

Comment 4 Relevance of Principle 9 to Plantation Standards

To date, certification assessments in New Zealand plantations have (conveniently) assumed that plantations cannot possibly contain High Conservation Values and that consequently, there is little need to conduct HCVF assessments within the actual exotic plantation of an FMU. Anecdotal and scientific evidence (in New Zealand) shows that a number of high conservation values such as rare species or water catchment values can be present within an exotic plantation and are not necessarily confined to the natural forest remnants within the exotic plantation matrix. Any revision of the FSC Principles and Criteria or any special Plantations Guidelines must make it clear that HCVF assessments must be conducted across the entire forest management unit including areas of plantation.

Comment 5 'Trading Conservation Credits'

At times, large exotic plantation managers who may own or manage plantation FMUs in a number of locations (within a country or region) have argued for a system of trading

conservation credits across their estate as a means of meeting the requirements of Criterion 6.2. I believe this is a sensible approach for those plantations which are located in relatively impoverished areas of indigenous biodiversity however, there need to be limits set on the geographical extent of such 'trading'. While this may be a matter for a National Standards process to deal with, it also requires some direction from FSC.

Comment 5 Clearcut Size and Sustainable Yield

Plantation managers, particularly exotic plantation managers (in New Zealand), have a tendency to think that constraints on clearcut size are largely irrelevant in plantation management and that yield regulation is simply an economic concern. They tend to view the plantation simply as a 'agricultural crop' and that harvesting is primarily dictated by market pressure and opportunity. Any revision of the FSC Principles and Criteria or any special Plantations Guidelines must make it clear that clearcut size and yield regulation must be specifically addressed in a Plantation Standard and must take full account of the associated environmental impacts of harvesting including the scale of harvesting, soil and water issues, and the spatial distribution of a reasonable range of age classes.

Comment 6 Choice of Species

To date, some plantation certifications (in New Zealand) have permitted different provenances of a single species as providing sufficient diversity in the plantation. I believe this is contrary to the intent of Criterion 10.3 in that allowing biodiversity at the genetic level allows a specie-monocultural plantation to be certified. The diversity expected in a FSC-certified plantation should at least be at the species level irrespective of the diversity provided by a range of age classes and their spatial arrangement.

Criterion 10.4 also requires that the choice of species be dependent on their suitability for the site and their appropriateness to the management objectives. A number of plantation certifications (in New Zealand) have occurred where the management objectives have not been balanced and or specific or explicit enough thereby allowing the certification of a species-monoculture. In conducting a forest evaluation, Certifying Bodies need to pay particular attention to the rationale of the manager and deficiencies in the rationale for planting single species exotic monocultures. Furthermore, CBs need to more critically evaluate the management objectives in relation to the full scope of matters intended under the FSC system.

Comment 7 Area Planted in Natural Forest Species

Criterion 10.5 requires that an area of the FMU be restored to natural forest cover appropriate to operational scale. This requirement does not preclude the future harvesting of such plantings. Despite this, a number of exotic plantations (in New Zealand) have gained certification with very little effort being made in terms of natural forest restoration. For example, the performance indicators in the SCS generic Standards for New Zealand Plantation evaluation refers only to existing natural forest and only requires policies and guidelines for natural forest restoration. This is patently absurd and and is not a performance indicator for actual natural forest restoration on the ground.

Regards,

Roger May