

# FOREST MANAGEMENT AND STUMP-TO-FOREST GATE CHAIN-OF-CUSTODY CERTIFICATION EVALUATION REPORT

## *Sustainable Timber Tasmania*

*Forest Management Unit name*

Tasmania, Australia

### SCS-FM/COC-APPLICANT

99 Bathurst Street

Hobart, TAS 7000

Australia

<https://www.sttas.com.au/>

CERTIFIED

-Applicant-

EXPIRATION

-Applicant-

DATE OF FIELD EVALUATION

20-31/May/2019

DATE OF REPORT FINALIZATION

3/February/2020

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## Foreword

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SCS Global Services (SCS) is a certification body accredited by the Forest Stewardship Council to conduct forest management and chain of custody evaluations. Under the FSC / SCS certification system, forest management enterprises (FMEs) meeting international standards of forest stewardship can be certified as “well managed,” thereby permitting the FME’s use of the FSC endorsement and logo in the marketplace subject to regular FSC / SCS oversight.

SCS deploys interdisciplinary teams of natural resource specialists and other experts in forested regions all over the world to conduct evaluations of forest management. SCS evaluation teams collect and analyze written materials, conduct interviews with FME staff and key stakeholders, and complete field and office audits of subject forest management units (FMUs) as part of certification evaluations. Upon completion of the fact-finding phase of all evaluations, SCS teams determine conformance to the FSC Principles and Criteria.

### Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the FSC Certificate Database (<http://info.fsc.org/>) no less than 30 days after issue of the certificate. Section B contains more detailed results and information for the use of by the FME.

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## SECTION A – PUBLIC SUMMARY

### 1. General Information

#### 1.1 Certificate Registration Information

##### Name and Contact Information

Organization name	Sustainable Timber Tasmania		
Contact person	[REDACTED]		
Address	Level 1 99 Bathurst street Hobart Tasmania Australia	Telephone	6169 2800
		Fax	
		e-mail	stakeholder@sttas.com.au
		Website	www.sttas.com.au

##### FSC Sales Information

FSC salesperson	[REDACTED]		
Address	Level 1 99 Bathurst street Hobart, Tasmania Australia	Telephone	6169 2800
		Fax	
		e-mail	stakeholder@sttas.com.au
		Website	www.sttas.com.au

##### Scope of Certificate

Certificate type	<input checked="" type="checkbox"/> Single FMU	<input type="checkbox"/> Multiple FMU
	<input type="checkbox"/> Group	
SLIMF if applicable	<input type="checkbox"/> Small SLIMF certificate	<input type="checkbox"/> Low intensity SLIMF certificate
	<input type="checkbox"/> Group SLIMF certificate	
# Group Members (if applicable)		
Number of FMU's in scope of certificate	1	
Geographic location of non-SLIMF FMU(s)	Latitude & Longitude: 41.4545° S, 145.9707° E	
Forest zone	<input type="checkbox"/> Boreal	<input checked="" type="checkbox"/> Temperate
	<input type="checkbox"/> Subtropical	<input type="checkbox"/> Tropical
Total forest area in scope of certificate which is: Units: <input checked="" type="checkbox"/> ha or <input type="checkbox"/> ac		
privately managed		
state managed	713,300 ha	
community managed		
Number of FMUs in scope that are:		
less than 100 ha in area		100 - 1000 ha in area
1000 - 10 000 ha in area		more than 10 000 ha in area
		1



<b>Total forest area in scope of certificate which is included in FMUs that:</b> Units: <input type="checkbox"/> ha or <input type="checkbox"/> ac	
are less than 100 ha in area	0
are between 100 ha and 1000 ha in area	0
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs	0
<b>Division of FMUs into manageable units:</b>	
Administratively, Sustainable Timber Tasmania divides its operations into Northern and Southern Regions. Regional operations are directed and supported by the Head Office in Hobart. STT's Permanent Timber Production Zone (PTPZ) land categorised using a map-based zoning system, known as Management Decision Classification ("MDC"), to delineate areas of forest that are to be managed for wood production and those that are to be managed for uses other than wood production. The basic operational unit for timber harvesting is the coupe which may contain more than one "forest stand" or may be used as equivalent to stand.	

## Social Information

<b>Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):</b>		
male workers: 614	female workers: 53	
<b>Number of accidents in forest work since previous evaluation:</b>	Serious: 10 [Note: 1 Staff LTI, 8 Harvest and Haulage LTI, 1 other LTI.]	Fatal: 1 [Note: Harvest and Haul. Truck driver had a heart attack whilst driving. Investigation is underway]

## Pesticide and Other Chemical Use, Prior Year

Active ingredient	Quantity applied (kg)	Total area treated (ha)	Reason for use
Glyphosate	172.92	79	Native forest pre-burn fine fuel treatment, and/or Firebreak maintenance, and/or Declared weed eradication.
Triclopyr	6.96	79	Native forest pre-burn fine fuel treatment, and/or Firebreak maintenance, and/or Declared weed eradication.
Alpha cypermethrin	10.97	502	Plantation insect control
Clopyralid	0.02	79	Native forest pre-burn fine fuel treatment, and/or Firebreak maintenance, and/or Declared weed eradication.
Metsulfuron methyl	1.68	79	Native forest pre-burn fine fuel treatment, and/or Firebreak maintenance, and/or Declared weed eradication.
Picloram	0.68	79	Native forest pre-burn fine fuel treatment, and/or Firebreak maintenance, and/or Declared weed eradication.
Aminopyralid	0.54	79	Native forest pre-burn fine fuel treatment, and/or Firebreak maintenance, and/or Declared weed eradication.

## Production Forests

<b>Timber Forest Products</b>	Units: <input checked="" type="checkbox"/> ha or <input type="checkbox"/> ac
-------------------------------	------------------------------------------------------------------------------

Total area of production forest (i.e. forest from which timber may be harvested)	373,000 ha
Area of production forest classified as 'plantation'	8,300 ha
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	8,300 ha
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	364,700 ha
<b>Silvicultural system(s)</b>	<b>Area under type of management</b>
Even-aged management	
Clearcut (clearcut size range )	178,300 ha
Shelterwood	39,000
Other:	
Uneven-aged management	
Individual tree selection	
Group selection	18,500
Other:	132,000
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
<b>Non-timber Forest Products (NTFPs)</b>	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0
Other areas managed for NTFPs or services	0
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	0
<b>Species in scope of joint FM/COC certificate: <i>Scientific/ Latin Name</i> (Common/ Trade Name)</b>	
Plantation: <i>Eucalyptus nitens</i> , <i>E. globulus</i> . Pine plantation: <i>Pinus radiata</i> . Native Forest: <i>Eucalyptus</i> spp. Special species timbers: Blackwood ( <i>Acacia melanoxylon</i> ), Myrtle ( <i>Nothofagus cunninghamii</i> ), celery top pine ( <i>Phyllocladus aspleniifolius</i> ), Sassafras ( <i>Atherosperma moschatum</i> ), Huon pine ( <i>Lagarostrobos franklinii</i> ), Silver wattle ( <i>Acacia dealbata</i> )	

### FSC Product Classification

Timber products		
Product Level 1	Product Level 2	Species
W1 Rough Wood	W1.1 Roundwood	All species listed in scope
Non-Timber Forest Products		
Product Level 1	Product Level 2	Product Level 3 and Species
Non identified		

## Conservation and High Conservation Value Areas

Conservation Area	Units: <input checked="" type="checkbox"/> ha or <input type="checkbox"/> ac
Total amount of land in certified area protected from commercial harvesting of timber and managed primarily for conservation objectives (includes both forested and non-forested lands).*	120 000 ha.

\*Note: Total conservation and HCV areas may differ since these may serve different functions in the FME's management system. Designation as HCV may allow for active management, including commercial harvest. Conservation areas are typically under passive management, but may undergo invasive species control, prescribed burns, non-commercial harvest, and other management activities intended to maintain or enhance their integrity. In all cases, figures are reported by the FME as it pertains local laws & regulations, management objectives, and FSC requirements.

High Conservation Value Forest / Areas			Units: <input checked="" type="checkbox"/> ha or <input type="checkbox"/> ac
Code	HCV Type	Description & Location	Area
HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	<ul style="list-style-type: none"> <li>• 1.2: Areas of floral, eucalypt and invertebrate endemism identified. Concentrated on East and North East coasts.</li> <li>• 1.3: Several migratory bird species aggregate in seasonal concentrations</li> <li>• 1.5: Areas of flora, fauna, community and paleoendemic richness identified.</li> <li>• 1.6: Glacial and contemporary refugia identified.</li> </ul>	713,300 ha
HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.	<ul style="list-style-type: none"> <li>• 2.1 Landscape level native forests</li> <li>• 2.2: Tarkine Wilderness Area, IGA assessment area, Swift parrot breeding habitat</li> <li>• 2.3.a Wildlife habitat corridors</li> <li>• 2.3b Refugia</li> <li>• 2.4a Intact Forest Landscapes</li> <li>• 2.4c Roadless areas</li> <li>• 2.4d Forests not affected by management activity</li> </ul>	2.1: 9,400 ha 2.2(Tarkine) : 22,100 2.2 IGA: 112,000 ha 2.3 : 44,800ha 2.4a: 5,900 ha 2.4.c: 13,800 ha 2.4d: 9,400 ha
HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	<ul style="list-style-type: none"> <li>• 3.1a Ecosystems that are threatened at the IBRA bioregion scale</li> <li>• 3.1b Ecosystems that are poorly reserved at the IBRA bioregion scale</li> <li>• 3.2 Areas for conservation of important genes or genetically distinct populations.</li> <li>• 3.3 Old growth forests</li> </ul>	3.1.a: 16,400 ha 3.3: ~105,000ha 3.4:

		<ul style="list-style-type: none"> <li>• 3.4b Mature Forest in degraded landscapes</li> </ul>	
HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	<ul style="list-style-type: none"> <li>• 4.2 Areas that provide protection from erosion</li> <li>• 4.3 Areas that provide barriers to the spread of destructive fires</li> <li>• 4.4 Areas that provide clean water catchments</li> </ul>	Not estimated
HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).	None	
HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).	<ul style="list-style-type: none"> <li>• 6.1 Aesthetic Values</li> <li>• 6.2               <ul style="list-style-type: none"> <li>○ Historical values of global or national cultural or archaeological significance - 942 ha of PTPZ land is within the Tasmanian Wilderness World Heritage Area</li> <li>○ 4 Tasmanian Heritage Register sites</li> <li>○ 1,100 recorded historic cultural heritage sites</li> <li>○ Present, Details of Aboriginal cultural sites are confidential.</li> </ul> </li> <li>• 6.3 Long Term Research sites</li> <li>• Social (including economic) values</li> <li>• 6.5 Spiritual and Cultural values</li> </ul>	942ha *  *Note some values identified do not have active management hectares associated and refer to social or cultural activities, such as apiary or spiritual values.
Total area of forest classified as 'High Conservation Value Forest / Area'			

### Areas Outside of the Scope of Certification (Partial Certification and Excision)

<input type="checkbox"/> N/A – All forestland owned or managed by the applicant is included in the scope.	
<input type="checkbox"/> Applicant owns and/or manages other FMUs not under evaluation.	
<input checked="" type="checkbox"/> Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.	
<b>Explanation for exclusion of FMUs and/or excision:</b>	<ul style="list-style-type: none"> <li>■ Areas where long-term Forestry Rights have been given to Norske Skog, Reliance Forest Management and/or New Forests.</li> <li>■ All other areas that are currently subject to temporary third-party Property Rights (e.g. leases, registered Forestry Rights) where STT does not have forest management control. When these rights expire in the future and when control is returned to STT, these areas will be considered for subsequent addition into the FMU.</li> <li>■ Waterbodies (Hydro lakes and Macquarie Harbour) where STT has salvage rights with Hydro Electric Commission and/or Parks and Wildlife</li> </ul>

	<p>Service for native pines, but does not have full forest management control</p> <ul style="list-style-type: none"><li>Some areas of plantation have been converted post 1994 and therefore do not qualify for FSC forest management certification</li></ul>	
Control measures to prevent mixing of certified and non-certified product (C8.3):	<p>Generally, the wood produced off other areas is not managed by STT, and no mixing occurs.</p> <p>Established Chain of custody procedures will manage the separation of controlled wood from fully certified FSC FM/COC Wood.</p>	
Description of FMUs excluded from or forested area excised from the scope of certification:		
Name of FMU or Stand	Location (city, state, country)	Size ( <input checked="" type="checkbox"/> ha or <input type="checkbox"/> ac)
Long term forestry rights	Tasmania	92,134 ha
Temporary third-party property rights	Tasmania	2,622 ha
Water bodies	Tasmania	63,846 ha
Plantations converted after 1994 conversion	Tasmania	19,900 ha

## 1.2 Standards Used

All standards employed are available on the websites of FSC International ([www.fsc.org](http://www.fsc.org)) or SCS Global Services ([www.SCSglobalServices.com](http://www.SCSglobalServices.com)). All standards are available on request from SCS Global Services via the comment form on our website. When no national standard exists for the country/region, SCS Interim Standards are developed by modifying SCS' Generic Interim Standard to reflect forest management in the region and by incorporating relevant components of any Draft Regional/National Standard and comments from stakeholders. More than one month prior to the start of the field evaluation, SCS Draft Interim Standards are provided to stakeholders identified by FSC International, SCS, forest managers under evaluation, and the FSC National or Regional Office for comment. SCS' COC indicators for FMEs are based on the most current versions of the FSC Chain of Custody Standard, FSC Standard for Group Entities in Forest Management Groups (FSC-STD-30-005), and FSC Accreditation Requirements.

Standards applicable <i>NOTE: Please include the full standard name and Version number and check all that apply.</i>	<input checked="" type="checkbox"/> Forest Stewardship Standard(s), including version: The FSC National Forest Stewardship Standard of Australia, FSC-STD-AUS-01-2018
	<input checked="" type="checkbox"/> SCS COC indicators for FMEs, V7-0
	<input checked="" type="checkbox"/> FSC Trademark Standard (FSC-STD-50-001 V2-0)
	<input type="checkbox"/> FSC standard for group entities in forest management groups (FSC-STD-30-005), V1-1
	<input type="checkbox"/> Other:

## 1.3 Conversion Table English Units to Metric Units

Length Conversion Factors		
To convert from	To	multiply by
Mile (US Statute)	Kilometer (km)	1.609347
Foot (ft.)	Meter (m)	0.3048
Yard (yd.)	Meter (m)	0.9144
Area Conversion Factors		
To convert from	To	multiply by

Square foot (sq. ft.)	Square meter (m <sup>2</sup> )	0.09290304
Acre (ac)	Hectare (ha)	0.4047
<b>Volume Conversion Factors</b>		
<b>To convert from</b>	<b>To</b>	<b>multiply by</b>
Cubic foot (cu ft.)	Cubic meter (m <sup>3</sup> )	0.02831685
Gallon (gal)	Liter (l)	4.546
<b>Quick reference</b>		
1 acre	= 0.404686 ha	
1,000 acres	= 404.686 ha	
1 board foot	= 0.00348 cubic meters	
1,000 board feet	= 3.48 cubic meters	
1 cubic foot	= 0.028317 cubic meters	



## 2. Description of Forest Management

### 2.1 Management Context

#### 2.1.1 Regulatory Context

<b>Pertinent regulations at the national level</b>	Aboriginal and Torres Strait Islander Heritage Protection Act 1984 Age Discrimination Act 2004 Agricultural and Veterinary Chemical Code Act 1994 Australian Human Rights and Equal Opportunity Commission Act 1986 Australian Heritage Commission Act 1975 Biosecurity Act 2015 Disability Discrimination Act 1992 Environment Protection and Biodiversity Conservation Act 1999 Export Control Act 1982 Fair Work Act 2009 Illegal Logging Prohibition Act 2012 Independent Contractors Act 2001 National Measurement Act 1960 Native Title Act 1993 (Amended 1998) Quarantine Act 1908 Racial and Religious Tolerance Act 2001 Racial Discrimination Act 1975 Regional Forest Agreements Act 2002 Sex Discrimination Act 1984 Spam Act 2003 Work Health and Safety Act 2011 Environmental Protection and Biodiversity Conservation Act 1999 Tasmanian Regional Forest Agreement 2017 Tasmanian Community Forest Agreement 2005 National Forest Policy Statement 1992
<b>Pertinent regulations at the state/local level</b>	Aboriginal Heritage Act 1975 Agricultural and Veterinary Chemicals (Control of Use) Act 1995 Animal Welfare Act 1993 Environmental Management and Pollution Control Act 1994 Fire Service Act 1979 Forest Practices Act 1985 Forest Practices Code 2015 Forestry Rights Registration Act 1990 The Forestry (Fair Contract Codes) Act 2001 Heavy Vehicle National Law (Tasmania) Act 2013 Historic Cultural Heritage Act 1995 Land Use Planning and Approvals Act 1993 Mineral Resources Development Act 1995 National Parks and Reserves Management Act 2002 Nature Conservation Act 2002 Natural Resources Management Act 2002

	<p>Regional Forests Agreement (Land Classification) Act 1998</p> <p>Threatened Species Protection Act 1995</p> <p>Also Water Management Act 1999</p> <p>Weed Management Act 1999</p> <p>Workplace Health and Safety Act 2012</p> <p>Workplace Health and Safety Regulations 2012</p>
<b>Regulatory context description</b>	<p>In Tasmania there are strict and comprehensive legislation and policy frameworks that dictate all aspects of forest planning, forestry operations and forest maintenance. This is based around the <i>Forest Practices Act (1985)</i>, <i>Regional Forests Agreement (Land Classification) Act (1998)</i> and the <i>Forest Practices Code (2015)</i>. The other significant codes of practice covering forestry activities are the <i>Forest Safety Code (2007)</i>. This is legislated under the <i>Work Health and Safety Act 2012</i> and covers all aspects of safety working in the forest. There are several other codes of practice that regulate forest activities including the <i>COP Aerial Spraying 2000</i>, <i>COP Ground Spraying 2001</i>, <i>COP Quarry's</i>, <i>Heavy Vehicle National Law (Tasmania) Act 2013</i>, and <i>Tasmanian Cable Harvesting Code 2006</i>.</p> <p>The development of all harvest planning, reforestation and management plans must comply with the above legislation and codes of practice. The legal and other requirements dictated in the above documents are monitored through regular compliance audits undertaken on the standard operating procedures.</p>

## 2.1.2 Environmental Context

<b>Environmental safeguards:</b>
<p>The <i>Forest Practices Authority (FPA)</i> is an independent statutory body responsible for administering the Tasmanian forest practices system. (<a href="http://www.fpa.tas.gov.au">www.fpa.tas.gov.au</a>). The FPA has a legislative requirement to set minimum standards, and the regulatory authority to monitor the implementation and effectiveness of the forest practice system across all tenures, including <i>Permanent Timber Production Zone (PTPZ)</i> land that is managed by Sustainable Timber Tasmania (STT). The standards for “best management practice” are contained within the <i>Forest Practices Code, 2015</i> which is widely recognized in Tasmania and is available to all forest workers. (<a href="http://www.fpa.tas.gov.au/data/assets/pdf_file/0020/132455/Forest_Practices_Code_2015.pdf">www.fpa.tas.gov.au/data/assets/pdf_file/0020/132455/Forest_Practices_Code_2015.pdf</a>). The Landscape Context Planning System (or Landscape Context tool) is a geographic information system-based system developed by Sustainable Timber Tasmania that uses mapped information on forest type, harvest boundaries and forest zoning, to inform, implement, and monitor habitat retention and coupe dispersal decisions. (<a href="http://www.sttas.com.au/forest-operations-management/managing-forest-values/landscape-context-planning-system">www.sttas.com.au/forest-operations-management/managing-forest-values/landscape-context-planning-system</a>).</p> <p><i>Forest Practices Officers (FPOs)</i>, who are trained and certified by FPA, are responsible for the preparation and approval of all <i>Forest Practices Plans (FPPs)</i> which describe how each forest coupe/stand will be harvested by contractors assigned to the task. STT assists this process by scheduling the order and location of coupes to be harvested, by applying the Landscape Context Planning System to consider the temporal and spatial context of harvesting in the landscape, by scheduling and implementing fire management, including post-harvest regeneration burns, and by maintaining a comprehensive program of ecological research to advise on improvements to ecological</p>

sustainability of management practices. ([www.sttas.com.au/forest-operations-management/managing-forest-values/landscape-context-planning-system](http://www.sttas.com.au/forest-operations-management/managing-forest-values/landscape-context-planning-system)).

**Management strategy for the identification and protection of rare, threatened and endangered (RTE) species and their habitats:**

Sustainable Timber Tasmania works with the Tasmanian *Department of Primary Industries, Parks Water and Environment* (DPIPWE) and the *Forest Practices Authority* (FPA) to co-ordinate conservation and recovery efforts across land tenures for Rare, Threatened and Endangered (RTE) species, including the Swift Parrot and Wedge-tailed Eagle. More than 600 species of plants and animals are currently threatened in Tasmania and are listed on the Schedules of the Threatened Species Protection Act 1995 per DPIPWE, [here](#). Tasmania's approach to conserving Tasmania's threatened species can be obtained from the [Threatened Species Strategy](#). Species requiring individual long-term strategies or requiring complex planned management may be managed under a Recovery Plan with actions identified for several years. Recovery Plans are prepared detailing the actions required for the recovery and long-term security of one or more species or ecological communities for a period of five years. They also typically detail the funds required to carry out these actions, list of [Recovery Plans](#).

Forest Practices planning, consistent with the forest practices system, identifies the known occurrences of all RTEs, potential RTE habitat, and other identified HCV attributes in or near the coupes to be harvested and specifies the agreed buffers and other exclusions from disturbance that may be required to conserve these species. There are routine pre-harvest surveys for wide-ranging RTE species, such as Swift Parrot, Masked Owl, Grey Goshawk, Tasmanian Devil and Spotted-tailed Quoll, so the important habitat requirements and presence of these species are generally surveyed by forestry FPOs as part of harvest planning activities. The FPA has developed the *Threatened Fauna Advisor*, [https://www.fpa.tas.gov.au/fpa\\_services/planning\\_assistance/advisory\\_planning\\_tools/threatened\\_fauna\\_advisor](https://www.fpa.tas.gov.au/fpa_services/planning_assistance/advisory_planning_tools/threatened_fauna_advisor), a web-tool to provide the forest management planner with recommended management actions to use in the development of species management prescriptions in Forest Practices Plans. More information on local RTE species can be found on FPA's (<http://www.fpa.tas.gov.au>) and DPIPWE's (<http://dPIPWE.tas.gov.au>) websites.

### 2.1.3 Socioeconomic Context

Sustainable Timber Tasmania plays a significant role in the forest economy of Tasmania, and the social and economic impacts of its operations reach widely into the community.

Tasmania has a small population of about half a million people. The Tasmanian community as a whole has a strong sense of its island identity, somewhat separate from mainland Australia, and this together with its political and economic framework provides a unique context within which social impacts are to be understood. While nearly half of the population is found in the greater-Hobart area, Tasmania has a lower level of urban concentration than the other Australian States, with strong regional identification and concern for local community development. Tasmania experiences a range of persistent adverse socio-economic attributes relative to the averages for mainland Australian States, including high levels of unemployment, particularly among youth, low income and high poverty levels, low educational achievement, and low workforce participation rates. Government agencies and business enterprises (such as Sustainable Timber Tasmania) play a central role in employment and hence socio-economic activity compared to the mainland Australia states.

[https://www.fwpa.com.au/images/OtherReports/Socio\\_economic\\_impacts\\_of\\_the\\_forest\\_industry\\_TAS.pdf](https://www.fwpa.com.au/images/OtherReports/Socio_economic_impacts_of_the_forest_industry_TAS.pdf)

Sustainable Timber Tasmania manages an estate of around 800,000 ha of native forest and plantations for the prime purpose of timber production as a Government Business Enterprise, <https://www.sttas.com.au/>. These forests encompass a wide range of additional products and services and forest uses that are valued by a range of stakeholders.

Forestry makes an important contribution to the Tasmanian economy, despite recent changes that have reduced that contribution by about two thirds. The forest sectors' annual contribution to Tasmania's Gross State Product is estimated to be \$400-450 million AUD, and it employs more than 2700 people. STT and its products support approximately half of that total economic activity of the state. Indirect effects on other sectors of the economy providing inputs or using outputs from the sector increase that contribution, by about a factor of two.

The forestry sector continues to be particularly important in a number of regional communities where employment remains relatively high. Dramatic structural changes in the industry in recent years yielded some small instability amongst the businesses and employees in the forestry sector. In addition to industry and customer stakeholders, other significant stakeholder groups include the Indigenous community, local regional communities and local governments, environmental groups, rural neighbours and forest users such as those using the forests for recreational pursuits, apiary, woodcrafts and firewood collection.

While the *Native Title Act 1993* provides a mechanism by which native title rights can be negotiated and recognised under Australian law, there are presently no native title rights holders in Tasmania. In 1803, estimates are there were somewhere between 4000-6000 Tasman natives, or Palawa, prior to European settlement. There were 200 Palawa documented to have survived the period of European settlement who were relocated to Flinders Island, 50 kilometers from Tasmania in 1830. By 1869, there were only 3 remaining survivors on Flinders Island. In 1876, Truganini, the last full-blooded speaker of the Tasmanian language on Flinders Island, died and a brief summary for her may be found here, <https://www.nationalgeographic.com.au/australia/the-last-indigenous-tasmanian.aspx>. Following invasion and oppression, Tasmanian aboriginal identity survived through escapees and survivors within Tasmania, and in the Furneaux Group of islands through the descendants of Aboriginal women and European sealers. The focus for the Furneaux community became Cape Barren Island where a reserve was established in 1881. With the adoption of the *Aboriginal Lands Act of 1995*, the Tasmanian government began returning control of significant places (including most of Cape Barren Island in 2005) to the Tasmanian Aboriginal community. As of 2016, there were 23 751 described as "Aboriginal and/or Torres Strait Islander peoples", ([www.quickstats.censusdata.abs.gov.au](http://www.quickstats.censusdata.abs.gov.au)). However, there are disputes within the Aboriginal community over the authenticity of some of those claims of indigenous ancestry. Since 1992, the *Tasmanian Aboriginal Centre* has undertaken the retrieval and revival of *palawa kani*, the indigenous Tasmanian Aboriginal language, throughout Tasmania, [tacinc.com.au](http://tacinc.com.au).

#### **2.1.4 Land use, Ownership, and Land Tenure**

Sustainable Timber Tasmania (STT) is a statutory authority established under the Government Business Enterprises Act. STT's principal purpose as identified in the Forest Management Act 2013 (Tas) is to manage and control all Permanent Timber Production Zone land (PTPZ land) and to undertake forest operations on PTPZ land for the purpose of selling forest products. This Act specifies that Sustainable Timber Tasmania is required to make available at least 137,000 cubic metres of high-quality eucalypt saw logs each year.

In accordance with the *Government Business Enterprises Act*, a Ministerial Charter that describes the operational scope and Government's broad expectations of STT is in place. The charter identifies STT's core commercial activities as land and forest management, harvesting and sales of forest products, fire management, roading, and other activities as agreed. The charter also allows for STT to undertake identified and agreed non-commercial activities. Activities that STT is authorized to undertake include the following responsibilities:

- Manage wood production forests based on sustainable forest management principles, while maximizing the recovery, utilization and value of harvested products.
- Provide input to forest policy development and implementation.
- Retain Australian Forestry Standard (AFS) and achieve Forest Stewardship Council (FSC) independent third-party certification.
- Work with the Department of State Growth to encourage economic forest industry development in the State.
- Facilitate a successful Tasmanian forest industry.
- Manage existing tourism activities on PTPZ land.
- Continually improve business operations, systems and processes.
- Be socially responsible and take all reasonable steps to reduce the risk of adverse environmental effects from STT activities.
- Operate in accordance with sound commercial practice and as efficiently as possible.
- Comply with Government policies.

The STT *Forest Management Plan 2019* applies to the area of land managed by STT. This area is primarily comprised of PTPZ land. The recently released *Forest Management Act* identifies STT as the manager of PTPZ land. Recent significant policy and legislative changes have changed the tenure and management responsibility for almost half of the land STT previously managed. These changes commenced with the *Tasmanian Forests Agreement Act* (now repealed) and the *Forest Management Act*, and were further changed by the *Forestry (Rebuilding the Forest Industry) Act 2014* (Tas).

The legislative changes have had significant implications for the management of the area included within the scope of this forest management plan. The approximately 800,000 hectares of PTPZ land represents 12 per cent of Tasmania's total land area and contains 17 per cent of Tasmania's native forested land area. The land is geographically distributed across Tasmania.

The PTPZ land is predominantly comprised of natural vegetation. Of this natural vegetation, approximately 365,000 hectares are presently allocated for wood production. There is also an unreserved 'non-productive' area of approximately 200,000 hectares, the majority of which is unlikely to ever be harvested due to operational constraints. About 120,000 hectares of PTPZ land is in informal reserve and is not available for timber production. This does not include any of the previous informal reserve that is now included in future potential production forest land, which has been transferred to DPIPW Crown Land Services. The PTPZ land also features a substantial plantation area (108,000 hectares) comprising both hardwood eucalypts and softwoods. STT manages 28,000 hectares of this plantation area, which is predominantly comprised of hardwoods. About 80,000 hectares of land associated with the plantation estate is managed by external parties under lease and forestry rights agreements with STT and is not subject to this plan.

The PTPZ land adjoins land managed by other landowners and managers, including other government authorities and private landowners. Areas adjoining PTPZ land are managed for a variety of purposes,



including but not limited to private residential areas, reserves (including national parks and World Heritage Areas), a variety of agricultural uses, other forestry operations, and mining operations.

In addition to PTPZ land, STT has partial management responsibility for forests on other land that are owned or managed by other agencies or individuals. This includes the Buckland Military Training Area (approximately 19,000 hectares) and approximately 1,000 hectares of plantations on private property. STT's activities on these lands are temporary and are authorized by the issue of leases, agreements, contracts, or registered forestry rights under the Forestry Rights Registration Act 1990 (Tas)."

\* From *Sustainable Timber Tasmania's Forest Management Plan, 2019*.

## 2.2 Forest Management Plan

Management objectives:
<p>Sustainable Timber Tasmania (STT) has four strategic objectives as described in <i>Sustainable Timber Tasmania Forest Management Plan – Revised April 2019 (FMP)</i>, <a href="http://www.sttas.com.au/sites/default/files/media/documents/plans/FMP_Published_April_2019.pdf">www.sttas.com.au/sites/default/files/media/documents/plans/FMP_Published_April_2019.pdf</a>.</p> <p>The four strategic objectives are:</p> <ol style="list-style-type: none"> <li>1. Achieve and maintain financial stability for Sustainable Timber Tasmania;</li> <li>2. Efficiently and effectively make available agreed wood volumes and other services to our customers;</li> <li>3. Professionally manage public production forest to maintain wood resource and other environmental, cultural and economic values; and</li> <li>4. Achieve zero harm to our people and contractors.</li> </ol> <p>The systems and strategies to achieve these objectives are detailed in the FMP while STT also seeks to meet these objectives while achieving financial stability.</p> <p>Sustainable Timber Tasmania's management of forest values is comprised of the following approaches:</p> <ul style="list-style-type: none"> <li>■ Contributing to the multi-tenure Tasmanian Comprehensive, Adequate and Representative reserve system, by managing Sustainable Timber Tasmania's informal reserves.</li> <li>■ Implementing Sustainable Timber Tasmania's Permanent Forest Estate Policy, which commits it to regenerating all harvested native forest, and does not permit broad-scale conversion to non-forest uses.</li> <li>■ Managing known environmental values, including high conservation values, through protection or management prescriptions.</li> <li>■ Using a comprehensive management system, which incorporates the forest practices system, to plan, implement and monitor forest operations. This includes identifying site-specific forest values and appropriate management strategies during operational planning.</li> <li>■ Using the Landscape Context Planning system to maintain landscape-level mature habitat and connectivity, and to disperse harvest operations over space and time.</li> <li>■ Using a GIS-based Management Decision Classification system to zone land and record identified special values and their management requirements.</li> <li>■ Managing a plantation estate that has been developed and is managed with due consideration of forest values.</li> <li>■ Using PTPZ land forest activity assessments for operations or activities not regulated under the forest practices system.</li> </ul>
Forest composition and rationale for species selection:
<p>STT's forest management is primarily based on native forest, which forms approximately 86 per cent of the existing PTPZ land. Tasmania's vegetation communities, including those on PTPZ land, have</p>



been extensively mapped into 156 identified vegetation types. Forest types can be considered a very broad classification of the forested vegetation communities located on PTPZ land. The native forest area on PTPZ land used for commercial wood production can broadly be separated into wet eucalypt forests, dry eucalypt forests, rainforests, and blackwood forests.

- **Wet eucalypt forests** are forests with a tall open canopy over a dense, closed understory. The forests are typically greater than 40 metres tall, but can be much taller. Wet eucalypt forests generally comprise one or more age-class cohorts of over-story eucalypts. The dominant eucalypt species in these forests generally rely on significant bushfire events to regenerate.
- **Dry eucalypt forests** have open canopies with short, open under-stories. Dry eucalypt forests are typically less than 40 metres tall and usually have a multi-aged structure, resulting from 'gap-phase recruitment' to the canopy. This means that seedlings may establish continuously in gaps, with additional regeneration arising from disturbances such as bushfire.
- **Rainforest** can regenerate naturally without major disturbance. Seedlings and saplings are often already present in undisturbed rainforest. Seedlings are also readily able to colonize gaps created by the death of mature trees.
- **Blackwood forests** are managed for timber in two different forest types: wet eucalypt forests rich in blackwood, and blackwood swamps. Blackwood seedlings regenerate naturally following major disturbance, usually fire, from abundant supplies of long-lived, ground-stored seed. Blackwood seedlings are very palatable and native mammals eat many. In natural systems, the seedlings are protected from browsing by dense understory species or hidden amongst the heads of downed trees.

The two eucalyptus species planted by STT are *Eucalyptus globulus* (Tasmanian blue gum) and *E. nitens* (shining gum). Approximately 73 per cent of the total hardwood estate is *E. nitens*, 22 per cent is *E. globulus*, and six per cent is other eucalypt species that were largely planted as growth trials. Decades of local and international research have shown that both *E. nitens* and *E. globulus* are suitable for growing high-quality logs, as they are fast growing and are suited to most Tasmanian conditions. However, *E. globulus* timber exhibits superior density, strength and pulp yield to *E. nitens*. Research is continuing into the development of efficient processing technologies, and the identification of high-value applications for plantation timber from both species. The existing high proportion of established *E. nitens* sites is a result of its superior frost and disease resistance. Successful growth of *E. globulus* is generally limited to lower-altitude sites where the risk of exposure to cold and frost is lower than on higher-altitude sites.

The *Mycosphaerella* leaf fungal disease also significantly affected earlier plantings of *E. globulus*. However, recent research has shown that over the course of a rotation, productivity losses in *E. globulus* caused by *Mycosphaerella* are manageable and are negated by the increased value of the final crop. There is a significant area of established *E. nitens* plantation that, following eventual harvest, may be suitable for future *E. globulus* plantings.

#### General description of land management system(s):

STT divides lands under management into two general categories, Production and protection Zones. This is supported by a Management Decision Classification System (MDCS), both of which rely upon state-of-the art GIS.

The MDCS is a two-tiered zoning system that enables areas identified with particular environment, social or economic values to be zoned and managed in a way that protects, maintains and/or enhances those values. Through this system all PTPZ land is allocated to one of two primary zones, which may be viewed on the Interactive map viewer on STT's website: 1) The **protection zone** includes land where the protection of identified special values is incompatible with wood production. This zone represents their *informal reserve system*. 2) The **production zone** includes native forest and

plantation areas that are generally available for wood production. This area largely comprises 'provisional' coupes but also includes non-production areas.

**Special management zones** form the second tier and may be recorded against any area to indicate an identified value and to place particular emphasis on its management to ensure its protection. Each special management zone classification identifies a management objective for that value and its respective prescription. Depending on the value being protected, prescriptions may or may not exclude timber harvesting.

The **Landscape Context Planning** system is a GIS-based conservation planning system developed by Sustainable Timber Tasmania in 2014 to help implement biodiversity management at multiple spatial scales. This system uses mapped information on forest type, harvest boundaries and forest zoning, to inform, implement, and monitor habitat retention and coupe dispersal decisions at a landscape scale. Sustainable Timber Tasmania implemented a program to cease native forest conversion on PTPZ land in 2007.

All forest operations must be carried out in accordance with a legally binding certified forest practices plan. All ongoing plantation operations must be planned and conducted to comply with the Forest Practices Code, which amongst other aspects, has specific requirements for the management of biodiversity. These include prescriptions for reducing the risk of hybridisation between the exotic *E. nitens* and native eucalypts.

Silviculture systems include: clearfell (regeneration harvests), aggregated retention, shelterwood, seed tree, advance growth retention, and potential sawlog retention. The specific type of partial harvest system chosen depends on factors such as age class structure, species present, topography and elevation. Many of the systems rely on retention of previously established regeneration, supplemented by new regeneration from naturally sown seed coming from retained trees. A receptive seedbed following harvesting is created by the harvesting disturbance, additional mechanical disturbance, or by fire. Fire is the most common technique used but is not always essential to create a receptive seedbed. All harvesting methods must meet STT requirements to maintain the on-site genetic composition of harvested native forest.

#### **Harvest methods and equipment used:**

Harvest methods are determined on a coupe-by-coupe basis. The traditional and most common method for harvesting native forest is hand felling with chainsaws. However, mechanical harvesting is used where practical and is becoming more common in regrowth forest harvesting (smaller logs). Logs are moved to the landing by ground-based, rubber-tired or tracked skidders or forwarders. These arrangements allow for flexibility in dealing with the variable topography, ground conditions and forest structure often encountered in native forest harvesting.

Harvesting on steeper terrain requires the use of cable harvesting systems. On steeper ground, cable harvesting causes considerably less ground disturbance than ground-based extraction systems. All cable operations are conducted in accordance with the Tasmanian Cable Harvesting Code of Practice. In stands with flatter terrain, clear understorey and smaller diameter trees, machines can often be used to fell and extract timber. This is the preferred option, as it presents the least safety risk for ground crews.

#### **Explanation of the management structures:**

STT is a statutory authority established under the Government Business Enterprises Act. STT's principal purpose as identified in the *Forest Management Act 2013* (Tas.) is to manage and control all *Permanent Timber Production Zone* land (PTPZ land) and to undertake forest operations on PTPZ land for the purpose of selling forest products. As a fully State-owned Government Business Enterprise, the Board of Directors is directly responsible to the Minister for Energy and Resources and the Treasurer for its operations. In accordance with the *Government Business Enterprises Act*, a Ministerial Charter that describes the operational scope and Government's broad expectations of STT

is in place. The charter identifies STT's core commercial activities as land and forest management, harvesting and sales of forest products, fire management, roading, and other activities as agreed. The charter also allows for STT to efficiently undertake identified and agreed non-commercial activities.

The Board of Directors of STT is comprised of independent non-executive directors. The Board is responsible for the overall corporate governance of the organisation. This includes setting strategic direction, overseeing financial performance and business affairs, setting management goals, and monitoring management's performance – as detailed in STT's Statement of Corporate Intent. The Chief Executive Officer is accountable to the STT Board of Directors. STT employees are distributed across offices or depots strategically located around the state. Administratively, STT divides its operations into Northern and Southern Regions, which are further separated into districts (Derwent and Huon in the south and Murchison and Bass in the north). Regional operations are directed and supported by a Head Office in Hobart. This structure enables STT to effectively manage the area under its control, and to support regional areas through provision of local employment and economic opportunities.

STT also engages a diverse, and expanding, contractor base to provide a wide range of services including harvest and haulage services, forest planning, establishment and maintenance, fire protection, road construction and maintenance, aviation services, stevedoring and shipping services, and building management services.

## 2.3 Monitoring System

### Growth and yield of all forest products harvested:

STT uses forest estate models to calculate sustainable yield, which is primarily based on the yield of high-quality eucalypt sawlogs from both native forest and plantations. These models are based on a 90-year period (rotation) and have the following elements:

- A network of forest inventory and growth plot measurements.
- A computer-based modelling and growth projection system.
- Incorporation of environmental constraints.
- Estimations of both eucalypt native forest and eucalypt plantation yields, incorporating calibrations of predicted versus actual harvest volumes.
- External independent audits.

Yields of high-quality eucalypt sawlogs are reviewed and the results published every five years, as required by the *Tasmanian Regional Forest Agreement*, to determine if these yields are sustainable. Yield predictions are generated from biologically based forest modelling of productive capacity, and *do not imply supply based on economic criteria*. STT monitors its compliance with the determined sustainable yield and reports its actual harvesting volumes in the *Annual Report*.

STT carries out three types of forest inventory, reflecting the differing uses to which the results are applied:

- **Permanent growth plots.** This network of plots is re-measured regularly in order to accurately measure forest growth over time. This inventory provides data that are used to develop growth models. These growth models are used in the calculation of sustainable yield and to simulate the impacts of prospective, alternative silvicultural regimes.
- **Strategic inventory.** These inventories are based on a network of single measurement plots, and are used to obtain unbiased estate-level estimates of present forest conditions. Inventory results from these plots are 'grown on' using growth models in order to gain an understanding of future forest conditions, and to inform sustainable yield calculations.



- **Operational inventory.** Inventories are used to obtain coupe-level estimates of product yields. Coupes can be inventoried either before harvest as part of the operational planning process, or after a stand treatment such as thinning, to determine the remaining growing stock. Due to their intense sampling requirement and subsequent cost, operational inventories are not conducted on a routine basis prior to all operations. Operational inventory is mandatory following plantation pruning and thinning operations, where it is combined with quality standards assessments. The results of this monitoring are used to improve estate planning and to drive continual improvement in silvicultural programs that support the production of high-quality sawlogs.

#### **Forest dynamics and changes in composition of flora and fauna:**

PTPZ land covers a range of forest and vegetation types in various successional stages that support a large diversity of species and communities. Habitat diversity is determined by the variation in soils and topography across the landscape, coupled with the frequency and pattern of disturbance events, principally bushfire and harvesting. Different successional stages of forest provide habitat for different species and communities, which are in a perpetual cycle of disturbance and recovery. Species persist in landscapes because there is sufficient habitat to maintain a source population, which can disperse and colonise suitable habitat as it becomes available, which in turn can become the next source population.

A basic understanding of patterns of distribution and abundance of forest fauna and flora, and their responses to forest management practices, has been established over several decades of ecological research that has been strongly supported by STT, the FPA, DPIWE, and the University of Tasmania. STT publishes an *Annual Report* annually to document the significant contribution that STT makes to State-wide protection and conservation of biodiversity on lands under STT management. Additional detail can be found on page 46 of the STT Forest Management Plan.

#### **Environmental impacts:**

The Forest Practices Plan (FPP) is the principal device for ensuring that negative environmental impacts are reduced or mitigated. All forest management operations are monitored regularly in the field to ensure that operational objectives are being met, that work is undertaken safely, and that environmental prescriptions are implemented. This includes assessing silvicultural and road construction outcomes against standard benchmarks. The impacts of forest management operations on biodiversity and HCV forest attributes, at multiple scales, has been established and includes provisions for continuous improvements.

#### **Social impacts:**

STT conducted a social impact assessment (SIA), *Social Impact Evaluation of Sustainable Timber Tasmania's Forest Management Activities*, 2019, Drielsma, 86pp. This was an update from the social impact report done in 2014. The SIA details the unique social, economic, and environmental aspects of STT forest management within Tasmania. The impact evaluation incorporates a review of existing studies and reports undertaken by STT (and former Forestry Tasmania), the Cooperative Research Centre for Forestry, University of Canberra, Forest and Wood Products Australia and the Tasmanian and Australian Governments, including those documents completed as part of the Tasmanian Forest Agreement process. The SIA acknowledges the challenges of balancing economic needs, social concerns, and environmental constraints with the wood product and wildlife benefits that derive from well-managed forests.

"As a somewhat marginal economy it [Tasmania] displays significant indicators of social and economic disadvantage which mean that economic development and jobs are important concerns. At the same time a unique environmental context has meant that environmental issues have also been important concerns. Natural resources have been a focal point for these competing concerns with Tasmania

historically having had a high level of economic and social dependence on the forest products sector. Consequently, Tasmania has a long and complex history which has been marked by environmental disputes about its forests.”

The community engagement Organisational Policy and Structure, Consultation processes, Community Development, Complaints and grievances, Monitoring, Reporting and Continuous Improvement are included as well.

#### **Costs, productivity, and efficiency:**

STT produces a *Statement of Corporate Intent*, which describes the organisation’s financial performance targets as agreed by its Board and shareholder Minister. STT aims to achieve financial stability by optimising returns from harvested wood products and provision of services, while also seeking opportunities to increase operational efficiency and reduce costs. The most recent summary of these targets and actual performance are described in the [2017/2018 STT Annual Report](#).

STT engages an independent company to establish a valuation for its entire forest estate, inclusive of land, roads and obligations. STT manages liquidity risk by maintaining adequate reserves, banking facilities and continuously monitoring forecast and actual cash flows against the operational activities planned to be undertaken.

In addition to regular Board meetings, the Board of Directors has 4 sub-committees, please refer to page 17 of 2017/18 annual report. Individual charters govern board sub-committees and membership is based on expertise. Relevant to monitoring of costs, productivity and efficiency are:

**Finance, Audit and Risk Management Committee:** This committee monitors STT’s overall control procedures, external financial reporting and business risks. The committee meets the independent auditors privately at least once a year to review the performance of the organisation and obtain assurances on the adequacy of financial and accounting controls.

## **3. Certification Evaluation Process**

### **3.1 Evaluation Schedule and Team**

#### **3.1.1 Evaluation Itinerary, Activities, and Site Notes**

<b>Monday, 20 May 2019 – STT Office</b>		
<b>Site ID/ Location</b>	<b>Feature of Interest</b>	<b>Activities/Notes</b>
STT Office, Hobart All	Opening Meeting	Opening meeting: introductions, audit scope, confidentiality and public summary, conformance evaluation methods and tools, CARs process, relevant work safety, emergency and security procedures for the audit team, review audit plan, questions
STT Office, Hobart All	Company presentations and Interviews	<p>Presentations: <i>About STT, Forest Management Plan Sustainable Yield, Three-Year Planning HCV Management Plan, Stakeholder engagement, Landscape context planning, Information systems, Socio-economic impact evaluation, Stakeholder engagement, Forest Products and Haulage, Chain of custody</i></p> <p>▪ Interviews: Engagement &amp; Land Manager, Senior Forest Resource Analyst, Planning Coordinator, Southern Region, Interviewed stakeholder</p>
<b>Tuesday, 21 May 2019</b>		

STT Hobart – Audit team	Office	<ul style="list-style-type: none"> <li>Presentations: <i>Forest Practices Authority (FPA), FPA Biodiversity, FPA Earth Sciences &amp; Cultural Heritage, FPA Compliance Biodiversity, STT Swift Parrot strategic approach</i></li> <li>Stakeholder interviews</li> </ul>
Hobart	Public venue	Interviewed stakeholder – specialty timbers
<b>Wednesday, 22 May 2019 – Southern Region, Huon, Team 1 with Stakeholders</b>		
STT Geeveston	Office	Interviewed Engagement & Land Manager P4; Project Officer P9, RE protection of giant trees; General Manager Land Management RE P1 – illegal harvesting of firewood.
Stewart		
HP010C Jacqmain, Stewart, and Larsen	Protection of Swift Parrot habitat	Interviewed stakeholders during inspection at coupe.
KD045B	Protection of riparian vegetation	Interviewed stakeholders during inspection at coupe.
Jacqmain, Stewart, and Larsen		
BB025A Stakeholder meeting	Recently burnt coupe SWPA nest	<p>Issue: Swift Parrot</p> <ul style="list-style-type: none"> <li>Recently burnt coupe, one hollow bearing tree retained (w 50m buffer) known to have a SWPA nest, buffer damaged in fire. Mature foraging habitat also logged (low density).</li> <li>Contractor spotted a SWPA and alerted STT, who engaged swift parrot expert for survey identifying a SWPA nest; SWPA nesting patterns discussed – they nest in groups. <b>Coupe had mature foraging habitat which was also logged. Site assessment recommendations by swift parrot expert were not followed.</b> There is mapped old growth in neighbouring coupe – the biggest patch remaining in the area. Burnt old trees were removed on safety grounds – must also be considered an impact.</li> <li>Demonstrated on this site: <b>Net loss of mature habitat for a critically endangered species.</b></li> </ul>
Jacqmain, Stewart, and Larsen		
<b>Wednesday, 22 May 2019 – Southern Region, Huon, Team 2</b>		
Geeveston Office	Site selection, teams arranged	Southern Region, Huon Valley, debrief and abbreviated opening.
CM001B Catamaran	Active harvesting (mechanical) in a dispersed retention coupe	<ul style="list-style-type: none"> <li>Site induction by contractor</li> <li>Interview contractor regarding harvesting processes (safety, boundary marking, log grades and grading, HCV values on site, HCV identification, log landing and track rehabilitation, stream crossings).</li> <li>Visited two log landings on coupe.</li> <li>Inspected old tramway located by STT</li> <li>Reviewed Wedge Tailed eagle nests located outside of coupe (Raptor Management Plan).</li> <li>Interviewed Forest Practices Officer about planning practices, stakeholder and Forest Practices Authority liaison and information to develop Forest Practices Plans</li> <li>Interviewed contractor regarding coupe start up, operational practices around Swift Parrot habitat, tramways and streams, threatened species,</li> </ul>
Lea and Phelan		



		<p>safety management and work place conditions, coupe rehabilitation and the delivery docket system.</p> <ul style="list-style-type: none"> <li>▪ Interviewed harvesting supervisor about supervision practices and monthly monitoring reports, safety audits, post operations inspections and planned regeneration activities including protection of retained habitat.</li> <li>▪ Interviewed truck driver regarding use of delivery docket system and customer weighbridge.</li> <li>▪ Inspected operation including processing at landing, skidding, snig track condition, habitat retention, historic site protection and snig track rehabilitation.</li> <li>▪ Reviewed planning maps and checklists and forest practices plan.</li> </ul>
HA018C Hastings Phelan and Lea	Recent regeneration burn	<ul style="list-style-type: none"> <li>▪ 15.4-hectare prescribed regeneration burn area, was a clear fall coupe, no retention</li> <li>▪ Receive briefing of burning procedures used</li> <li>▪ Coupe is surrounded by PTPZ land</li> <li>▪ Burn application made to Coordinated Smoke Management Tasmania</li> <li>▪ Coupe sown within 21 days of burn</li> <li>▪ Monitoring to be set up -including wild animal browsing control</li> <li>▪ Interviewed Senior Forest Officer regarding operations planning, burn preparation, burn operations. Topics covered included protection of class 3 stream, consideration of local community impacts, smoke management, management of burn escapes, post burn eucalypt sowing, germination monitoring and browsing management.</li> <li>▪ Inspected burn area including burn boundary tracks, burn result, impacts to adjacent retained vegetation.</li> <li>▪ Interviewed Regional Forest Manager about Quality Standards Program relating to regeneration standards.</li> </ul>
SOO34A Southport Phelan and Lea	Harvested area (two years ago)	<ul style="list-style-type: none"> <li>▪ Visit harvest coupe (47.8 ha) with STT staff. Reported that 20-man days spent “building” harvest area</li> <li>▪ Controversial harvest site that contained multiple single habitat trees in harvested area. STT staff reported there was considerable stakeholder input and review undertaken.</li> <li>▪ Surrounded by High, Medium and Low-density Swift Parrot Habitat.</li> <li>▪ Informed of landscape level considerations as coupe was visible from nearest township (Dover)</li> <li>▪ WTE nests located outside of coupe, harvesting had to be completed by 30 June 2017. Interviewed Senior Forest Officer about stakeholder consultation for operations in Geeveston including identification of interested and affected parties and face to face consultation.</li> <li>▪ Interviewed Forest Practices Officer about coupe planning and reconnaissance process, addressing application of landscape management, Swift Parrot breeding habitat and Wedge-tailed Eagle prescriptions.</li> <li>▪ Interviewed tactical planner about formulation of 3-year plan and stakeholder consultation.</li> </ul>

SO034 A	Harvest operation (current)  Active harvesting (manual) in a clearfell coupe	<ul style="list-style-type: none"> <li>Visit ground based, manual falling harvesting operation</li> <li>Receive site induction from Contractor Principal</li> <li>Interview contractor re safety, harvesting processes, log landing management, CoC requirements including electronic log docket system, First aid procedures and qualifications, log grading, fuel management and storage.</li> <li>Contractor confirmed that he can install locked gates into harvest area so long as it is not on a main road</li> <li>Interviewed contractor about management of exclusion areas, Wedge-tailed Eagle breeding season constraints, new sightings of threatened species, crew training, worker conditions, safety, fire weather suspensions, log merchandising and integrated firewood operation, machinery hygiene.</li> <li>Inspected operations around coupe boundary, coupe marking, retention of Swift Parrot habitat, snig track condition and landing operations.</li> </ul>
HP029A Hopetoun block  Phelan and Lea	Hopetoun Road 512 extension	<ul style="list-style-type: none"> <li>Site induction for STT Roding coordinator</li> <li>Interview contractors building road extension</li> <li>Interviewed roading coordinator and forest officer about planning and road construction operations.</li> <li>Interviewed roading contractors about practices.</li> <li>Inspected full length of newly constructed road noting alignment to minimize impacts to forests, clearance width, construction quality, spacing and size of drainage features relative to slope and waterway classification, batter slopes.</li> <li>Reviewed site documentation including a road only FPP, safe work method statements, site specific hazards and other safety documentations, special values information and checklists.</li> </ul>
HP003C, Hopetoun block  Phelan and Lea	Completed harvesting subsequently affected by wildfire	<ul style="list-style-type: none"> <li>Review burnt areas</li> <li>Visit historic heritage log loading site (rusted machine parts, large old logs rotting on ground, possible tramway)</li> <li>Confirm HCV site marked off by STT Interviewed certification staff and made observations of Swift Parrot foraging habitat retained on the site compared to LIDAR analysis.</li> <li>Observed fire effects on the coupe and retained forest.</li> </ul>
Thursday, 23 May 2019 – Southern Region, Team 1 with Stakeholders		
WW041B Wentworth Hill Stakeholder meeting Jacqmain, Stewart and Larsen	Aggregated retention Active coupe, not burnt yet Harvesting of old growth	<p>Issue: Old growth forest</p> <ul style="list-style-type: none"> <li>85.5 ha in size and contained 52.5 ha of mapped old growth forest, logging has removed 59.5% of old growth forest within the coupe.</li> <li>Stakeholder asserts that STTs old growth layer has not been shared with SH. STT confirms the stakeholder did receive most recent spatial data. There appears to be some confusion as to whether the data is updated.</li> <li>Machinery alleged to cross a Class 4 stream.</li> <li>Impact on rainforest strip – disturbance by machinery.</li> </ul>
WW031B Jacqmain, Stewart and Larsen	Aggregated retention Active coupe, not burnt yet	Stakeholder meeting. Potential impact on rainforest strip – disturbance by machinery.

TY065G, TY065L, TY067B Jacqmain, Stewart and Larsen	Firewood cutting, forest harvesting and regeneration	Interviewed stakeholders. Discussed issues of harvesting in relation to maintenance of HCV values, illegal firewood harvesting, suitability of regeneration methods, i.e. asserting overreliance on high intensity burns/seeding.
Thursday, 23 May 2019 – Southern Region, Team 2		
TY063C, Tyenna block  Phelan	2014 regeneration	<ul style="list-style-type: none"> <li>Interviewed forest officer about native forest regeneration planning, operational practices and monitoring covering species, seed source, stocking standards, fertilizer use and timeliness.</li> <li>Inspected regenerating coupe and made observations about age class management and amounts of mature forest within the viewshed.</li> <li>Reviewed silvicultural maps and records.</li> </ul>
Styx Bridge  Phelan	Bridge upgrade works	<ul style="list-style-type: none"> <li>Interviewed roading coordinator and contract road engineer about planning and implementing the replacement of the bridge girders. Discussed the methods used to minimise disturbance to the Styx River and surrounding vegetation and safety when working at heights.</li> <li>Inspected the bridge works and surrounds.</li> <li>Reviewed planning and engineering documentation.</li> </ul>
TY068G, Tyenna block  Phelan	Recently commenced harvesting (mechanical)	<ul style="list-style-type: none"> <li>Interviewed forest officer about the site characteristics and supervision processes.</li> <li>Interviewed crew supervisor about the harvesting system, management of special values and boundaries, log merchandising, safety and incident management, identification of seed and site rehabilitation.</li> <li>Interviewed the harvester operator about operating practices around hazards, waterways and unrecorded HCVs, and workplace conditions.</li> <li>Observed harvesting and processing within the coupe including adherence to boundaries, snig track condition and landing operations.</li> <li>Reviewed the landscape context analysis, stakeholder notifications, Forest Practices Plan and coupe map, contractor safety and HCV information and records.</li> </ul>
TY034 Tyenna block  Phelan	Active harvesting (cable)	<ul style="list-style-type: none"> <li>Interviewed forest officer about site characteristics, HCV (including Wedge-tailed Eagle reserve, steep slopes, rainforest, world heritage area and threatened species habitat) and stream management.</li> <li>Interviewed the crew supervisor about the harvesting system, management of special values and waterways, progressive site rehabilitation, training, worker conditions and specialty timber recovery.</li> <li>Observed harvesting system set up, landing operations and log stacks, and the condition of harvested areas including boundary and excluded area integrity, soil conditions and disturbance, class 4 streams, drainage lines and stump sizes.</li> </ul>
Thursday, 23 May 2019 – Southern Region, Team 3		
Lampton office	Meet STT staff	Site selection, debrief presented to STT representatives
CZ 013 A  Lea	Quarry (Biggs Road Quarry)	<ul style="list-style-type: none"> <li>Site induction from Forest officer – Roding</li> <li>Inspect active quarry site – 2.25-hectare site, below ground level quarry (pit)</li> <li>Review FPP, confirm no HCV's or significant issues on site</li> <li>Interview Forest officer Roding</li> </ul>
CZ 022 B	Harvest site	Site induction by Crew Supervisor

Lea		<ul style="list-style-type: none"> <li>▪ <i>E. delegatensis</i> Advanced growth retention harvesting</li> <li>▪ Interview crew supervisor regarding harvesting processes, tree selection, grading, first aid, fuel storage, Wildlife Habitat Clump (WHC)</li> </ul>
WW 033 A Lea	<i>E. delegatensis</i> regrowth	<ul style="list-style-type: none"> <li>▪ Visit 10-year-old regrowth, Review FPP CGP 0215 for aerially applied <i>E. delegatensis</i> seed.</li> <li>▪ During interview with STT representatives, confirmed that there are no further management activities planned for the coupe.</li> </ul>
WW 034 C Lea	Aggregated retention harvest area	<ul style="list-style-type: none"> <li>▪ Receive site induction from crew representative</li> <li>▪ Inspect buffer zones and exclusion zones marked off by STT. Discuss falling and log extraction methods, inspect site documentation including harvest maps and work prescriptions.</li> <li>▪ Interview crew principal (operating log landing excavator) who confirmed six loads per day from the site. Mix of Cat 1 and Cat 3 as well as chip (pulp) logs.</li> <li>▪ Interview contractor re safety, harvesting processes, log landing management, CoC requirements including electronic log docket system, First aid procedures and qualifications, log grading, fuel management and storage.</li> </ul>
Friday, 24 May 2019 – STT Office		
Hobart Office	Staff interviews and document review	<ul style="list-style-type: none"> <li>▪ Presentations: Fire Management, Fire Recovery, STT Finance, STT Social - People and Culture, STT staff - monitoring component of the forest management system, including audits, non-conformance management and management review. (Note included Environmental Values Monitoring framework, HCV monitoring and reporting and the Reserve Monitoring program.), Native Forest Silviculture, Variable Retention, Regeneration, Safety, Providing Access, FPP planning GMOs &amp; Research, Conversion, IPM, Weed control, &amp; chemical use</li> <li>▪ Interviews: STT General Manager Corporate Services - business changes to achieve financial viability, budgets and financial compliance activities; STT Senior Safety Advisor - health and safety system, safety statistics and incident rates; STT People and Culture Manager - worker representation, gender equality, cultural change, training, issue and grievance resolution processes and wages; STT plantation management team - integrated pest management, pesticide and fertilizer use, compliance with derogation requirements, southern region exotic weed control program; General Manager Forest Products; Chief Executive Officer, Land Property Manager and Forest Manager, North</li> </ul>
Sunday, 27 May 2019 – STT Office		
Northern Tasmania	Private venue	Interviewed stakeholder, management of HCVs on PTPZ land and other public lands in Tasmania. Jacqmain, Lea, and Stewart.
Monday, 27 May 2019 – Northern Region, West		
Phelan and Larsen	Office	Abbreviated opening for field staff. Site selections/adjustments and final routes for the day. District activity overview. Explanation of three-year planning and forest practices planning for several coupes identified by auditors and through stakeholder submissions. Discussion about work to improve contractor safety, contractor procurement processes and recent forest protests in the region.

EM005B Emu Block, NW Region  Phelan and Larsen	Active harvesting operation	<ul style="list-style-type: none"> <li>▪ Almost completed clearfell operation with associated new road in <i>Eucalyptus obliqua</i> regrowth forest. Interviewed forest officers about road building and maintenance, site characteristics and supervision process.</li> <li>▪ Interviewed crew supervisor/faller about generation of delivery dockets, the harvesting system, management of special values and boundaries, log merchandising, crew training, safety and incident management, identification of seed, oil and fuel management and site rehabilitation.</li> <li>▪ Interviewed truck driver about road permits, load limits, safety and delivery procedures at mills and Massey Green chip site.</li> <li>▪ Observed truck loading, and condition of the coupe including adherence to boundaries, stump sizes, stream protections, snig track condition, waste levels and landing operations.</li> <li>▪ Reviewed the stakeholder notifications, Forest Practices Plan and coupe map, harvest monitoring and coupe visit records, hazard notification form on the coupe file, and the contractor safety system documentation.</li> </ul>
KA006D Kara Block, NW Region  Phelan and Larsen	Recently completed regeneration burn	Clearfelled <i>E. obliqua</i> site burnt in April 2019. Reviewed burn planning and operational records. Inspected burn boundaries and internal streamside reserves. Discussed methods employed to protect adjacent and streamside reserve vegetation during operation and stakeholder engagement.
Wellers Road Regeneration Kara Block, NW Region  Phelan and Larsen	2009, 2013 and 2015 regeneration	Inspected various ages of <i>E. obliqua</i> / <i>E. delegatensis</i> / regeneration along Wellers Rd and associated regeneration survey results. Discussed seed source, stocking standards, browsing management and treatment of understocked areas.
<b>Monday, 27 May 2019 – Northern Region, East</b>		
STT Perth  Jacqmain, Stewart, and Lea	Office	Abbreviated opening for field staff. Final site selections and routes. Daily morning briefing. Review of audit team questions and any new lines of inquiry. Site selections/adjustments and final routes for the day.
BS1031  Jacqmain and Stewart	Regeneration of wet forests	Interviewed STT field staff– compliance with regulations, stakeholder consultation, protection of HCV, forest regeneration techniques for <i>Eucalyptus delegatensis</i> forest.
BS113A  Jacqmain and Stewart	Hardwood plantations	Interviewed STT field staff– silviculture to produce high quality sawlogs in <i>Eucalyptus nitens</i> plantations.
Mowbray  Jacqmain and Stewart	Private venue	Interviewed stakeholders– supply arrangements to industry and processing of logs supplied by STT.
Nile River crossing  Lea	Community Service Obligation	<ul style="list-style-type: none"> <li>▪ Site visits to STT North East region</li> <li>▪ Visit the Nile River Crossing, accompanied by STT roading staff. The crossing is a considerable concrete river crossing that includes concrete culverts the structure was repaired by STT on the basis that it would</li> </ul>



		benefit the community as it is a public road but could also be used by STT logging trucks, the structure is on FPPF land.
NL 118 G, Lea	Advanced Growth Retention harvesting area	<ul style="list-style-type: none"> <li>Site induction from crew supervisor and explanation of harvest area. This was a 69 ha harvest area of <i>E. delegatensis</i>, <i>E. ovata</i> and <i>E. viminalis</i> previously selectively harvested 16 years ago,</li> <li>Review harvest documentation and harvesting maps</li> <li>Harvesting crew interviews (Bushman, Crew Supervisor, Skid Driver and Log landing attendant). Interviews ranged over Wildlife Habitat Clump protections and wildlife habitat strips, Health and safety as this crew had had two accidents previously</li> <li>Visit and inspect felling operations and interview regarding tree selection, remaining tree spacing after harvesting, log grading, extraction methods, health and safety, working hours and log quality.</li> <li>Review buffer zones surrounding wildlife habitat clumps within the felling area</li> </ul>
SY 010 D Lea	Aggregated retention harvest area	<ul style="list-style-type: none"> <li>Site induction from Crew Supervisor</li> <li>Review harvest documentation and harvesting maps applicable to this area (232 Ha) across several coupes</li> <li>Inspect harvest area adjacent to log landing. Interview crew supervisor in relation to tree selection, health and safety, buffer zones and boundaries.</li> <li>Also Interview Crew supervisor in relation to working hours.</li> <li>Log grades being cut at the time of the audit were Cat 1, 2 and 8, peeler logs and Chip</li> <li>Interview harvesting crew owner in relation to log haulage, company health and safety processes, training and working conditions.</li> </ul>
Fingal MF 056C Lea	Shelter wood Retention harvesting area	<ul style="list-style-type: none"> <li>Induction from Crew Supervisor</li> <li>Review harvest documentation and harvesting maps.</li> <li>Visit and inspect marked buffer zones along class 4 stream, inspect log landing and interview crew supervisor in relation to tree selection, log extraction methods Log haulage track rehabilitation, health and safety.</li> <li>Crew has daily toolbox meetings where the days operations, health and safety issues and any operational matters are discussed.</li> <li>Interview tree feller, 47 years felling experience. Confirm tree retention processes</li> <li>During interview discuss HCV species protections and STT site induction for the crew when operations commenced. Note: Wedge Tailed Eagle located outside the Harvest area.</li> <li>Confirm working hours for this crew as there is a considerable travel distance involved (1-2 hours)</li> <li>log grades were Cat 1, 2, and 8, Peeler is, pulp, and firewood (Dry logs only)</li> <li>Interview STT Senior Forest Officer in relation to harvesting operations for this crew</li> </ul>
<b>Tuesday, 28 May 2019 – Northern Region, West and East</b>		
CH042G Christmas Hills Block, NW Region	Seasonally closed and partially	Inspected partially harvested coupe of <i>Acacia melanoxylon</i> (Blackwood). Interviewed STT staff about operating conditions/seasonality, soil



Phelan and Larsen	harvested Blackwood swamp coupe	protection practices for harvesting in Blackwood swamps, threatened species management, coupe residues and market factors.
CH041G Christmas Hills Block, NW Region Phelan and Larsen	Eldridge Spur 1A-1 road construction and CH041G planning	Inspected newly constructed road and discussed roading and associated harvesting techniques in swampy Blackwood forest conditions. Inspected Blackwood forest identified for harvest and a planned <i>E. brookeriana</i> exclusion area. Reviewed FPP and planning checklists.
CH036I Christmas Hills Block, NW Region Phelan and Larsen	2018 Blackwood clearfell regeneration coupe	Inspected coupe one-year post regeneration burn including rehabilitated landing, fencing and browsing plots. Discussed regeneration silviculture practices for Blackwood swamps including burn preparation, intensity, seed source, nurse crops and regeneration monitoring.
CH044H Christmas Hills Block, NW Region Phelan and Larsen	2019 fire affected Blackwood regeneration	Inspected fenced Blackwood coupe regenerated in 2016 and subsequently burnt in 2019 by wildfire. Discussed rehabilitation work post fire, planned regeneration monitoring activities, impact of the fire on production levels and potential salvage operations.
CH025A Christmas Hills Block, NW Region Phelan and Larsen	Active harvesting coupe	Inspected active harvesting operation in <i>E. obliqua</i> regeneration including landing operations, streamside reserves / boundary integrity, utilization levels and coupe infrastructure condition. Interviewed owner and faller about safety management, STT inductions and supervision, worker training, fire suppression equipment, harvesting practices around dead standing trees and threatened species management.
Smithton Office Phelan and Larsen	Document review	Review of documentation relating to yield reconciliation, 9-year tactical plan, FPP planning processes for a complex coupe and protest management.
<b>Tuesday, 28 May 2019 – Northern Region, East</b>		
Derby, North West Jacqmain and Stewart	Community use of PTPZ land	<ul style="list-style-type: none"> <li>Interviewed STT field staff re P4 – facilitation of community access to PTPZ land for mountain bike trails.</li> <li>Interviewed stakeholders– positive impact on socio-economic development on Derby and surrounding towns as a result of the development of mountain bike trails.</li> </ul>
CC118A Jacqmain and Stewart	Community use of PTPZ land	Interviewed STT field staff– observed management of mountain bike trail on PTPZ land.
CC104B Jacqmain and Stewart	Regeneration of wet forests, stakeholder engagement	Interviewed STT field staff– compliance with regulations, stakeholder consultation, protection of HCV, forest regeneration techniques for <i>Eucalyptus regnans</i> forest.
CC158A Jacqmain and Stewart	Hardwood plantations	Interviewed STT field staff– silviculture to produce high quality sawlogs in <i>Eucalyptus nitens</i> plantations.
CC125A	Regeneration of wet forests	Interviewed STT field staff– Protection of HCV, forest regeneration techniques in <i>Eucalyptus obliqua</i> forests.

Jacqmain and Stewart		
Perth Jacqmain and Stewart	Telephone call	Interviewed stakeholder– supply arrangements to industry and processing of logs supplied by STT.
Goulds Country GC 081 A and B  Lea	Plantation harvesting operation	<ul style="list-style-type: none"> <li>Receive site induction from harvesting operator, 62.3 ha <i>E. globulus</i> plantation 1st (T1) thinning harvest area. Logs to chipping facility at Bell Bay</li> <li>Review harvesting documentation and plantation harvesting maps. Interview operator in relation to health and safety, working hours, interpretation of harvest maps, fuel and oil storage, first aid, buffer zone protections from mechanical harvesting and working relationship with STT harvesting supervisor.</li> <li>Originally 1100 S/hectare being thinned down to 350 S/hectare, cutting approximately 6 loads/day and harvesting 3 to 4 days ahead of forwarding operation (logs from harvest area to log landing for storage)</li> </ul>
Goulds Country GC 066B  Lea	Seed tree retention harvest area	<ul style="list-style-type: none"> <li>Visit and inspect harvest area, no crew working due to significant weather occurrence</li> <li>Review STT copies of harvest maps and harvesting documentation. 74.10 ha seed tree retention, <i>E. obliqua</i>.</li> <li>Interview STT staff in relation to tree selection, buffer zone marking for harvesting crew and site induction processes. This harvest area included Wildlife Habitat Clumps so interviewed STT staff in relation to marking and protection of these areas.</li> <li>Inspect wildlife habitat clump marking set out ahead of the harvesting crew</li> </ul>
Goulds Country GC 097 B  Lea	Harvesting road access	<ul style="list-style-type: none"> <li>Interview STT Roding Supervisor in relation to road construction. Confirm STT currently has no defined timeframe for roading program to be ahead of forest operations</li> <li>This road was installed to allow harvesting access to the area consisting of 67.8 hectares seed tree retention harvest area (harvesting already completed)</li> <li>Review STT planning documentation and maps, also review FPP PNJ 003/02 applicable to this operation.</li> <li>Confirm with STT representative there were no unexpected issues in relation to installing this road, culverts installed every 90 m in line with prescriptions.</li> </ul>
Goulds country - Tebrakunna Bridge  Lea	Community Service Obligation	<ul style="list-style-type: none"> <li>Visit bridge replaced by STT as part of the Community Service Obligation allowing harvesting trucks and public access to areas on the East Coast (St Helens). Noted that this is a significant access road used by both public and forestry companies.</li> </ul>
<b>Wednesday, 29 May 2019</b>		
STT offices Hobart  Lea		<ul style="list-style-type: none"> <li>Return to STT offices Hobart</li> <li>Interview HR representative in relation to training, inductions and training records.</li> <li>Presentations continued</li> </ul>

		<ul style="list-style-type: none"> <li>Plantation management, GMO's and research</li> </ul>
Hobart Jacqmain and Stewart	Public venues (x2)	Interviewed stakeholders– role of STT in state-wide industry, management of HCVs, provision of community services, business viability.
Hobart Jacqmain and Stewart, EL	Public venue	Interviewed stakeholder– management of HCVs, management of Swift Parrot habitat, operation of Forest Practices System.
STT Hobart Jacqmain and Stewart	Office	Interviewed Engagement & Land Manager re P4 – follow-up of observations made during field visits.
Evening	Private Venue	All auditors' deliberations. Compilation of audit results.
<b>Thursday, 30 May 2019 – Hobart</b>		
STT Office Hobart  Lea	STT Staff Presentations	<ul style="list-style-type: none"> <li>Presentations: Forest products and Haulage, Chain of Custody</li> <li>Staff interviews and documentation review</li> </ul>
Hobart Jacqmain and Stewart	Public venue	Interviewed stakeholders– role of STT in state-wide industry, Tasmanian Regional Forest Agreement, Forest Practices System, provision of community services, business viability.
STT Hobart Stewart	Office	Interviewed STT staff– sustained yield modelling, follow-up re stakeholder engagement.
Hobart – Audit Team	Private venue	Meet with STT representatives in relation to RTE, HCV and FPP issues.
Hobart – Audit team	Private venue	Auditor deliberations. Compilation of audit results.
<b>Friday, 31 May 2019 – STT Office</b>		
Private venue	Deliberations	Audit team deliberations and preparation for closing meeting.
STT Office (Hobart)	Closing	Closing meeting: Re-introduction for any new attendees, review any outstanding problems or issues encountered during the audit; presentation of the audit findings and conclusions; confidentiality and public summary; questions.

### 3.1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	10
B. Number of auditors participating in on-site evaluation:	5
C. Number of days spent by any technical experts (in addition to amount in line A):	0
D. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	5
E. Total number of person days used in evaluation:	20

### 3.1.3 Evaluation Team

<b>Auditor name:</b>	Beth Jacqmain	<b>Auditor role:</b>	FSC Lead Auditor
<b>Qualifications:</b>	Beth is a Senior Certification Forester with SCS Global Services. Master of Science in Forest Biology/Ecology from Auburn University and Bachelor of Science in Forest Management from Michigan State University. Beth has 20+		

	<p>years' experience in forestry including public land management, private consulting, and private corporate forest management working with landowners and harvest crews. Qualified ANSI RAB accredited ISO 14001 EMS Lead Auditor and FSC Lead Auditor for Forest Management/Chain of Custody. Audited and led FSC evaluations, harvest and logging operations certification audits; and joint/combined PEFC (AFS, RW, SFI, ATFS) audits. An 11-year member of the Forest Guild, 21-year adjunct-Faculty with Itasca Community College, Natural Resources Department. Member 20+ years Society of American Foresters, served MN State Chair 2010 and multiple committees, state and national, throughout. Beth's experience is in forest management and ecology; ecosystem silviculture; the use of silviculture towards meeting strategic and tactical goals; nursery/tree regeneration; forest timber quality improvement (sawmill/veneer), CSA Phase II forest inventory; grade/veneer timber appraisals; conifer thinning operations, native pine restoration, wildfire fighting, and fire ecology in conifer dominated systems. Beth has conducted evaluations in forested regions of the United States; WA, SA, and Victoria, Australia; New Zealand; Viti levu, Republic of Fiji, and Slovakia.</p>		
<b>Auditor name:</b>	Graeme Lea	<b>Auditor role:</b>	Team Auditor
<b>Qualifications:</b>	<p>Graeme is a Lead Auditor for FSC FM and a Senior Lead Auditor for CoC/CW and has 30 years' experience in forestry in New Zealand and Australia, is qualified as a Forest Service Woodsman and has been involved in many aspects of forestry, including establishment, silviculture, harvesting, sawmilling, processing, exporting and bio-security. Graeme gained a NZQA National certificate in Forest Product Inspection while working in New Zealand, and has been a qualified Quality Management auditor for approximately ten years. In addition, Graeme has also undertaken ISO 14001 training. Graeme moved to Adelaide South Australia eleven years ago and since that time has taken part in Forest Management, Controlled Wood and Chain of Custody audits and assessments, but has also undertaken Controlled Wood auditing in Papua New Guinea, Vietnam, Cambodia, Japan, and Thailand. Graeme has been part of more than forty-five teams for Forest Management audits in both exotic and indigenous forests and has also carried out in excess of 100 Chain of Custody audits.</p>		
<b>Auditor name:</b>	Tuesday Phelan	<b>Auditor role:</b>	Team Auditor
<b>Qualifications:</b>	<p>Tuesday Phelan is an FSC Forest Management Lead Auditor, Senior FSC CoC Lead Auditor, and Auditor trainee for PEFC Responsible Wood Forest Management. She has a Bachelor of Forest Science and 25 years' experience in forest and fire management in Australia. Tuesday has worked in plantation, native forest and biodiversity management, including forest establishment and regeneration, silviculture, roading and harvesting, environmental policy and regulation, and community engagement. Tuesday completed FSC Forest Management and FSC CoC auditor training in 2014 and has since worked on Forest Management, Controlled Wood and Chain of Custody audits under both FSC and PEFC schemes.</p>		
<b>Auditor name:</b>	Hugh Stewart	<b>Auditor role:</b>	Team Auditor, Social Auditor
<b>Qualifications:</b>	<p>Dr. Hugh Stewart, PhD, MSc Forestry, BSc Forestry, Diploma of Forestry. Hugh has over 40 years of professional experience in both the public and private forestry sectors. He has worked for the Forests Service of the Victorian</p>		



	Government for 18 years, as a Forestry Research Scientist in Zimbabwe, with the Victorian Plantations Corporation, and with the Treecorp Group as a Forest Resources Manager. He is a distinguished social scientist having key areas of expertise in plantation development and management, forestry due diligence and auditing, the planning, management, and conduct of research and development as well as the social dimensions of private forestry and stakeholder engagement in natural resource management. He combines commercial expertise with substantial knowledge of forest science to focus on providing services to improve management and financial outcomes for forest resources and the socio-economic outcomes for dependent communities. Hugh has been part of multiple teams for Forest Management audits in both exotic and indigenous forests.		
<b>Auditor name:</b>	Elisabeth Larsen	<b>Auditor role:</b>	Team Auditor
<b>Qualifications:</b>	Elisabeth Larsen has a M. Env. Management from Macquarie University and a B Soc. Science from Bergen University, Norway. Larsen's experience is in ecology, natural resource management, and tertiary education. She has 10+ years of experience as an environmental consultant based on the South Coast of NSW. Larsen's work includes ecological assessments, environmental impact assessments and environmental planning for public, private and commercial clients. Previously, Larsen held a position as a Postgraduate Program Developer at the Department of Biology, Macquarie University. In Norway, Larsen worked as a science management coordinator for the Norwegian Polar Research Institute, and was stationed on the High Arctic islands of Svalbard for 3 years. She has also worked with information management for the Norwegian oil and gas industry. In Australia, Larsen has pioneered the use of goats for weed and fire hazard control, and successfully established Australia's first vegetation management service using goats.		

## 3.2 Evaluation of Management System

### 3.2.1 Methodology and Strategies Employed

SCS deploys interdisciplinary teams with expertise in forestry, social sciences, natural resource economics, and other relevant fields to assess an FME's conformance to FSC standards and policies. Evaluation methods include reviewing documents and records, interviewing FME personnel and contractors, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observing implementation of management plans and policies in the field, and collecting and analysing stakeholder input. When there is more than one team member, each member may review parts of the standards based on her or his background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant field observations, interviews, stakeholder comments, and reviewed documents and records. Where consensus among team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section and/or in observations.

### 3.2.2 Pre-evaluation

- ☒ A pre-evaluation of the FME *was not* required by FSC norms.
- ☐ A pre-evaluation of the FME was conducted as required by and in accordance with FSC norms.

## 3.3 Stakeholder Consultation Process

In accordance with SCS protocols, consultation with key stakeholders is an integral component of the evaluation process. Stakeholder consultation takes place prior to, concurrent with, and following field evaluations. Distinct purposes of such consultation include:

- To solicit input from affected parties as to the strengths and weaknesses of the FME's management, relative to the standard, and the nature of the interaction between the company and the surrounding communities.
- To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests (HCVFs).

Stakeholder consultation activities are organized to give participants the opportunity to provide comments according to general categories of interest based on the three FSC chambers, as well as the SCS Interim Standard, if one was used. A public notice was sent to stakeholders at least 6 weeks prior to the audit notifying them of the audit and soliciting comments.

### 3.3.1 Stakeholder Groups Consulted

Principal stakeholder groups are identified based upon results from past evaluations, lists of stakeholders from the FME under evaluation, and additional stakeholder contacts from other sources. Stakeholder groups who are consulted as part of the evaluation include FME management and staff, consulting foresters, contractors, lease holders, adjacent property owners, local and regionally-based social interest and civic organizations, purchasers of logs harvested on FME forestlands, recreational user groups, tribal members and/or representatives, members of the FSC National Initiative, members of the regional FSC working group, FSC International, local and regionally-based environmental organizations and conservationists, and forest industry groups and organizations, as well as local, state, and federal regulatory agency personnel and other relevant groups.

### 3.3.2 Summary of Stakeholder Comments and Evaluation Team Responses

The table below summarizes the major comments received from stakeholders and the evaluation team's response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

***The volume of stakeholder input for the audit of Sustainable Timber Tasmania forest management was relatively large with stakeholder input received before, during, and after the audit. Detailed records of input, stakeholders, and individual responses as well as inquiries stemming from***

*stakeholder comments are maintained confidentially in SCS records, subject to review and examination by FSC. All communications are treated as strictly confidential unless express written permission was provided.*

*Submissions were evaluated as to whether they are addressed within the Scope of the FSC-Australia Forest Management Standard. There were submissions that were critical, in general, of FSC or aspects of Tasmanian government that did not fall under the scope of this Standard. There was a submission regarding the revisions of the Tas Forest Code of Practices that falls outside the scope of the FSC standard. The FSC Australian National Forest Stewardship Standard is available online here, <https://au.fsc.org/preview.fsc-australia-national-forest-stewardship-standard.a-1413.pdf>. The standard is organized into 10 Principles which are subdivided into Criterion, and further subdivided into verifiable Indicators, collectively referred to as PC&I.*

*Over 75 individual submissions of stakeholder input were received and all were carefully reviewed. There were critical, as well as supportive, comments related to STT received by SCS. Input was grouped into topic areas which were then summarized below under 3 general areas of concern: Economic, Environment, and Social (community)*

Stakeholder Comment	SCS Response
Economic	
Certification would be economically beneficial for Tasmania and our business supports the pursuit of FSC certification.	Most parties interviewed during the audit agreed with this statement. It is acknowledged that achievement of certification may offer economic benefits on a state-wide basis in terms of marketability of Tasmanian forest products. Sustainable Timber Tasmania (STT) has been responsive to such interest from external and internal parties. Wide-ranging evidence was provided of improvements made to STT systems since the 2014 FSC FM audit with significant progress made. The professionalism of the staff and commitment to advancing systems and practices were notable and documented throughout the audit.
STT is not harvesting enough considering how much land is “tied up” in reserves in Tasmania.	No non-conformity was found related to overall harvest levels of STT. FSC certification does not generally focus on areas outside lands under consideration for certification during an audit. One notable exception to this is for consideration of certain landscape and ecosystem interactions. The state of Tasmania zones lands for management purposes. STT operates on Permanent Timber Production Zone land (PTPZ) and follows a planning approach that focuses on sustainable harvest levels for the resource base under their management authority. The people of Tasmania through legislative processes decides which lands are zoned for which purposes; this is not decided by STT or their staff. Harvesting levels are evaluated by a collection of indicators falling under Principle 5, “The Organisation shall efficiently manage the range of multiple products and services of the Management Unit to maintain or enhance long-term economic viability and the range of social and environmental benefits.” There were no non-conformities identified under Principle 5.

<p>STT has improved their financial viability/performance and we support their pursuit of FSC certification. [There were multiple submissions commenting about improved financial performance of STT].</p>	<p>The audit team concurs with the assessment of improvements to financial performance and measures, as reviewed during this audit. Since 2014, STT established benchmarks and completed a major and significant restructuring of the organization in order to achieve acceptable financial performances. Numerous interviews and examinations during the audit confirmed these aspects of their performance. These are specifically addressed under <i>Criterion 5.5 The Organisation shall demonstrate through its planning and expenditures proportionate to scale, intensity and risk, its commitment to long-term economic viability</i>. The following indicators were examined to verify conformity: 5.5.1 Sufficient funds are allocated to implement the Management Plan to meet this standard and to ensure long-term economic viability. 5.5.2 Expenditures and investments are made to implement the Management Plan to meet this standard and to ensure long-term economic viability.</p> <p>The audit team interviewed senior executive staff in STT, stakeholders from the Tasmanian Government, and reviewed the 2017-18 Financial Statements in STT's 2017-18 Annual Report (pp. 23-71). The audit team determined that sufficient funds are allocated to implement the Management Plan and to ensure long-term economic viability.</p> <p>The audit team evaluation was that the Company is currently in a strong financial position. Interview with the GM Finance and review of annual budgets and forecasts confirmed that sufficient investments are available to meet FMP requirements</p>
<p>We want to be sure that Specialty Timbers are not forgotten or ignored. We think STT needs to do more for our business sector (multiple comments received for 2 Regions). --Related-- Individuals think STT should facilitate non-typical wood product manufacturing such as chips and biomass processing within the state.</p>	<p>No non-conformity was found. This question was evaluated during the audit with interviews of specialty timber stakeholders and relevant STT staff and by examination of policies and procedures. STT devotes a section of its <i>Forest Management Plan</i> (April 2019) to <i>Special species Timbers</i>, page 32. Each year, STT reviews the annual supply of special species timbers and publishes it in its <i>Three Year Wood Production Plan</i>. Special species timber production is aligned with the <a href="#">Tasmanian Special Species Management Plan 2017</a>. Each year STT uses Island Specialty Timbers outlets to facilitate the sale of special species timber to the public and offers online auctions to achieve the best possible price for special species logs.</p> <p>Working with specialty timber interests fall within the scope of the FSC forest management standard under interested and affected stakeholder engagements across multiple PC&amp;I. As an economic sub-group, specialty timbers also fall under Principle 5, to provide for diverse business opportunities to local users when possible.</p> <p>STT's Annual Report 2017-18 (p. 28) reported the production of:</p> <ul style="list-style-type: none"> <li>• High-quality sawlogs.</li> <li>• Native forest posts, poles and piles.</li> <li>• Native forest high-grade domestic peeler logs.</li> <li>• Native forest pulpwood.</li> <li>• Firewood.</li> <li>• Bark and sawdust.</li> <li>• Special species timber and craftwood.</li> <li>• Hardwood plantation sawlog and pulpwood.</li> </ul>



	<ul style="list-style-type: none"> <li>Softwood plantation sawlog and pulplog.</li> </ul> <p>The total amount of wood produced by STT in 2017-18 was 1.525 million tonnes (STT Annual Report 2017-18, p. 77).</p> <p>In relation to strengthening the local economy, it was found that STT is 'co-mingling' wood chip products (i.e. multiple industry players supply product to a centralised wood chip mill, that stockpiles the chips on infrastructure leased by STT and made available to the broader industry). This arrangement allows local private wood producers to participate in this market.</p>
<p>We think STT has done well and made good improvements since 2014 regarding the Apiary business needs of Tasmania. We think STT can still do more for our business sector and, at the very least, we don't want them to reduce cooperation in the future.</p> <p>--Related--</p> <p>We have concerns about leatherwood protection, cultivation and access.</p>	<p>The STT <a href="#">Forest Management Plan</a>, April 2019, includes section 4.6.3.2 <i>Apiary sites</i>, on page 66. The audit team conducted interviews with apiary representatives during the audit and found overall satisfaction with the progress of STT in their engagement, and enthusiastic support of STT's pursuit of FSC certification. Their group communicated mutually agreed areas for continued improvement.</p> <p>The audit team confirmed that STT allows special considerations and use access to apiarists for placement of portable apiaries located for proximity to targeted, flowering tree species, such as leatherwood. Interviews with STT and review of planning documents confirm commitments to continued cooperation for this Tasmania business sector.</p>
<p>Our business uses sawlogs for our products. STT has done a very good job tracking trends, projecting/modelling resource availability, and in communicating with our production and marketing teams about changes in resource availability.</p>	<p>The audit team interviewed STT's General Manager Forest Products, STT regional staff with responsibilities for marketing of logs, and stakeholders who operate Tasmanian-based processing and value-added facilities that are supplied logs by STT.</p> <p>Traditionally, the highest quality eucalypt timber supply has been sourced from mature native forests. A significant transition to using regrowth trees started around 1990. This transition has resulted in a trend towards the use of smaller diameter logs, which has challenged the sawmilling industry in developing changes in processing technology to optimise recovery of sawn timber. Furthermore, STT has established management eucalypt plantations specifically for sawlog and other solid wood production to supply local processing. These sawlogs, that will become increasingly important in the longer term in terms of supply, have different characteristics to sawlogs sourced from native forests.</p> <p>Interviews with stakeholders confirmed that STT is supporting collaborative research into the development of efficient processing technologies, and the identification of high-value applications for logs from plantations and communicates advances to the wider manufacturing facilities located in Tasmania.</p> <p>This was noted as positive evidence of conformity under Criterion 5.4, <i>The Organisation shall use local processing, local services, and local value-adding to meet the requirements of The Organisation where these are available, proportionate to scale, intensity and risk. If these are not locally available, The Organisation shall make reasonable attempts to help establish these services.</i> Under indicator 5.4.2, <i>Reasonable attempts are made to support and encourage establishment of capacity where local goods, services, processing and value-added facilities are not available.</i></p>
<p>The forest products industry has operated in good faith for decades to</p>	<p>The audit team acknowledges that the forest products industry in Tasmania has demonstrated high level leadership in seeking compromise and resolution</p>

try and resolve differences between industry and environmental groups. We think STT meets the FSC standard.	of differences with environmental non-governmental organizations (ENGOS). Support by forest products industry is noted as conformity in stakeholder engagements of STT. Beneficial environmental outcomes that resulted, in part, from cooperative agreements with the forest products industry also contributed to conformity for a variety of indicators under Principle 6.
Our small business company has a long-standing relationship with STT and has experienced firsthand that many procedures and plans have changed for us that we have to follow. We also support FSC certification for STT.	The audit team agrees many changes and improvements have occurred since 2014. Transfer of new materials and training of contractors, policies and procedures have been well developed as reflected by near complete conformance by STT with indicators related to harvest operations, contracting, contractor activities as prescribed by STT Forest Practices Officers (FPOs) in Plans, in training programs, and monitoring systems. The audit team interviewed STT staff and reviewed management documentation about the use of contracting services, which have increased to compensate for significant reductions in forestry staff. The team also conducted comprehensive review of STT's contractor management and monitoring program. The changes required by STT since 2014 represent a great deal of effort and documentation on the part of all contractors. In the review of STT contractors, the audit team found no non-conformities. There was only one related Observation, see Obs 2019.4, which includes an opportunity to improve retention and recall of training records.
<b>Environmental</b>	
STT harvesting activity is detrimental to critically endangered Swift Parrot. --Related-- From multiple, recognized swift parrot experts, informed the audit team prior to- and during the audit that STT is harming Swift Parrot habitat (some with details of specific areas). These scientists asserted STT has ignored expert advice and recommendations.	The audit team inspected several of the coupes for which information was provided by swift parrot experts during stakeholder consultations. Instances of forest harvesting activities were discovered to negatively impact Swift Parrot habitat. See Major CARs 2019.6, 2019.13, 2019.14, 2019.15, 2019.16, and 2019.17. The audit team acknowledges that STT has made significant improvements in its program to identify and protect swift parrot breeding and habitat protection. However, further improvement is necessary to meet FSC Forest Management standard requirements for a Critically Endangered species.
Sugar glider is now known and understood to be a predator of Swift Parrot resulting in significant, continued decline of the populations. STT is not doing enough to reduce this predation and, in fact, are increasing it.	The audit team concurs and has issued a CARs related to this topic area. The FSC audit team identified the need to a Swift Parrot Threat assessment that specifically includes the sugar glider and increased collaboration with scientific experts. See Major CARs 2019.13, 2019.14 and 2019.16.
Old growth forests or trees are being harvested against Tasmania regulations and FSC. --Related/Similar-- It is stated in the HCV Plan 2019 that the 25% threshold "is used to distinguish significant patches of old growth" (page 63) but there is no explanation of why the 25% figure is	The question of old-growth harvesting was evaluated in detail. Old growth-related indicators within the new FSC-Australia National Forest Stewardship Standard (NFSS) have considerably revised language such that old growth is specifically referenced only under HCV3.3 and as ecosystems that are rare, threatened, or endangered. This drew the question of how old growth is considered under the new FSC Australia NFSS, when old-growth is not rare, threatened, or endangered. For additional discussions, see stakeholder comments regarding Giant and Tall trees, below. There are significant

used. If this threshold has some clear justification, then the HCV Plan 2019 must be amended to incorporate it. [multiple submissions were made relative to this topic]	considerations around these topics as reflected in Major CARs 2019.12, 2019.15, and 2019.18.
Rainforest areas are being damaged by equipment and fires.	The audit team evaluated rainforest protections from harvests and burning. See Observation 2019.9.
Large old trees are being cut outside of regulation requirements to build roads. [multiple comments were made for roads related to timber harvesting, gravel and mining.]	<p>A stakeholder interviewed in the bush maintained that STT had operated outside of FPP regulations when conducting limited harvest along an existing road to widen and prepare for future potential harvest. STT constructs, maintains and uses roads and landings as part of its operations. Environmental and cultural protection relating to these aspects are addressed in Forest Practices Plans, <i>except road maintenance</i>. Investigation of this site found this activity was considered road maintenance and fell within operational regulatory requirements. Another stakeholder maintained that mining was being used to “go around” requirements. The audit team carefully reviewed procedures and requirements for road building including temporary, maintenance of existing, construction of new roads, and road related projects such as bridge installations.</p> <p>Road and road maintenance sites were inspected during the audit and verified to the extent possible during field visits. (Site notes, HP029A Hopetoun block as an example). New road construction environmental aspects were examined by document review and interview that special values assessments had been completed, and the road designed to minimize impacts to waterways and forest values. Road construction also considers cultural values identified in the Forest Practices Plan. The auditors noted environmental values were being managed in accordance with standards set out in the Code, observing well located alignment, appropriate drainage structures, minimal clearance widths, and appropriately battered cuts and fills. The auditors also inspected upgrade works on a Bridge and interviewed the construction contractor about the planning and implementation of the bridge upgrade. In this case the contractor had completely avoided impacts to the river by using cranes from temporary pads built into the first land-based span of the bridge.</p> <p>Road maintenance and gravel mining/extraction are among types of conversion allowed which followed established STT procedures and affected on limited portions of the management unit. These are closely controlled and limited in scope.</p> <p>Some mining operations, which are regulated under the Mineral Resources Development act and outside of the control of STT may result in the clearance of significant areas of forest. STT's <i>Permanent Forest Estate Policy</i> commits STT to negotiating to minimise such conversion and to maximise the recovery of forest products in situations where other parties have legislative use rights to convert PTPZ land to non-forest uses.</p>

	Where mining leases or licences are granted, STT may agree to provide an access licence for mining companies requiring use of forestry roads outside the mining lease. Such agreements are subject to STT's internal approval procedures, as described in the property rights section of their forest management plan. The audit team confirmed this process is carefully and effectively regulated and monitored.
Hollow-bearing trees for wildlife are being destroyed by logging and burning after logging.	The audit team evaluated harvest coupes during the audit for hollow bearing tree retention due to their importance as wildlife habitat for multiple species. STT has devoted great effort to innovative design methods including use of Variable Retention Harvests. STT has examined leaving (retention) hollow bearing trees in both dispersed and aggregated patterns with corresponding scientific studies that have garnered international recognition. Although aggregate retention is now preferred, the audit team determined there were not enough individual hollow bearing habitat trees retained within harvest coupes. See Minor CAR 2019.7 and Major CAR 2019.19. The audit team also found a number of questions around how hollow bearing trees are identified and the use of a precautionary approach in the absence of clear identification methods.
STT is not sufficiently maintaining Giant and Tall Trees. -Related- STT is actively harvesting "old growth" trees. -Related- An important result of the Riveaux rd fire is that the remaining Giant and Tall trees need extra protection from nearby logging and its flow on effects. This is especially important with regards to the few trees now left in the 300m <sup>3</sup> + wood volume category: These are the largest hardwood trees known on the planet and have international significance. Furthermore, in light of the huge loss of old growth forest and individual old growth trees in the Riveaux Road fire.	The comment overlaps slightly with comment above regarding hollow bearing trees. This stakeholder provided a "Table of Largest Tasmanian Trees by Wood Volume" and photo evidence Giant and Tall trees burned in the "Riveaux Road fire" (photo evidence included examples of Eucalypt trees over 6-7 meters across the base). The STT <a href="#">Forest Management Plan</a> , April 2019, devotes a section of the management plan to giant trees, 4.4.2.1.3 <i>Giant trees</i> . Although it is recognized that Tasmania's giant trees are among the largest hardwoods in the world and are of national and international significance. However, STT also responds to the fact that Giant trees are not protected by legislation in Tasmania or covered specifically by the Forest Practice Code. STT does recognise the cultural value of these trees and, instituted its own <a href="#">Giant Tree Policy</a> which requires that all trees at least 85 metres in height or 280 cubic metres in volume be protected. Sustainable Timber Tasmania implements this policy by actively searching for giant trees with LiDAR, and by protecting them from harvesting in reserves with boundaries at least 100 metres from the tree. Protecting giant trees outside of PTPZ land is outside of STT's management responsibility. Protecting giant trees during wildfires is also challenging due to safety and other issues. As an example, during the recent fires STT and other fire agencies went to significant efforts to protect Centurion, the tallest flowering plant in the world by managing the fuel around the base of the tree prior to the fire front hitting. The tree sustained some damage but is expected to survive. That said, there are several significant considerations around the topic of large old habitat trees, as habitat features, reflected in Minor CAR 2019.7 and Major CAR 2019.19.
The following comments summarize and are examples of two similar, but distinct concerns about wildlife habitat and biodiversity, related to	This comment expressed a general concern about how harvesting impacts wildlife through type conversions and removal of large, old trees. The audit team examined this question during the audit and non-conformities were issued



<p>harvesting in general, and for specific aspects of management activities.</p> <p>1. STT management is detrimental to wildlife habitat.</p> <p>2. STT conducts clear felling of native forests on publicly owned land on a large scale. In some and perhaps most cases they burn the forest residue after removing the larger trees. This obviously harms the habitat of native animal species, some of which are endangered and most of which are supposedly “protected”. The process also substantially changes the composition of the flora, and the subsequent appearance of the forest. Sometimes the fires deliberately lit [<i>sic</i> Prescribed] by STT escape, burning adjacent forest, including private property. When that happens STT apparently have vague policies to compensation people affected. STT are a wood product harvesting corporation. Having the word “sustainable” in their name is a form of false advertising and propaganda, which has no basis whatsoever. STT do not seem to genuinely understand the value of forests as storage for carbon or reservoirs of biodiversity. Undoubtedly, this is because to do so would be less profitable using the current economic rules.</p>	<p>related to treatment of large old trees under STT’s forest management program see Minor CAR 2019.7 and Major CAR 2019.19.</p> <p>However, it is important to note that STT employs a comprehensive biodiversity program that does provide protections for a broad range of plants and wildlife that inhabit STT’s PTPZ lands. For example, STT carefully tracks informal reserves of about 120,000 hectares of that contribute to Tasmania’s Comprehensive, Adequate and Representative reserve system. These provide habitat features such as wildlife habitat strips, skyline reserves and others protect natural and cultural values. More on the STT biodiversity program may be found here, <a href="https://www.sttas.com.au/forest-operations-management/managing-forest-values/biodiversity">https://www.sttas.com.au/forest-operations-management/managing-forest-values/biodiversity</a>.</p> <p>The audit team found that FPO’s and FPPs followed regulatory requirements that include biodiversity protections from the landscape down to the site scale.</p> <p>The audit team encourages all interested parties to review section 4.4.1.3 <i>Landscape context planning system</i> of the STT <a href="#">Forest Management Plan</a>, April 2019 which is an innovative approach recognized internationally for conservation planning at landscape scales. Such landscape provision for wildlife habitat features at larger scales can place losses of individual larger trees within a broader perspective.</p>
<p>What about climate change related to STT and FSC?</p>	<p>Stakeholders asked questions about climate change in the context of FSC. For climate change, in most cases, the audit team was able to clarify and specify concerns about the forest resources managed by STT address those topics as elaborated below. It is important to note that “climate change” is referenced in only two (2) areas within the <i>FSC-Australia National Forest Management Standard (NFSS)</i>. These are indicator <b>5.2.1.12</b> and in the <b>Glossary</b> under <b>Restore/restoration</b>.</p> <p><b>Indicator 5.2</b> The Organisation shall normally harvest products and services from the Management Unit* at or below a level that can be permanently sustained.</p> <p>5.2.1 Timber harvesting levels are based on an analysis of current Best Available Information* on: 12) <b><i>Impact from</i></b> climate change, pests diseases and natural hazards. (bold, italic added for emphasis).</p> <p>The expectation to <b>assess</b> impacts is in contrast for expectations for <b>restoration</b>. From the FSC-Australia NFSS, in the <b>Glossary</b> Section, under the definition of <b>Restore/restoration</b>, page 95:</p> <p>The Organisation is not necessarily obliged to restore those environmental values that have been affected <b><i>by factors beyond the control of The Organisation</i></b>, for example by natural disasters, <b><i>by climate change</i></b>, or by the legally authorised activities of third parties, such as public infrastructure, mining, hunting or settlement. FSC-POL-20-003 The Excision of Areas from the Scope of Certification describes the processes by which such areas may be excised from the area certified, when appropriate. (bold italics added for emphasis).</p>

It is worthwhile to note that climate change is a large-scale, ecosystem-level phenomenon that crosses ownership boundaries, administrative authorities and other levels and factors outside of a forest management organization's control. In this regard, it is similar to insect and disease outbreaks, catastrophic floods, and other disasters.

Below is a list of the areas accepted as related to climate change that are found within FSC NFSS, globally, and were addressed during this audit.

**Areas of climate change overlap with the FSC standards (international context)**

**Environmental & social impacts**

- Environmental and biodiversity baseline description
- Environmental and biodiversity impacts
- Environmental and biodiversity impacts monitoring
- Social baseline description
- Social impacts
- Social impacts monitoring
- Stakeholder consultation, grievance mechanism and transparency
- Identification and monitoring of High Conservation Value (HCV) Areas
- Forest benefits

Each of these elements were reviewed and evaluated under related indicators for the STT audit. When this audit was conducted May 2019, climate change was not, proportionally, a focus of stakeholder concerns, compared to swift parrot protections.

STT addresses climate change in a number of program aspects. Please see STT's Forest Management Plan (STT FMP) and the STT HCV Plan, both of which are referenced within this document and are available online. The audit team also notes here, that STT forestry staff were conversant and knowledgeable about climate change. STT addresses climate change specifically within its Forest Management Plan: **4.4.2.1.4 Biodiversity monitoring and research; 4.4.2.3 Carbon - page 48; and 4.4.2.3.1 Managing fossil fuel emissions - page 49-50.** Climate change is also recognized in STT's HCV Plan: Climate change listed as a potential threat to some HCVs in HCV Plan, page 7; and Climate change discussed under *Contemporary refugia*, page 26.

Social/Community	
<p>A representative of a group with &gt;5000 members. "I feel a strong loyalty to STT as the managers of our forests and do not wish to undermine or jeopardise their work. However, I am conflicted because I do not support STT's decision to seek FSC certification. We have 7th generation families who have worked with Tasmanian timbers since settlement who have passed knowledge and skill on through the generations. Our timber communities in the past have worked with our land to harvest our timbers and regenerate our forests with a desire for harvesting</p>	<p>FSC is a voluntary, market-driven certification system based on evaluations by independent, 3<sup>rd</sup> parties who objectively assess the applicant forest management system and activities. FSC acknowledges that an organization does not have to be certified to practice good forestry. The extent and comprehensiveness of the reserve system in Tasmania is a testimony to the people of Tasmania and their devotion to forests and ecosystems of the state.</p> <p>The audit team recognizes the well-developed, professional forest management program as encountered and evaluated during the 2019 audit. We also recognize out of over 200 indicators under the new FSC-Australia National Forest Stewardship Standard there were less than 15 indicators with non-conformities and 5 opportunities for improvement (Observations). This is a significant achievement and supports the description of STT as a professional and competent management agency despite very significant and complex challenges.</p>

<p>to occur again and again. Our crafts people ... value it's [native wood] uniqueness in quality, appearance and purpose. Our boat builders have been practicing their craft with Tasmanian timbers since settlement. That timber harvesting and regeneration practices have been done so well that much of our previously harvested forests are now considered HCV is testimony to our skills, and connection to our land. [The stakeholder describes the "green" groups as non-Tasmanians.] "While FSC certification requires the protection of areas of significant cultural heritage, it does not acknowledge or provide for the protection of the living cultural heritage of our timber community. Australia has its own certification system that is widely respected as it is based on a very high standard of sustainable practices that protect our environment and is legislated and regulated under strict Forestry Codes of Practice."</p>	<p>The Forest Practices Planning Officer (FPO) training for staff include legal responsibilities for planning and implementing Forest Practices Plans. This covers legal requirements, cultural site assessment and management, social, economic and environmental impact assessments and mitigation measures. These activities include requirements for local communities, but also local economic entities.</p> <p>The FSC forest management standard requires protection of confirmed local and significant cultural heritage. Specialty timbers and apiaries as just two examples of such culturally significant users.</p> <p>The Comprehensive Adequate and Representative reserve system of Tasmania is internationally impressive and contributes to considerations under FSC that are likely to be found in only a few other places in Oceania. <a href="https://environment.gov.au/land/nrs/science/scientific-framework">https://environment.gov.au/land/nrs/science/scientific-framework</a></p> <p>As to the assertion that the concerned environmentalists are "outsiders". The audit team does not agree. The audit team conducted extensive stakeholder engagements on-site, reviewed and responded to inquiries both verbal and written. We found that a large proportion of interest in STT activities came from Tasmanian citizens, demonstrating a depth of passion for Tasmanian forests whether supporting or critical of forest management activities.</p>
<p>We can't find information about management activities and planning documents related to roads for this sale in my home "area".</p>	<p>The site referenced in this comment involved the removal of timber as part of road maintenance accessing a coupe for potential future harvests. Formal and certified plans (FPPs) are required for the harvest coupe areas, and 100% of the harvest sites inspected during the audit did have an associated certified FPP. However, STT procedures do not require such plans for road maintenance. There are procedural mapping and documentation steps required internally which were followed in this case.</p>
<p>I requested information from STT about certified Forest Plans (FPP) and they would not supply the information I requested.</p>	<p>In this case an individual first requested the FPP adjacent to their own property. They then requested copies of plans for a broader area. The audit team inspected the stakeholder tracking system maintained by STT which was found to be both accurate and extensive. STT had also tracked their consideration of this stakeholder input as received.</p> <p>FSC classifies stakeholders, broadly as those <b>affected</b> by or <b>interested in</b> the organization's forest management activities. STT has interpreted this that interested parties include the general public but affected are those directly impacted by management activities (such as adjacent landowners).</p> <p>STT's analysis and response to such requests considers whether requestors are affected or interested. STT maintains public plans for all forest management activities for 3-year periods. See the public website listing all 3-year plans here, <a href="https://www.sttas.com.au/forest-operations-management/our-operations/three-year-wood-production-plan/three-year-wood">https://www.sttas.com.au/forest-operations-management/our-operations/three-year-wood-production-plan/three-year-wood</a>.</p>

<p>The state foresters have done a great job of working with our recreational bike trail construction, maintenance, and communications with our group. It has really benefited our bike trail business and our town.</p>	<p>The audit team visited the town of Derby, Tasmania to inspect trail features and conduct stakeholder interviews. Derby has built a world-class, premier mountain bike trail, <a href="https://www.ridebluederby.com.au/">https://www.ridebluederby.com.au/</a>. STT was confirmed to have responded promptly and appropriately to stakeholder requests in cooperatively adjusting harvest planning and trail protections in the area. This is noted as evidence of positive conformity to indicator 4.4.2, <i>Projects and additional activities are implemented and/or supported that contribute to local social and economic benefit and are proportionate to the socio-economic impact of management activities.</i></p>
<p>There is too much illegal firewood stealing and STT isn't doing enough to stop it.</p>	<p>No non-conformity was found. This is addressed under indicator 1.4.1, <i>Measures are implemented aimed at providing protection from unauthorised or illegal harvesting, hunting, fishing, trapping, collecting, settlement and other unauthorised activities.</i></p> <p>During interview with STT management representatives the auditor confirmed that STT has no prosecution powers, also this can be a significant safety issue for staff in the field. The audit team also notes that there are extensive, unpatrolled roads for access to these public forests.</p> <p>STT does have a permit system for specific coupes whereby the public can get a permit to collect a specific amount of firewood and instructions are issued by STT in the permitted activities. This designed to make legal acquisition of firewood affordable, accessible and sustainable.</p> <p>The company also confirmed that management of illegal firewood collection is a challenge. Multiple actions have been taken and STT continues to address it as part of continuous improvement. STT has analysed the issue and finds it to be reasonably widespread across the estate but tends to concentrate closer to production areas and population centres.</p> <p>STT does have a budget item for the monitoring and management of illegal activity including firewood collection and rubbish dumping. Incidents are reported in the STT database system (the Vault).</p>
<p>Professional foresters in Tasmania recognize STT as having high level performance and believe they merit certification.</p>	<p>The audit team recognizes that STT has an ongoing, continuous improvement program and has demonstrated significant improvements since their last audit in 2014, as have been discussed in numerous comments above. The audit team acknowledges that STT meets and often exceeded professional forestry standards as our team understands forestry practices from the perspectives of local, state, federal and international professionals.</p>
<p>The Tasmanian Division of The Institute of Foresters of Australia (IFA), believes it is vitally important that Forest Managers employ staff that have the skills, training and experience needed to deliver sustainable forest management. IFA members, particularly those with Registered Professional Forester (RPF) accreditation, generally have these skills (the Division recognises that others may also have these skills).</p> <p>The Tasmanian Division supports the efforts by Sustainable Timbers Tasmania for their upcoming Forest Stewardship Council certification evaluation.</p>	<p>This comment is representative of related comments received by professional foresters operating in Tasmania. The auditors note that no negative comments were received from professional foresters in Tasmania.</p> <p>The Institute of Foresters of Australia are recognized throughout Oceania as a premier professional forestry organization. STT has a strong forestry qualification and training program, with an observed rigor appropriate to those with IFA membership and accreditation as RPFs. The IFA's endorsement of STT is a significant; it is considered as evidence of positive conformity within interested community representative stakeholders.</p>



<p>This individual is a neighbour to STT PTPZ land and is an example of positive comments received from stakeholders identified as being potentially impacted by STT forest management.</p> <p>“I have had direct communication with foresters working for STT and in my dealings with STT I have found their staff to be highly professional and reasonable. Examples include agreements relating to road usage, burning and spraying operations.</p>	<p>Noted as evidence of conformity under requirements to consult with affected stakeholders regarding forest management impacts.</p>
<p>Detailed submission by environmental group representative (lawyer). Summary: This organization put forth questions around FSC indicator 1.6 and 6.4. They provided a comprehensive, detailed and thorough analysis and presentation of evidence. Their citation of FSC PC&amp;I: Principle 1.6 – compliance with applicable national laws, local laws, international conventions and obligatory codes of practice; Principle 6.4 – protection of rare species, threatened species and their habitats in the management unit, proportionate to the scale, intensity and risk of management activities and to the conservation status and geographic range and ecological requirements of rare and threatened species.</p>	<p>In the new FSC-Australia NFSS, compliance with applicable national laws, local laws, international conventions and obligatory codes of practice now falls under indicator 1.5.1, <i>Compliance with applicable national laws, local laws, ratified international conventions and obligatory codes of practice relating to the transportation and trade of forest products up to the point of first sale is demonstrated.</i></p> <p>The audit team examined STT operations specifically in reference to compliance with the Tasmanian regulatory framework. The audit concluded STT operates within the Tasmanian regulatory framework and relative to indicator 1.5.1.</p> <p>Under 6.4 the audit team did find non-conformities, see Major CAR 2019.6. See also Major CARs 2019.12, 2019.13, 2019.14, 2019.15, and 2019.16.</p>

## 4. Results of Evaluation

### 4.1 Notable Strengths and Weaknesses of the FME Relative to the FSC P&C

Table below contains the evaluation team’s findings as to the strengths and weaknesses of the subject forest management operation relative to the FSC Principles of forest stewardship. Weaknesses are noted as Corrective Action Requests (CARs) related to each principle.

Principle / Subject Area	Strengths Relative to Conformity to the Standard	Weaknesses Relative to Conformity to the Standard
<b>P1: Compliance With Laws</b>	No exceptional strengths noted.	See Observation (OBS) 2019.1
<b>P2: Workers’ Rights and Employment Conditions</b>	STT was found to exhibit exemplary equal opportunities for gender and diversity. The Policy system is both strong and proactive, such as the Corporate Toolbox Program.	See OBS 2019.2, Minor 2019.3, and OBS 2019.4

<b>P3: Indigenous Peoples' Rights</b>	No exceptional strengths noted.	No exceptional weaknesses noted.
<b>P4: Community Relations</b>	The organization was found to exceptionally provide community services and work with local communities. Cooperative work done with the town of Derby for mountain biking trails was exceptional. Notification and communications with communities is done at multiple levels using multiple methods.	See OBS 2019.4
<b>P5: Benefits from the Forest</b>	The degree to which STT works with local and state level communities to maximize benefits of the forest to those communities was exemplary.	No exceptional weaknesses noted.
<b>P6: Environmental Values and Impacts</b>	No exceptional strengths noted.	See Major CARs 2019.6 and 2019.7
<b>P7: Management Planning</b>	No exceptional strengths noted.	See Minor CAR 2019.8
<b>P8: Monitoring &amp; Assessment</b>	No exceptional strengths noted.	See Minor OBS 2019.9 and Minor CARs 2019.10 and 2019.11
<b>P9: High Conservation Value Forests</b>	No exceptional strengths noted.	See Major CARs 2019.12-2019.18
<b>P10: Implementation of Management Activities</b>	No exceptional strengths noted.	See Major CAR 2019.19
<b>Chain of Custody</b>	No exceptional strengths noted.	See Major CAR 2019.20
<b>Group Management</b>	N/A	N/A

## 4.2 Process of Determining Conformance

### 4.2.1 Structure of Standard and Degrees of Nonconformance

FSC-accredited forest stewardship standards consist of a three-level hierarchy: principle, the criteria that correspond to that principle, and the performance indicators that elaborate each criterion. Consistent with SCS Forest Conservation Program evaluation protocols, the team collectively determines whether or not the subject forest management operation is in conformance with every applicable indicator of the relevant forest stewardship standard. Each nonconformance must be evaluated to determine whether it constitutes a major or minor nonconformance at the level of the associated criterion or sub-criterion. Not all indicators are equally important, and there is no simple numerical formula to determine whether an operation is in nonconformance. The team therefore must use their collective judgment to assess each criterion and determine if the FME is in conformance. If the FME is determined to be in nonconformance at the criterion level, then at least one of the applicable indicators must be in major nonconformance.

Corrective action requests (CARs) are issued for every instance of a nonconformance. Major nonconformances trigger Major CARs and minor nonconformances trigger Minor CARs.

#### **4.2.2 Interpretations of Major CARs, Minor CARs and Observations**

*Major CARs:* Major nonconformances, either alone or in combination with nonconformances of all other applicable indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant FSC Criterion given the uniqueness and fragility of each forest resource. These are corrective actions that must be resolved or closed out before a certificate can be awarded. If Major CARs arise after an operation is certified, the timeframe for correcting these nonconformances is typically shorter than for Minor CARs. Certification is contingent on the certified FME's response to the CAR within the stipulated time frame.

*Minor CARs:* These are corrective action requests in response to minor nonconformances, which are typically limited in scale or can be characterized as an unusual lapse in the system. Most Minor CARs are the result of nonconformance at the indicator-level. Corrective actions must be closed out within a specified time period of award of the certificate.

*Observations:* These are subject areas where the evaluation team concludes that there is conformance, but either future nonconformance may result due to inaction or the FME could achieve exemplary status through further refinement. Action on observations is voluntary and does not affect the maintenance of the certificate. However, observations can become CARs if performance with respect to the indicator(s) triggering the observation falls into nonconformance.

#### **4.3. Existing Corrective Action Requests and Observations**

N/A, this is a new, full evaluation.

#### 4.4. New Corrective Action Requests and Observations

<b>Finding Number: 2019.1</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	<b>1.3.1</b> All activities undertaken in the Management Unit are carried out in compliance with: 1) Applicable laws and regulations and administrative requirements.
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): Some paperwork, for example within the procurement framework, refers to Forestry Tasmania. Because Forestry Tasmania is still the legal name for STT, this is raised as an Observation.	
<b>Corrective Action Request</b> (or Observation): STT should examine all documentation and paperwork to determine if Forestry Tasmania (FT) should be replaced with Sustainable Timber Tasmania (STT) for legal or administrative reasons as well as clarity of communications.	
<b>FME response</b> (including any evidence submitted)	Both names are appropriate and legal for use in internal documents. STT is aware of existing documents with FT and they are being changed as documents become due for review.
<b>SCS review</b>	SCS review of the FME response is that the organization is aware of the need to monitor and change documents to reflect the name changes. SCS also acknowledges both names are legally acceptable thus warranting the closure of this observation.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2019.2</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	<b>2.2.1</b> Systems are in place that promote gender equality and prevent discrimination in employment practices, training opportunities, awarding of contracts, processes of engagement and management activities.
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): The FME has a comprehensive system to promote gender equality and prevent discrimination. Relevant policies include the <i>Diversity Policy V1.1</i> (Dec 17), the <i>Anti-Discrimination and Grievance Policy V3.11</i> (Nov 17), the <i>Recruitment and Selection Policy V4.1</i> (Feb 18), and <i>Section 18 of the EA</i> . Employee expectations regarding discrimination are set out in the <i>Code of Conduct V2.4</i> (Nov 17) with discipline procedures set out in <i>Section 20 of</i>	

the EA. Interviews with both female and male staff indicated that the FME provides appropriate engagement processes, training opportunities and management to support gender equity.

However, review of STT documents found that contract language for contractors promoting gender equity and to prohibit discrimination could be improved.

**Corrective Action Request (or Observation):**

The organization's overall conformance to this indicator would be strengthened if it was clearer in the awarding of contracts that contractors should promote gender equality and prevent discrimination.

<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2019.3</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	<b>2.3.5</b> The trend and severity of incidents are generally decreasing over time.
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b> There have been 16 Lost Time Injuries (LTIFR) in harvest and haulage contractors from April 2018 to March 2019. The frequency of injuries has increased in the last two years, according to information from STT. In reviews of lost time injuries and subsequent staff interviews, it was identified that fatigue management by STT for contractors has not been expressly considered, although it has been identified as a potential issue. This indicated STT has missed potential factors in their root cause analysis or had not recorded them. The organization has recognized there are safety problems through internal investigation, and is developing corrective actions, which justifies the grading of this non-conformity as Minor.	
<b>Corrective Action Request (or Observation):</b> Regarding addressing the problem of lost time injuries, STT must ensure that procedures for review sufficiently capture potential incident causes to be considered during root cause analysis, such that identified corrective actions are fully implemented towards conformance with this indicator. (See also 2.3.1)	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)



<b>Finding Number: 2019.4</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	<b>2.5.4</b> Up to date training, education and competency assessment records are kept and maintained for all workers.
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): STT was not able to provide the auditors with full training records for Forest Practices Officers (FPOs) and contract operators during the audit. However, partial records were available and confirmed procedural requirements of STT to maintain such training records. The audit team confirmed that STT conducts internal audits, identified this area for improvement, and has begun taking action, thus justifying the grading of this finding as an Observation.	
<b>Corrective Action Request</b> (or Observation): STT should be able to provide relevant FSC-related and other required training records for workers, including FPOs and contract operators. STT should assess which contractor and FPO training records should be maintained in readily accessible locations as necessary for FSC purposes and explore means to ensure those records are available during audits.	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2019.5</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	<b>4.6.4</b> Fair compensation is provided to local communities and individuals for damage proven to be caused by negative impacts of management activities.
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): The Auditors viewed in Consultation Manager, the stakeholder database registry, the actions taken in August 2018 related to remediation works done by STT, at its cost, on private property impacted by management activities; e.g., coupe TU487T. The Auditors also reviewed two STT letters to stakeholders confirming the payment of compensation for negative impacts of STT's management activities (fire impacts).	

Interviews with executive staff of STT confirmed STT has a process, widely understood by staff, to address negative impacts of management activities in a fair and equitable manner.	
Although STT does not have documented policies or procedures for fair compensation, the evidence and history of having provided fair compensation in conformance with this Indicator is justification of grading this finding as an Observation.	
<b>Corrective Action Request (or Observation):</b> Documented company procedures regarding fair compensation would strengthen STT's program and conformance to this Indicator.	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2019.6</b>	
<b>Select one:</b> <input checked="" type="checkbox"/> <b>Major CAR</b> <input type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input checked="" type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	<b>6.4.4</b> The rare and threatened species and their habitats in the Management Unit are protected, at operational and landscape level, including through the provision of conservation zones, protection areas, connectivity, and other direct means for their survival and/or viability, such as species recovery programs.
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b> <p>In 2016, the status of the swift parrot was changed from Endangered to the higher threat category of Critically Endangered under the IUCN Red List and Australia's EPBC Act. Thus, the swift parrot is now a single threat category from becoming Extinct in the Wild.</p> <p>The swift parrot is an Austral migrant (i.e., a species whose annual migration is undertaken within the Southern Hemisphere). It breeds during the southern summer and only in Tasmania. Nesting patterns are also determined by the annual variation in the flowering patterns of food trees; for successful breeding, the species require the co-occurrence of flowering trees and the presence of tree-hollows suitable for nesting. Suitable hollows are rare and found mostly in large trees more than 150 years old.</p> <p>The swift parrot is extremely mobile and follows food resources, mostly nectar from flowering trees, across a large area of potential habitat (Saunders et al 2007). Due to the annual variation of flowering patterns of their food resources in Tasmania (<i>Eucalyptus globulus</i>, <i>E. ovata</i>), the location and extent of area occupied by the swift parrot may vary dramatically from year to year. However, swift parrot has also been found to return to breeding sites and individual hollow bearing nest trees over time.</p>	

The audit team acknowledges the considerable effort and planning done by STT to exclude a significant amount of hollow bearing trees and foraging trees during operational planning, both within- and outside of swift parrot habitat areas. This was observed in both of the following cited coupes and for a variety of wildlife species. However, observations by the audit team in the field included harvests of potential nesting trees and foraging trees within sight of an identified swift parrot nest site classified as "low density" by STT, or determined "harvestable". For example, Coupes BB025A and SO034A were both harvested but were observed to have had potential swift parrot habitat, which was confirmed in consultations with swift parrot experts.

It is the audit team's judgement that the "low density foraging trees" as determined in these cases by the STT-FPA-DPIPWE framework, are still critical swift parrot habitat. Thus, the conclusion reached through observations of the audit team, as was confirmed by multiple experts when interviewed, is that STT is negatively impacting swift parrot habitat through harvest of these habitat areas.

Additionally, expert recommendations against harvesting in these areas were given by a swift parrot expert, as confirmed in documentation and interviews. These recommendations to STT staff, and other relevant Tasmanian agencies, were considered but recommendations for no-harvest were not followed. Again, these areas were advised by scientific experts that there were former nesting trees, and it was specifically recommended to retrain the large hollow bearing trees that were advised to be potential swift parrot foraging areas, that were near identified, current swift parrot nest trees.

The audit team acknowledges the STT approach meets Tasmanian regulatory requirements; however, it does not protect critically endangered habitat as required using the *Precautionary Approach* and *Best Available Information* as defined in the FSC-Australia FM Standard. As such, we must conclude that STT is not in conformance to Indicator 6.4.4.

**Corrective Action Request (or Observation):**

STT shall protect rare, threatened, and endangered species, specifically the Swift Parrot, and their habitats in the Management Unit at operational and landscape level, including through the provision of conservation zones, protection areas, connectivity, and other direct means for their survival and/or viability, such as species recovery programs.

**FME response**  
(including any  
evidence submitted)

**SCS review**

**Status of CAR:**

☐

Closed

☐

Upgraded to Major

☐

Other decision (refer to description above)

**Finding Number: 2019.7**

**Select one:** ☐ Major CAR ☒ Minor CAR ☐ Observation

**FMU CAR/OBS issued to** (when more than one FMU):

**Deadline**

☐

Pre-condition to certification/recertification

☐

3 months from Issuance of Final Report

☒

12 months or next regularly scheduled audit (surveillance or re-evaluation)

☐

Observation – response is optional

☐

Other deadline (specify):

**FSC Indicator:**

**6.6.3** Management maintains, enhances, or restores plant communities and habitat features associated with native ecosystems, to support the diversity of naturally occurring species and their genetic diversity.

<b>Non-Conformity (or Background/ Justification in the case of Observations):</b> Observations were made during field (bush) site inspections of insufficient retention of either hollow bearing trees or coarse woody debris (CWD) at the within-stand level following clear felling and high intensity prescribed burning. This lack of retention was notable when there was evidence of likely hollow bearing trees and/or CWD through occurrence of very large stumps (2-3m diameter) present within the stand, the composition and structure of adjacent coupes of similar forest type, and/or STT records and mapping. Coupes observed with insufficient large, old tree and CWD retention include: EM005B, KA006D, SOO34A, KD045B, BB025A, HP003C, WW041B, and CH036I (note, this is not an exhaustive list of coupes lacking retention that were observed during the audit). Documentation of the effectiveness of management strategies and actions in maintaining, enhancing or restoring plant communities and <b>habitat features</b> is required by this Indicator. The methods used by STT for maintaining requisite habitat features have not been validated for clear fell harvesting, including those partial harvest areas (aggregate retention) that included clear fell areas. Per FSC definition, included within FSC-STD-AUS-V1-2018, <b>Habitat features</b> are “Naturally occurring forest stand attributes and structures, including but not limited to: Old trees whose age noticeably exceeds the average age of the main canopy; Hollow-bearing trees; Dead standing trees; and Coarse woody debris.	
<b>Corrective Action Request (or Observation):</b> STT must modify and document its retention procedures for clear fell operations so as to improve assurances of retention of habitat features such as hollow bearing trees and coarse woody debris within harvest areas. (See also 6.6.4)	
<b>FME response</b> <i>(including any evidence submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2019.8</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to (when more than one FMU):</b>	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	<b>7.6.3</b> Affected stakeholders are provided with an opportunity for culturally appropriate engagement in monitoring and planning processes of management activities that affect their interests. <b>7.6.4</b> On request, interested stakeholders are provided with an opportunity for engagement in monitoring and planning processes of management activities that affect their interests.
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b> Stakeholder consultation formed a significant part of the evaluation process and was carried out prior to, during, and after the evaluation fieldwork. The audit team found that there is a lack of transparent communication to stakeholders of the STT landscape planning tool about how landscape environmental values are being evaluated and managed. Given the importance of STT's <i>landscape planning context tool</i> , a landscape analysis database mapping program with significant impact on STT operational planning, its use in Tasmania, and the interest in STT management of the public estate expressed by stakeholders, the audit team finds that STT must undertake further	

<p>stakeholder consultation related to the methodology and implementation the tool. STT's Stakeholder Engagement Operational Approach provides opportunities for engagement in the monitoring and planning process, additional opportunities were given also as part of the Forest Management Plan process, and the HCV Assessment and Management Plan, in the Three Year Wood Production Plan, and finally, on the website and fact sheet (<a href="https://www.sttas.com.au/sites/default/files/media/documents/fact-sheet/Fact%20Sheet%209%20Biodiversity.pdf">https://www.sttas.com.au/sites/default/files/media/documents/fact-sheet/Fact%20Sheet%209%20Biodiversity.pdf</a>). The broad, state-wide scope and multiple documents are acknowledged.</p> <p>However, extensive stakeholder input confirms persistent misunderstanding of the interested and affected members of the public regarding the harvest of large, old trees as justified through the use of the landscape planning context tool. The existing stakeholder engagement platforms and avenues for stakeholder input justify grading this finding as a Minor rather than Major non-conformity.</p>	
<p><b>Corrective Action Request (or Observation)</b></p> <p>STT must ensure interested and affected stakeholders are engaged in a culturally appropriate way regarding the <i>landscape planning context tool</i> implementation as part of the STT management monitoring and planning processes.</p>	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2019.9</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	<b>8.2.1</b> The social and environmental impacts of management activities are monitored consistent with the applicable elements of Annex F. <b>Annex F.</b> Part j): The impacts of infrastructural development, transport activities and silviculture on rare and threatened species, habitats, ecosystems, landscape values, water and soils
<p><b>Non-Conformity (or Background/ Justification in the case of Observations):</b></p> <p>This finding is regarding post-harvest and post-burning harvested sites. In several coupes, streamside buffers were unintentionally burned, either peripherally or completely during prescribed burning operations. Examples are streamside protections observed at coupes HA018C and KA060. These areas were designed to be retained by FPO's as protection for water and soil quality as required in STT procedures and the Tasmanian regulatory system. Prescribed burning operations demonstrated consistent, protective actions around reserve features installing "fire lines", and then recorded incidents of fire line breach at the time of burning, when detected. Interviews with both fire and forestry staff confirmed that there may also be cases where such fire escapes happen but are not noted, particularly when fire line breaches are discovered after prescribed fire operations are deemed "closed". STT provides systematic and programmatic monitoring through a Monitoring Framework to assess burning impacts on their lands in harvested stands, over time. High level preparation and prescription planning for burns, protective measures taken, and monitoring program justify the grading of this finding as an Observation.</p>	



<b>Corrective Action Request (or Observation):</b> STT are monitoring changes in environmental conditions consistent with Annex F. STT should improve assurances that prescribed burning is not eliminating habitat values sought to be retained. STT should improve monitoring of rainforest protection areas or otherwise demonstrate how STT reviews and modifies prescribed burning practices to reduce unintentional burning of protected streamside buffers and retention zones.	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2019.10</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	<b>8.5.1</b> A system is implemented to track and trace all products that are sold by the Organisation as FSC certified.
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b> STT does not yet have written software code to enable sales system to differentiate between CW and FM FMU wood products as part of their chain of custody system.	
<b>Corrective Action Request (or Observation):</b> STT must develop written software code to enable sales system to differentiate between CW and FM FMU wood products as part of their chain of custody system.	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2019.11</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional

	<input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	<b>8.5.2</b> Information about all products sold is compiled and documented, including: 1) Common and scientific species name, or where necessary, species group; 2) Product name or description; 3) Volume (or quantity) of product; 4) Information to trace the material to the source of origin harvest block; 5) Harvest date range; 6) If basic processing activities take place in the forest, the date and volume produced; and 7) Whether or not the material was sold as FSC certified.
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b> Information about species is not provided for all products, specifically export species as required by this indicator.	
<b>Corrective Action Request (or Observation):</b> STT must revise its chain of custody procedures to assure that information about species and/or species groups are provided for all products, including those that are exported. (See also 2.2 of the Chain of Custody Indicators for FMEs.)	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2019.12</b>	
<b>Select one:</b> <input checked="" type="checkbox"/> <b>Major CAR</b> <input type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input checked="" type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	<b>9.1.1</b> An assessment is completed consistent with Annex G that records the location and status of High Conservation Value Categories 1-6, as defined in Criterion 9.1; the High Conservation Value Areas they rely upon, and their condition.
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b> Relative to this finding, read <b>CAR 2019.18</b> , monitoring of old growth on the STT estate. Under HCV 3.3, there is Guidance that allows harvesting old growth stands when they are confirmed as: 1) not rare, threatened, or endangered (RTE) ecosystem <u>and</u> , 2) are confirmed as not threatened at the landscape level.  However, as described in <i>Major CAR 2019.18</i> , STT did not demonstrate sufficient monitoring of significant changes to baseline old growth data, and thus the resulting datasets at the management unit level are not complete enough to support such claims. Without the assurance of accurate mapping and identification of old growth within the estate, it was determined by the audit team that STT has not provided sufficient evidence to support contentions that harvesting old growth within the estate is not a threat at the landscape level. This does not meet the requirements under HCV 3.3, thus STT has improperly harvested old growth under FSC rules. This includes forest stands containing old growth at less than 25% within coupe. Until such time as STT has provided sufficient and accurate assurances of protections at the landscape and of rare, threatened or endangered stands at the forest level, old growth on the estate must be protected. STT has not properly identified old growth as HCV in conformance with this indicator.	
<b>Corrective Action Request (or Observation):</b>	

STT must assess old growth as HCV on the estate in accordance with Annex G and must accord those old growth trees and forest with appropriate protections.	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2019.13</b>	
<b>Select one:</b> <input checked="" type="checkbox"/> <b>Major CAR</b> <input type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input checked="" type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	<b>9.2.1</b> Threats to High Conservation Values are identified as required in Annex G, Section 1.8 <i>Threat Assessment</i> .
<p><b>Non-Conformity (or Background/ Justification in the case of Observations):</b></p> <p>Threats to critically endangered species must be identified, in accordance with Annex G, Section 1.8. In the case of swift parrot, the implications of sugar glider (<i>Petaurus breviceps</i>) predation analysis and documentation was determined to be insufficient.</p> <p>Using a different nesting location each year exposes swift parrots to dramatic variation in predation risk, largely dependent on the extent of habitat loss (breeding habitat) and the occurrence of the sugar gliders which is an introduced arboreal marsupial predator (Heinsohn et al. 2015).</p> <p>Stojanovic et al (2014) found a positive correlation between predation by sugar gliders and decreasing mature forest cover at the landscape scale. Reproductive success is very high when the swift parrot nests on offshore islands where sugar glider is absent, such as Bruny and Maria Islands. However, intermittent island nesting is insufficient to prevent extinction (Heinsohn et al 2015, Stojanovic et al 2018). Islands are also vulnerable, and bioclimatic models show that they are suitable for sugar gliders (Stojanovic et al 2018). Additionally, stochastic events such as wildfires contribute to the loss of breeding habitat and these are likely to increase across the breeding range with climate change (Grose et al 2014).</p> <p>This information is not present in a management plan specific to the swift parrot presented by STT, nor is other relevant documentation.</p> <p>Other identified issues include the following:</p> <ul style="list-style-type: none"> <li>There is uncertainty surrounding the utility for swift parrots of retention of small patches of nesting habitat, down to 1 ha in size, that are surrounded by areas that have been harvested. Research suggests the predation of swift parrot nests by sugar gliders will increase within such small fragments of retained habitat. In a study by Stojanovic et al 2014, predation rates were found to be inversely related to the amount of mature forest cover within a 5 km radius.</li> </ul> <p>In the absence of a Swift parrot Management Plan for the STT estate, or other documentation of the analysis of sugar glider predation and other threats relative to forest management activities and natural disturbances, the audit team concludes that the requirements of this Indicator have not been met. That is, we conclude that STT has not appropriately identified and acted in consideration of threats to the Critically Endangered swift parrot.</p>	

This Indicator requires that the process of identifying specific threats to the maintenance and/or enhancement of identified HCVs, in this case the Critically Endangered swift parrot, must include an assessment of the likelihood of occurrence and the severity of consequences. Threats may include those from management activities and other causes. This indicator requires documentation of specific threats to the maintenance and enhancement of identified HCVs.	
<b>Corrective Action Request (or Observation):</b> STT must undertake and document an assessment of threats to swift parrot, from management activities and other causes. The threat assessment must include a determination of the likelihood of occurrence and the severity of consequences of threats associated with STT's commercial forest management activities.	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2019.14</b>	
<b>Select one:</b> <input checked="" type="checkbox"/> <b>Major CAR</b> <input type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input checked="" type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	<b>9.2.2</b> Management strategies and actions are developed to maintain and/or enhance the identified High Conservation Values and to maintain associated High Conservation Value Areas prior to implementing potentially harmful management activities.
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b> STT has developed a general HCV Management Plan and presently relies upon the FPA Threatened Fauna and Flora advisory system in the management of the swift parrot. However, it is the finding of this audit team that a STT-specific Swift Parrot Management Plan must be developed for the STT estate, reflecting the status of swift parrot as a Critically Endangered species to ensure ability to locate and protect historic and known nesting trees; manage, and monitor populations and habitat for this species and, in particular, to secure the long-term retention of adequate mature habitat (breeding and foraging habitat), using the <i>Precautionary Approach</i> and <i>Best Available Information</i> as defined in the FSC-Australia FM standard. STT has not demonstrated that management approaches sufficiently maintain and/or enhance swift parrot habitat.	
<b>Corrective Action Request (or Observation):</b> Management Plans must include management strategies and actions to maintain and/or enhance HCVs including critical habitat, and must include consideration of identified threats, such as the sugar glider. For a Critically Endangered species and continued controversy surrounding management approaches, a Management Plan specific to the swift parrot must be developed that meets all requirements of this indicator.	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	

<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)
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<b>Finding Number: 2019.15</b>	
<b>Select one:</b> <input checked="" type="checkbox"/> <b>Major CAR</b> <input type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>	
<b>FMU CAR/OBS issued to (when more than one FMU):</b>	
<b>Deadline</b>	<input checked="" type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	<b>9.2.3</b> Affected and interested stakeholders and regional experts with knowledge of the conservation of HCVs are consulted in the development of management strategies and actions to maintain and/or enhance the identified High Conservation Values. <i>Verifiers: Documentation of correspondence, interviews, and data provision from stakeholders. Documentation of responses to stakeholder comment and information.</i>
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b> There are two parts to this finding: 1) Swift parrot consultation with experts, and 2) old growth forests. <b>1) Swift parrot:</b> Interviews with swift parrot experts during the audit discovered several examples of expert recommendations not being taken under advisement or meaningfully applied within the development of strategies for the management and protection of the swift parrot within the regulatory framework of the State of Tasmania forest practices system.  <b>2) Old growth:</b> STT has invoked a portion of the Guidance in the new FSC-Australia FM standard (2018) relative to HCV 3.3, old growth ecosystems. FSC defines old growth in this Standard as "ecologically mature forest with negligible disturbance."  The portion of Guidance invoked by STT in their approach to harvesting mapped old growth includes the following: It is important to note that the presence of HCV 3.3 old-growth forest in the management unit <i>does not necessarily exclude harvesting</i> . It is the responsibility of The Organisation to demonstrate that its status at a landscape level will be maintained and not threatened as a result of management activities." (italics for emphasis).  First it is important to note that per the FSC-Australia FM standard (page 10): <b><i>Individual elements within the guidance, when considered separately, are not requirements of this Forest Stewardship Standard.</i></b>  STT provided some evidence that maintenance and security of rare, threatened or endangered (RTE) old growth will not be threatened under STT's approach to forest management activities. The approach is based on an analysis of the existence of old growth; its presence in the National Reserve System (NRS) as a <i>Comprehensive, Adequate and Representative</i> reserve system; and off-reserve management and adjusted harvest practices. About 87% (1.1 million hectares) of all old growth forest is managed for protection in the NRS reserve system. In addition to this, the IBRA level analysis (using JANIS thresholds) has identified specific old growth forest communities that require further protections at a regional scale. STT has implemented a policy of not clearfelling coupes containing more than 25% old growth forest. The audit team must, however, consider the entire Guidance cited in this case, from page 66 of FSC-STD-AUS-V1-2018: <i>Identification and assessment of HCV 3.3 should include consideration of:</i>	



*The degree to which it is rare and/or threatened at a global, national or regional level*

- *Its distinctiveness in terms of size and quality (including stand structural characteristics and ecological functions) in a landscape level context*
- *Geographic range.*
- *Determining these shall be based on assessments by government agencies, peer reviewed literature, or assessments by recognised experts, and be considered at the landscape level.*

The first and third bullet points merits further discussion. The overall landscape analysis, used by STT as evidence of “no-threat” from harvesting old growth on STT public lands, relies heavily upon the JANIS system (1996). The JANIS system was used to originally designate forest stands and institute the NRS/CAR reserve system for forests in Tasmania. The target is to reserve 100% of old growth forest communities classified as *rare or depleted*. For Old growth forest communities that have been assessed at the IBRA level as Not threatened, the minimum reservation target is 60%. Based on 87% of old growth forest being in reserve, these reservation targets are generally exceeded.

The audit team received multiple stakeholder comments, including expert input, that challenge the sufficiency of the JANIS system for use in the context of landscape level analysis as the basis for threat assessments of harvesting old growth on STT managed public lands. The JANIS methodology is not endorsed within the FSC-Australia FM standard, although widely used in Australia. It is the audit team’s determination that further engagement with regional experts must be conducted relative to the use of JANIS. Considering that JANIS is a core methodology used by STT in justifying their approach to harvesting mapped old growth, considering also that this is the first test of a new FSC-Australia FM standard, and finally given the volume of stakeholder input, further general stakeholder consultation is necessary. Stakeholder submissions reflect the need for further education around the JANIS system as well as the system STT uses for modelling, predicting, and conducting pre-harvest reviews, including how various GIS data and map layers or feature classes are used. Management of HCV old-growth, which is generally perceived by the public as large old trees, is not understood by the general public and public consultation by local communities for HCV are required by the FSC Forest Management Standard.

**Corrective Action Request (or Observation):**

- 1) When a new Swift parrot Management Plan is developed it must undergo a stakeholder consultation process aligned with the requirements of 9.2.3 that also includes affected and interested stakeholders and experts outside of the current Tasmanian regulatory framework. These consultations must include appropriate verifiers such as documentation of correspondence, interviews, and data provision from stakeholders; and documentation of responses to stakeholder comment and information.
- 2) STT must undertake further consultation specific to public education and input as well as additional expert consultation regarding the company’s strategy and management implementation:
  - a) General public, defined as interested and affected stakeholders and including local communities as required for consultation by FSC, must continue to be consulted as to the general approach and process used to conduct pre-harvest assessments by FPO’s and use of FPA/DPIPWE GIS resources as related to old growth determination including structure, function, and condition.
  - b) Experts: Evaluation of the use of JANIS as basis for landscape level analysis and threat level determinations of forest stands, in particular of old growth; review of improvements to JANIS; and exploration of any new systems for evaluating old growth, e.g. ecologically mature forests with negligible disturbance.

**FME response**  
(including any  
evidence submitted)

**SCS review**

**Status of CAR:**

☐

Closed

☐

Upgraded to Major

☐

Other decision (refer to description above)

<b>Finding Number: 2019.16</b>	
<b>Select one:</b> <input checked="" type="checkbox"/> <b>Major CAR</b> <input type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input checked="" type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	9.3.1 The High Conservation Values are maintained and/or enhanced, including by implementing the strategies developed.
<p><b>Non-Conformity</b> (or Background/ Justification in the case of Observations):</p> <p>The audit team acknowledges the considerable effort and amount of protections instituted for swift parrot habitat protection by exclusion from harvesting. For coupe SO034D, STT reported approximately 20 days of field surveying and visits to the coupe were done by FPA experts. The initial area under consideration for planning was 90 ha but only 47 ha were included in the final treatment area (harvest). There were 256 assessed potential nesting trees in the coupe, and STT reports only 29 were included in the final harvest area representing a retention rate of 89% of potential nesting trees. For coupe SO034A, STT reported ground-truthing pre-harvest assessment as confirming the presence of approximately 3.25 ha of forest containing blue gum (foraging habitat) which was all retained in a reserve area.</p> <p>However, the audit team concluded those harvested were indeed potential nesting and foraging trees within sight of identified swift parrot nest sites and thus constituted critical habitat. This included those harvested at "low density"; for example, Coupe BB025A and SO034A.</p> <p>STT is not sufficiently maintaining or enhancing swift parrot habitat as assessed during the audit. In order to do so, STT must demonstrate protection of habitat for a critically endangered species as required using the <i>Precautionary Approach</i> and <i>Best Available Information</i> as defined in the FSC-Australia Forest Stewardship Standard.</p> <p>Specific issues identified include the following:</p> <ul style="list-style-type: none"> <li>It is unclear how STT will protect habitat for the swift parrot, how STT has defined swift parrot habitat, and whether STT's landscape-scale mapping (internal, informal reserve system) will materially improve protection of known habitats.</li> <li>There is no publicly available Swift Parrot Management Plan that clearly outlines exactly how STT intends to protect swift parrot habitat, and how STT will manage the threat associated with the introduced predator, the sugar glider.</li> <li>A Public Authority Management Agreement (PAMA) for swift parrot habitat within the Southern Forests and Bruny Island is currently being developed (DPIPWE). The PAMA was not finalized at the time of the audit. Some of the recommendations or prescriptions contained therein are described as being already followed by STT. However, to what extent this is in fact the case was not clear to the auditors.</li> <li>The PAMA seems to offer a marked improvement on previous swift parrot management, particularly the protection of critical habitat on Bruny Island. While acknowledging that the draft document is currently dynamic and changing, one shortcoming of the PAMA identified during the audit was that it did not preclude further loss of breeding and foraging habitat for the swift parrot within PTPZ land on the Tasmanian mainland (estates managed by STT and under scope of consideration for this audit); the PAMA covered a small proportion of the mainland breeding range. No agreement had been developed for areas of PTPZ land or other areas of Production Forest outside the three identified management zones.</li> <li>Employing STT's current harvesting prescriptions means that potential swift parrot nesting habitat in patches &lt;1 ha, and foraging habitat in patches &lt;1 ha or with &lt;50% of trees being <i>E. globulus</i> or <i>E. ovata</i>, could still be harvested in the three management zones of the PAMA, as is currently being done.</li> </ul> <p>Criterion 9.3 requires the Organisation to implement strategies and actions that maintain and/or enhance the</p>	

identified High Conservation Values. These strategies and actions must implement the precautionary approach and be proportionate to the scale, intensity and risk of management activities. The indicator 9.3.1 further specifies that the High Conservation Values are maintained and/or enhanced, including by implementing the strategies developed.	
<b>Corrective Action Request (or Observation):</b> STT must revise and implement strategies and actions that maintain and/or enhance identified High Conservation Values. Strategies and actions must be consistent with the Precautionary Approach, using Best Available Information (consistent with the FSC definition of this term including external experts), and be proportionate to the scale, intensity and risk of management activities. (See also 9.3.2 and 9.3.3).	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2019.17</b>	
<b>Select one:</b> <input checked="" type="checkbox"/> <b>Major CAR</b> <input type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input checked="" type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	<b>9.4.1</b> A program of periodic monitoring assesses the following, consistent with Annex G: 1) Implementation of strategies; 2) The status of High Conservation Values, including High Conservation Value Areas on which they depend; and 3) The effectiveness of the management strategies and actions for the protection of High Conservation Values, to maintain and/or enhance the High Conservation Values.
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b> STT's relies upon a broad range of operational monitoring as well as other state agencies to conduct monitoring of various aspects of forest management operations. This includes determining effectiveness of management activities for biodiversity objectives (FPA), and to conduct basic research and apply expertise regarding swift parrot (DPIPWE). STT conducts additional monitoring to track results of management towards meeting landscape context objectives. However, the STT forest management program does not currently meet this indicator.	
<b>Corrective Action Request (or Observation):</b> STT must ensure that swift parrot habitat needs are accurately identified, and protections are instituted such that evaluation and monitoring systems are able to detect deficiencies in program effectiveness, particularly relative to maintenance of Critically Endangered species such as the swift parrot. In other words, STT must verify the effectiveness of management strategies including those deficiencies identified in 2019.13-2019.16.	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	

<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)
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<b>Finding Number: 2019.18</b>	
<b>Select one:</b> <input checked="" type="checkbox"/> <b>Major CAR</b> <input type="checkbox"/> <b>Minor CAR</b> <input type="checkbox"/> <b>Observation</b>	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input checked="" type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	<b>9.4.3</b> The monitoring program has sufficient scope, detail and frequency to detect changes in High Conservation Values, relative to the initial assessment and status identified for each High Conservation Value.
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b> <p>The method of identifying old-growth in Tasmania is described in <i>Tasmania-Commonwealth Regional Forest Agreement Environment &amp; Heritage Report Vol. I, Table 2.8, Background Report Part C</i>, Tasmanian Public Land Use Commission, Nov. 1996. It explains that old-growth identification for Tasmania was done by: 1) mapping older growth stages, 2) collecting disturbance data, and 3) identifying old growth for each forest community. The growth stage classes assessed are regrowth, early mature, mature, late mature and over mature, the late mature and over mature equating to older growth forest. Photo interpreters assessed the growth stage of each stand based on the proportion of trees by growth stage. For trees to be late mature or over mature they must have senescent features such as shrinking crowns, bayonet branches and missing branches. For a stand to be late mature/over mature it had to have more than 10% mature eucalypt cover, not be dominated by regrowth and with no obvious logging or grazing disturbance. There was considerable field validation done in Tasmania. This initial mapping of growth stages is the basis of the PI type layer that STT now maintains as one of their key stand mapping datasets. It is worth noting that all rainforest and some blackwood swamp is classified as old-growth.</p> <p>Until 2017, STT maintained the Tasmanian Government old-growth layer, which STT maintains. The high conservation value status of old growth forest communities in Tasmania was analysed in 2014 (Rod Knight, 2014) based on the current IBRA bioregions, Tasveg vegetation communities and 2014 updated RFA mapped old growth layer. Evidence that more recent analysis or updates have been conducted were not found. STT is updating its old growth assessment in the FMU with harvest data but the company is not updating fire impacts on old growth.</p>	
<b>Corrective Action Request (or Observation):</b> <p>STT must ensure that monitoring of rare, threatened, and endangered old growth, e.g. ecologically mature forests in relatively undisturbed condition, is sufficient to support maintenance, enhancement, or restoration of such ecosystems; or determining when non-RTE ecologically mature forests become threatened at a finer spatial or temporal scale currently offered. STT must update the old growth mapping in response to disturbance from fire, must demonstrate consideration of other forms of large-scale natural disturbances, such as forest insect and diseases, and then assess such impacts on the conservation status of old growth forest communities.</p>	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	

<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)
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<b>Finding Number: 2019.19</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	<b>10.11.4</b> Harvesting practices minimise damage to standing residual trees, residual woody debris on the ground and other environmental values identified in Criterion 6.1 and Cultural Sites identified in Criterion 3.5.
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b> Observations at post-harvest burn sites were that practices aimed at minimisation of damage to standing trees and residual coarse woody debris, and coarse woody debris (CWD) were not sufficient. Management activities do not protect standing residual trees within harvest areas. Examples of such were residuals trees damaged in adjacent stands and streamside reserves during burning operations, such as HA018C and KA006D (note, this list is not all inclusive of those observed during the audit experience burning damage to standing residual trees). The FSC Standard identifies the following elements of the biophysical and human environment as environmental values: <i>Ecosystem functions</i> (carbon storage and sequestration); <i>Biological diversity</i> (rare and threatened species, vegetation communities, habitat features, fauna and flora); <i>Water resources</i> (water quantity and quality); <i>Soils</i> (stability); <i>atmosphere</i> (air quality); and <i>Landscape values</i> (visual and amenity values). Given the use of regeneration practices, specifically burning, as typical post-harvest management, this finding is specifically related to prescribed burning as follows harvesting within the silvicultural program.	
<b>Corrective Action Request (or Observation):</b> STT must ensure that harvesting practices minimize damage to standing residual trees and course woody debris on the ground (CWD). (See also 10.1.1, 10.11.3)	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2019.20</b>	
<b>Select one:</b> <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input checked="" type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation)



	<input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC-STD-50-001, 1.1.5
<b>Non-Conformity (or Background/ Justification in the case of Observations):</b> Improper logo use found in "Forest Management Plan - Revised April 2019". Section 2, page 7 of this document has the first prominent use of FSC without the proper symbol, "®", as is required for use in Australia. The same found in "Sustainable Forest Management Policy", February 2018. Website use was also checked and found to be in conformance; however, it is noted that the above documents are available at the STT public website as self-contained, downloadable content.	
<b>Corrective Action Request (or Observation):</b> FSC trademark and logo use in public facing and sale documents must be modified so as to demonstrate conformance with FSC Trademark and Logo use requirements for Australia.	
<b>FME response</b> <i>(including any evidence submitted)</i>	In response to this finding, STT has updated its publicly available Forest Management Plan, HCV plan and sustainable forest management policy to have the trademark symbol present at the first mention of FSC in the document. The website was also reviewed to reflect this requirement. Refer to: <ul style="list-style-type: none"> <li>• <a href="https://www.sttas.com.au/sites/default/files/media/documents/plans/Forest%20Management%20Plan%20Oct%202019.pdf">https://www.sttas.com.au/sites/default/files/media/documents/plans/Forest%20Management%20Plan%20Oct%202019.pdf</a> (page 7)</li> <li>• <a href="https://www.sttas.com.au/sites/default/files/media/documents/plans/HCV%20MP%20Version%20FSC%20TM%20October%202019.pdf">https://www.sttas.com.au/sites/default/files/media/documents/plans/HCV%20MP%20Version%20FSC%20TM%20October%202019.pdf</a> (page 6)</li> <li>• <a href="https://www.sttas.com.au/sites/default/files/media/documents/policies/SFM%20policy%20approved%20February%202018%20RW%20logo%20FSC%20TM.pdf">https://www.sttas.com.au/sites/default/files/media/documents/policies/SFM%20policy%20approved%20February%202018%20RW%20logo%20FSC%20TM.pdf</a></li> <li>• <a href="https://www.sttas.com.au/forest-operations-management/our-operations/certifying-our-operations">https://www.sttas.com.au/forest-operations-management/our-operations/certifying-our-operations</a></li> </ul>
<b>SCS review</b>	Review of the above evidence confirmed the FSC trademark and logo demonstrates conformance to the indicator requirements.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

#### 4.4.1 Citations for Section 4.4

- Grose MR, Fox-Hughes P, Harris RMB, Bindoff NL (2014) Changes to the drivers of fire weather with a warming climate – a case study of southeast Tasmania. *Climate Change*, 124, 255-269.
- Heinsohn R, Webb M, Lacy R, Terauds A, Alderman R and Stojanovic D (2015) A severe predator-induced population decline predicted for endangered, migratory swift parrots (*Lathamus discolor*), *Biological Conservation*, 186, p75.
- Porfirio LL, Harris RMB, Stojanovic D, Webb M, Mackey B (2016) Projected direct and indirect effects of climate change on the Swift Parrot, an endangered migratory species, *Emu - Austral Ornithology*, 116, 3, p273.
- Saunders, DL, Brereton R, Tzaros C, Holdsworth M, Price R (2007) Conservation of the swift parrot *Lathamus discolor* – management lessons for a threatened migratory species. *Pacific Conservation Biology*, 13, 111– 119.
- Stojanovic D, Webb M, Alderman R, Porfirio LL, Heinsohn R (2014) Discovery of a novel predator reveals extreme but highly variable mortality for an endangered migratory bird *Diversity and Distributions*, 20, 1200-1207.

Stojanovic D, Terauds A, Westgate MJ, Webb M, Roshier DA, Heinsohn R (2015) Exploiting the richest patch has a fitness pay-off for the migratory swift parrot, *Journal of Animal Ecology*, 84, 5, 1194-1201.

Rod Knight (2014) Effects of changes to the Tasmanian conservation reserve system on High Conservation Value indicators in Forestry Tasmania's Forest Management Unit. Report to Forestry Tasmania.

## 4.5 Major Nonconformances

<input type="checkbox"/>	No Major CARs were issued to the FME during the evaluation. Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input type="checkbox"/>	Major CARs were issued to the FME during the evaluation, which have all been closed to the satisfaction of the audit team and meet the requirements of the standards. Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
<input checked="" type="checkbox"/>	Major CARs were issued to the FME during the evaluation and the FME has not yet satisfactorily closed all Major CARs.

## 5. Certification Decision

Certification Recommendation	
FME be awarded FSC certification as a "Well-Managed Forest" subject to the minor corrective action requests stated in Section 4.2.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The SCS evaluation team makes the above recommendation for certification based on the full and proper execution of the SCS Forest Conservation Program evaluation protocols.	
Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A – Full New Eval
No Major CARs were issued to the FME during the evaluation.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> MAJOR CARs WERE ISSUED
FME has demonstrated that their system of management is capable of ensuring that all of the requirements of the applicable standards (see Section 1.6 of this report) are met over the forest area covered by the scope of the evaluation.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
FME has demonstrated that the described system of management is being implemented consistently over the forest area covered by the scope of the certificate.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<b>Comments:</b> A total of 10 Major CARs, 5 Minor CARs, and 5 Observations were issued as a result of this full evaluation audit against FSC-STD-AUS-V1-2018. The Major CARs were related to a small number of specific issues that the audit team acknowledges are challenging and quite complex.	
<b>Commendations:</b>	

The audit team notes that the STT personnel interviewed during the audit consistently demonstrated a high level of commitment to forest stewardship of the state lands under their management.

The following commendations substantively underscore positive aspects of STT forestry program regardless of the certification decision:

- 1. STT personnel demonstrate an ethos of responsible management for and stewardship of a robust array of values and resources found on the state lands under their charge.**
- 2. STT personnel interviewed during field audits demonstrated thorough and consistent knowledge of updated and new procedures, reinforced by specific related trainings on the subject matter.**
- 3. As an organization STT demonstrated a culture of innovation and adaptive management through dedication to continuous improvement. Significant changes and improvements are recognized from 2014 to 2019.**

## SECTION B – APPENDICES (CONFIDENTIAL)

### Appendix 1 – Current and Projected Annual Harvest

The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood):	Mandated at 137,000 m3 of High Quality sawlog /year
Explanation of the assumptions, methodology, and reference to the data source upon which AAH and NTFP harvest rates estimates are based:	
<p>Sustainable Timber Tasmania generally uses a 90-year horizon for strategic planning. This time period matches the nominal rotation length for eucalypt native forest, or at least three rotations for eucalypt plantations managed for sawlog production. STT manages PTPZ land under the <i>Forest Management Act 2013</i> to make available at least 137,000 cubic metres of high-quality eucalypt sawlogs annually to the veneer and sawmilling industries. Lower quality sawlogs, peeler and pulp logs are secondary products arising from high-quality eucalypt sawlog harvest. STT uses eucalypt forest estate models to calculate sustainable yield, which is primarily based on the yield of high-quality eucalypt sawlogs from both native forest and plantations. These models are based on a 90-year period and have the following elements:</p> <ul style="list-style-type: none"> <li>■ A network of forest inventory and growth plot measurements.</li> <li>■ A computer-based modelling and growth projection system.</li> <li>■ Incorporation of environmental constraints.</li> <li>■ Estimations of both eucalypt native forest and eucalypt plantation yields,</li> <li>■ incorporating calibrations of predicted versus actual harvest volumes.</li> <li>■ External independent audits.</li> </ul> <p>High-quality eucalypt sawlog yields are reviewed, and the results published every five years, as required by the <i>Tasmanian Regional Forest Agreement</i>, to determine if high-quality eucalypt sawlog yields are sustainable. Yield predictions are generated from biologically based forest estate modelling of productive capacity, and do not imply supply based on economic criteria.</p> <p>The most recent review occurred in 2017 and includes data on the 90-year view of high-quality eucalypt sawlog availability. The review also indicated a transition to increased sawlog and peeler availability from eucalypt plantations commencing from 2022.</p> <p>In addition, the 2017 review projects STT can make available 157,000 cubic metres per year of eucalypt peeler billets for the period until 2027. The volume of eucalypt arisings (which could be used for a range of products such as engineered wood products, pulpwood and biofuels) is also described (Figure 9). Importantly, the review indicated that there will be more standing volume of eucalypt wood products in STT's native and plantation forests by the turn of the next century than there is in 2017. The STT 2017, <i>Sustainable high-quality eucalypt sawlog supply from Tasmania's Permanent Timber Production Zone Land</i>, provides additional detail. Previous reviews in 1998, 2002, 2007 and 2014 incorporated the effects of successive changes in the resource base over that period. The 2017 review incorporated the relevant legislation: the <i>Forest Management Act 2013</i> and the <i>Forestry (Rebuilding the Forest Industry) Act (Tas) 2014</i>. N. All forest that is within the PTPZ land and that has been classified as available for wood production under the MDC zoning system has been mapped into provisional coupes.</p> <p>(a) 60% is in provisional coupes, designated for long term wood production (including 10% managed by other forest management companies);</p> <p>(b) 15% is in reserves that form part of Tasmania's Comprehensive, Adequate and Representative Reserve System; and</p> <p>(c) 25% is unavailable for wood production because of other management priorities (e.g., conservation).</p>	

The area designated for long term wood production (i.e., the area within provisional coupes) can be further classified into broad forest management types. Annual harvest modelling assumes little change to the area within each classification over the modelled period. In particular, this reflects Forestry Tasmania's policy since 2007 that no areas of native forest be converted to plantation. Additional methodology detail and data sources are provided on page 11, of the "Sustainable high quality eucalypt sawlog supply from Tasmania's Permanent Timber Production Zone Land". Yield predictions are for a 90-year planning horizon, from 1 July 2016 to 30 June 2105.

Other relevant assumptions:

- (a) a continuation of the area managed by Sustainable Timber Tasmania, of 821,000 hectares, including 812,000 hectares of Permanent Timber Production Zone land; and
- (b) a continuation in the legislated annual minimum high-quality eucalypt sawlog to be made available, of 137,000 cubic metres.

In addition, other items incorporated in the last review continue. These can be summarised as follows:

- (c) a continuation in the quantity of eucalypt peeler logs contracted for annual supply to Sustainable Timber Tasmania's relevant domestic customer of 195,000 tonnes, until at least 30 June 2027; and
- (d) the application of a "headroom factor", being a percentage discount to the modelled predicted yields of each relevant forest product, as a safety margin to account for the potential impact on harvest areas and yields of any future changes such as changes the requirements for conservation under the Forest Practices Code (Forest Practices Authority, 2015).

Over the period 2016/17 to 2021/22, the statutory minimum annual quantity to be made available of 137,000 cubic metres can be met from existing eucalypt native forest base. Beyond that period, the predicted yield from eucalypt native forests reduces to about 106,000 cubic metres per year until 2026/27, and then to about 73,000 cubic metres per year, augmented by significant additional quantities of high-quality eucalypt sawlogs from eucalypt plantations.

## Appendix 2 – List of FMUs Selected for Evaluation

- ☒ FME consists of a single FMU
- ☐ FME consists of multiple FMUs or is a Group

## Appendix 3 – Additional Evaluation Techniques Employed

- ☒ None.
- ☐ Additional techniques employed (*describe*):

## Appendix 4 - Staff and Stakeholders Consulted

SCS maintains additional records of stakeholder consultation activities (email communications, other records) in its record-keeping system. Stakeholders listed below have given their ***express written permission*** to include their name, contact details, and comments in the report. Most stakeholders are included anonymously in this audit report.



## Appendix 5 – Required Tracking

### Pesticide Derogations

☒ This is a new certificate application as such there are no existing pesticide derogations.

### Progressive HCVF Assessments

☒ FME does not use partial or progressive HCVF assessments.

## Appendix 6 – Forest Management Standard Conformance Table

*C= Conformance with Criterion or Indicator*

*C/NC= Overall Conformance with Criterion, but there are Indicator nonconformances*

*NC= Nonconformance with Criterion or Indicator*

*NA= Not Applicable*

REQUIREMENT	C/ NC	COMMENT/CAR
<b>PRINCIPLE 1: COMPLIANCE WITH LAWS</b> The Organisation shall comply with all applicable laws, regulations and nationally- ratified international treaties, conventions and agreements.		
<b>1.1 The Organisation shall be a legally defined entity with clear, documented and unchallenged legal registration, with written authorisation from the legally competent authority for specific activities. (new)</b>	C	
<b>1.1.1</b> Legal registration to carry out all activities within the scope of the certificate is documented and unchallenged.	C	The audit team confirmed that the <u>Government Business Enterprise Act 1995</u> defines the Forestry Corporation, which was originally established under the now repealed Forestry Act 1920 and continued under the <u>Forest Management Act 2013</u> , as a statutory authority. Sustainable Timber Tasmania (formerly Forestry Tasmania) is the agency responsible under the Forest Management Act 2013 for the management and control of PTPZ land. Permanent Timber Production Zone (PTPZ) land as defined by the <u>Forest Management Act 2013</u> means land that is dedicated as PTPZ land under this or any other Act (including the <u>Forestry (rebuilding the Forest Industry) Act 2014</u> ). The <u>Forest Management Act 2013</u> defines the Forestry Corporation (Sustainable Timber Tasmania -STT) as the Forest Manager for permanent timber production zone land including its legal functions and powers i.e. scope. <u>Ministerial Charter</u> defines scope in further detail.
<b>1.1.2</b> Legal registration is granted by a legally competent authority according to legally prescribed processes.	C	The audit team confirmed in interview that the <u>Government Business Enterprise Act 1995</u> and <u>Forest Management Act 2013</u> are state legislation enacted by the Tasmanian State Parliament.
<b>1.2 The Organisation shall demonstrate that the legal status of the Management Unit, including tenure and use rights, and its boundaries, are clearly defined.</b>	C	

<p><b>1.2.1</b> Legal tenure to manage and use resources within the scope of the certificate is documented.</p>	C	<p>The legal tenure to manage and use resources within the scope of the certificate are set out in The <u>Forest Management Act 2013</u> which defines Permanent Timber Production Zone land (PTPZ land) and the legal right of Sustainable Timber Tasmania (Forestry Corporation) as the Forest Manager on this land.</p> <p><b>Section 7</b> of the Forest Management Act 2013 states the Forest Manager for permanent timber production zone land: (1) The Forestry Corporation is the Forest Manager for permanent timber production zone land and has the functions and powers specified in this Act. (2) Notwithstanding section 9(1), sections 9 and 10 of the Government Business Enterprises Act 1995 apply to the Forestry corporation in exercising its powers as the Forest Manager under this Act.</p> <p><b>Section 8.</b> states the Functions of Forest Manager. The Forest Manager has the following functions: (a) to manage and control all permanent timber production zone land; (b) to undertake forest operations on permanent timber production zone land for the purpose of selling forest products; (c) such other functions as are approved in writing by the Minister and the Treasurer.</p> <p><b>Section 9</b> states the powers of Forest Manager (1) The Forest Manager has such powers as are necessary to enable it to perform its functions. (2) Without limiting subsection (1), the Forest Manager may grant to a person a permit, licence, lease, or other occupation right, in relation to permanent timber production zone land.</p>
<p><b>1.2.2</b> Legal tenure is granted by a legally competent authority according to legally prescribed processes.</p>	C	<p>The State parliament is the duly elected representative of the state and has the required legal authority to enact legislation. Both the <u>Government Business Enterprise Act 1995</u> and The Forest Management Act 2013 are properly enacted state legislation.</p>
<p><b>1.2.3</b> The boundaries of all Management Units within the scope of the certificate are clearly marked or documented and clearly shown on maps.</p>	C	<p>Estate maps were reviewed throughout the entire audit process, both in hard copy and electronically and are also clearly shown in the company GIS database.</p> <p>The public can also access an interactive state wide map at the company website <a href="http://www.sttas.com.au">www.sttas.com.au</a> which shows the FMU at a state wide level with layers including PTPZ land, production forests, non-production forest and informal reserves. The website also includes general definitions of the various management zones maintained by STT.</p> <p>Also reviewed the Land tenure and FMU on the STT GIS database The audit team also confirmed that the STT GIS database receives data from the Land Information System Tasmania database, again a publicly accessible land tenure database.</p>
<p><b>1.3</b> The Organisation shall have legal rights to operate in the Management Unit, which fit the legal status of The Organisation and of the Management Unit and shall comply with the associated legal obligations in applicable national and local laws and regulations and administrative requirements. The legal rights shall provide for harvest of products and/or supply of ecosystem services from within the Management Unit. The</p>	C	

Organisation shall pay the legally prescribed charges associated with such rights and obligations.		
<p><b>1.3.1</b> All activities undertaken in the Management Unit are carried out in compliance with:</p> <ol style="list-style-type: none"> <li>1) Applicable laws and regulations and administrative requirements;</li> <li>2) Legal rights; and</li> <li>3) Obligatory codes of practice.</li> </ol>	C (Obs)	<p>The majority of forestry activities in Tasmania regulated by the Forest Practices Authority who are a statutory regulatory body overseeing forest utilisation in the state. The Forest Practices Authority is an independent statutory body that administers the Tasmanian forest practices system on both public and private land. The system regulates the management of forest and threatened non-forest vegetation on both public and private land.</p> <p>The FPA website describes the FPA as an independent advisor, researcher and regulator, and has a key role to play in the search for a sustainable future for Tasmanian forests. The FPA was set up in 1985 and is also involved in the implementation of other forest regulated legislation and policies. The FPA is funded by the Tasmanian government as well as by fees charged for Forest Practices Plans submitted by forest companies in Tasmania.</p> <p>The FPA requires that forestry activities including all harvesting activities, re-forestation, clearing native vegetation, roading for forestry use, and quarrying for forestry use are approved activities and require a Forest Practices Plan to be developed and certified prior to the operation commencing. The forest practices system was set up by the Tasmanian Parliament through the Forest Practices Act 1985. The system recognises the many values of forests have and it is designed to ensure that reasonable protections for the natural and cultural values of the forest is provided when forest practices are carried out. The forest practices system is based on a co— regulatory approach, combining self-management by the industry and independent monitoring and enforcement by the FPA. Forest Practices Officers are trained and authorised by the FPA and employed within the industry to plan, supervise and monitor forest practices. FPA staff provide advice on regulatory and technical matters including requirements for the protection of natural and cultural values. The FPA also monitors forest practices to ensure that standards are being met. Corrective action is taken where required, which can include completion of remedial works, fines or prosecution. The FPA applies principles of Administrative law that predicates that the FPA must follow clear guidelines and adherence to principles of natural justice.</p> <p>STT along with all other forestry companies in Tasmania must also comply with all requirements of the Tasmanian Forest Practices Code 2015.</p> <p>Some paperwork, for example within the procurement framework, refers to Forestry Tasmania. Because Forestry Tasmania is still the legal name for STT, this is raised as <b>OBS 2019.1</b>.</p>
<p><b>1.3.2</b> Payment is made in a timely manner of all applicable legally prescribed charges connected with forest management.</p>	C	<p>The audit team confirmed in interview with STT management that the only legally prescribed charges are Council land rates, evidence in folder.</p>
<p><b>1.3.3</b> Activities covered by the Management Plan are designed to comply with all applicable laws.</p>	C	<p>As stated, above forest activities, included those covered in the Forest Management plan must comply with all applicable laws and regulations within the State of Tasmania, this includes compliance with Forest Practices Plans which must be developed and certified prior to a forest operation commencing which also includes</p>

		compliance with requirements stated in the Tasmanian Forest Practices Code 2015.
<b>1.3.4</b> Potential conflicts between applicable Australian federal, state and/or local laws, the FSC Principles & Criteria, and international agreements are identified and recorded.	C	STT has identified potential conflicts which are listed in the "Register of Conflicts between Legal Requirements and FSC requirements" updated 14/5/19 to meet FSC Australia FM standard requirements. There are no known conflicts between existing laws and FSC P&C, although three potential conflicts were identified there are existing mechanisms within the FSC standard to address them and they do not require STT to choose between FSC conformance and legal compliance. Interviews with staff confirmed awareness that should any such conflicts arise, they must notify SCS immediately.
<b>1.4</b> The Organisation shall develop and implement measures, and/or shall engage with regulatory agencies, to systematically protect the Management Unit from unauthorised or illegal resource use, settlement and other illegal activities.	C	
<b>1.4.1</b> Measures are implemented aimed at providing protection from unauthorised or illegal harvesting, hunting, fishing, trapping, collecting, settlement and other unauthorised activities.	C	<p>During interview with STT management representatives the audit team confirmed that STT has no prosecution powers, also this can be a significant safety issue for staff in the field. The audit team was also reminded by the company that these are public forests with many roads open to the public.</p> <p>STT does have a permit system for specific coupes whereby the public can get a permit to collect a specific amount of firewood and instructions are issued by STT in the permitted activities.</p> <p>The company also confirmed that illegal firewood collection is a challenge for the company, it is reasonably widespread across the estate but tends to concentrate closer to production areas and population centres.</p> <p>STT does have a budget item for the monitoring and management of illegal activity including firewood collection and rubbish dumping. Incidents are reported in the Vault system.</p> <p>The audit team reviewed the Dumped Rubbish Management Procedure dated August 2018 which includes procedures for managing the dumping of Asbestos, medical waste, tyres, building and industrial waste and agricultural waste.</p>
<b>1.4.2</b> Where protection is the legal responsibility of regulatory bodies, a system is implemented to work with these regulatory bodies to identify, report, control and discourage unauthorised or illegal activities.	C	<p>The audit team confirmed in interview that STT work closely with Police and other regulatory agencies in relation to reporting any illegal activities within the FMU. This includes dumping of rubbish, illegal firewood collection and illegal hunting.</p> <p>However, the audit team were asked to consider staff safety in relation to illegal activities and the Dumped Rubbish Management Procedure dated August 2018 clearly takes staff safety as a primary consideration in relation to any illegal activity seen within the estate.</p>
<b>1.4.3</b> If illegal or unauthorised activities are detected, actions are undertaken, where appropriate, to mitigate impacts and improve systems aimed to prevent further illegal or unauthorised activities.	C	The audit team also confirmed in interview that surveillance cameras may be used in the forest to detect illegal activities, as needed. It was also confirmed in interview that contractors can work with STT to erect gates at access roads into their coupes, so long as gates are not on a public access way.



<b>1.5 The Organisation shall comply with the applicable national laws, local laws, ratified international conventions and obligatory codes of practice, relating to the transportation and trade of forest products within and from the Management Unit, and/or up to the point of first sale.</b>	C	
<b>1.5.1</b> Compliance with applicable national laws, local laws, ratified international conventions and obligatory codes of practice relating to the transportation and trade of forest products up to the point of first sale is demonstrated.	C	STT maintain compliance with applicable national laws and international conventions. The audit team also confirmed that where applicable STT complied with the minimum list of applicable laws, regulations and nationally ratified international treaties, conventions and agreements, as outlined in Annex A of National standard. A list of Legislation and policies relevant to the management of PTPZ land is also seen in appendix 3 of the Forest Management Plan and includes Tasmanian legislation and policies and Australian legislation and policies.
<b>1.5.2</b> Compliance with CITES provisions is demonstrated, including through possession of certificates for harvest and trade in any CITES species.	C	There are currently no CITES species harvested by STT, confirmed both in interview and from review of the CITES species list.
<b>1.6 The Organisation shall identify, prevent and resolve disputes over issues of statutory or customary law, which can be settled out of court in a timely manner, through engagement with affected stakeholders.</b>	C	
<b>1.6.1</b> A publicly available dispute resolution mechanism is in place, modified where necessary through culturally appropriate consultation with affected stakeholders.	C	Reviewed the Complaints Resolution Procedure, dated May 2019, and available on the STT website. Interview the Engagement and Land Management manager in relation to the procedure and the process undertaken with affected stakeholders. The Complaint resolution Procedures are modified as required depending on the circumstances surrounding the complaint/dispute.
<b>1.6.2</b> Disputes related to issues of applicable laws or customary law that can be settled out of court in a timely manner are responded to promptly, and all reasonable steps are undertaken to resolve the dispute.	C	STT has disputes and complaints, but not usually related to legal issues. The audit team also confirmed in interview that there are currently no disputes relating to customary law pertaining to the STT FMU. Unresolved complaints or disputes can be referred to the Ombudsman (an official appointed to investigate individuals' complaints against a company or organization, especially a public authority). Court settlement of disputes is the final level of an unresolved dispute, and only occurs after all other avenues of resolution have been undertaken. The auditors reviewed a dispute surrounding access for a member of the public with adjoining land, that is reported to be being taken to the small claims court to recover purported lost earnings accumulated during a dispute. (Note; the complainant did not work through the STT Complaints Procedures, rather deciding to go straight to the small claims court -this has not been completed at the time of the audit)
<b>1.6.3</b> Up to date records of disputes related to issues of applicable laws are held including: 1) Steps taken to resolve disputes; 2) Outcomes of all dispute resolution processes; and	C	Company has records of disputes and complaints that are recorded in the Consultation Manager Database and are recorded as formal complaints. The audit team reviewed one case involving a stakeholder with concerns surrounding a quarry access road, and has also previously interviewed the stakeholder, this case has been ongoing for several

3) Unresolved disputes and the reasons why they are not resolved, how they will be resolved, or why they are not resolvable.		years and at the time of audit remains unresolved despite multiple meetings between STT and the stakeholder and referral to local councils for action. The stakeholder has repeatedly been informed by STT that STT have no control over the access road. STT has suggested the stakeholder take the complaint to the Ombudsman for settlement
<b>1.6.4</b> Operations cease in areas where disputes exist: 1) Of substantial magnitude; or 2) Of substantial duration; or 3) Involving a significant number of interests.	C	The audit team confirmed in interview the process that STT undertake in a dispute of this type. The company has developed a "Protest Kit" for staff to access if in this position.
<b>1.7 The Organisation shall publicise a commitment not to offer or receive bribes in money or any other form of corruption and shall comply with anti-corruption legislation where this exists. In the absence of anti-corruption legislation, The Organisation shall implement other anti-corruption measures proportionate to the scale and intensity of management activities and the risk of corruption.</b>	C	
<b>1.7.1</b> The Organisation's Management Plan and relevant contractual arrangements contain an anti-corruption commitment.	C	The audit team confirmed that the Code of Conduct dated November 2017, the FT Values Vision Mission dated 24/6/16, the General Services Contract version 1.1, the Gifts benefits and Hospitality policy all contain commitments in relation to anticorruption.
<b>1.7.2</b> The commitment meets or exceeds related legislation.	C	The overall commitment provided by STT throughout their documentation confirms that the anticorruption commitment as part of the expected ethics of all staff employed by STT. <ul style="list-style-type: none"> <li>Also, that STT is subject to the Integrity Commission Act 2009, which is aimed at promoting and enhancing standards of ethical conduct by public officers.</li> <li>Bribery is a criminal offence under state legislation (<a href="#">Section 266 of the Criminal Code Act 1924</a>).</li> </ul> Commitments made in STT's staff code of conduct meet this legislative requirement.
<b>1.7.3</b> The commitment is included in the public summary of the Management Plan.	C	During interviews with STT staff and review of the FMP, the auditors confirmed that Section 4.8.3 of the FMP contains a section on Values and Staff conduct, "employees are required at all times to act professionally, honestly, ethically and in accordance with the law; be fair in all decisions they make in relation to their involvement with Sustainable Timber Tasmania; and treat others with respect.
<b>1.7.4</b> No evidence is found of bribes offered by, or accepted by, The Organisation, or any other form of corruption.	C	The auditors found no evidence of any bribery having taken place, and from interview also confirm that the monthly compliance and financial audits provide surety for the board that bribes are not accepted by or offered by STT.
<b>1.7.5</b> Corrective measures are implemented if corruption does occur.	C	The auditors were informed that should misconduct be identified within STT then the company would follow the procedures outlined in the document: <i>Guide to managing misconduct in the Tasmanian public sector</i> .
<b>1.8 The Organisation shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria in the Management Unit, and to related FSC Policies and Standards. A statement of this</b>	C	



<b>commitment shall be contained in a publicly available document made freely available.</b>		
<b>1.8.1</b> The Organisation shall have a written statement, signed by someone with the authority to implement it, that includes a long-term commitment to forest management practices consistent with FSC Principles and Criteria and related Policies and Standards.	C	During the Evaluation audit the auditors reviewed the Sustainable Forest Management Policy, signed by the CEO February 2018 and approved by the STT Board of Directors and seen on page 13 of the Forest Management Plan which sets out the long-term commitment to forest management practices consistent with the requirements of FSC.
<b>1.8.2</b> The statement is publicly available at no cost.	C	As stated above the Forest Management Plan, revised April 2019 is a publicly available document from the company website <a href="http://www.sttas.com.au">www.sttas.com.au</a> .
ANNEX A: MINIMUM LIST OF APPLICABLE LAWS, REGULATIONS AND NATIONALLY-RATIFIED INTERNATIONAL TREATIES, CONVENTIONS AND AGREEMENTS	C	
<b>PRINCIPLE 2: WORKERS' RIGHTS AND EMPLOYMENT CONDITIONS</b> The Organisation shall maintain or enhance the social and economic wellbeing of workers.		
<b>2.1</b> The Organisation shall uphold the principles and rights at work as defined in the ILO Declaration on Fundamental Principles and Rights at Work (1998) based on the eight ILO Core Labour Conventions.	C	
<b>2.1.1</b> Employment practices and conditions for workers demonstrate conformity with or uphold the principles and rights of work addressed in the eight ILO Core Labour Conventions as defined in the ILO Declaration on Fundamental Principles and Rights at Work (1998).	C	<ol style="list-style-type: none"> <li>1. Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87) - See 2.1.2.</li> <li>2. Right to Organise and Collective Bargaining Convention, 1949 (No. 98) - See 2.1.2.</li> <li>3. Forced Labour Convention, 1930 (No. 29), The majority of STT staff have standard hours specified in the EA or have freely signed onto a contract. Interviews with both staff and contractors indicate forced labour is not occurring.</li> <li>4. Abolition of Forced Labour Convention, 1957 (No. 105) - As above.</li> <li>5. Minimum Age Convention, 1973 (No. 138) , Minimum worker age is specified under Australian Workplace law. There were no underage employees sighted during the audit, and interviews at sites visited by the auditors confirmed staff are of working age.</li> <li>6. Worst Forms of Child Labour Convention, 1999 (No. 182) - See above.</li> <li>7. Equal Remuneration Convention, 1951 (No. 100) - See 2.2.4</li> <li>8. Discrimination (Employment and Occupation) Convention - See 2.2</li> </ol>
<b>2.1.2</b> Workers can establish or join labour organisations of their own choosing subject only to the rules of the labour organisation concerned.	C	Australian worker rights to choose or establish a union are legislated under the Fair Work Act 2009. The FME's policy on this is set out in Section 43 of the Sustainable Timber Tasmania Enterprise Agreement 2018 (the EA). Contracts include clause requiring contractors to comply with all applicable law in Tasmania. Workers interviewed confirmed some staff are union members and indicated the FME is supportive of this. Contractors interviewed were on the whole not union members but understood they could seek representation.
<b>2.1.3</b> Agreements are implemented resulting from collective bargaining with formal and informal workers organisations.	C	The FME has established and implements an EA covering topics including salary, employment relationship, consultation, hours of work, leave, expenses. The current EA was finalised in 2018, and involved both union representatives and self-represented workers. The FME actively encourages workers to seek representation in its

		enterprise bargaining processes. The auditors sighted an email dated 31/8/17 to all STT staff titled Notice of Representation Rights and attachment, inviting each staff member to identify their representative to this process. Workers interviewed confirmed some staff are union members and some staff represent themselves in enterprise bargaining.
<b>2.2 The Organisation shall promote gender equality in employment practices, training opportunities, awarding of contracts, processes of engagement and management activities.</b>	<b>C</b>	
<b>2.2.1</b> Systems are in place that promote gender equality and prevent discrimination in employment practices, training opportunities, awarding of contracts, processes of engagement and management activities.	<b>C (OBS)</b>	The FME has a comprehensive system to promote gender equality and prevent discrimination. Relevant policies include the Diversity Policy V1.1, Dec 17, the Anti-Discrimination and Grievance Policy, V3.11 Nov 17, the Recruitment and Selection Policy, V4.1, Feb 18 and Section 18 of the EA. Employee expectations regarding discrimination are set out in the Code of Conduct V2.4, Nov 17 with discipline procedures set out in Section 20 of the EA. Interviews with both female and male staff interviewed indicated that the FME provides appropriate engagement processes, training opportunities and management to support gender equity. After this review it was determined the program would be strengthened with some addition to language in contracts. See <b>OBS 2019.2.</b>
<b>2.2.2</b> Job opportunities are open to both women and men under the same conditions, and women are encouraged to participate actively in all levels of employment.	<b>C</b>	The Diversity Policy includes an explicit commitment to promote diversity at all levels of the organization. The FME monitors gender demographics across all work groups. There is representation of women at Board and Senior Management Level (> 50%) and within the Corporate Services Division. Statistically, there are more men employed in the Forest Products and Land Management Divisions, but not out of alignment with industrial norms and higher education rates of women within forestry. The FME is proactively improving recruitment methods and training programs such as the Unconscious Bias training, which it has recently commenced roll out of all staff with responsibilities for recruitment and performance evaluation. The FME is now applying specific techniques to attract women applicants to roles traditionally held by men. For example, roles are advertised with the title of Project Manager with more generic selection criteria, and advertising methods used enable explicit communication of flexible work arrangements. Where an applicant's specific experience in a role is deficient, but all other selection criteria indicates they are the best candidate for a role, the FME may use a coaching and mentoring approach to enable to applicant to gain the experience they need. An example was provided of where this had been applied with an internal female applicant. Women staff members interviewed confirmed the organization supports women applicants into all role types.
<b>2.2.3</b> Work undertaken by men and women are equally included in training and WHS programs.	<b>C</b>	Training rights are set out in section 13 of the EA, and the approach is outlined in the Learning and Development Guidelines v1.4, Apr 19. Staff are expected to identify individual learning goals via the Performance Review and Development Plan process on an annual basis. This is implemented through a combination of on the job

		learning, mentoring and formal training. A summary of the formal training plan shows all staff regardless of their gender are listed as attending training relevant to their role.
<b>2.2.4</b> Women and men of the same qualifications, skill and experience are paid the same wage when they do the same work.	C	The pay rates of all staff except executive and senior management are prescribed under Appendix B of the EA. Pay rates are linked to bands which specify the features of the work and levels of expertise, judgement and accountability expected for that band. The chart of Pay Statistics - Current shows a high degree of equity between male and female salaries at each level.
<b>2.2.5</b> When returning from maternity or paternity leave, if returning in a period less than 6 weeks after child birth, consideration of special provisions shall be provided to workers on their request, and if necessary will be granted to ensure workplace health and safety is maintained.	C	The FME conforms to the requirements of the National Employment Standards, which requires that an employee may request changes to their working arrangements if they have responsibility for a child of school age or younger. There are current employees with workplace arrangements relevant to this scheme.
<b>2.2.6</b> Meetings, management committees and decision-making forums are organised to include relevant workers including women and men, and to facilitate the active participation of both.	C	The FME has four female board members and two female members on the General Management Team. Women are also represented on various workplace committees. The auditors sighted minutes showing both women and men attended decision making forums such as the Forest Management System Annual Management Review, 31 July 2018 and the Environment, Safety and Health Board Committee, 26 March 2019.
<b>2.2.7</b> Paternity leave is available and there is no penalty for taking it.	C	Section 32 of the EA specifies arrangements for paid parental leave, inclusive of primary and secondary carers. Interviews with workers indicate that male employees within the FME may take extended paternity leave and have experienced no penalty for taking it.
<b>2.2.8</b> Confidential and effective mechanisms exist for reporting and eliminating cases of sexual harassment and discrimination, workplace harassment or bullying.	C	Mechanisms for reporting and eliminating cases of sexual harassment and discrimination, workplace harassment or bullying are outlined in the Anti-Discrimination and Grievance Policy, V3.1, Nov 17 and Section 18 and Appendix A of the EA. These include reporting mechanisms via both contact officers and supervisors / managers, and the option to choose to have a grievance or complaint investigated externally at any time. Interview with the People and Culture Manager confirmed that these mechanisms are utilised, indicating they are trusted by staff (see 2.2.9).
<b>2.2.9</b> Complaints of sexual harassment and discrimination, workplace harassment or bullying are treated seriously and investigated promptly, confidentially and impartially.	C	The People and Culture Manager reported there have been two cases of sexual / workplace harassment reported over the past two years. These cases have been investigated and acted on using appropriate mechanisms. One case resulted in dismissal of a contractor. The other case involved outsourced mediation between the parties. During these periods the FME put in place mechanisms to prevent further harassment from occurring until the issues were resolved.
<b>2.3</b> The Organisation shall implement health and safety practices to protect workers from occupational safety and health hazards. These practices shall, proportionate to scale, intensity and risk of management activities, meet or exceed the recommendations of the ILO Code of Practice on Safety and Health in Forestry Work. (C4.2 P&C V4)	C	
<b>2.3.1</b> A Workplace Health and Safety (WHS) program is in place, that meets or exceeds the ILO Code of	C	The FMEs WHS program is certified to AS/NZS 4801:2001, Certificate Number OHS603481, expiring 30/6/2021. The Tasmanian Forest

<p>Practice on Safety and Health in Forestry Work, and which complies with relevant workplace health and safety legislation and regulations, facilitates improvement in WHS and adopts working conditions that do not endanger workers.</p>	<p>Safety Code 2007 is a mandatory code that applies to all forest operations in Tasmania. This code generally addresses the requirements of the ILO Code of Practice on Safety and Health in Forestry Work.</p> <p>The STT WHS system includes a Work Health and Safety Policy, Oct 17, and a series of procedures including risk assessment, training and induction, monitoring, emergency management, audit and incident management. The FME is currently overhauling its safety documentation into a single safety manual, which is due for release at the end of June 2019. This will apply to both staff and contractors.</p> <p>The WHS governance framework involves decision making at multiple levels including the board, senior management, work health and safety advisors and two regional safety committees. The board reviews safety as the first item on its agenda and has a dedicated environment, safety and health subcommittee.</p> <p>The FME subscribes to Safety Essentials, which it reviews fortnightly in order to identify changes in WHS legislation. The auditors were shown the example of STTs response to recent change to the National Heavy Vehicle Law. The FME has analysed the effect of changes on its operations and is developing a policy and procedure, and changes to transport agreements in response. Some changes to load restraint requirements were also identified by contractors during site visits.</p> <p>All new staff and contractors are inducted in the FMEs safety systems on commencement and signed off on the New Employee Safety Management System Induction. A new online contractor training induction is currently being developed. The FME provides a range of general and work specific health and safety training including Safety Circle (cultural training). The FME is currently rolling out Safety Circle and investigations training to all contractors.</p> <p>Registers, safe work method, safety data sheets and incidents are recorded in the Vault database. Staff and contractors are required to be certified as competent for high risk operational roles they undertake such as fire operations, harvesting operations and chemical handling.</p> <p>Contractors are required to have their own safety management systems which are reviewed at the commencement of new contract terms. The contractors prepare a Forest Operations Safety (FOS) plan for each site, induct all workers and apply appropriate work practices to address risks. FOS plans were sighted at a number of operations. A range of inspections are implemented throughout the year including monthly equipment audits by all staff (sighted several records in Vault), depot inspections (sighted Geeveston 26/3/19 and Strahan 11/4/19), three monthly contractor inspections (sighted completed iauditor report for CM001B, 22/5/19) and external contractor safety audits.</p> <p>Safety communication is conducted via all staff Toolbox meetings, safety alerts and training. Safety alerts were sighted in contractor paperwork at most sites visited during the audit.</p> <p>During interviews at operational harvesting sites, auditors found that several contractors were working more than 12 hour days. Whilst the FME considers work hours and labour costings during contract negotiations, and monitors self-reported contractor hours as part of</p>
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		its injury reporting statistics, it has no formal system in place for fatigue management for contractors.
<b>2.3.2</b> The program is developed and implemented in consultation and cooperation with workers and/or workers' representatives.	C	All staff are required to attend monthly toolbox meetings in their region where they are able to provide input into the WHS program. The FME has a North and a South Safety Committee comprising elected representatives from all work groups. They meet monthly to review the safety program and determine directions, considering input from the toolbox meetings. A monthly toolbox meeting was observed occurring in the head office during the audit and attendance sheets for the NW and Southern Region toolbox meetings on 15/4/19 and 17/4/19 respectively sighted. Staff can raise health and safety matters at any time via their manager or the Vault database.
<b>2.3.3</b> Workers have personal protective equipment appropriate to their assigned tasks and its use is enforced.	C	Appropriate job specific personal protective equipment (PPE) is listed in Tasmania's Forest Safety Code and listed in the STT PPE Guidelines version 1.1, undated. Section 37.4 of the EA specifies the FME must provide protective clothing to staff as required to carry out their duties. Employees are provided a full kit of PPE relevant to their duties at commencement and are required to assess the condition of the PPE on a monthly basis via a mandatory vehicle and equipment checklist in the "iAuditor" tool. Several recently completed forms were sighted in the iAuditor database. Equipment in unsuitable condition is replaced by the FME. Contractors are required to supply their own PPE, which is assessed by the FME during three monthly safety audits.
<b>2.3.4</b> Records are kept on compliance with the WHS program and on all incidents including near misses, medical treatments and lost time. Accident rates and lost time to accidents will also be kept.	C	The FME keeps records of internal audits for WHS on the iAuditor database. Independent safety audits and ISO accreditation reports are held in the STT directories. Incident and near miss records are held in Vault, a sample of which was reviewed during the audit. Summaries of incident and accident statistics are prepared for each monthly board and general management team meeting (sighted GMT WHS discussion paper dated 15/5/19).
<b>2.3.5</b> The trend and severity of incidents are generally decreasing over time.	NC	STT Lost Time Injury Frequency Rates and Medical Treatment Injury Rates are reported on a rolling 12-month cycle in the GMT WHS discussion paper. These show LTIFR is lower in 2019 than in 2018. LTIFR statistics from 1974 to 2017/18 show LTIs are at an all-time low for the organization. See <b>Minor 2019.3</b> for additional detail. See also indicator 2.3.1.
<b>2.3.6</b> The health and safety practices are reviewed and revised as required and after major workplace changes/alterations or incidents.	C	The Vault system includes a structured process of review for incidents. Incidents involving staff are investigated by the relevant manager and preventative actions identified. These are reported to the relevant Operations meeting, General Management Team and Board as part of the monthly WHS Reporting. The April 2019 GMT WHS Report includes an analysis of a tripping incident requiring medical treatment and a safety alert issued in response. Incidents involving harvesting contractors are required to be investigated by contractors immediately and the report presented to the General Manager – Forest Products and the relevant Production Manager for review and discussion. The FME currently has a policy to suspend operations until this investigation is complete. The objective of this process is to improve incident investigation capability in the contractor workforce, where most incidents are occurring.



		The Senior Safety Advisor also outlined a recently completed Safety Review project. This project reviewed safety incidents and causes to identify trends and potential solutions to a recent increase in contractor injuries at a strategic level. The review found there were a range of factors contributing to contractor incidents, which required a holistic approach to resolve. A work plan was developed to deliver actions, which include Safety Circle Training for contractors, investigations training, on-line safety inductions and the development of a one-stop-shop Safety Manual.
<b>2.4 The Organisation shall pay wages that meet or exceed minimum forest industry standards or other recognised forest industry wage agreements or living wages, where these are higher than the legal minimum wages. When none of these exist, the Organisation shall through engagement with workers develop mechanisms for determining living wages.</b>	C	
<b>2.4.1</b> Workers are engaged freely and duly compensated for the work they perform.	C	Prior to commencement with STT, a formal letter of offer is provided to the applicant, which provides a copy of the EA and the remuneration details. The Letter- Non-EA Contract offer and STT letter of offer – EA long term templates were sighted during the audit.
<b>2.4.2</b> Wages paid by the Organisation in all circumstances meet or exceed legal minimum wage rates, where such rates exist.	C	The FME conducted the BOOT Analysis of Silviculture Industry Award 2010 and the Sustainable Timber Tasmania Enterprise Agreement 2018 during the development of the EA. This shows wages paid by the FME are considerably higher than those specified in the award.
<b>2.4.3</b> When either minimum industry wage standards or other recognised industry wage agreements or awards or living wages exist that are higher than legal minimum wage rates, then wages paid meet or exceed at least one of those higher minimums.	C	See 2.4.2
<b>2.4.4</b> When no minimum wage levels exist, wages are established through culturally appropriate engagement with workers and/or formal or informal labour organisations.	NA	
<b>2.4.5</b> Records of pay rates across the Organisation and how these relate to established benchmarks (e.g. minimum wage) are maintained.	C	See 2.4.2
<b>2.4.6</b> Wages, salaries, superannuation and other entitlements and employment contracts are paid on time.	C	The EA specifies that wages, superannuation and other entitlements be paid to employees on a fortnightly basis. Staff interviews and recent bank statements confirmed payment occurs as per the EA. Contractors are paid on a monthly basis, as confirmed through interviews and bank statements.
<b>2.4.7</b> Workers (male and female) are paid directly and using mutually agreed methods.	C	New starters are provided a Direct Deposit Authority form on commencement which identifies their preferred bank details for fortnightly wages / salary. The Direct Deposit Authority form was reviewed during the audit.
<b>2.5 The Organisation shall demonstrate that workers have job-specific training and supervision to safely and effectively implement the Management Plan and all management activities. (C7.3 P&amp;C V4)</b>	C	



<p><b>2.5.1</b> Workers have adequate job specific training consistent with Annex B and supervision to safely and effectively undertake their roles and duties as part of the implementation of the management plan.</p>	C	<p>All workers employed within STT roles have Position Descriptions that describe essential and desirable qualifications or competence and levels of experience associated with their role. Recruitment processes assess applicants against the Position Description, and staff bring skills into the FME.</p> <p>On commencement, all employees undergo a systematic induction process that covers off on STTs policies and procedures including anti-discrimination, health and safety, and incident free driving training. The EA is also provided as part of employee start up, which covers relevant workplace and industrial relations legislation and matters relevant to rights at work.</p> <p>Additional job-training is provided for staff with specific accreditation requirements to maintain competency in these requirements. Training and refreshers are identified in the annual Performance Review Development Plan (PRDP) for each individual.</p> <p>Job specific types of training provided include:</p> <ul style="list-style-type: none"> <li>▪ Forest Practices Officer training for staff with legal responsibilities for planning and implementing Forest Practices Plans. This covers legal requirements, indigenous cultural site assessment and management, social, economic and environmental impact assessments and mitigation measures.</li> <li>▪ accredited ChemCert, fire, harvesting equipment and other plant, and fire warden training.</li> <li>▪ Access to Property rights database</li> <li>▪ Water sampling</li> <li>▪ First aid</li> <li>▪ Advanced driving</li> <li>▪ Risk assessment</li> </ul> <p>The FME also provides customised training packages for staff such as Unconscious Bias Training and Be the best you can be (culture) training.</p> <p>Staff interviewed about training confirmed the FME supports them to complete training as identified in the PRDP.</p> <p>Competency specifications for contractor employees are set out in services contracts, and require that all workers must have the necessary qualifications and accreditation to carry out the work under the contract or be involved in a training program and overseen by an accredited person. The Harvest and Haulage contract specifies all operators must have completed a basic Forest Practices operator training course, a basic safety awareness course and hold current and relevant Forest Works FOLS cards. Interviews with contractors at a variety of worksites confirmed that all were fully aware of their accreditation requirements and operating within these. STT also provide customised training for contractors from time to time.</p>
<p><b>2.5.2</b> Trainers possess suitable competence and qualifications to deliver training. Where applicable, training is provided by accredited providers to nationally accredited standards.</p>	C	<p>The FME and its contractors utilise the Forest Practices Authority and trainers recommended by Forest Works to provide accredited training and qualifications for forestry-based skills. The People and Culture team manage procurement of other training programs, and select trainers on the basis of competence and qualifications.</p>

2.5.3 Assessment of competence must be undertaken by an assessor with suitable competence and qualifications.	C	Several harvesting contractors interviewed explained how competency assessments for FOLs for specific operations would be undertaken for their trainees. The process in Tasmania is mandatory, and involves accredited assessors from Registered Training Organizations observing the competence of the trainee in their operations and marking a theory exam.
2.5.4 Up to date training, education and competency assessment records are kept and maintained for all workers.	C (Obs)	<p>The FME stores most employee training records in the Aurion database. A variety of training records were reviewed during the audit including:</p> <ul style="list-style-type: none"> <li>- 2019 Expiring Training</li> <li>- 2018/2019 PRDP Tracker</li> <li>- Forest Operator License (FOL)s / Aurion records for operational skills</li> <li>- Full training records for several staff members with different roles.</li> </ul> <p>Some records are also held by the Forest Practices Authority and in the Forest Works FOLs database. These were not easily accessed during the audit. The FME should have arrangements in place with the training providers – Forest Practices Authority and Forest Works to access training records for its workers. See <b>Observation 2019.4</b> for additional detail.</p>
<b>2.6 The Organisation through engagement with workers shall have mechanisms for resolving grievances and for providing fair compensation to workers for loss or damage to property, occupational diseases, or occupational injuries sustained while working for the Organisation.</b>	C	
2.6.1 A publicly available dispute resolution process is in place, developed in consultation and agreement with workers and their representatives.	C	Section 23 of the EA outlines problem solving / grievance procedures. This document was developed in consultation with workers and unions involved in the negotiation of the EA and is publicly available on the Fair Work Australia website. Additionally, the FME has a Workers Compensation & Injury Management Policy, last reviewed 30/6/16.
2.6.2 Workers' grievances are identified and responded to and are either resolved or are in the dispute resolution process.	C	See 2.2.9.
<p>2.6.3 Up to date records of workers' grievances related to workers' loss or damage of property, occupational diseases or occupational injuries are maintained including:</p> <ul style="list-style-type: none"> <li>a) Steps taken to resolve grievances;</li> <li>b) Outcomes of all dispute resolution processes including fair compensation;</li> <li>c) Unresolved grievances and the reasons why they were not resolved;</li> <li>d) Unresolvable disputes and the reasons why they are not resolvable.</li> </ul>	C	<p>The People and Culture Manager confirmed she holds confidential records on individual grievances on individual personnel files. Due to the sensitivity of this information, the auditors did not review these files.</p> <p>All injuries are recorded in the Vault non-conformance system. The Senior safety Adviser maintains confidential records of process of responding to these injuries, including resolution of any disputes. Recording injuries and subsequent claims is covered in the Workers compensation and Injury Management Procedures.</p>
2.6.4 Fair compensation is provided to workers for work-related loss or damage of property and occupational diseases or occupational injuries. See Annex B.	C	All workers compensation claims in Australia are covered under WorkSafe workers compensation processes. The FME's process is to issue injured workers with a Notice of Right to Make a Workers Compensation Claim form, as per the mandated process.

		Section 29.2 of the EA outlines Sick Leave arrangements, which apply a No Credit No Debit approach, meaning staff are covered for their full period of absence provided they can return to work.
Annex B: TRAINING REQUIREMENTS FOR WORKERS	C	See Annex B table at the end of this table.
<b>PRINCIPLE 3: INDIGENOUS PEOPLES' RIGHTS</b> <b>The Organisation shall identify and uphold Indigenous Peoples' legal and customary rights of ownership use and management of land territories and resources affected by management activities.</b>		
<b>3.1 The Organisation shall identify the Indigenous Peoples that exist within the Management Unit or those that are affected by management activities. The Organisation shall then, through engagement with these Indigenous Peoples, identify their rights of tenure, their rights of access to and use of forest resources and ecosystem services, their customary rights and legal rights and obligations, that apply within the Management Unit. The Organisation shall also identify areas where these rights are contested.</b>	C	
<b>3.1.1</b> Indigenous Peoples connected to the Management Unit, or that may be affected by management activities, are identified through a systematic process using Best Available Information. Verifiers: Documentation of organisations engaged, and databases accessed. Documentation of methods used for identification. Interviews with stakeholders.	C	<p>The audit team interviewed STT's Engagement &amp; Land Manager and regional staff reviewed STT's relevant databases (e.g. Consultation Manager). The audit team found that STT reviewed in March 2019 the Federal Government listing of Indigenous peoples (Aboriginal Peoples) under the ORIC website. This was to check the adequacy of listings already captured on Consultation Manager. Some gaps were identified and rectified.</p> <p>STT also engaged in April 2019 with Aboriginal Heritage Tasmania to review the listings captured on Consultation Manager.</p> <p>The audit team viewed the listing on Consultation Manager – 77 were listed in the 'Aboriginal Peoples' stakeholder group, comprising 12 'Aboriginal Community Organisations' and individuals within organisations.</p>
<b>3.1.2</b> Through culturally appropriate engagement with the Indigenous Peoples identified in 3.1.1, the following issues are documented and/or mapped: 1) Their legal rights of tenure; 2) Their cultural responsibilities to care for country, including use rights of the forest resources and ecosystem services that apply within the Management Unit; 3) The agreed and reasonable evidence supporting these rights, responsibilities and obligations; 4) Areas where rights and responsibilities are contested between Indigenous Peoples connected to the Management Unit, governments and/or others; 5) Summary of how the legal rights, cultural responsibilities and any contested rights, are acknowledged by The Organisation; and 6) The aspirations and goals of Indigenous Peoples related to their identified legal rights and cultural responsibilities.	C	<p>The <i>Native Title Act 1993</i> (Cwlth) provides a mechanism by which native title rights can be negotiated and recognised under Australian law; however, there are presently no native title right holders on PTPZ land or any other land in Tasmania.</p> <p>Nevertheless, STT recognises the Tasmanian Aboriginal people as traditional owners of the land, and the significance of cultural heritage for maintaining continuous links with the land.</p> <p>STT provides for Indigenous People's use rights through the sighted policies: Aboriginal Access to Traditional Materials Policy 2014 and Aboriginal Heritage Policy 2018. These policies are under a periodic five-year review by STT, and are currently before the Aboriginal Heritage Council that was established under the <i>Aboriginal Heritage Act 1975</i> (Tas). STT plans to reach out to the Tasmanian Aboriginal Centre and other organisations that had input to the initial policies.</p> <p>STT is not aware of any contested rights and responsibilities between Indigenous Peoples connected to the FMU, governments and/or others.</p> <p>STT acknowledges the legal rights and cultural responsibilities through its policies and the FM plan (s 4.6.2.7).</p>

<b>3.2 The Organisation shall recognise and uphold the legal and customary rights of Indigenous Peoples to maintain control over management activities within or related to the Management Unit to the extent necessary to protect their rights, resources and lands and territories. Delegation by Indigenous Peoples of control over management activities to third parties requires Free, Prior and Informed Consent.</b>	C	
<b>3.2.1</b> Through culturally appropriate engagement, Indigenous Peoples connected to the Management Unit are informed when, where and how they can comment on and request modifications to management activities to the extent necessary to protect their rights, cultural responsibilities, resources, lands and territories.	C	<p>Since there are no native title rights there is no direct formal connection by Indigenous Peoples to the FMU. However, STT's sighted documents Communication and Stakeholder Engagement Policy 2017 and Stakeholder Engagement Operational Approach 2018 provide policies and procedures for informing Indigenous Peoples about management activities on the FMU. The audit team sighted in STT's database Consultation Manager examples of Indigenous Peoples being engaged in relation to management activities on the FMU. The Communication and Stakeholder Engagement Policy invites input from stakeholders to STT regarding management activities on the FMU at any stage and time.</p> <p>All STT staff that manage cultural heritage have cultural awareness training conducted by the Forest Practices Authority (FPA). This includes field staff involved in the preparation and implementation of Forest Practices Plans (FPPs).</p> <p>STT includes aboriginal stakeholders in their routine notifications programs for burning, chemical use and the three-year wood supply plan. Email is the main method of notifications of management activities. On some specific issues STT will contact key aboriginal stakeholders via phone to invite discussion on matters. There are records of this occurring in 2015, and records of attempted phone contact in 2017 with no response.</p> <p>The FPA's view is that it is impossible to identify who the relevant stakeholders are. It consulted with the Aboriginal Heritage Council to gain endorsement for the Guidelines for Aboriginal Cultural Heritage 2017, and considers the Aboriginal Heritage Tasmania unit of DPIPW is the best point of contact for consultation.</p>
<b>3.2.2</b> The legal rights and cultural responsibilities identified under 3.1.2 (sub-points 1&2) of Indigenous Peoples connected to the Management Unit are not violated by The Organisation.	C	<p>STT is not aware of any legal rights or cultural responsibilities of Indigenous Peoples that have been identified in connection with the FMU.</p> <p>The audit team was satisfied that STT has mechanisms in place to deal with any issues that might arise. Key policies are the sighted Complaints Policy 2019 and Complaint Resolution Procedure 2019. The audit team confirmed that these documents were publicly available on STT's website.</p>
<b>3.2.3</b> Where evidence exists that legal rights and cultural responsibilities of Indigenous Peoples connected to the Management Unit related to management activities have been violated, the situation is corrected, and if necessary, through culturally appropriate engagement and/or through the dispute resolution process as required in Criteria 1.6 or 4.6.	C	<p>Refer to 3.2.2.</p>

<b>3.2.4</b> Free, Prior and Informed Consent is granted by Indigenous Peoples connected to the Management Unit prior to management activities that affect their rights through a process that includes: 1) Ensuring Indigenous Peoples know their rights and obligations regarding the resource; 2) Informing the Indigenous Peoples of the value, in economic, social and environmental terms, of the resource over which they are considering delegation of control; 3) Informing the Indigenous Peoples of their right to withhold or modify consent to the proposed management activities to the extent necessary to protect their rights, resources, lands and territories; and 4) Informing the Indigenous Peoples of the current and future planned forest management activities.	C	Refer to 3.2.2.
<b>3.3</b> In the event of delegation of control over management activities, a binding agreement between The Organisation and the Indigenous Peoples shall be concluded through Free, Prior and Informed Consent. The agreement shall define its duration, provisions for renegotiation, renewal, termination, economic conditions and other terms and conditions. The agreement shall make provision for monitoring by Indigenous Peoples of The Organisation's compliance with its terms and conditions.	C	
<b>3.3.1</b> Where control over management activities has been granted through Free Prior and Informed Consent based on culturally appropriate engagement, the legally binding agreement contains the duration, provisions for renegotiation, renewal, termination, economic conditions and other terms and conditions.	C	STT advised that no control over management activities has been applied for nor granted. The audit team did not discover any examples.
<b>3.3.2</b> Records of legally binding agreements are maintained.	C	Not applicable - refer 3.3.1.
<b>3.3.3</b> The legally binding agreement contains the provision of opportunities for monitoring by Indigenous Peoples connected to the Management Unit of The Organisation's compliance with its terms and conditions.	C	Not applicable - refer 3.3.1.
<b>3.4</b> The Organisation shall recognise and uphold the rights, customs and culture of Indigenous Peoples as defined in the United Nations Declaration on the Rights of Indigenous Peoples (2007) and ILO Convention 169 (1989).	C	
<b>3.4.1</b> The Organisation demonstrates a commitment to upholding the rights, customs and culture of Indigenous Peoples as defined in UNDRIP and ILO Convention 169 through:	C	The audit team found no evidence that STT had not complied with national and state laws outlined in 3.2, 4.1, 4.2 and 4.3 of Annex A. The audit team viewed STT's summary of relevant State and Federal legislation. At a State level the legislative requirements were covered



1) Compliance with national and state laws outlined in 3.2, 4.1, 4.2 and 4.3 of Annex A; and 2) An anti-discrimination policy or commitment.		through the Forest Practices System in relation to cultural heritage matters. At a Federal level the legislation related to native title, none of which exist in Tasmania. The audit team sighted STT's Anti-discrimination and Grievance Policy 2017.
<b>3.4.2</b> Where evidence that rights, customs and culture of Indigenous Peoples, as defined in UNDRIP and ILO Convention 169 in 3.4.1, have been violated by The Organisation, the situation is documented including steps to restore these rights, customs and culture of Indigenous Peoples, to the satisfaction of the rights holders.	C	STT advised that it is not aware that it has violated any rights, customs and culture of Indigenous Peoples, as defined in UNDRIP and ILO Convention 169 in 3.4.1. The audit team found no such evidence.
<b>3.5 The Organisation, through engagement with Indigenous Peoples, shall identify sites which are of special cultural, ecological, economic, religious or spiritual significance and for which these Indigenous Peoples hold legal or customary rights. These sites shall be recognised by The Organisation and their management, and/or protection shall be agreed through engagement with these Indigenous Peoples.</b>	C	
<b>3.5.1</b> Cultural landscapes and sites of special cultural, ecological, economic, religious or spiritual significance for which Indigenous Peoples hold legal rights and/or cultural responsibility are identified through culturally appropriate Engagement and Best Available Information. Verifiers: Documentation of sites and cultural landscapes, including maps (as appropriate) identified through available heritage registers or databases or from Indigenous Peoples identified by 3.1.	C	There is one registered Aboriginal Cultural landscape in Tasmania identified as HCV 6.2 in the HCV plan – Western Tasmania Aboriginal Cultural Landscape. This is not on PTPZ land. STT identifies aboriginal cultural sites using the Conserve Aboriginal Database and via Aboriginal Heritage Register searches requested through Aboriginal Heritage Tasmania. This is Best Available Information in Tasmania. Sites of Aboriginal cultural heritage are located across Tasmania, including PTPZ land. Sites can include stone artefacts, quarries, caves and rock shelters, stone arrangements. New sites are continually being recorded. The existence and locations of many of these sites needs to remain confidential, and as such no specific detail on the locations of these sites is provided in the HCV plan. Forest Practices Officers have been trained in the identification of Aboriginal heritage sites. FPA procedures for Managing Aboriginal Cultural Heritage have been developed in a consultative process involving Aboriginal Heritage Tasmania and a Forestry Working Group of which STT was a member. FPOs conduct desktop analyses to identify the likelihood of cultural heritage being present including liaison with Aboriginal Heritage Tasmania (AHT). Field inspections are conducted on the recommendation of AHT after review of their (AHT) internal database. STT's Harvesting Monitoring and Roding Monitoring forms have requirements to check for cultural heritage in disturbed soil. The audit team viewed the Harvesting Monitoring Form (Monthly) for coupe CM001B, 9/5/19. S 7.3b of the form had the question: "In areas where significant amounts of mineral soil have been exposed (e.g. landings) has an inspection for unusual rock flakes or other possible signs of Aboriginal Heritage been undertaken?"



<p><b>3.5.2</b> Measures to protect such cultural landscapes and cultural sites are agreed through culturally appropriate engagement with Indigenous Peoples connected to the Management Unit. Measures are documented, implemented, and monitored. When Indigenous Peoples determine that physical identification of sites in documentation or on maps would threaten the value or protection of the sites, then other means will be used.</p>	C	<p>Whilst there are no Indigenous Peoples connected to the FMU, procedures to protect cultural sites are embedded in the Forest Practices Authority planning system. These procedures were developed in a consultative process involving Aboriginal Heritage Tasmania and a Forestry Working Group of which STT was a member. Any sites identified will be logged in the conserve database in the GIS. FPOs use the Guidelines for Aboriginal Cultural Heritage to determine appropriate management prescriptions. The FPA consulted with the Aboriginal Heritage Council (comprising representatives of all Tasmanian Aboriginal groups) to gain endorsement for the Guidelines for Aboriginal Cultural Heritage 2017. STT does not generally seek agreement on individual site-specific protection measures with the Aboriginal community, but relies on the FPA guidelines that contain pre-approved protection measures for specific value types. The site-specific procedures are documented in the special values assessment and incorporated into FPPs..</p>
<p><b>3.5.3</b> Wherever cultural landscapes or cultural sites of special cultural, ecological, economic, religious or spiritual significance are newly observed or discovered, management activities cease without delay in the vicinity until protective measures have been agreed to with the Indigenous Peoples connected to the Management Unit, and/or as directed by state and national laws.</p>	C	<p>Prescriptions for cease without delay of management activities wherever a cultural site is newly observed or discovered are provided in FPPs.</p> <p>The audit team viewed these provisions in Section D Conservation of Natural and Cultural values of the FPP for coupe BB026G, created on 7/7/2015.</p>
<p><b>3.6</b> The Organisation shall uphold the right of Indigenous Peoples to protect and utilise their traditional knowledge and shall compensate local communities for the utilisation of such knowledge and their intellectual property. A binding agreement as per Criterion 3.3 shall be concluded between The Organisation and the Indigenous Peoples for such utilisation through Free, Prior and Informed Consent before utilisation takes place, and shall be consistent with the protection of intellectual property rights.</p>	C	
<p><b>3.6.1</b> Traditional knowledge and intellectual property are protected and are only used when the acknowledged owners of that traditional knowledge and intellectual property have provided their Free, Prior and Informed Consent formalised through a legally binding agreement.</p>	C	<p>STT advised that it is not aware of the use of any traditional knowledge and intellectual property in any component of its management system.</p>
<p><b>3.6.2</b> Indigenous Peoples are compensated according to the legally binding agreement reached through Free, Prior and Informed Consent for the use of traditional knowledge and intellectual property.</p> <p>Verifiers: Documentation of Free, Prior and Informed Consent where traditional knowledge has been used. Documentation of any compensation payments for the use of traditional knowledge.</p>	C	<p>Refer 3.6.1.</p>
<p><b>PRINCIPLE 4: COMMUNITY RELATIONS</b></p> <p><b>The Organisation shall contribute to maintaining or enhancing the social and economic wellbeing of local communities.</b></p>		

<b>4.1 The Organisation shall identify the local communities that exist within the Management Unit and those that are affected by management activities. The Organisation shall then, through engagement with these local communities, identify their rights of tenure, their rights of access to and use of forest resources and ecosystem services, their customary rights and legal rights and obligations, that apply within the Management Unit.</b>	C	
<b>4.1.1</b> Local communities that exist in the Management Unit and those that may be affected by management activities are identified through a systematic process using Best Available Information.	C	<p>The audit team interviewed STT's Engagement &amp; Land Manager and regional staff and viewed STT's list of stakeholders in its Consultation Manager database. This was initially developed through a stakeholder identification exercise in 2014, and has been continually updated through self-nomination and identification by staff. The list currently has 4779 records and continues to grow – in March 2018 there were 4400 records.</p> <p>The approach to identifying local communities that exist in the FMU and those that may be affected by management activities is described in STT's Stakeholder Engagement Operational Approach 2018.</p> <p>In addition, STT identifies affected stakeholders in proximity to forest operations via LIST (Land Information System of Tasmania). LIST is part of the State Government GIS that records the ownership details of individual land titles.</p>
<b>4.1.2</b> Through a reasonable level of culturally appropriate engagement with the local communities identified in 4.1.1, the following are identified, documented and/or mapped within the Management Unit, or outside the Management Unit when identified by local communities as being potentially impacted by The Organisation's management activities within the Management Unit: <ol style="list-style-type: none"> <li>1) Their legal rights of access to the forest, and use rights of the forest resources and ecosystem services;</li> <li>2) Their demonstrated long and established use or association;</li> <li>3) Their legal rights and obligations that apply within the Management Unit;</li> <li>4) The evidence supporting these rights, associations and obligations;</li> <li>5) Areas where these rights, associations and obligations are contested between The Organisation, local communities, governments and/or others; and</li> <li>6) Summary of how the legal, and contested rights, association and uses are acknowledged by The Organisation.</li> </ol>	C	<p>The <i>Forest Management Act 2013</i> (Tas), s 13, provides the legal right of the public to access PTPZ land and use the forest resources but not in a commercially exploitative sense and not in a manner incompatible with the management of PTPZ land under the Act. The Act also establishes STT as the management entity of PTPZ land. These legal rights are summarised in the FM plan (s 4.6).</p> <p>The PTPZ land provides a broad range of opportunities for recreation in a variety of settings. Activities include, but are not limited to, bushwalking, forest drives, four-wheel driving, mountain and trail bike riding, horse riding, boating, canoeing, fishing and hunting.</p> <p>STT has a range of agreements for the provision of access: Forestry Rights, which vest management in another entity; leases and licences; forest activity permits (e.g. recreational events, research activities), and permits to collect firewood.</p> <p>STT advised that it is not aware of any contested rights, associations and obligations on PTPZ land. The audit team did not discover any.</p>
<b>4.2 The Organisation shall recognise and uphold the legal and customary rights of local communities to maintain control over management activities</b>	C	

<b>within or related to the Management Unit to the extent necessary to protect their rights, resources, lands and territories. Delegation by local communities of control over management activities to third parties requires Free, Prior and Informed Consent.</b>		
<b>4.2.1</b> Through culturally appropriate engagement local communities are informed of when, where and how they can comment on and request modification to management activities to the extent necessary to protect their rights.	C	STT describes its commitment to culturally appropriate engagement with local communities who may be impacted by management activities, and procedures to provide comment on and request modification to management activities to obviate any potential impacts, through the sighted Communication and Stakeholder Engagement Policy 2017, and the implementation of this policy through the sighted Stakeholder Engagement Operational Approach 2018. Both of these are public documents. The FM plan provides a public summary of STT's approach. The audit team viewed during field visits documented modification of management activities following consultation with affected stakeholders and requests by stakeholders – e.g. coupe CC104B.
<b>4.2.2</b> The legal rights and agreed rights, demonstrated through long and established use or association, of local communities are not infringed by The Organisation.	C	STT advised it is not aware of any instances where any legal and agreed rights have been infringed. The audit team did not discover any nor were any identified through stakeholder submissions. By way of example of long-established use, the Warra ecological research site is partly on PTPZ land and has been a collaborative research project including STT for 25 years.
<b>4.2.3</b> Where evidence exists that legal rights and agreed rights, demonstrated through long and established use or association, of local communities related to management activities have been infringed the situation is corrected, if necessary, through engagement and/or through the dispute resolution process in Criteria 1.6 or 4.6.	C	Refer to 4.2.2. STT has a sighted Complaints Policy 2019 and Complaint Resolution Procedure 2019.
<b>4.2.4</b> Free, Prior and Informed Consent is granted by local communities prior to management activities that affect their legal and agreed rights through long use of association through a process that includes: 1) Ensuring local communities know their rights and obligations regarding the resource; 2) Informing the local communities of the value of the resource, in economic, social and environmental terms; 3) Informing the local communities of their right to withhold or modify consent to the proposed management activities to the extent necessary to protect their rights and resources; and 4) Informing the local communities of the current and future planned forest management activities.	C	Refer to 4.2.2. STT advised it is not aware of any issues related to long use of association on PTPZ land by local communities. The audit team did not discover any.
<b>4.3</b> The Organisation shall provide reasonable opportunities for employment, training and other services to local communities, contractors and suppliers proportionate to scale and intensity of its management activities.	C	

<p><b>4.3.1</b> Reasonable opportunities are communicated and provided to local communities, local contractors and local suppliers for: 1) Employment; 2) Training; and 3) Other services. Verifiers: Documentation of opportunities provided to workers and/or contractors from local communities (newspaper ads, use of local employment services etc.).</p>	C	<p>The audit team interviewed STT's Engagement &amp; Land Manager, STT's General Manager Forest Products and regional staff. STT advised that all employment vacancies are advertised in Tasmania and on the STT website.</p> <p>The audit team reviewed the Tasmania Government's document Buy Local Policy: A Guide for Government Agencies – Version 4, 2019. STT adheres to this policy, as enunciated in its Procurement Framework 2012 that also includes such principles as 'enhancing opportunities for local business'.</p> <p>STT's Annual Report for the 2018 FY (Table 22, p. 80) showed that its performance against the indicator 'Buy local' was:</p> <ul style="list-style-type: none"> <li>• Proportion of total purchases from Tasmanian businesses – 75%.</li> <li>• Value of purchases from Tasmanian businesses – \$110.06 million.</li> <li>• Number of Tasmanian businesses paid – 700.</li> </ul>
<p><b>4.4 The Organisation shall implement additional activities, through engagement with local communities, that contribute to their social and economic development, proportionate to the scale, intensity and socio-economic impact of its management activities.</b></p>	C	
<p><b>4.4.1</b> Opportunities for local social and economic development are identified through engagement with local communities and other relevant organisations proportionate to the scale, intensity and socio-economic impact of its management activities.</p>	C	<p>The audit team interviewed STT's Engagement &amp; Land Manager and regional staff with specific responsibilities related to engagement with local communities and other relevant organisations regarding identification of opportunities for local social and economic development. The interviewees identified a wide range of local communities and other relevant organisations they had engaged with for this purpose. The audit team confirmed this engagement by reviewing records in STT's Consultation Manager database.</p> <p>STT advised that it is formally represented on 51 external groups. The audit team reviewed the details of this representation in STT's report Social Impact Evaluation of Sustainable Timber Tasmania's Forest Management Activities 2019 (Table 28) that lists the stakeholder committees, working groups or forums on which STT was formally represented and had been actively engaged during 2017-2018. Interviews with STT staff confirmed that they have taken leadership roles in some of these groups and that many of the groups provide for identification of local social and economic development (e.g. North Apiary Management Committee, Rural Land Management Group, TasGRN Business Process Owners Group, Tasmanian Forest &amp; Forest Products Network, Training and Skills Development Services Program Steering Committee, ARBRE Forest Industries Training &amp; Careers Hub).</p>
<p><b>4.4.2</b> Projects and additional activities are implemented and/or supported that contribute to local social and economic benefit and are proportionate to the socio-economic impact of management activities.</p>	C	<p>The audit team reviewed STT's register of long-term access arrangements on PTPZ land. The access arrangements that contribute to local social and economic benefit include:</p> <ul style="list-style-type: none"> <li>• Access Licence or Easement</li> <li>• Agistment Lease or Licence</li> <li>• Agricultural Lease or Licence</li> <li>• Apiary Licence</li> <li>• Buildings Lease</li> <li>• Community Lease or Licence</li> <li>• Dam Lease</li> </ul>



		<ul style="list-style-type: none"> <li>• Drain Line Licence</li> <li>• Education/Recreation Lease or Licence</li> <li>• Farming Lease or Licence</li> <li>• Forest Produce Stockpiling Licence</li> <li>• Game Lease or Licence</li> <li>• Grazing Lease or Licence</li> <li>• Helicopter Tours Licence</li> <li>• Historic Hut Maintenance Lease or Licence</li> <li>• Irrigation Lease or Licence</li> <li>• Motor Sports Lease</li> <li>• Pipeline/ Mini Hydro Lease or Easement</li> <li>• Power/Telecom line/ Transmission Lease, Licence or Easement</li> <li>• Property Management Lease</li> <li>• Radio Sites Lease</li> <li>• Reserve Management – Council Lease or Licence</li> <li>• Residence Lease or Licence</li> <li>• Rifle Range Lease</li> <li>• Road Licence or Easement</li> <li>• Shack Lease or Licence</li> <li>• Shed Lease</li> <li>• Stock Licence</li> <li>• Tip Lease</li> <li>• Tourism Licence</li> <li>• Track (Bike / walking) Lease or Licence</li> <li>• Waste Lease</li> <li>• Water Lease</li> <li>• Water Pipeline/Water Race Lease, Licence or Easement</li> <li>• Wind Farms Lease, Licence or Easement</li> </ul> <p>STT's Annual Report 2017-18 (p. 78) reported that there were 571 leases, licences and easements on PTPZ land.</p> <p>The audit team confirmed that STT's website has a quick-link 'Using Our Forests', which takes the viewer to a page providing further information regarding access to the forest and information regarding forest activity permits and leases and licences.</p> <p>The FM plan describes the process for seeking approvals to conduct activities for which permits and licences are required.</p> <p>STT described its collaborative project with local government and Tasmania Parks and Wildlife Service to provide access to PTPZ land to provide part of the network for mountain bike trails (approximately 30 km in 100 km of trails) in the locality of Derby in northeast Tasmania. During field visits the audit team interviewed four stakeholders from Derby who confirmed STT's view that the development of the mountain bike facilities had revitalised the economy of the town with substantial positive 'spill over' socio-economic benefits to nearby communities.</p> <p>Table 29 of STT's report Social Impact Evaluation of Sustainable Timber Tasmania's Forest Management Activities 2019 outlines the corporate sponsorship made by STT during 2017–2018 to education, research and community groups, amounting to \$454,000.</p>
4.5 The Organisation, through engagement with local communities, shall act to identify, avoid and	C	

mitigate significant negative social, environmental and economic impacts of its management activities on affected communities. The action taken shall be proportionate to the scale, intensity and risk of those activities and negative impacts. FSC Australia has also developed guidance regarding social impact evaluations. It is not normative; The Organisation may use other methods to meet the requirements under 4.5. The guidance follows Annexes.		
Low SIR: Only L4.5.1 applies.	C	
<b>4.5.1</b> The Organisation shall conduct a social impact evaluation related to forest management activities, appropriate to the scale and intensity of operations.	C	STT conducted a social impact evaluation in 2014. This study was updated in 2018 at a whole-of organisation, state-wide level and reported in the sighted document Social Impact Evaluation of Sustainable Timber Tasmania's Forest Management Activities 2019. The audit team interviewed the author of the document and STT's Engagement & Land Manager who has carriage of social impact evaluation related to forest management activities. The audit team was satisfied that STT had conducted a social impact evaluation related to forest management activities, appropriate to the scale and intensity of operations.
<b>L4.5.1</b> Actions are implemented to identify, avoid and mitigate significant negative social impacts of management activities.	N/A	FME is not a Low SIR applicant so this alternative indicator does not apply.
<b>4.5.2</b> The Organisation shall document the processes that it will use to engage with stakeholders, including local communities and neighbours, that could be affected during the planning and implementation of forest management activities.	C	STT's sighted documents Communication and Stakeholder Engagement Policy 2017 and Stakeholder Engagement Operational Approach 2018 provide policies and processes that STT will use to engage with stakeholders, including local communities and neighbours, that could be affected during the planning and implementation of forest management activities.
<b>4.5.3</b> The Organisation provides regular opportunities for engagement with all stakeholders and local communities affected by its operations to identify social impacts and the potential to avoid or reduce such impacts on an ongoing basis.	C	The documented processes described in 4.5.2 provide the opportunities for regular engagement with stakeholders affected by STT's operations. The STT website provides further opportunities by way of its contact information for STT offices, an interactive map viewer showing locations of proposed operations, and a <i>Three-year Wood Production Plan</i> provides specific coupes planned for harvesting. STT has six regional offices for stakeholders to visit and engage with staff.
<b>4.5.4</b> The Organisation shall demonstrate that the information derived from social impact evaluations and/or consultation processes with stakeholders has been considered and, where appropriate, addressed in the planning and implementation of forest management activities.	C	At a state-wide level, the sighted document Social Impact Evaluation of Sustainable Timber Tasmania's Forest Management Activities 2019 provides evidence that STT has demonstrated that the information derived from social impact evaluations and/or consultation processes with stakeholders has been considered and, where appropriate, addressed in the planning and implementation of forest management activities. Specific examples are provided in relation to prescribed burning practices, silvicultural practices and use of chemicals in response to social impact evaluations, community consultation and research. At an operational level, the sighted Stakeholder Engagement Operational Approach 2018 sets out procedures for STT to



		<p>incorporate stakeholder input into implementation of forest management activities.</p> <p>The audit team reviewed the Forest Practices Plan Preparation Procedure 2018. Step 3 requires stakeholders to be notified; step 9 requires the FPP to be communicated to stakeholders. Stakeholders potentially affected and specifically referenced include lease, permit and licence holders, apiarists, research organisations.</p> <p>Part of the planning is completing a Coupe Planning Summary checklist. The audit team viewed the document. It contains a series of checks related to potential impacts on stakeholders.</p> <p>The audit team viewed examples during the field visits (e.g. CC 104B; LW006B where STT adjusted the harvesting boundary to leave a forested buffer with private property, following engagement with a neighbour).</p>
<b>4.6 The Organisation, through engagement with local communities, shall have mechanisms for resolving grievances and providing fair compensation to local communities and individuals about the impacts of management activities of The Organisation.</b>	C	
<b>4.6.1</b> A publicly available dispute resolution mechanism is in place, with opportunity for modification through consultation with affected local communities.	C	<p>STT has a sighted Complaints Policy 2019 and Complaint Resolution Procedure 2019. The audit team confirmed that the Complaints Policy 2019 is publicly available on STT's website at <a href="https://www.sttas.com.au/about-us/our-plans-policies">https://www.sttas.com.au/about-us/our-plans-policies</a>.</p> <p>The Complaint Resolution Procedure 2019 provides that "STT will immediately redress any identified areas of deficiency in the Complaints Policy and Dispute Resolution Procedure and will review its efficiency and effectiveness every three years to identify and implement improvements."</p>
<b>4.6.2</b> Grievances related to the impacts of management activities are responded to promptly, and all reasonable steps are undertaken to resolve them.	C	<p>The audit team interviewed STT's Engagement &amp; Land Management Manager and regional staff with specific responsibilities for responding to grievances related to the impacts of management activities.</p> <p>The audit team reviewed STT's database in Consultation Manager. A search was conducted for a management activity site nominated by the audit team in response to concerns raised by a stakeholder – forest coupe CC104B. This generated a list of 33 events recorded including emails, meetings and phone calls, from 1/10/2012 until 30/5/2016. The list provided evidence of consultation over an extended period with an affected stakeholder to resolve grievances.</p> <p>The stakeholder also raised similar concerns independently with FPA who independently investigated – FPA issued a s 41 notice under the <i>Forest Practices Act 1985</i> (Tas) regarding required road works that were subsequently done by STT. The audit team inspected the coupe during the field visits and interviewed regional staff that had first-hand communications with the stakeholder. The regional staff supplied an operational file that documented extensive communications with the stakeholder. The audit team was of the opinion that all reasonable steps had been taken to resolve the stakeholder's grievances.</p>

<p><b>4.6.3</b> An up to date record of grievances related to the impacts of management activities is held, including:</p> <ol style="list-style-type: none"> <li>1) Steps taken to resolve grievances;</li> <li>2) Outcomes of all grievance resolution processes including fair compensation; and</li> <li>3) Unresolved disputes and the reasons why they are not resolved, how they will be resolved, or why they are not resolvable.</li> </ol>	C	<p>The audit team viewed the list of 'Formal Complaints' in STT's Consultation Manager database. Formal Complaints are those complaints received in writing, that is, an escalation of an issue raised by telephone, email or in person.</p> <p>There were two unresolved complaints.</p> <p>One related to a long-standing unresolved dispute concerned with truck movements past the stakeholder's property on a road not controlled by STT but emanating from a private operation on private land with an access easement on PTPZ land. At the Auditor's request STT generated from Consultation Manager a consolidated report showing all consultation events related to this stakeholder issue. Thirty-nine communications between the stakeholder and STT were recorded from 13/10/2013 until 3/4/2019. A phone call was recorded on 18/4/2018. In this discussion, STT informed the stakeholder that, as had been done many times before, there was nothing else that STT believed it could do in relation to the issue and that a possible course of action for the stakeholder would be appeal to the Tasmanian Ombudsman. The audit team was satisfied with the reasons provided by STT as to why the complaint was not resolvable.</p> <p>The other unresolved complaint related to a recent (2019) issue for which STT advised that steps were being taken to resolve the issue. At a corporate level, action to resolve complaints is monitored through the Monthly Consultation Manager report issued to the Field Operations Group, plus a quarterly report to the General Management Team headed by the CEO and the Environment Safety and Health Committee of the STT Board. In Consultation Manager an action plan for resolution of a grievance can be set.</p> <p>The 'Yellow Book' is a listing of a range of KPIs across all aspects of the business, reported against quarterly to the Senior Management Team. There are 147 KPIs, including KPIs related to resolving grievances from stakeholders. For example, KPI #120: 'Less than or equal to one field operation delayed as a results of stakeholder concerns that has not been addressed during planning processes. Zero cases, Yellow Book report May 2019.</p>
<p><b>4.6.4</b> Fair compensation is provided to local communities and individuals for damage proven to be caused by negative impacts of management activities.</p>	C (Obs)	<p>Interviews with executive staff of STT revealed that STT attempts to deal with negative impacts of management activities in a fair and equitable manner.</p> <p>The audit team viewed in Consultation Manager the action taken in August 2018 related to remediation works done by STT at its cost on private property impacted by management activities, near Tunbridge in the North East region, coupe TU487T.</p> <p>The audit team also sighted two letters to stakeholders confirming the payment of compensation for negative impacts of STT's management activities (fire impacts).</p> <p>STT does not have documented policies or procedures for providing fair compensation to local communities and individuals for damage proven to be caused by negative impacts of management activities. See <b>OBS 2019.5</b></p>
<p><b>4.6.5</b> Operations cease in applicable areas while there exist disputes of substantial magnitude.</p>	C	<p>This provision is part of procedures in the Protestor Management Kit.</p>

		<p>The Complaints Resolution Procedure contains a provision to consider the cessation of operations if a dispute of substantial magnitude occurs.</p> <p>STT is not aware of any such disputes at this time.</p> <p>STT has chosen to take a precautionary approach to management of Swift Parrot habitat on Bruny Island by choosing not to conduct harvesting operations there.</p>
<b>4.7 The Organisation, through engagement with local communities, shall identify sites which are of special cultural, ecological, economic, religious or spiritual significance, and for which these local communities hold legal or customary rights. These sites shall be recognised by The Organisation, and their management and/or protection shall be agreed through engagement with these local communities.</b>	C	
<b>4.7.1</b> Sites of special cultural, ecological, economic, religious or spiritual significance for which local communities hold legal rights or agreed rights demonstrated through long and established use or association, are identified through culturally appropriate engagement and are recognised by The Organisation.	C	<p>Such sites are recognised as HCV 6 in STT's sighted HCV Management Plan 2019. The sites are:</p> <ul style="list-style-type: none"> <li>• 942 ha of PTPZ land within the Tasmanian Wilderness World Heritage Area.</li> <li>• Four Tasmanian Heritage Register sites.</li> <li>• 1,100 recorded historic cultural heritage sites.</li> <li>• Aboriginal cultural sites (location confidential).</li> </ul> <p>These sites are recorded on GIS layers used by FPOs and accessed through STT's Conserve database.</p> <p>The FPP planning procedures requires field surveys to confirm existing recorded sites and search for new sites by coupe reconnaissance.</p> <p>The Planning Notice of Intent letters (voluntary) sent to affected stakeholders during the preparation of the FPP, requests any information they may have in relation to the coupe that STT should take into account.</p> <p>Post certification of the FPP plan and prior to operations commencing (at least 30 days and no more than 12 months), a regulatory Notice of Intent of Operation Commencement is sent to affected stakeholders.</p> <p>These procedures provide stakeholders to bring to the attention of STT local knowledge of sites of special cultural, ecological, economic, religious or spiritual significance.</p>
<b>4.7.2</b> Measures to protect such sites are documented and implemented through appropriate engagement with local communities. When local communities determine that physical identification of sites in documentation or on maps would threaten the value or protection of the sites, then other means will be used.	C	<p>The procedures for protection of such sites are provided in FPA Procedures for Managing Historic Cultural Heritage when Preparing Forest Practices Plans 2017. Documented measures to protect such sites are part of the prescriptions in the FPP.</p>
<b>4.7.3</b> Wherever and whenever cultural or archaeological sites are newly observed or discovered, any management activities impacting these sites cease without delay in the vicinity until protective measures have been implemented.	C	<p>A precautionary statement is included in all FPPs to the effect that if such sites are newly discovered operations cease immediately within the vicinity and STT's supervisor is notified. STT will then assess the need for expert advice and development of further management prescriptions to protect the site.</p> <p>STT's contractors are provided with a photo guide of a range of special values including cultural heritage. This issue is also covered in STT's</p>

		operational briefings of its contractors before works commence on a coupe.
<b>4.8 The Organisation shall uphold the right of local communities to protect and utilise their traditional knowledge and shall compensate local communities for the utilisation of such knowledge and their intellectual property. A binding agreement as per Criterion 3.3 shall be concluded between The Organisation and the local communities for such utilisation through Free, Prior and Informed Consent before utilisation takes place, and shall be consistent with the protection of intellectual property rights. (New)</b>	C	
<b>4.8.1</b> Traditional knowledge and its associated intellectual property are protected and are only used when the owners of that traditional knowledge have provided their Free, Prior and Informed Consent formalised through a binding agreement.	C	The audit team interviewed STT's Engagement & Land Manager who advised that STT is not aware of the use by STT of any traditional knowledge and its associated intellectual property.
<b>4.8.2</b> Local communities are compensated according to the binding agreement reached through Free, Prior and Informed Consent for the use of traditional knowledge and its associated intellectual property.	C	Refer 4.8.1.
<b>ANNEX C: ADDITIONAL REQUIREMENTS FOR ECOSYSTEM SERVICES</b>	N/A	Annex C for Ecosystem Services was not evaluated for this audit.
<b>PRINCIPLE 5: BENEFITS FROM THE FOREST</b> The Organisation shall efficiently manage the range of multiple products and services of the Management Unit to maintain or enhance long-term economic viability and the range of social and environmental benefits.		
<b>5.1 The Organisation shall identify, produce, or enable the production of, diversified benefits and/or products, based on the range of resources and ecosystem services existing in the Management Unit to strengthen and diversify the local economy proportionate to the scale and intensity of management activities.</b>	C	
<b>5.1.1</b> Consistent with management objectives, the range of forest products and ecosystem services that could strengthen and diversify the local economy are identified.	C	<p>The audit team interviewed STT's General Manager Forest Products and regional staff.</p> <p>STT identifies a range of wood-based products from the forest it manages. The main products are:</p> <ul style="list-style-type: none"> <li>• High-quality eucalypt sawlogs suitable for milling into appearance grade timber, structural timber and sliced veneer.</li> <li>• Lower-quality sawlogs to primarily produce structural timber.</li> <li>• Special species timbers, for domestic furniture manufacture, boat building and craftwood industries.</li> <li>• High-grade domestic peeler logs suitable for domestic rotary peeling into veneer.</li> <li>• Low-grade peeler logs suitable for laminated veneer lumber production.</li> <li>• Pulp logs for processing into woodchips for pulp and paper production.</li> <li>• Poles for electricity infrastructure.</li> </ul>

		<ul style="list-style-type: none"> <li>• Other logs such as those used for bridge building.</li> <li>• Firewood typically sold under license to public.</li> <li>• Tree ferns sold to local garden businesses to be replanted in gardens.</li> </ul> <p>STT identifies a range of ecosystem services that could strengthen and diversify the local economy – management of watercourses on PTPZ land, maintenance of the carbon storage capacity of forests on PTPZ land, and management of landscape and visual amenity and cultural heritage on PTPZ land.</p>
<b>5.1.2</b> Consistent with management objectives, the identified benefits and products are produced by The Organisation and/or made available for others to produce, to strengthen and diversify the local economy.	C	<p>STT produces the identified forest products. STT's Annual Report 2017-18 (p. 28) reported the production of:</p> <ul style="list-style-type: none"> <li>• High-quality sawlogs.</li> <li>• Native forest posts, poles and piles.</li> <li>• Native forest high-grade domestic peeler logs.</li> <li>• Native forest pulpwood.</li> <li>• Firewood.</li> <li>• Bark and sawdust.</li> <li>• Special species timber and craftwood.</li> <li>• Hardwood plantation sawlog and pulpwood.</li> <li>• Softwood plantation sawlog and pulplog.</li> </ul> <p>The total amount of wood produced by STT in 2017-18 was 1.525 million tonnes (STT Annual Report 2017-18, p. 77).</p> <p>In relation to strengthening the local economy, The audit team interviewed STT's General Manager Forest Products who advised that STT facilitates the 'co-mingling' of wood chip products (i.e. multiple industry players supply product to a centralised wood chip mill that stockpiles the chips on infrastructure leased by STT and made available to the broader industry). This arrangement allows local private wood producers to participate in this market.</p>
<b>5.1.2</b> Consistent with management objectives, forest products are produced by The Organisation and/or made available for others to produce, to strengthen and diversify the local economy.	N/A	See 5.1.2 above.
<b>5.1.3</b> When the Organisation makes FSC promotional claims regarding the maintenance and/or enhancement of ecosystem services, Annex C is followed regarding additional requirements.	C	None made.
<b>5.2</b> <i>The Organisation shall normally harvest products and services from the Management Unit at or below a level that can be permanently sustained.</i>	C	
<b>5.2.1</b> Timber harvesting levels are based on an analysis of current Best Available Information on: 1) Growth and yield; 2) Inventory of the forest; 3) Mortality rates; 4) Maintenance of ecosystem functions; 5) Conservation of biological diversity; 6) Maintenance of ecosystem health and vitality; 7) Maintenance of soil and water; 8) Maintenance of carbon cycles;	C	<p>The audit team interviewed STT's General Manager Forest Products and its Senior Forest Resource Analyst and reviewed documentation. The Tasmanian Regional Forest Agreement requires a five-yearly review of the sustainable yield of high-quality eucalypt sawlogs from State forests (now Permanent Timber Production Zone land). Previous reviews in 1998, 2002, 2007 and 2014 incorporated the effects of successive changes in the resource base over that period. The 2017 review (Sustainable High-Quality Eucalypt Sawlog Supply from Tasmania's Permanent Timber Production Zone Land, Review No. 5, July 2017) incorporates the relevant legislation: the <i>Forest</i></p>

<p>9) Maintenance of productive capacity;  10) Maintenance of natural and cultural heritage;  11) Maintenance of socio-economic benefit; and  12) Impact from climate change, pests, diseases and natural hazards.</p>	<p><i>Management Act (Tas) 2013 and the Forestry (Rebuilding the Forest Industry) Act (Tas) 2014</i>. The report is publicly available and independently reviewed.</p> <p>For eucalypt native forests, the nominal rotation length is 90 years (typically varying from about 60 years on highly productive sites to about 120 years on sites of low productivity). For eucalypt plantations that are managed for sawlog production, the nominal rotation length is 25 years. Actual rotation lengths for individual coupes vary according to local site conditions and to the requirement to avoid large variations in supply from one period to the next.</p> <p>Eucalypt native forests are generally managed under either a partial felling regime or a clear-felling regime (with or without thinning). STT applies partial felling wherever possible; particularly in highland eucalypt forests and lowland dry eucalypt forests.</p> <p>Yield estimates apply factors that take into account the exclusion from harvesting of forest areas within coupes for maintenance of ecosystem functions, conservation of biological diversity, maintenance of ecosystem health and vitality, and maintenance of soil and water values.</p> <p>The audit team interviewed STT's Senior Forest Resource Analyst who is responsible for calculations of harvesting levels based on modelling of sustainable yield for the FMU.</p> <p>The main components of STT's yield forecasting system are:</p> <ol style="list-style-type: none"> <li>1. The area of each type of forest that is available for wood production, based on detailed mapping of forest types and provisional coupes within PTPZ land.</li> <li>2. Allowances for each of the many factors that might reduce the area actually harvested, relative to the area available, based on field reconnaissance, detailed mapping and historical data.</li> <li>3. Predicted yields of each relevant forest product per hectare, for each of 95 identified forest classes in 21 inventory areas, based on plot measurements, growth models and historical data.</li> <li>4. Various constraints, based on sustainable yield principles, operational factors and supply targets over time for each relevant forest product.</li> </ol> <p>The relevant data for 1 to 4 are used as inputs to a specialised forest estate modelling software system (the "Woodstock" module of the Remsoft Spatial Planning System).</p> <p>The forest estate model is run as a linear programming optimisation. The audit team viewed the independent auditor's statement of the 2017 Yield Review that concluded "... the datasets, models, approximations, systems and methodologies used in the calculation of sustainable yield for 2017 are reasonable and adequate for purpose".</p> <p>The above approach uses best available information on growth and yield, forest inventory, and mortality rates. The planning framework used by STT implemented through the FPA system provides for maintenance of ecosystem functions, conservation of biological diversity, maintenance of ecosystem health and vitality, maintenance of soil and water, maintenance of carbon cycles, and maintenance of natural and cultural heritage. The approach to sustained yield management used by STT provides for maintenance of productive capacity, and maintenance of socio-economic benefit.</p>
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<b>5.2.2</b> For native forests, the average annual timber harvest level across the Management Unit over a 20-year period does not exceed a level that can be sustained in the long-term (> 100 years).	C	The Tasmanian Regional Forest Agreement requires a five-year review of the sustained yield of high-quality sawlogs that is independently verified. The audit team examined the 2017 review (Sustainable High-Quality Eucalypt Sawlog Supply from Tasmania's Permanent Timber Production Zone Land, Review No. 5, July 2017). The review (p. 13) showed actual annual supply of high-quality eucalypt sawlogs from public land over the 20-year period 1996-97 to 2015-16 and STT's Annual Reports provide the actual harvest of high quality eucalypt sawlogs since then. The audit team observed that the actual yields did not exceed a level that can be sustained in the long-term (90 years). The long-term sustainable yield is primarily based on the yield of high-quality eucalypt sawlogs from both native forest and plantations. Lower quality sawlogs, peeler and pulp logs are secondary products arising from high-quality eucalypt sawlog harvests. The sustainable yield of the FMU is the level of commercial timber (or product mix) that can be maintained under a given management regime, without reducing the long-term productive capacity of the forest. Yield predictions are generated from biologically based forest estate modelling of productive capacity, and do not imply supply based or economic criteria.
<b>5.2.3</b> For native forests, harvesting levels maintain or increase the standing timber stock over the long-term and productive capacity of the forest estate.	C	The productive capacity of a forest over time is measured by STT by comparing the total standing quantity of merchantable wood at the beginning and end of the planning horizon. The total standing quantity of merchantable wood within eucalypt forest areas available for wood production at the date of the most recent five-year review conducted in 2017 was about 41 million cubic metres. The predicted total standing quantity of merchantable wood, within eucalypt forest areas available for wood production at the end of the planning horizon in 2105, was about 58 million cubic metres. The difference is a result of the transition from harvesting of mature age eucalypt native forest to harvesting of older regrowth, then younger regrowth eucalypt native forest. The sustainable yield report (Sustainable High-Quality Eucalypt Sawlog Supply from Tasmania's Permanent Timber Production Zone Land, Review No. 5, July 2017) therefore shows that the total standing quantity of merchantable native forest wood is predicted to increase over the 90-year planning horizon.
<b>5.2.4</b> Actual annual harvest levels for timber are recorded and are consistent with the projected harvest level identified under 5.2.2.	C	Actual annual harvest levels are recorded and reported in the publicly available Annual Report. The most recent data are provided in STT's Annual Report 2017-18 (p. 77). The audit team reviewed the harvest levels and found them to be consistent with the projected harvest level identified under 5.2.2.
<b>5.2.5</b> For plantations, the timber harvesting level does not exceed the productive capacity of the site to sustain similar levels of yield through cycles of harvest and regeneration. Productive capacity may be informed by current economic constraints, productivity indices, estate models, growth models and past historic records.	C	STT's yield forecasting system, described under 5.2.2, incorporates analysis of sustainable yields from plantations in the FMU. Plantations yields are currently a small proportion of the total wood yield across the FMU.
<b>5.2.6</b> Timber harvest levels are reviewed periodically (at least five-year intervals) to ensure that they are	C	Under the Tasmanian Regional Forest Agreement, STT on behalf of the Tasmanian Government is required to prepare a five-yearly review of

based on current growth estimates, regulatory requirements, previously recorded actual versus projected yield and market conditions.		the timber harvest levels on the FMU. This review is independently verified and made available to the public on STT's website. The audit team reviewed the most recent report (Sustainable High-Quality Eucalypt Sawlog Supply from Tasmania's Permanent Timber Production Zone Land, Review No. 5, July 2017) and found that it was based on current growth estimates, regulatory requirements, and previously recorded actual versus projected yield. The audit team interviewed STT's General Manager Forest Products who advised that the available log supply is merchandised and allocated to customers according to, inter alia, market conditions.
<b>5.2.7</b> For extraction of commercially harvested services and biological non-timber forest products under The Organisation's control a sustainable harvest level is calculated and adhered to. Sustainable harvest levels are based on Best Available Information.	C	NTFPs include: worms harvested for recreational fishing bait; pepper berries for bush food; tree ferns for nursery trade; nectar for apiary industry. All collection activities are conducted under the Forest Activity Permit process apart from tree ferns that are managed through the Forest Practices System as arisings. Apiary sites are regulated in consultation with Apiarists to ensure sustained supply. In issuing of permits for worms and pepper berries, STT sets restrictions on the level of take.
<b>5.3 The Organisation shall demonstrate that the positive and negative externalities of operations are included in the Management Plan.</b>	C	
<b>5.3.1</b> Strategies and safeguards to prevent, mitigate or compensate for potential negative social and environment impacts of management activities are identified and included in the Management Plan.	C	The Management Plan (April 2019) provides an overview of STT's forest management system and of the way it manages social, economic and environmental values and impacts while meeting statutory and contractual log supply obligations. Other sighted documents (e.g. STT's report Social Impact Evaluation of Sustainable Timber Tasmania's Forest Management Activities 2019; Stakeholder Engagement Operational Approach 2019) provide more detail on strategies and safeguards to prevent, mitigate or compensate for potential negative social and environment impacts of management activities.
<b>5.3.2</b> Benefits related to positive social and environment impacts of management activities are identified and included in the Management Plan.	C	The Management Plan (April 2019) provides an overview of STT's forest management system and of the way it manages social, economic and environmental values and impacts while meeting statutory and contractual log supply obligations. Other sighted documents (e.g. STT's report Social Impact Evaluation of Sustainable Timber Tasmania's Forest Management Activities 2019) describe benefits related to positive social and environment impacts of management activities.
<b>5.4 The Organisation shall use local processing, local services, and local value-adding to meet the requirements of The Organisation where these are available, proportionate to scale, intensity and risk. If these are not locally available, The Organisation shall make reasonable attempts to help establish these services.</b>	C	
Low SIR: Only 5.4.1 Applies.	NA	
<b>5.4.1</b> Where cost, quality and capacity of non-local and local options are at least equivalent, local goods, services, processing and value-added facilities are used.	C	The audit team reviewed the Tasmania Government's document Buy Local Policy: A Guide for Government Agencies – Version 4, 2019. STT adheres to this policy, as enunciated in its Procurement Framework 2012 that also includes such principles as 'enhancing opportunities for local business'.

		<p>STT's Annual Report for the 2018 FY (Table 22, p. 80) showed that its performance against the indicator 'Buy local' was:</p> <ul style="list-style-type: none"> <li>• Proportion of total purchases from Tasmanian businesses – 75%.</li> <li>• Value of purchases from Tasmanian businesses – \$110.06 million.</li> <li>• Number of Tasmanian businesses paid – 700.</li> </ul> <p>Associated with the production of forest products, STT paid \$48 million to harvest and haulage contractors in the 2018 FY. FTT also pays rates to local government levied against PTPZ land excluding formal reserves, to the tune of \$1.8 million in the 2018 FY – these payments are widely distributed across regional municipalities. In relation to the use of local processing and value-added facilities, STT supplies logs under a number of sales arrangements:</p> <ul style="list-style-type: none"> <li>• Long term contracts to provide certainty of investment for local sawlog customers.</li> <li>• Medium term contracts for the sale of lower grade logs.</li> <li>• Short term (up to one year) contracts for the sale of surplus products.</li> <li>• Minor forest product sale arrangements for firewood, poles and tree ferns.</li> <li>• Export contracts that enable the sale of forest residues to identified markets.</li> <li>• Island Specialty Timbers outlets that facilitate the sale of special species timber to the public.</li> <li>• Online auctions to achieve the best possible price for special species logs.</li> </ul> <p>In 2017-18 STT supplied logs to 47 wood processing customers.</p>
<b>5.4.2</b> Reasonable attempts are made to support and encourage establishment of capacity where local goods, services, processing and value-added facilities are not available.	C	<p>The audit team interviewed STT's General Manager Forest Products, STT regional staff with responsibilities for marketing of logs, and stakeholders who operate processing and value-added facilities that are supplied logs by STT.</p> <p>Traditionally, the highest quality eucalypt timber supply has been sourced from mature native forests. A significant transition to using regrowth trees commenced around 1990. This transition has resulted in a trend towards the use of smaller diameter logs, which has challenged the sawmilling industry in developing changes in processing technology to optimise recovery of sawn timber. Furthermore, STT has established and management eucalypt plantations specifically for sawlog and other solid wood production to supply local processing. These sawlogs, that will become increasingly important in the longer term in terms of supply, have different characteristics to sawlogs sourced from native forests. Interviews with stakeholders confirmed that STT is supporting collaborative research into the development of efficient processing technologies, and the identification of high-value applications for logs from plantation.</p>
<b>5.4.3</b> In the absence of a third party able to provide the local good and/or service, where economically viable, reasonable and consistent with management objectives, The Organisation shall make reasonable attempts to establish capacity.	C	<p>The audit team interviewed STT's General Manager Forest Products. The primary focus of STT is to supply logs to local processing and value-added facilities where there is capacity. STT is collaborating with stakeholders (corroborated in interviews with stakeholders) to develop efficient processing technologies for this type of product.</p>

<b>5.5 The Organisation shall demonstrate through its planning and expenditures proportionate to scale, intensity and risk, its commitment to long-term economic viability.</b>	C	
<b>5.5.1</b> Sufficient funds are allocated to implement the Management Plan to meet this standard and to ensure long-term economic viability.	C	<p>The audit team interviewed senior executive staff in STT, stakeholders from the Tasmanian Government, and reviewed the 2017-18 Financial Statements in STT's 2017-18 Annual Report (pp. 23-71). The audit team was satisfied that sufficient funds are allocated to implement the Management Plan and to ensure long-term economic viability.</p> <p>Company is currently in a strong financial position, requests for sufficient funds are from the "bottom up" through an approval process, currently these requests are being approved</p>
<b>5.5.2</b> Expenditures and investments are made to implement the Management Plan to meet this standard and to ensure long-term economic viability.	C	<p>The audit team interviewed senior executive staff in STT, stakeholders from the Tasmanian Government, and reviewed the 2017-18 Financial Statements in STT's 2017-18 Annual Report (pp. 23-71). The audit team was satisfied that expenditures and investments are made to implement the Management Plan and to ensure long-term economic viability.</p> <p>Interview with the GM Finance and review of annual budgets and forecasts confirmed that sufficient investments are available to meet FMP requirements</p>
<b>PRINCIPLE 6: ENVIRONMENTAL VALUES AND IMPACTS</b> <b>The Organisation shall maintain, conserve and/or restore ecosystem services and environmental values of the Management Unit, and shall avoid, repair or mitigate negative environmental impacts.</b>		
<b>6.1 The Organisation shall assess environmental values in the Management Unit and those values outside the Management Unit potentially affected by management activities. This assessment shall be undertaken with a level of detail, scale and frequency that is proportionate to the scale, intensity and risk of management activities, and is sufficient for the purpose of deciding the necessary conservation measures, and for detecting and monitoring possible negative impacts of those activities. (New)</b>	C	
<b>6.1.1</b> Best Available Information is used to identify environmental values within and, where potentially affected by management activities, outside of the Management Unit. Verifiers: Documentation of the specific environmental values, including their locations, using maps and other relevant documents.	C	<p>The Coupe Planning Summary form is used to record details related to this indicator under the relevant planning levels: <i>Planned Area, 3 Year Plan, Prescription, and Special Values</i>. Details are recorded under environmental areas of consideration including: <i>Roading/Access to the Forest, Harvesting FPA Special Values, Other Forest Values, Landscape Context Planning &amp; Dispersal Management, Stakeholder Engagement, Re-establishment/Regeneration, and System Updates</i>.</p>
<b>6.1.2</b> Assessments of environmental values are conducted with a level of detail and frequency so that: 1) Impacts of management activities on the identified environmental values can be assessed as per Criterion 6.2; 2) Risks to environmental values can be identified as per Criterion 6.2;	C	<p>The hierarchical planning system is organized from landscape to field levels to provide for identification of environmental impacts. The values identified are relevant per 6.2. Parts 3 and 4 are covered in pre-assessment procedures as supported by GIS databases.</p>

3) Necessary conservation measures to protect values can be identified as per Criterion 6.3; and 4) Monitoring of impacts or environmental changes can be conducted as per Principle 8.		
<b>6.2 Prior to the start of site-disturbing activities, The Organisation shall identify and assess the scale, intensity and risk of potential impacts of management activities on the identified environmental values.</b> FSC Australia has also developed guidance regarding environmental impact assessments. It is not normative. The Organisation may use other methods to meet the requirements under 6.2. The guidance follows at the end of Annexes.	C	
<b>6.2.1</b> An environmental impact assessment identifies potential impacts, both direct and cumulative, of management activities on environmental values at a stand level. Verifiers: Documentation of the environmental impact assessment methodology used that identifies appropriate baselines and likely impacts and considers cumulative impacts.	C	The environmental context of the stand/coupe is established and documented in the <i>Forest Practices Plan (FPP)</i> . The FPP includes geological, topographic, general harvest practices, general conservation information, detailed mapping, and other planning information that contribute to providing the EIA. For example, see JMB0042-1, in evidence. The <i>Coupe Planning Summary</i> provides an EIA including roading, harvesting, special values (FPA), Landscape context, and regeneration.
<b>6.2.2</b> An environmental impact assessment identifies potential impacts, both direct and cumulative, of management activities on environmental values at the landscape level.	C	The Forest Practices Plan is the principal device for ensuring that negative environmental impacts are reduced or mitigated.
<b>6.2.3</b> The environmental impact assessment identifies and assesses the impacts of the management activities prior to the start of site-disturbing activities.	C	The Forest Practices Plan and regulatory plan development process is the principal device for ensuring that negative environmental impacts are reduced or mitigated.
<b>6.3 The Organisation shall identify and implement effective actions to prevent negative impacts of management activities on the environmental values, and to mitigate and repair those that occur, proportionate to the scale, intensity and risk of these impacts.</b>	C	
<b>6.3.1</b> Management activities are planned and implemented to protect environmental values.	C	The Forest Practices Authority (FPA) is an independent statutory body responsible for administering the Tasmanian forest practices system. ( <a href="http://www.fpa.tas.gov.au">www.fpa.tas.gov.au</a> ). The FPA has a legislative requirement to set minimum standards, and the regulatory authority to monitor the implementation and effectiveness of the forest practice system across all tenures, including Permanent Timber Production Zone (PTPZ) land that is managed by Sustainable Timber Tasmania (STT). The standards for “best management practice” are contained within the Forest Practices Code, 2015 which is widely recognized in Tasmania and is available to all forest workers. ( <a href="http://www.fpa.tas.gov.au/data/assets/pdf_file/0020/132455/Forest_Pra">www.fpa.tas.gov.au/data/assets/pdf_file/0020/132455/Forest Pra</a>



		<p><a href="#">ctices Code 2015.pdf</a>). The Landscape Context Planning System (or Landscape Context tool) is a geographic information system-based system developed by Sustainable Timber Tasmania that uses mapped information on forest type, harvest boundaries and forest zoning, to inform, implement, and monitor habitat retention and coupe dispersal decisions. (<a href="http://www.sttas.com.au/forest-operations-management/managing-forest-values/landscape-context-planning-system">www.sttas.com.au/forest-operations-management/managing-forest-values/landscape-context-planning-system</a>).</p> <p>Forest Practices Officers (FPOs), who are trained and certified by FPA, are responsible for the preparation and approval of all Forest Practices Plans (FPPs) which describe how each forest coupe/stand will be harvested by contractors assigned to the task. STT assists this process by scheduling the order and location of coupes to be harvested, by applying the Landscape Context Planning System to consider the temporal and spatial context of harvesting in the landscape, by scheduling and implementing fire management, including post-harvest regeneration burns, and by maintaining a comprehensive program of ecological research to advise on improvements to ecological sustainability of management practices. (<a href="http://www.sttas.com.au/forest-operations-management/managing-forest-values/landscape-context-planning-system">www.sttas.com.au/forest-operations-management/managing-forest-values/landscape-context-planning-system</a>).</p>
<b>6.3.2</b> Management activities protect environmental values.	C	Generally established through FPP planning process as described in detail in other portions of this report.
<b>6.3.3</b> Where damage to environmental values occurs, measures are adopted to prevent further damage, and the damage is mitigated and/or repaired.	C	All forest practices are carried out in accordance with legally binding Forest Practices Plans (FPP). The FPP is the principal device for ensuring that negative environmental impacts are reduced or mitigated.
<b>6.4</b> The Organisation shall protect rare species and threatened species and their habitats in the Management Unit through conservation zones, protection areas, connectivity and/or (where necessary) other direct measures for their survival and viability. These measures shall be proportionate to the scale, intensity and risk of management activities and to the conservation status and ecological requirements of the rare and threatened species. The Organisation shall take into account the geographic range and ecological requirements of rare and threatened species beyond the boundary of the Management Unit, when determining the measures to be taken inside the Management Unit.	C	
<b>6.4.1</b> Rare and threatened species, and their habitats are identified using <i>Best Available Information</i> , including CITES species and those listed on national, regional and local lists of rare and threatened species that are present or likely to be present within the Management Unit and adjacent to the Management Unit.	C	RTE species are identified and researched primarily through the FPA regulatory framework and also relies upon DPIPWE. A primary tool for STT planners is the conservation information system, <a href="https://dpiipwe.tas.gov.au/conservation/development-planning-conservation-assessment/planning-tools/conservation-information-system">https://dpiipwe.tas.gov.au/conservation/development-planning-conservation-assessment/planning-tools/conservation-information-system</a> , which incorporates species locations and habitat descriptions for threatened species in Tasmania. Supporting documents may include the <i>Habitat descriptions of threatened flora in Tasmania</i> , most recently published in 2016 by the Forest Practices Authority. A key document for fauna

		<p>has been Habitat descriptions for threatened fauna in Tasmania, compiled in 2012,  <a href="https://www.fpa.tas.gov.au/_data/assets/pdf_file/0011/111404/Threatened_fauna_range_and_habitat_descriptions.pdf">https://www.fpa.tas.gov.au/_data/assets/pdf_file/0011/111404/Threatened_fauna_range_and_habitat_descriptions.pdf</a>.</p> <p>The audit team confirmed extensive database that identifies RTE as maintained by the State of Tasmania and discovered no omitted species during expert consultations.</p>
<p><b>6.4.2 Best Available Information</b>, including expert opinion and targeted field surveys, is used to identify specific locations of habitat of endangered and critically endangered species that are present or likely to be present within and adjacent to the Management Unit.</p>	C	<p>See 6.4.1 above.</p> <p>The FPA process requires field surveys to identify of habitat of RTE species. This habitat in most cases is associated with habitat features such as hollow bearing trees. STT also identifies habitat trees and coarse woody debris to implement the Forest practices system requirement to retain habitat clumps on operations.</p>
<p><b>6.4.3</b> Potential impacts of management activities on rare and threatened species and their conservation status and habitats are identified and management activities are modified to avoid negative impacts. Verifiers: Documentation of potential impacts and modifications to management activities.</p>	C	<p>This is generally done through the FPP process. Demonstration of the identification of potential impacts and resulting modification of management activities were noted.</p>
<p><b>6.4.4</b> The rare and threatened species and their habitats in the Management Unit are protected, at operational and landscape level, including through the provision of conservation zones, protection areas, connectivity, and other direct means for their survival and/or viability, such as species recovery programs. Verifiers: Documentation of management strategies and actions in protecting rare and threatened species and their habitats is with relevant information on species populations, habitat protections, and/or other information.</p>	NC	<p>This is done through the FPP process and includes the Coupe Summary document both of which entail the aspects of this indicator. Numerous examples were observed during the 2019 audit of protective measures, such as those described in the indicator, were being installed or completed to provide conservation zones, protection areas, and connectivity, see Site Notes. Notably STT has conducted extensive research around the topic of different types of green tree retention.</p> <p>However, see <b>Major CAR 2019.6</b> for additional detail regarding swift parrot habitat protection.</p>
<p><b>6.4.5</b> Measures are in place to prevent unauthorised hunting, fishing, trapping and collection of rare or threatened species.</p>	C	<p>There was no evidence of illegal harvesting of fauna and flora. Interviews with staff confirm that harvesting of rare and threatened species is largely not an issue and review of publicly available materials confirm such illegal poaching is uncommon in Tasmanian culture, in general.</p>
<p><b>6.5</b> The Organisation shall identify and protect representative sample areas of native ecosystems and/or restore them to more natural conditions. Where representative sample areas do not exist or are insufficient, The Organisation shall restore a proportion of the Management Unit to more natural conditions. The size of the areas and the measures taken for their protection or restoration, including within plantations, shall be proportionate to the conservation status and value of the ecosystems at the landscape level, and the scale, intensity and risk of management activities.</p>	C	

<p><b>6.5.1</b> <i>Best Available Information</i> is used to identify native ecosystems that exist within the Management Unit including assessments of the conservation status and value of the ecosystems at the landscape level.</p> <p>Verifiers: Documentation of native ecosystems, including their locations, using maps and other relevant documents. Documentation of the conservation status of identified native ecosystems.</p>	C	<p>Native vegetation communities are generally described in the Forest Management Plan (2019) starting on page 22. Conservation status and values are identified through the FPP process.</p> <p>STT's FPP preparation process requires the compilation of a field-checked map of the vegetation communities in a planned operational area. The forest type is recorded on the cover of the FPP.</p> <p>TASVEG is Tasmania's comprehensive vegetation classification and mapping system. It includes periodically updated descriptions and spatial locations of all Tasmanian vegetation. This database is checked to identify threatened vegetation communities that may occur within or near the operational area.</p> <p>Threatened vegetation communities are considered as HCV 3.1 in STT's HCV management plan. This includes threatened and under-reserved vegetation communities at a state wide and IBRA regional scale. A description of mechanisms that identify the conservation status of communities is provided in the HCV plan.</p>
<p><b>L6.5.1</b> <i>Best Available Information</i> is used to identify native ecosystems that exist within the Management Unit.</p>	NA	<p>Low scale, risk and intensity does not apply in this case.</p>
<p><b>6.5.2</b> The Organisation shall identify conservation measures for the protection and/or restoration of representative sample areas. These areas in combination with other components of the conservation area network comprise a minimum of 10% of the Forest Management Unit.</p>	C	<p>STT relies on several different analyses to assess the level of representativeness of RSAs on their forest. Mainly, STT participates in the multi-tenure Tasmanian Comprehensive, Adequate, and Representative Reserve System, i.e. CAR reserves. The analysis for this reserve system was conducted by DPIPW across different ownership types throughout Tasmania, and is designed to maintain a reserve system of a range of different vegetation types and age classes. For STT this resulted in the classification of 120,000 ha of "informal reserves". These informal reserves are not specifically classified as RSAs, since this system was not designed with FSC in mind. However, the process meets similar requirements of this indicator in its goal to assess the adequacy of reserves throughout the state.</p> <p>In addition, as part of STT's HCV assessment, an IBRA - level landscape analysis of forest types was completed. This analysis identified additional underrepresented areas that STT needs to identify and potentially manage for protection during operational planning.</p>
<p><b>6.5.3</b> For Management Units where native forest harvesting occurs, representative sample areas of native ecosystems are protected, where they exist, proportionate to the conservation status and value of the ecosystems at the landscape level, the size of the Management Unit and the intensity of forest management.</p>	C	<p>STT uses the FPA's <i>Forest Botany Manual</i>, published in 2005 to guide and direct field assessments for Forest Practices Officers (FPOs). In addition to informal Comprehensive, Adequate and Representative reserves, there are substantial areas of PTPZ land that are either not available for wood production, not harvested due to various constraints, or retained for the long term to contribute to mature habitat management at a landscape scale. Furthermore, at all stages of implementing the planning and operational framework (refer Figure 5 of Forest Management Plan), management decisions generally see a reduction in areas available for harvest (refer Figure 9 of Forest Management Plan).</p> <p>Although not formally recognised in the Comprehensive, Adequate and Representative system, non-production areas make a significant contribution to maintaining environmental values on PTPZ land.</p>
<p><b>6.6</b> The Organisation shall effectively maintain the continued existence of naturally occurring native</p>	C	

species and genotypes, and prevent losses of biological diversity, especially through habitat management in the Management Unit. The Organisation shall demonstrate that effective measures are in place to manage and control hunting, fishing, trapping and collecting.		
6.6.1 <i>Best Available Information</i> is used to identify habitat features including hollow bearing trees to support the diversity of naturally occurring native fauna species.	C	This is achieved by ensuring, at a minimum, that at least 20 per cent of the public native forest within a one-kilometre radius of each coupe, harvested by clearfall or aggregated retention, is managed in reserves or in long term retention. This is applied after identification and management of specific threatened species habitat is done. Long term retention forest includes areas of native forest that will not be available for harvest for at least 100 years. They can include non-production areas that have been set-aside to protect environmental values, such as streamside reserves and wildlife habitat clumps. Where required, additional forest to be managed in long term retention are recorded in STT's Management Decision Classification system as a special management zone. This objective is to be achieved in at least 90% of coupes, harvested by clearfall or aggregated retention, annually.
6.6.2 Management planning identifies specific prescriptions and guidelines for maintaining habitat features.	C	The FPP sets out the prescriptions for how operations will be conducted in accordance with the provisions in the Forest Practices Code. Only a forest practices officer who has been accredited by the Forest Practices Authority may certify the plan. The Forest Practices Authority accredits forest practices officers once they have undertaken training and met specific proficiency requirements. Prescriptions and guidelines are directed by the FPP process.
6.6.3 Management maintains, enhances, or restores plant communities and habitat features associated with native ecosystems, to support the diversity of naturally occurring species and their genetic diversity. Verifiers: Documentation of the effectiveness of management strategies and actions in maintaining, enhancing or restoring plant communities and habitat features.	NC	Maintenance of features described in this indicator are generally addressed through FPA as confirmed by effectiveness studies done through the State of Tasmania forest practices system. The FPA has a legislative requirement to monitor the implementation and effectiveness of the forest practice system across all tenures.  However, see <b>Minor CAR 2019.7</b> .
6.6.4 Where past management by The Organisation has eliminated plant communities or habitat features, management activities aimed at re-establishing such habitats are implemented.	C	The FMP provides for remedial actions to be taken as appropriate when identified. For example, the audit team reviewed an incident from August 2018 related to remediation works done by STT at its cost on private property impacted by management activities, near Tunbridge in the North East region, coupe TU487T.
6.6.5 Effective measures are taken to manage and control hunting, fishing, trapping and collecting activities to ensure that naturally occurring native species, their diversity within species and their natural distribution are maintained.	C	STT does have a permit system for specific coupes whereby the public can get a permit issued by STT in the permitted activities. STT does have a budget item for the monitoring and management of illegal activities. Game hunting requirements may be found here, <a href="https://dipwe.tas.gov.au/wildlife-management/management-of-wildlife/game-management/game-hunting-requirements">https://dipwe.tas.gov.au/wildlife-management/management-of-wildlife/game-management/game-hunting-requirements</a> and fishing here, <a href="https://dipwe.tas.gov.au/sea-fishing-aquaculture/recreational-fishing">https://dipwe.tas.gov.au/sea-fishing-aquaculture/recreational-fishing</a> (both last accessed 21June2019).



		<p>STT liaises with Tasmania Police, neighbours and other community groups in order to develop appropriate prevention and response strategies.</p> <p>The <i>Forest Management Act 2013</i> provides Sustainable Timber Tasmania with the authority to direct a person:</p> <ul style="list-style-type: none"> <li>• not to enter PTPZ land or a forest road;</li> <li>• to leave PTPZ land or a forest road; or</li> <li>• to cease to undertake an activity or engage in a conduct.</li> </ul> <p>Sustainable Timber Tasmania planning is to respond to unauthorised activities in a manner that does not put STT staff, contractors or public safety at risk.</p>
<b>6.7 The Organisation shall protect or restore natural watercourses, water bodies, riparian zones and their connectivity. The Organisation shall avoid negative impacts on water quality and quantity and mitigate and remedy those that occur.</b>	C	
<b>6.7.1</b> Management measures are developed using Best Available Information, including buffers, machinery exclusion zones, and/or filter strips, with the aim to protect water quality and quantity in natural watercourses, water bodies and riparian zones. Such zones are increased where required for the management of slope, erosion risk or threatened species.	C	<p>STT treatment of riparian areas, soils and other water quality features meets the requirements of this indicator Based upon extensive and long-held geological conservation principles STT employs landscape level to stream level assessments, protective and restoration measures, and high-level monitoring. Systems include <i>Natural and Cultural Values Evaluation Sheet</i> as part of <i>Earth Sciences and Cultural Heritage</i> at the operational level that is among the most extensive and highest levels of management encountered.</p> <p>Approaches for this are provided in section 4.4.2.2.1 <i>Water</i> of the Forest Management Plan.</p>
<b>6.7.2</b> Management measures for headwater streams and drainage lines include the following, except at designated crossing points: 1) Headwater streams: buffer zones, machinery exclusion zones or filter strips that extend a minimum of 10 metres from the stream bank; and 2) Drainage lines: buffer zones, machinery exclusion zones or filter strips that extend a minimum of two metres from the centre of the drainage line; and 3) Such zones are increased where required for the management of slope, erosion risk or threatened species, and considerate of risks associated with 10.7.5.	C	<p>These measures were generally followed for harvesting operations. There were instances of fires burning along edges of harvest units but overall the program provided for these measures as described above in 6.7.1.</p>
<b>6.7.3</b> Management measures are implemented that protect natural watercourses, water bodies, riparian zones, identified groundwater recharge areas and their connectivity, including water quantity and water quality.	C	
<b>6.7.4</b> A program of periodic monitoring assesses the effectiveness of management measures in protecting natural watercourses, water bodies, riparian zones and their connectivity, including water quantity and water quality, and includes verifiable targets. Verifiers: Documentation of the monitoring program that monitors the above values as well as any other	C	<p>Monitoring activities are provided in the Forest Management Plan that include these elements.</p> <p>One such example provided by STT included a report, "The impact of road construction, timber harvesting and regeneration burning on water quality in Canaways Creek, Tyenna". Additional examples may be found online.</p>



involvement by any other organisations or authorities.		
<b>6.7.5</b> Where implemented management measures do not protect watercourses, water bodies, riparian zones and their connectivity, water quantity or water quality from impacts of forest management, restoration activities or mitigation measures are implemented.	C	The Forest Management Plan provides accounting for remedial actions that may be implemented in cases where warranted. An example examined during the 2019 audit was given in an incident report dated 19/09/2017 for SO016C.
<b>6.7.6</b> Where natural watercourses, water bodies, riparian zones and their connectivity, water quantity or water quality have been damaged by past activities on land and water by The Organisation, restoration activities or mitigation measures are implemented.	C	Where problems are identified, STT can direct the contractor to undertake remedial action. Contractual arrangements allow for STT to shut the operation down until remedial action is taken. If an identified environmental problem is considered serious, the Forest Practices Authority is notified. Further actions may involve formal investigations, verbal or written warnings, fines and prosecution for failure to comply with a certified forest practices plan. Once an operation is completed, the area is rehabilitated, which involves: <ul style="list-style-type: none"> <li>• removing temporary stream crossings;</li> <li>• rehabilitating tracks and landings; and</li> <li>• removing all machinery and all other items.</li> </ul>
<b>6.7.7</b> Where continued degradation exists to watercourses, water bodies, water quantity and water quality caused by previous managers and the activities of third parties, measures are implemented that prevent or mitigate this degradation.	C	The STT system provides for such implementation and mitigations through similar mechanisms as described in 6.7.6, above.
<b>6.8</b> The Organisation shall manage the landscape in the Management Unit to maintain and/or restore a varying mosaic of species, sizes, ages, spatial scales and regeneration cycles appropriate for the landscape values in that region, and for enhancing environmental and economic resilience.	C	
<b>6.8.1</b> The landscape in a native forest component of the Management Unit (i.e., that within the control of The Organisation) is managed to maintain and/or restore habitat connectivity and a varying mosaic of species, sizes, ages, spatial scales and regeneration cycles consistent with native forest types and disturbance patterns. Verifiers: Documentation of management strategies and actions to maintain a mosaic of age classes, species mix, and disturbance patterns on the Management Unit. Documentation of management strategies and actions to maintain and/or restore connectivity between habitats.	C	Connectivity is maintained through established informal reserves and non-production areas. These include (but are not limited to) wildlife habitat corridors that are considered HCV 2.3A. The HCV plan identifies management objectives with regards to: <ul style="list-style-type: none"> <li>• Maintenance of landscape level forests (HCV2)</li> <li>• Maintenance of old growth age class (HCV3.3)</li> <li>• Maintenance of mature forest (HCV 3.4b)</li> </ul> STT's Landscape Context Planning (LCP) system includes methods for measuring, setting targets for and reporting on landscape heterogeneity and connectivity. It generates landscape indicator reports that quantify landscape biodiversity values to provide context for future management decisions. Annual reports are provided to FPA for their Agreed Procedures reporting. During the audit, STT demonstrated the process of implementing landscape heterogeneity and connectivity objectives in forest

		practices planning, consistent with forest types and disturbance patterns, for several coupes, including for coupes identified by auditors and through stakeholder submissions, e.g. NA021B, BO109A.
<b>6.8.2</b> For native forest components within the Management Unit, where the current mosaic of species, sizes, ages, spatial scales and regeneration cycles lacks natural levels of diversity, management activities and measures are implemented that enhance and/or restore spatial diversity.	C	Refer to 6.8.1  The landscape context planning system provides for long-term restoration of habitat features (mature forest) at a coupe and block scale by setting coupe and block level targets for long-term retention. An annual report on compliance with the landscape context planning system is developed.
<b>6.9 The Organisation shall not convert natural forest to plantations, nor natural forests or plantations on sites directly converted from natural forest to non- forest land use, except when the conversion:</b> <b>1. Affects a very limited portion of the area of the Management Unit, and</b> <b>2. Will produce clear, substantial, additional, secure long-term conservation benefits in the Management Unit, and</b> <b>3. Does not damage or threaten High Conservation Values, nor any sites or resources necessary to maintain or enhance those High Conservation Values.</b>	C	
<b>6.9.1</b> There is no conversion of native forest to plantation, nor conversion of native forests to non-forest land use, nor conversion of plantations on sites directly converted from native forests to non-forest land use, except when the conversion: 1) Affects a very limited portion of the Management Unit; and 2) The conversion will produce clear, substantial, additional, secure, long-term conservation benefits in the Management Unit; and 3) Does not damage or threaten High Conservation Values, nor any sites or resources necessary to maintain or enhance those High Conservation Values.	C	STT Implements the <i>Permanent Forest Estate Policy</i> , which commits it to regenerating all harvested native forest, and does not permit broad-scale conversion to non-forest uses. No incidences of conversion were discovered during the 2019 audit that constituted conversion outside of allowed conditions in 1)-3). Road maintenance and gravel extraction were among types of conversion allowed which followed established STT procedures and affected limited portions of the management unit. These are closely controlled and limited in scope.  Some mining operations, which are outside of STT's management control may result in the clearance of significant areas of forest. STT's <i>Permanent Forest Estate Policy</i> commits them to negotiating to minimise such conversion and to maximise the recovery of forest products in situations where other parties have legislative ability to convert PTPZ land to non-forest uses. STT will also endeavour to be compensated for the loss of any foregone timber revenue resulting from clearing for mining activities. Where mining leases or licences are granted, STT may agree to provide an access licence for mining companies requiring use of forestry roads outside the mining lease. Such agreements will be

		subject to STT's internal approval procedures, as described in the property rights section of this plan.
<b>6.9.2</b> The Organisation shall not revert plantations to non-forest land use except where The Organisation demonstrates: 1) That a decision not to replant current or alternative species is due to unforeseen factors or external decisions not under The Organisation's control; or 2) That replanting would not be economically viable; and 3) The social benefits of reversion, including its ability to maintain contractual obligations.	C	This follows the Policy as described in 6.9.1, above. The only reversions under the policy are, "Revert areas unsuitable for plantation reestablishment back to their pre-existing vegetation type or native vegetation."
<b>6.10 Management Units containing plantations that were established on areas converted from natural forest after November 1994 shall not qualify for certification, except where:</b> <b>1. Clear and sufficient evidence is provided that The Organisation was not directly or indirectly responsible for the conversion, or</b> <b>2. The conversion affected a very limited portion of the area of the Management Unit and is producing clear, substantial, additional, secure long-term conservation benefits in the Management Unit. (C10.9 P&amp;C V4)</b>	C	
<b>6.10.1</b> Based on Best Available Information, accurate data is compiled on all conversions since 1994.	C	STT provided for this through GIS and other records to not include these types of plantations/conversions under the proposed scope of the certificate.
<b>6.10.2</b> Areas converted from native forest to plantation since November 1994 are not certified, except where: 1) The Organisation provides clear and sufficient evidence that it was not directly or indirectly responsible for the conversion; or 2) The conversion is producing clear, substantial, additional, secure, long-term conservation benefits in the Management Unit; and 3) The total area of plantation on sites converted from native forest since November 1994 is less than 5% of the total area of the Management Unit.	C	See STT's <i>Permanent Forest Estate Policy</i> described in 6.9.1 and 6.9.2, above.

<b>PRINCIPLE 7: MANAGEMENT PLANNING</b> The Organisation shall have a Management Plan consistent with its policies and objectives and proportionate to scale, intensity and risks of its management activities. The Management Plan shall be implemented and kept up to date based on monitoring information to promote adaptive management. The associated planning and procedural documentation shall be sufficient to guide staff, inform affected stakeholders and interested stakeholders and to justify management decisions. <i>For verification of indicators in Principle 7 and Annex E:</i> <ul style="list-style-type: none"> <li>• Documentation associated with the Management Plan and related processes.</li> <li>• Interviews with workers and/or stakeholders.</li> <li>• Documentation of relevant stakeholder correspondence.</li> </ul>		
<b>7.1</b> The Organisation shall, proportionate to scale, intensity and risk of its management activities, set policies (visions and values) and objectives for management, which are environmentally sound, socially beneficial and economically viable. Summaries of these policies and objectives shall be incorporated into the Management Plan, and publicised.	C	
<b>7.1.1</b> Policies (vision and values) that contribute to meeting the requirements of this standard are defined.	C	The audit team confirmed in interview with STT management and review of the STT Lead and Subordinate Policies list updated January 2018 contains the main company policies and policies that are subordinate under each heading, the date these policies were last reviewed and the custodian of the policy. The Sustainable Forest Management Policy updated February 2018 defines the sustainability policies of the company.
<b>7.1.2</b> Specific operational management objectives that address the requirements of this standard are defined.	C	The auditors confirmed that STT has a broad range of policies, procedures, supporting documentation and templates that detail required practices and approaches that aim to achieve compliance requirements. Also, that: <ul style="list-style-type: none"> <li>• These documents are readily available to all staff from the STT WIKI database</li> <li>• That the Publicly available Forest Management Plan identifies four broad corporate objectives.</li> </ul> The strategic objectives are: Achieve and maintain financial stability for Sustainable Timber Tasmania; Efficiently and effectively make available agreed wood volumes and other services to our customers; Professionally manage public production forest to maintain wood resource and other environmental, cultural and economic values; and <ul style="list-style-type: none"> <li>• Achieve zero harm to our people and contractors.</li> <li>• Also, that STT's "Yellow book" contains a set of key performance indicators and strategic project initiatives aimed at managing risk and driving continual improvement.</li> </ul>
<b>7.1.3</b> Summaries of the defined policies and management objectives are included in the Management Plan and publicised.	C	Review of the Forest Management Plan updated April 2019 confirmed that the document contains summaries of relevant policies and summaries of the practices and approaches undertaken by STT aimed at achieving compliance with all applicable requirements evidenced by the following statements: 'This Forest Management Plan details the systems and strategies that Sustainable Timber Tasmania has in place to achieve these strategic objectives. In particular, the plan describes how Sustainable Timber Tasmania aims

		to make available agreed wood volumes (see sections 3.1, 3.2 and 3.3), maintain environmental, cultural and economic values, (3.4, 3.5, 3.6 and 3.7), and achieve a healthy and productive workplace (3.8). The document then goes on to state “Sustainable Timber Tasmania implements the systems and strategies outlined in this plan to meet these objectives, while also seeking to meet its objective of achieving financial stability”.
<b>7.2 The Organisation shall have and implement a Management Plan for the Management Unit which is fully consistent with the policies and management objectives as established according to Criterion 7.1. The Management Plan shall describe the natural resources that exist in the Management Unit and explain how the plan will meet the FSC certification requirements. The Management Plan shall cover forest Management Planning and social Management Planning proportionate to scale, intensity and risk of the planned activities.</b>	C	
<b>7.2.1</b> The Management Plan includes management actions, procedures, strategies and measures to achieve the management objectives.	C	It needs to be clearly understood that the FMP is the “front”, or the public summary of the Forest Management System, which is the management tool of STT, and not publicly available. Section 4 of the FMP provides an overview of the Forest Management System and then provides a description and operational framework that includes the statement: “STT uses a planning and operational framework (shown in figure 5 of the FMP) to supply forest products and to regrow and maintain PTPZ land, the framework involves strategic, tactical and operational planning, and implementation of these plans in order to generate forest products, subsequent regeneration and stand maintenance activities to maintain the forest’s productive capacity “ The auditors confirmed that STT does have a broad range of policies, procedures supporting documentation and company templates that detail required practices and approaches that again aim to achieve the management objectives.
<b>7.2.2</b> The Management Plan addresses the applicable elements listed in Annex E and is implemented.	C	The auditors were informed that STT had conducted a self-assessment of its publicly released FMP against Annex E. The check confirmed that STT’s management plan addresses all of the elements in the checklist. The auditors also went through Annex E with STT management and also confirmed the Annex E Checklist compiled by STT which listed the elements from the Annex and the applicable sections of the Forest Management Plan
<b>7.3 The Management Plan shall include verifiable targets by which progress towards each of the prescribed management objectives can be assessed.</b>	C	
<b>7.3.1</b> Verifiable targets, and the frequency that they are assessed, are established for monitoring the progress towards each management objective.	C	As stated above the publicly available Forest Management Plan identifies four broad objectives and that the STT “Yellow Book” details strategic project initiatives aimed at managing risk driving continual improvement. Project initiatives are reviewed at least quarterly



		<p>Operational plans are developed that contain prescriptions, or clear outcomes for managing environmental values, again assessed regularly.</p> <p>Forest operations are monitored very regularly, at least weekly throughout the operation to ensure compliance with the FPP requirements. The type of monitoring and the frequency depends on the operation type. (I.e. harvesting is formally monitored monthly but visited at least weekly by Forest supervisors – this was confirmed repeatedly throughout the site visits to harvesting operations throughout the entire STT estate.</p>
<b>7.4 The Organisation shall update and revise periodically the Management Planning and procedural documentation to incorporate the results of monitoring and evaluation, stakeholder engagement or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. (C7.2 P&amp;C V4)</b>	C	
<b>7.4.1</b> The Management Plan is revised and updated periodically to incorporate: 1) Monitoring results, including results of certification audits; 2) Evaluation results; 3) Stakeholder engagement results; 4) New scientific and technical information; and 5) Changing environmental, social, or economic circumstances.	C	<p>The Forest Management Plan (page 5) states that; “It is intended to review this plan on a five yearly cycle or earlier if required.”</p> <ul style="list-style-type: none"> <li>As this is the initial FSC evaluation for STT it was confirmed that future updates will include the results of certification audits.</li> <li>Stakeholder consultation and ongoing engagement is a significant consideration for STT review of the stakeholder database verified examples of stakeholder input resulting in adjustments of forest management prescriptions (school bus routes, neighbour considerations, roading considerations, and environmental concerns) also raised by stakeholders</li> <li>Changing environmental considerations are covered in the High Conservation Values Assessment and Management Plan, dated April 2019 and the use of the Biodiversity Evaluation Sheet provided by the Forest Practices Authority.</li> <li>Scientific and technical information is exemplified by the document titled “FPA process for earth sciences special values assessment and planning”, and the document titled “Habitat descriptions of threatened flora in Tasmania” released by the FPA dated 2016</li> </ul>
<b>7.5 The Organisation shall make publicly available a summary of the Management Plan free of charge. Excluding confidential information, other relevant components of the Management Plan shall be made available to affected stakeholders on request, and at cost of reproduction and handling.</b>	C	
<b>7.5.1</b> A summary of the Management Plan, listing its components, in a format comprehensible to stakeholders including maps and excluding confidential information is made publicly available at no cost.	C	<p>The auditors confirmed throughout the audit, and stated in (1.8.2), that the Forest Management Plan, revised April 2019 is a publicly available document from the company’s website <a href="http://www.sttas.com.au">www.sttas.com.au</a>. The auditors also confirmed that the website contains an interactive map viewer that enables location specific searching of PTPZ land and that there is a range of fact sheets that provide summaries of key aspects of the business that could be of interest to stakeholders</p>

<p><b>7.5.2</b> Relevant components of the Management Plan, including relevant supporting information, excluding confidential information, are available to affected stakeholders on request at the actual costs of reproduction and handling.</p>	C	<p>The auditors reviewed the STT Stakeholder Engagement Operational Approach sets out STT's approach to making information available to affected and interested stakeholders.</p> <p>Was also confirmed that STT is subject to the Tasmanian Right to Information Act. Section 7 of the Right to Information Act 2009 creates a legally enforceable right to information in the possession of public authorities and Ministers unless it is exempt information.</p> <p>Was also confirmed that the Sustainable Forest Management Policy includes the requirements to;</p> <ul style="list-style-type: none"> <li>• Actively engage with stakeholders, and</li> <li>• regularly monitor, audit review and publicly report on our performance</li> <li>• Also, to communicate this policy and make it publicly available</li> </ul>
<p><b>7.5.3</b> Relevant components of the Management Plan, excluding confidential information, are available to interested stakeholders where specific concerns are identified and where requests are reasonable and practicable. At its discretion The Organisation may charge for reproduction and handling.</p>	C	<p>Throughout the audit process the auditors confirmed that information is available to both affected and interested stakeholders including where specific concerns are identified. This includes information that is not already publicly available, and which is generally provided upon request and again normally at no cost.</p> <p>The auditors were informed of one instance where a stakeholder had required information of a specific high conservation value plant but wanted the information across 40 different coupes. This request was deemed to be excessive and not fulfilled. During interview this matter was reviewed by the auditors who deemed STT's position to be appropriate.</p> <p>The auditors were not informed of any cases where STT had charged for reproduction and handling of information.</p>
<p><b>7.6 The Organisation shall, proportionate to scale, intensity and risk of management activities, proactively and transparently engage affected stakeholders in its Management Planning and monitoring processes, and shall engage interested stakeholders on request.</b></p>	C	
<p><b>7.6.1</b> Culturally appropriate engagement is used to ensure that affected stakeholders are proactively and transparently engaged in the following processes:</p> <ol style="list-style-type: none"> <li>1) Dispute resolution processes (Criterion 1.6, Criterion 2.6, Criterion 4.6);</li> <li>2) Definition of Living wages (Criterion 2.4);</li> <li>3) Identification of rights (Criterion 3.1, Criterion 4.1), sites (Criterion 3.5, Criterion 4.7) and impacts (Criterion 4.5);</li> <li>4) Local communities' socio-economic development activities (Criterion 4.4); and</li> <li>5) High Conservation Value assessment, management and monitoring (Criterion 9.1, Criterion 9.2, Criterion 9.4).</li> </ol>	C	<p>STT actively encourages involvement in dispute resolution processes through both external (e.g. stakeholder engagement: operational approach, and internal (e.g. toolbox meetings) forums. STT's complaints resolution procedure is available on its website free of charge.</p> <ul style="list-style-type: none"> <li>• Wages for STT staff are established during Enterprise agreement processes that involves staff and union consultation. The auditors reviewed several examples of wage rates and confirmed they exceeded living wages.</li> <li>• Throughout the audit process it was confirmed that STT actively encourages involvement in the identification of rights, sites and impacts through its stakeholder engagement responsibilities, and is also seen in the <i>Procedures for managing historical cultural Heritage when preparing forest practices Plans</i> dated September 2017 published by the FPA. NOTE: stakeholder engagement is also a requirement of the Forest Practices system and a requirement for the development of FPPs.</li> </ul>

		<ul style="list-style-type: none"> <li>• STT is involved in a range of forums with stakeholders that help to identify and progress local development opportunities. A summary of these committees is provided in the Socio-economic impact assessment report (Table 28, page 80) reviewed by the audit team and titled; <i>Stakeholder groups in which forestry Tasmania had formal representation in 2017/18</i></li> <li>• Opportunities for local socio-economic development activities are regularly brought to the attention of relevant Regional and Land property staff through regular stakeholder engagement (e.g. Blue Derby Mountain biking). And also evidenced by the involvement of STT in instances such as the Nile River Crossing, replaced by STT as a public road Community Service Obligation (CSO). The crossing is a considerable concrete river crossing that includes concrete culverts the structure was repaired by STT on the basis that it would benefit the community as it is a public road but could also be used by STT logging trucks, The structure is on FPPF land managed by Parks service.</li> <li>• The HCV identification process involved two rounds of active stakeholder consultation Refer indicator 9.1.2. Ongoing engagement is outlined in the document: Stakeholder engagement: operational approach</li> </ul>
<p><b>7.6.2</b> Culturally appropriate engagement and best efforts are used to:</p> <ol style="list-style-type: none"> <li>1) Determine appropriate representatives and contact points (including, where appropriate, local institutions, local/ state/ national organisations and authorities);</li> <li>2) Identify interested and affected stakeholders;</li> <li>3) Determine mutually agreed communication channels allowing for information to flow in both directions;</li> <li>4) Ensure stakeholders are provided with equal opportunities to engage;</li> <li>5) Ensure all meetings, all points discussed, and all agreements reached are recorded;</li> <li>6) Ensure the content of meeting records is circulated;</li> <li>7) Ensure the results of all culturally appropriate engagement activities are shared with those involved; and</li> <li>8) Ensure relevant data in appropriate formats is provided, allowing information to flow in both directions.</li> </ol>	C	<p>In various stages throughout the audit process the auditors received a wide-ranging set of company presentations, reviewed documentation and carried out multiple stakeholder consultations.</p> <ul style="list-style-type: none"> <li>• During interview the auditors confirmed that STT's Communications and Stakeholder Engagement policy (June 2017) guides STT's stakeholder engagement processes.</li> <li>• The policy contains statements, including commitments to an open transparent process, developing strong positive relationships with stakeholders, understanding communication needs of different stakeholders promoting two way communication, and being non-discriminatory in stakeholder engagement processes.</li> <li>• The Consultation Manager database provides records of the mechanisms by which stakeholder engagement occurs and records the content of the consultation.</li> <li>• The Stakeholder Engagement Operational Approach (July 2018) sets out STT's approach to engaging with affected and interested stakeholders and states; The Approach applies to all of the operations undertaken by Sustainable Timber Tasmania, staff, contractors or any other person who engages with stakeholders on behalf of Sustainable Timber Tasmania. While recognising the importance of ongoing positive engagement with Sustainable Timber Tasmania's Government shareholders, this Approach specifically focuses on our relations with stakeholders affected by, or interested in, Sustainable Timber Tasmania's operational</li> </ul>

		<p>activities.</p> <ul style="list-style-type: none"> <li>The auditors also reviewed consultation records in the Consultation Manager database</li> </ul>
<b>7.6.3</b> Affected stakeholders are provided with an opportunity for culturally appropriate engagement in monitoring and planning processes of management activities that affect their interests.	NC	<p>Affected stakeholders have been identified in the <i>STT Stakeholder Engagement Operational Approach</i> and subscribes to the <i>Tasmanian Forest Managers Good Neighbour</i> protocol. Refer to: <a href="https://www.pft.tas.gov.au/publications/tasmanian_forest_managers_good_neighbour_protocol">https://www.pft.tas.gov.au/publications/tasmanian_forest_managers_good_neighbour_protocol</a>. However, see <b>Minor CAR 2019.8</b>.</p>
<b>7.6.4</b> On request, interested stakeholders are provided with an opportunity for engagement in monitoring and planning processes of management activities that affect their interests.	NC	See 7.6.3, above. <b>Minor CAR 2019.8</b> .
ANNEX E: ELEMENTS OF THE MANAGEMENT PLAN	C	Annex E was evaluated and is copied at the end of this table.
<p><b>PRINCIPLE 8: MONITORING AND ASSESSMENT</b></p> <p>The Organisation shall demonstrate that, progress towards achieving the management objectives, the impacts of management activities and the condition of the Management Unit, are monitored and evaluated proportionate to the scale, intensity and risk of management activities, in order to implement adaptive management.</p> <p>For verification of indicators in Principle 8 and Annex F:</p> <ul style="list-style-type: none"> <li>Documentation associated with monitoring and adaptive management processes.</li> <li>Interviews with workers and/or stakeholders.</li> <li>Documentation of relevant stakeholder correspondence.</li> </ul>		
<b>8.1</b> The Organisation shall monitor the implementation of its Management Plan, including its policies and management objectives, its progress with the activities planned, and the achievement of its verifiable targets.	C	
<b>8.1.1</b> Procedures are documented and executed for monitoring the implementation of the management plan including its policies and management objectives and achievement of verifiable targets.	C	<p>The FME holds an ISO 14001 Certificate EMS 603479 for its administration, planning, management, operations within the PTPZ and the associated harvesting, transport and sale of forest products. This certificate requires that monitoring is conducted and results evaluated.</p> <p>Integrated objectives and targets are documented in relation to the Sustainable Forest Management Policy, February 2018, the Work Health and Safety Policy, October 2017 and the Communications and Stakeholder Engagement Policy, June 2017 in the Yellow Book, environmental objectives and safety objectives and targets.</p> <p>Procedures for monitoring and reviewing implementation of the FMEs policies, objectives and targets are documented in a range of topic related and systems SOPs. Specific evidence relating to the execution of the monitoring is described in relevant indicators in the checklist for this principle.</p>
<b>8.2</b> The Organisation shall monitor and evaluate the environmental and social impacts of the activities carried out in the Management Unit, and changes in its environmental condition.	C	

<b>8.2.1</b> The social and environmental impacts of management activities are monitored consistent with the applicable elements of Annex F.	C (OBS)	<b>See Annex F, located after this main conformity table.</b> See also <b>OBS 2019.9</b>
<b>8.2.2</b> Changes in environmental conditions are monitored consistent with Annex F.	C	<b>See Annex F</b>
<b>8.3 The Organisation shall analyse the results of monitoring and evaluation and feed the outcomes of this analysis back into the planning process.</b>		
<b>8.3.1</b> Adaptive management procedures are implemented so that monitoring results feed into periodic updates to the planning process and the resulting Management Plan.		<p>The Management Review Procedure, V5, last reviewed December 2017 summarises the policies, objectives and targets that require review, the monitoring data source and what forums the relevant review occurs at. It also sets out the procedure for the annual Forest Management System review.</p> <p>Integrated objectives and targets for strategic initiatives and operational management and progress towards them are documented in the Yellow Book and reported against at monthly meetings including the Environment, Safety and Health, the Field Operations Team and General Manager Team forums. The auditors sighted monitoring related agenda items on the respective June, March and May 2019 agendas for these forums, in addition to reports titled '5.1 Harvest monitoring form failed item trends', 'Environmental report for May 2019' and 'SEG Incident Report – 05 May 2019'. Regeneration – Quality Standards Review presentation.</p>
<b>8.3.2</b> If monitoring results show non-conformities with the FSC Standard then management objectives, verifiable targets and/or management activities are changed to address the non-conformities.	C	The FME has a number of targets in its Yellow book relevant to the FSC principles and criteria, which are tracked and considered in management review processes. An example of new objectives and targets set in response to FSC findings is the Landscape Context Planning Approach, which was modified to explicitly quantify the cumulative effects of operations on environmental values at mid-landscape scale, a non-conformance from the 2014 FSC audit. The implementation of the Landscape Context Planning System is now reported on annually at an FME level.
<b>8.4 The Organisation shall make publicly available a summary of the results of monitoring free of charge, excluding confidential information.</b>		
<b>8.4.1</b> A summary of the monitoring results consistent with the applicable elements of Annex F, in a format comprehensible to stakeholders including maps and excluding confidential information is made publicly available at no cost.	C	<p>The Annual Report is published on the FMEs website and includes a significant proportion of the monitoring results. Some monitoring results are currently published in the Forest Practices Authority Annual Report and the State of the Forests Reports.</p> <p>Some monitoring elements applicable in Annex F are not easily found but are publicly available (ie reported on by FPA or in scientific papers, not linked from STT information). Annex F, items 1., 2., and 3. are subdivided and each one is addressed and also cross-references to related indicators. Please see Annex F, following this table, 7 pages.</p>
<b>8.4.2</b> Upon reasonable request where specific concerns are identified, The Organisation shall provide summaries of the relevant methodology and management responses to monitoring activities, or if agreed, in-person briefings, excluding confidential information. At its discretion The Organisation may	C	The FME applies its Stakeholder Engagement Operational Approach, July 2018 to specific requests for information from stakeholders. Pg 12 of this document notes that informal requests for information will be responded to prior to formal right to information applications. The auditors note that the FME is generally responsive to stakeholder requests (see P4).



charge for the actual costs of reproduction and handling.		
<b>8.5 The Organisation shall have and implement a tracking and tracing system proportionate to scale, intensity and risk of its management activities, for demonstrating the source and volume in proportion to projected output for each year, of all products from the Management Unit that are marketed as FSC certified.</b>	<b>C</b>	
<b>8.5.1</b> A system is implemented to track and trace all products that are sold by The Organisation as FSC certified.	NC	<p>The FME uses its Sales System and an associated eDocketing system to track and trace products from the forest to the forest gate. Some pulpwood and firewood customers do not have technology to utilise eDocketing and for these customers a paper-based docket is completed by the contractor. Sighted Forest Produce Weighbridge Docket book at coupe SO034A.</p> <p>The forest gate is established via contract and may include operating some stumpage contracts and some mill door contracts. These are recorded in contracts and described in our sales system.</p> <p>The Sales System is used to store information about the origin, quantity, description, production / haulage details, customer and certification status of the products sold. Much information is pre-populated in the Sales System (which is linked to the Forest Operations Database) prior to commencement of harvest. Production details (and if applicable sawlog dimensions) are entered at the coupe on the contractors' phone or tablet and delivery dockets printed at the site. Products sold by weight are measured at the government certified weighbridges.</p> <p>The FME currently holds certificates to sell FSC Controlled Wood from its plantation estate and 100% AFS certified products from its entire estate. The application of the tracking and tracing system to these certificates was observed during the audit.</p> <p>Not all of the plantation estate is eligible for FSC certification due to it being established by the FME after 1994. Products from these sites can only be issued with the FSC Controlled Wood claim. The auditors sighted the Proposed Forest Management GIS layer, which distinguishes the area of the FMEs estate that will remain ineligible for FSC certification from that which it intends to be certified to this standard.</p> <p>The Sales System has not yet been programmed to correctly allocate FSC claims to all products sold from its estate. See <b>Minor CAR 2019.10</b>.</p>
<b>8.5.2</b> Information about all products sold is compiled and documented, including: 1) Common and scientific species name, or where necessary, species group; 2) Product name or description; 3) Volume (or quantity) of product; 4) Information to trace the material to the source of origin harvest block; 5) Harvest date range;	NC	<p>The following log delivery dockets were sighted during field visits: Log Delivery Docket 7177936, 20/5/19, sawlog Log Delivery Docket 7185098, 13/5/19, export log Log Delivery Docket 7169583, 21/5/19, sawlog Log Delivery Docket 7192682, 27/5/19, pulpwood</p> <p>The contractor at EM005B demonstrated how the dockets are created on a phone app and printed on-site. Contractors at CM001B and SO034A also described this process.</p>

6) If basic processing activities take place in the forest, the date and volume produced; and 7) Whether or not the material was sold as FSC certified.		Species or species groups were not identified on the export log delivery dockets. See <b>Minor CAR 2019.11</b> for more detail.
<b>8.5.3</b> Sales invoices or similar documentation are kept for a minimum of five years for all products sold with an FSC claim, which identify at a minimum, the following information: 1) Name and address of purchaser; 2) The date of sale; 3) Common and scientific species name or, where necessary, species group; 4) Product description; 5) The volume (or quantity) sold; 6) Certificate code; and 7) The FSC Claim "FSC 100%" identifying products sold as FSC certified.	C	Sales invoice 165406, 30/4/19 was reviewed and noted to include all details except the FSC certificate and claim, (which is not yet available) (see NC under 8.5.1). The audit team noted that the species group 'Euc' had been included on the load summary. As Tasmanian eucalypt timber is sold within the solid wood industry as Tas Oak, this is considered acceptable.
ANNEX F: MONITORING REQUIREMENTS	C	
<b>PRINCIPLE 9: HIGH CONSERVATION VALUES</b> The Organisation shall maintain and/or enhance the High Conservation Values in the Management Unit through applying the precautionary approach.		
<p><b>9.1 The Organisation, through engagement with affected stakeholders, interested stakeholders and other means and sources, shall assess and record the presence and status of the following High Conservation Values in the Management Unit, proportionate to the scale, intensity and risk of impacts of management activities, and likelihood of the occurrence of the High Conservation Values (9.1):</b></p> <p><b>HCV 1 – Species diversity.</b> Concentrations of biological diversity including endemic species, and rare, threatened or endangered species, that are significant at global, regional or national levels.</p> <p><b>HCV 2 – Landscape-level ecosystems and mosaics.</b> Intact forest landscapes and large landscape-level ecosystems and ecosystem mosaics that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance.</p> <p><b>HCV 3 – Ecosystems and habitats.</b> Rare, threatened, or endangered ecosystems, habitats or refugia.</p> <p><b>HCV 4 – Critical ecosystem services.</b> Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes.</p> <p><b>HCV 5 – Community needs.</b> Sites and resources fundamental for satisfying the basic necessities of local communities or Indigenous Peoples (for livelihoods, health, nutrition, water, etc.), identified through engagement with these communities or Indigenous Peoples.</p> <p><b>HCV 6 – Cultural values.</b> Sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or Indigenous Peoples identified through engagement with these local communities or Indigenous Peoples.</p>		
<b>9.1.1</b> An assessment is completed consistent with Annex G that records the location and status of High Conservation Value Categories 1-6, as defined in Criterion 9.1; the High Conservation Value Areas they rely upon, and their condition. Verifiers: Documentation of the assessment methodology.	NC	STT provides an assessment of HCVs in the <i>High Conservation Values Assessment and Management Plan</i> (published April 2019). The HCV Plan identifies the existence and status of HCVs within the Permanent Timber Production Zone (PTPZ) and considers the status of the identified HCVs in the broader state-wide landscape. Management actions identified in the HCV Plan are integrated into the STT Forest Management System (FMS). The FMS incorporates compliance with the State of Tasmania's Forest Practices System, which is regulated by the Forest Practices Authority

		<p>(FPA), and provides for the development and implementation of HCV management prescriptions in operational planning.</p> <p>For the identification and assessment of threatened species (HCV 1) relevant to PTPZ land and STT operations, the HCV Plan refers to supporting documentation, including Wapstra and Doran (2009) for fauna, and the Forest Practices Authority (2016) for flora. Multiple publicly available resources and datasets are used to develop management prescriptions for threatened species (included those provided through the Threatened Fauna and Flora advisory system, maintained by FPA). Specific assessments of identified threatened species are not detailed in the HCV Plan.</p> <p>The HCV assessment methodology is documented in the HCV Plan and the document has undergone a process of public consultation.</p> <p>The audit team acknowledges that the STT approach to HCV assessment and management meets Tasmanian regulatory requirements.</p> <p>See <b>Major CAR 2019.12</b>.</p>
<p><b>9.1.2</b> The assessment considers results from culturally appropriate engagement with affected and interested stakeholders with an interest in the conservation of the High Conservation Values.</p> <p>Verifiers: Documentation of responses to stakeholder comment.</p>	C	<p>The auditors confirmed that STT's stakeholder engagement program conforms to these requirements:</p> <ul style="list-style-type: none"> <li>- A range of experts were consulted in the development of the HCV Plan. The expert consultations are registered in the STT Consultation Manager Database.</li> <li>- STT has carried out two rounds of public consultation to develop its current HCV Plan (mid 2014 and early 2017).</li> <li>- The Consultation Manager Database provides a registry of key issues identified by stakeholders and describe how STT has responded to these issues.</li> <li>- HCVs have been added in recognition of stakeholder feedback (e.g. leatherwood honey areas, the Tarkine region, Swift parrot habitat, barriers to fire)</li> </ul>
<p><b>9.2</b> The Organisation shall develop effective strategies that maintain and/or enhance the identified High Conservation Values, through engagement with affected stakeholders, interested stakeholders and experts.</p>	NC	
<p><b>9.2.1</b> Threats to High Conservation Values are identified as required by Annex G.</p> <p>Verifiers: Documentation of specific threats to the maintenance and enhancement of identified HCVs.</p>	NC	<p>The HCVs identified by STT cover a broad range of values, many of which are subject to similar threats and threatening processes. Page 7 of the HCV Plan identifies natural and human-induced threats that are not unique to the STT estate.</p> <p>Specific threats to threatened species and detailed species management prescription are, however, not provided in the HCV Plan, due to the large number of threatened species relevant to PTPZ land and STT's operations. The stated threatened species management focus is on "contributing to the maintenance of habitat", achieved through the CAR Reserve System (JANIS 1997) and STT's off-reserve management of production areas. Tactical and strategic landscape planning is facilitated by the STT Landscape Context Planning (LCP) system, which provides a planning framework, backed up by GIS-based tools, that enables the integration of landscape-level biodiversity conservation objectives into forest planning, reporting and monitoring.</p>

		<p>With regards to the identification and management of <i>specific</i> threats to HCVs, including threatened species within the STT estate, STT presently relies upon the State of Tasmania's Forest Practices System (regulated by FPA) for management recommendations in forest practices planning.</p> <p>Management objectives and rationale for each threatened species are detailed in the Threatened Fauna and Flora Adviser documentation which is developed and maintained by the FPA in consultation with experts.</p> <p>The audit team acknowledges the quality of STT's tactical and strategic landscape planning system, and that STT is acting within the regulatory framework of the State of Tasmania Forest Practices System.</p> <p>The audit team notes that this indicator requires documentation of <i>specific threats</i> to the maintenance and enhancement of identified HCVs. The documentation must include an assessment of the likelihood of occurrence and the severity of consequences. Threats may include those from management activities and other causes.</p> <p>With regards to the Critically Endangered Swift Parrot, the audit team found that there is an absence of a clear and transparent strategic approach to the management of habitat. Also, there is no species-specific documentation or analysis of the specific threats to this species (including effects of habitat loss, sugar glider predation and other threats relative to forest management activities and natural disturbances), as required by the <i>Precautionary Approach</i> and <i>Best Available Information</i> as defined in the FSC-Australia FM Standard. This finding was supported by written expert stakeholder submissions and in audit interviews.</p> <p>The audit team concludes that the requirements of this Indicator have not been met. That is, we conclude that STT has not appropriately identified and acted in consideration of specific threats to this threatened species.</p> <p>See <b>Major CAR 2019.13</b> for additional detail</p>
<p><b>9.2.2</b> Management strategies and actions are developed to maintain and/or enhance the identified High Conservation Values and to maintain associated High Conservation Value Areas prior to implementing potentially harmful management activities.</p> <p>Verifiers: Documentation of Management Plans including management strategies and actions to maintain and/or enhance HCVs, including strategies in response to identified threats.</p>	NC	<p>The HCV Plan describes actions and strategies developed to maintain HCVs. Management actions are implemented through STT's Forest Management System, which incorporates strategic, tactical and operational planning, operational briefing and monitoring.</p> <p>For species-specific management strategies and actions, STT largely refers to supporting documentation for information (descriptions, biology, threat status, ranges, habitats and observed locations) and relies on Tasmania's Forest Practices System, which is regulated by the Forest Practices Authority (FPA), for management prescriptions in operational planning.</p> <p>The Swift Parrot is exceptional in that it has been identified in the HCV Plan as a trigger for HCV 1.4 (<i>Areas with mapped significant seasonal concentrations of species</i>). It is an Austral migrant and communal breeder, with a breeding range restricted to the east and south-east</p>

		<p>coast of Tasmania, including areas of PTPZ land (Saunders and Tzaros 2011). The Swift Parrot recently had its threatened status upgraded to Critically Endangered due to the discovery of sugar glider predation which is having a severe impact on its population. A species-specific Management Plan does not exist for this species.</p> <p>It is the finding of this audit team that a STT-specific Management Plan for the Swift Parrot must be developed for the STT estate, reflecting the upgraded threat status to Critically Endangered of this species; to ensure the ability to locate and protect historic and known nesting trees; manage, and monitor populations and habitat for this species and, in particular, to secure the long-term retention of adequate mature habitat (breeding and foraging habitat), using the <i>Precautionary Approach</i>, and <i>Best Available Information</i> as defined in the FSC-Australia FM standard.</p> <p>See <b>Major CAR 2019.14</b> for additional detail.</p>
<p><b>9.2.3</b> Affected and interested stakeholders and regional experts with knowledge of the conservation of HCVs are consulted in the development of management strategies and actions to maintain and/or enhance the identified High Conservation Values.</p> <p>Verifiers: Documentation of correspondence, interviews, and data provision from stakeholders. Documentation of responses to stakeholder comment and information.</p>	NC	<p>STT provides evidence of consultation with interested stakeholders in the Consultation Manager Database. The database identifies the key issues that stakeholders had, and how STT has responded. STT has carried out two rounds of public consultation to develop its current HCV Plan (mid 2014 and early 2017). The process used by the FPA to develop Forest Practices system prescriptions involves consultation with species experts and other experts. STT actively seeks stakeholder engagement during the development of Forest Practices and operational plans.</p> <p>Observations during the audit confirmed that STT largely conforms to the requirements of this indicator. However, in written stakeholder statements and stakeholder consultations during the field audit, two issues were identified to have considerable gaps between stakeholder input (including expert advice) and implementation of the HCV management strategy during logging operations.</p> <p><i>Protection of Swift Parrot habitat:</i> Interviews with swift parrot experts during the audit discovered numerous examples of expert recommendations not being taken under advisement or meaningfully applied within the development of strategies for the management and protection of Swift Parrot habitat within the regulatory framework of the State of Tasmania Forest Practices System.</p> <p><i>Harvesting of old growth forest:</i> The audit team received multiple stakeholder comments, including expert input, that challenge the sufficiency of the JANIS system for use in the context of landscape level analysis as the basis for threat assessments of harvesting old growth on STT managed public lands. The JANIS methodology is not endorsed within the FSC-Australia FM standard, although widely used in Australia.</p> <p>It is the audit team's determination that further engagement with regional experts must be conducted relative to the use of JANIS. Considering that JANIS is a core methodology used by STT in justifying</p>



		<p>their approach to harvesting mapped old growth, considering also that this is the first test of a new FSC-Australia FM standard, and finally given the volume of stakeholder input, further general stakeholder consultation is necessary.</p> <p>See <b>Major CAR 2019.15</b> for additional detail</p>
<b>9.3 The Organisation shall implement strategies and actions that maintain and/or enhance the identified High Conservation Values. These strategies and actions shall implement the precautionary approach and be proportionate to the scale, intensity and risk of management activities.</b>	C/NC	
<b>9.3.1</b> The High Conservation Values are maintained and/or enhanced, including by implementing the strategies developed.	NC	<p>Observations during the audit confirmed that STT's Forest Management System largely conforms to these requirements:</p> <ul style="list-style-type: none"> <li>- HCV Management actions are implemented through the STT Forest Management System, which requires strategic, tactical and operational planning, operational briefing and monitoring (3-year cycle).</li> <li>- STT is legally required to report on the implementation of Forest Practices Plans to the FPA through the Certificate of Compliance process.</li> <li>- STT's Reserve Monitoring Program confirms that areas managed for retention are intact.</li> </ul> <p>Observations by the audit team in the field, and statements by expert stakeholders in interviews and in writing, provided evidence of harvest of known Swift Parrot nesting and foraging habitat within sight of identified nest sites. Clearly, harvesting nest trees and foraging areas is not maintaining or enhancing swift parrot habitat. These actions are not consistent with Criterion 9.3, which requires the FME to implement strategies and actions that maintain and/or enhance the identified High Conservation Values. These strategies and actions must implement the <i>Precautionary Approach</i> and be <i>Proportionate to the Scale, Intensity and Risk</i> of management activities. See <b>Major CAR 2019.16</b> for additional detail</p>
<b>9.3.2</b> The strategies and actions to maintain and/or enhance and avoid risks to High Conservation Values are implemented, even when the scientific information is incomplete or inconclusive, and when the vulnerability and sensitivity of High Conservation Values are uncertain. Verifiers: Documentation of the implementation of strategies and actions to maintain and/or enhance HCVs, including the level of scientific uncertainty.	C	<p>Observations during the audit confirmed that the STT Forest Management System largely conform to these requirements. See also 9.3.1.</p>
<b>9.3.3</b> Activities that damage High Conservation Values are suspended without delay and where necessary actions are taken to restore and protect the High Conservation Values. Verifiers: Documentation of any instances of suspension of activities, including the period between identification of damage and suspension of	C	<p>Observations during the audit confirmed that the STT largely conforms to these requirements:</p> <ul style="list-style-type: none"> <li>- Forest Practices Plans are required to have stop work requirements in the event of identifying specific values (e.g. cultural heritage sites, swift parrot habitat trees, raptor nests, streams).</li> </ul>

activities. Documentation of actions to restore and protect HCVs proportionate to the harm caused.		<ul style="list-style-type: none"> <li>- The Vault System provides records of where these values have been found or where prescribed management actions were not fully implemented. The Vault System includes corrective actions that address the findings.</li> </ul> <p>See also 9.3.1.</p>
<b>9.4 The Organisation shall demonstrate that periodic monitoring is carried out to assess changes in the status of High Conservation Values and shall adapt its management strategies to ensure their effective protection. The monitoring shall be proportionate to the scale, intensity and risk of management activities, and shall include engagement with affected stakeholders, interested stakeholders and experts.</b>	C/NC	
<b>9.4.1</b> A program of periodic monitoring assesses the following, consistent with Annex G: 1) Implementation of strategies; 2) The status of High Conservation Values, including High Conservation Value Areas on which they depend; and 3) The effectiveness of the management strategies and actions for the protection of High Conservation Values, to maintain and/or enhance the High Conservation Values.	NC	<p>The STT <i>Environmental Values Monitoring Framework</i> (2019) describes the methods used to monitor implementation, effectiveness and status of HCVs on PTPZ land, and STT's audit program, objectives and key performance indicators and reporting procedures.</p> <p>The audit team noted that:</p> <ul style="list-style-type: none"> <li>- Biodiversity management requirements are regulated under the State of Tasmania Forest Practices System, which is administered by FPA. The effectiveness of management strategies is monitored through the FPA's research and effectiveness monitoring program for threatened species. The program includes identifying research priorities and monitoring projects.</li> <li>- STT conducts HCV monitoring projects in collaboration with lead research agencies (FPA, UTAS, CSIRO, FWPA, ARC-Forest value, ANU, DPIPW), and with in-house projects, including long term monitoring projects (Warra Ecological Research Site), strategic monitoring projects (e.g. bio-acoustic monitoring), routine monitoring projects (e.g. reserve monitoring, weed monitoring, quarry monitoring). Collaboration with research agencies occurs in the form of research levies, cash contribution, and in-kind contribution (access to sites/permits, data, staff-resources and intellectual property).</li> <li>- STT conducts annual monitoring to track results of management towards meeting landscape context objectives. This includes monitoring of changes in landscape scale forest condition and disturbance on PTPZ land.</li> <li>- A STT Effectiveness Monitoring Projects Register has been developed to record project metadata and outputs to review management and redefine effective monitoring project priorities.</li> </ul> <p>Observations in the field and stakeholder input provided evidence that with regards to the Swift Parrot, its habitat needs are not accurately identified, and protections must be instituted such that evaluation and monitoring systems are able to detect deficiencies in program effectiveness. This is particularly important relative to the maintenance of a Critically Endangered Species.</p> <p>Statements by expert stakeholders in interviews and in writing expressed concern that the monitoring of rare, threatened, and</p>

		endangered old growth forest communities does not have sufficient scope, detail or frequency to detect changes to the status of these ecologically mature forests. See <b>Major CAR 2019.17</b> for more detail.
<b>9.4.2</b> The monitoring methodology and a periodic public summary of monitoring results are made publicly available, excluding confidential information. At its discretion The Organisation may charge for the actual costs of reproduction and handling.	C	<p>Observations during the audit confirmed that STT has in place systems that conform to these requirements:</p> <ul style="list-style-type: none"> <li>- STT publishes an Annual Report that provides a summary of monitoring events for the year.</li> <li>- STT biodiversity and landscape monitoring at a forest block scale is made available via the FPA website.</li> <li>- STT's contribution to FPA's effectiveness monitoring program for threatened species, and the results of this, are made available via FPA forums (annual review days, annual research reports on FPA website).</li> <li>- The FPA produce a State of Forests report every five years. This report includes information provided by STT.</li> </ul>
<b>9.4.3</b> The monitoring program has sufficient scope, detail and frequency to detect changes in High Conservation Values, relative to the initial assessment and status identified for each High Conservation Value.	NC	<p>STT has developed a monitoring framework that includes the monitoring of HCV implementation, status and effectiveness monitoring. The monitoring program is designed to detect change in each identified HCV.</p> <p>Statements by expert stakeholders in interviews and in writing expressed concern that the monitoring of rare, threatened, and endangered old growth forest communities does not have sufficient scope, detail or frequency to detect changes to the status of these ecologically mature forests. Due to the spatial and temporal scale of the current mapping currently in use, monitoring programs also do not adequately detect when non-RTE ecologically mature forests become threatened.</p> <p>There is a concern that STT does not adequately update its old growth maps in response to disturbance from fire. Mapping must also be improved to demonstrate considerations of other forms of large-scale natural disturbances, such as forest insect outbreaks and the effects of forest disease outbreaks, and then assess such impacts on the conservation status of old growth forest communities.</p> <p>See <b>Major CAR 2019.18</b> for additional detail</p>
<b>9.4.4</b> Management strategies and actions are adapted when monitoring or other new information show these strategies and actions are insufficient to ensure the maintenance and/or enhancement of High Conservation Values.	C	<p>Observations during the audit confirmed that STT has in place systems that conform to these requirements.</p> <p>The Forests Practices System is underpinned by an adaptive management framework, and there are several examples that demonstrate management change in response to monitoring from a threatened species management perspective (e.g for giant freshwater crayfish, <i>Odixia achaleana</i>, wedge-tailed eagle) and silviculture perspective (e.g. aggregated retention, wildlife habitat strips)</p>
ANNEX G: FRAMEWORK FOR ASSESSMENT, MANAGEMENT AND MONITORING OF HIGH CONSERVATION VALUES	C	Evaluated
<b>PRINCIPLE 10: IMPLEMENTATION OF MANAGEMENT ACTIVITIES</b> Management activities conducted by or for The Organisation for the Management Unit shall be selected and implemented consistent with The Organisation's economic, environmental and social policies and objectives and in compliance with the Principles and Criteria collectively.		

<b>10.1 After harvest or in accordance with the Management Plan, The Organisation shall, by natural or artificial regeneration methods, regenerate vegetation cover in a timely fashion to pre-harvesting or more natural conditions. (New)</b>	C	
<b>10.1.1</b> Harvested sites are regenerated in a timely manner and using a method that: 1) Protects affected environmental values; and 2) Is suitable to recover overall pre-harvest or native forest composition and structure. Verifiers: Documentation of environmental values identification, assessment and management for both native forests and plantations. Documentation of pre-harvest conditions for native forests.	C	<p>The FME's Permanent Forest Estate Policy 2018 commits to regeneration of harvested native forest coupes to native forest in a timely manner. Measures for protection of environmental values during regeneration processes are set out in the Forest Practices Plan based on the requirements of the Code. Regeneration processes are outlined in SOP for Native Forest Establishment, version 2, December 2018 and relevant Technical Bulletins.</p> <p>The auditors visited the following regenerating sites during the audit: HA018C Hastings block, TY063C Tyenna block, KA006D and Wellers Road Regeneration Kara Block, CH036I and CH044H Christmas Hills Block. Relevant FPPs and burn plans were reviewed for identification of environmental values and protection measures, particularly during regeneration burning.</p> <p>The auditors also interviewed Forest Management staff responsible for silvicultural work. They explained that the FME uses pre-harvest species composition and distribution within coupes to guide sowing activities during regeneration. This information is available via GIS mapping of stand types and vegetation communities, and is verified during FPP development. The FME seeks to collect seed for regeneration purposes on-site during harvesting operations, and has a protocol to use seed collected from within seed zone wherever possible. STT also uses tree climbers to collect seed when not available from harvesting coupes. Time between harvest and site preparation (regeneration burning) is generally kept to 12-15 months for optimal sowing conditions. Lighting patterns are designed carefully to minimise burn impacts to surrounding vegetation, however there are often other considerations such as smoke impacts and weather conditions and resource availability that influence burn decisions. Browsing is monitored at most sites and controlled where necessary. The 2018 Quality Standards Review presentation shows 68% of regeneration area meets the standard for seed provenance, requirement to sow a minimum amount of on-site seed and the rest with in-zone seed. About 99% of harvested areas were sown within 21 days of site preparation works. 95% of STTs regenerated area fully meets its regeneration stocking standards.</p> <p>The auditors observe that vegetation within and immediately adjacent to coupes regenerated using high intensity regeneration burns is particularly vulnerable to scorch and slop overs. Edge scorch and minor slop overs were visible at all of the 2018 regeneration burn sites visited during the audit. See also 10.11.4.</p>
<b>10.1.2</b> Planned regeneration or replanting activities are implemented in a timely manner that: 1) For harvest of existing plantations, re-establish plantation or regenerate to pre-harvest or more natural conditions using ecologically well-adapted species;	C	<p>The FME is not currently re-establishing plantations. See 10.1.2 for evidence covering regeneration of native forests.</p> <p>The Quality Standards 2018 presentation shows that for 2018, of the 4166ha due for scheduled regeneration surveys, 94% of area met stocking standards. The FME's analysis of reasons for understocking shows that poor burns, mammal browsing, wood cutters and wildfire are the cause of understocking.</p>

2) For harvest of native forests, regenerate to pre-harvest or more natural conditions; or 3) For harvest of degraded native forests, regenerate to more natural conditions. Verifiers: Documentation of assessments of pre-harvest conditions. Documentation of regeneration plans, including targets and timings.		
<b>10.2 The Organisation shall use species for regeneration that are ecologically well adapted to the site and to the management objectives. The Organisation shall use native species and local genotypes for regeneration, unless there is clear and convincing justification for using others.</b>	C	
<b>10.2.1</b> Species chosen for native forest regeneration are ecologically well adapted to the site and are native species and of local provenance unless, clear and convincing justification is provided for using species of non-local provenance.	C	The system for selecting species and provenance for native forest regeneration is set out in Technical Bulletin # 1 Eucalypt Seed and Sowing, 2010. The FME endeavours to collect seed for regeneration purposes on-site during harvesting operations, and has a protocol to use seed collected from within seed zone wherever possible. Seed zones are mapped areas with similar altitude, dryness and coldness, and similar ecological adaption. Preferred alternative seed collection localities are also provided for when in-zone seed is not available. See also further evidence in 10.1.1.
<b>10.2.2</b> Species chosen for regeneration are consistent with the regeneration objectives and with the management objectives.	C	The Permanent Forest Estate Policy September 2018 specifies all harvested native forest coupes will be regenerated to native forest. The Forest Practices Plans include a regeneration section and set out the site-specific objectives for each coupe to meet the Code. The Code requires the previous species composition to be sown, and seed to be collected on-site or from the nearest similar ecological zone. The Native Forests Quality Standards Manual, V2.2, April 2018 sets out the FMEs target for seed mixes, specifying the number of viable seeds collected on-site vs in-zone / out-of zone. The key performance indicator for this standard is to achieve this standard on 69% of coupes state-wide. The Quality Standards 2018 presentation shows 68% of coupes met the standard, however it also shows that over the last decade the FME has exceeded the standard. See also further evidence in 10.1.1.
<b>10.3 The Organisation shall only use exotic species when knowledge and/or experience have shown that any invasive impacts can be controlled, and effective mitigation measures are in place.</b>	C	
<b>10.3.1</b> Exotic species are used only when direct experience and/or the results of scientific research demonstrate that invasive impacts can be controlled.	C	The two eucalyptus species planted by Sustainable Timber Tasmania are <i>Eucalyptus globulus</i> (Tasmanian blue gum) and <i>E. nitens</i> (shining gum). Approximately 73 per cent of the total hardwood estate is <i>E. nitens</i> , 22 per cent is <i>E. globulus</i> , and six per cent is other eucalypt species that were largely planted as growth trials. Decades of local and international research have shown that both <i>E. nitens</i> and <i>E. globulus</i> are suitable for growing high-quality logs, as they are fast growing and are suited to most Tasmanian conditions. However, <i>E. globulus</i> timber exhibits superior density, strength and pulp yield to <i>E. nitens</i> . Research is continuing into the development of efficient processing technologies, and the identification of high-value applications for plantation timber from both species.



<b>10.3.2</b> Exotic species are used only when effective mitigation measures are in place to control their spread outside the area in which they are established.	C	This process is covered in the FPA biodiversity special values evaluations. Refer to Flora Technical Note 12. Management of Gene flow from plantation eucalypts.
<b>10.3.3</b> The spread of invasive species introduced by The Organisation is controlled.	C	<p>The FME implements machine hygiene procedures to avoid spreading invasive plant species. Contractors at the SO034A coupe explained these procedures as applied at their worksite, which are consistent with the Tasmanian Washdown Guidelines for Weed and Disease Control, April 2004.</p> <p>The Environmental Weed Control Strategy, v2, August 2016 sets out the FMEs strategy, procedures and guidelines for control of the spread of invasive species. The FME manages according to the legislated requirements to either contain or eradicate weeds, and sets priorities accordingly considering risks.</p> <p>Interviews with Forest Management staff indicate that weed and pest records are collected either through weed mapping projects or through incidental records lodged in the Forest Operations Database and the Horizon GIS during the year by staff members. The methodology for mapping is set out in the Environmental Weed Mapping System – User Manual, v2, November 2016. These records are used to generate works programs.</p> <p>The auditors sighted current weed maps for the Southern and North Western Regions, and completed records associated with Contractor Job Specifications – Ground Spraying to control declared weeds in specific forest blocks in the audit period.</p> <p>Tasmania has relatively minimal feral animal issues, compared to mainland Australia, and as such the FME has no specific pest control program.</p>
<b>10.3.4</b> Management activities are implemented, in cooperation with separate regulatory bodies where these exist, with an aim to control the invasive impacts of exotic species.	C	The FME cooperates with local government, Landcare, the Department of State Growth and Parks and Wildlife on weed control projects for declared weeds. An example was provided of the Derwent Catchment Project and another project at Ida Bay in 2018 where STT conducted cross tenure weed control on behalf of local government and Parks and Wildlife.
<b>10.4 The Organisation shall not use genetically modified organisms in the Management Unit.</b>	C	
<b>10.4.1</b> Genetically modified organisms are not used. Verifiers: Documentation of seed origins. Documentation of compliance with any state/federal regulations such as the Office of the Gene Technology Regulator.	C	The report Forestry Tasmania Eucalypt Breeding Program and Strategic Plan describes the STT tree breeding program, confirming that only material from STT seed orchards is used in the plantation program and there is no use of GMOs by the FME.
<b>10.5 The Organisation shall use silvicultural practices that are ecologically appropriate for the vegetation, species, sites and management objectives.</b>	C	
<b>10.5.1</b> Silvicultural practices are implemented that are ecologically appropriate for the vegetation, species, sites and management objectives.	C	STT has researched and documented silvicultural practices for specific forest types it operates in, including: Technical Bulletins 2 – Eucalyptus delegatensis forests, 3 – Lowland dry eucalypt forests, 4 – High altitude Eucalyptus dalrympleana and Eucalyptus pauciflora forests, 8 – Lowland wet eucalypt forests, 9 Rainforest silviculture and 10 Blackwood. It has also developed a Variable Retention Manual, v2, 17 July 2018 to guide application of retention harvesting methods.

		This methodology is based on a comprehensive research program at the Warra Long Term Ecological Research site. The auditors observed silvicultural practices being implemented consistent with these documents across a range of forest types during the field visits.
<b>10.6 The Organisation shall minimise or avoid the use of fertilisers. When fertilisers are used, The Organisation shall demonstrate that use is equally or more ecologically and economically beneficial than use of silvicultural systems that do not require fertilisers, and prevent, mitigate, and/or repair damage to environmental values, including soils.</b>	C	
<b>10.6.1</b> The use of fertilisers is minimised or avoided. Verifiers: Documentation of application of fertilisers.	C	STT uses minimal quantities of fertilizers in its operations as there is no current re-establishment program in plantations, and fertilizer is only used in native forest where basacote pellets are placed in planting holes on refill planting areas. The 2017 Annual Report shows under 15kg of fertiliser were used in 2017-18, and the maximum annual use since 2012/13 was 60.5kg in 2013/14.
<b>10.6.2</b> When fertilisers are used, their ecological benefits and economic benefits are equal to or higher than those of silvicultural systems that do not require fertilisers. Verifiers: Documentation of assessments of alternative non-fertiliser reliant silvicultural methods.	C	Currently fertilizers are only used where standard non-fertiliser reliant silvicultural methods such as burning and sowing or mechanical disturbance and sowing have failed and planting is the only remaining option. Alternative non-fertiliser remedial treatment options are set out on page 6 of Technical Bulletin #7 – Remedial Treatments. Interview with Forest Management staff at Tyenna 68G and TY63 explained how remedial treatment involving planting and fertilising is minimised consistent with the Technical Bulletin #7.
<b>10.6.3</b> In native forests, fertilisers are only used where there are clear ecological benefits.	C	See evidence for 10.6.2
<b>10.6.4</b> When fertilisers are used, their types, rates, frequencies and site of application are documented.	C	Fertilizer applications are recorded in the Forest Operations Database and on Forest Operations Plans.
<b>10.6.5</b> When fertilisers are used, environmental values are protected, including through implementation of measures to prevent damage. Verifiers: Documentation of environmental values for both native forests and plantations, including the use of any buffer zones around rare plant communities, riparian zones, watercourses and water bodies.	C	Fertilizer associated with refill planting is applied using a pellet placed at the bottom of the planting hole. This ensures fertiliser is not directly applied to environmental values. Environmental risks are documented within Forest Operations Plans. The auditors reviewed Forest Operations Plan for TN063C NF2 confirming it documents environmental risks, including mapping of exclusion areas and watercourses.
<b>10.6.6</b> Damage to environmental values resulting from fertiliser use is mitigated or repaired.	C	There were no incidents relating to damage from fertilizer application recorded in the Vault incident system.
<b>10.7 The Organisation shall use integrated pest management and silviculture systems which avoid, or aim at eliminating, the use of chemical pesticides. The Organisation shall not use any chemical pesticides prohibited by FSC policy. When pesticides are used, The Organisation shall prevent, mitigate, and/or repair damage to environmental values and human health.</b>	C	
<b>10.7.1</b> Integrated pest management, including selection of silviculture systems, is used to avoid, or aim to eliminate the frequency, extent, and amount of chemical pesticide applications.	C	The Pesticide Use Policy, July 2014 sets out the FMEs policy to minimise and strive to avoid the use of pesticides. The FME currently uses pesticides for control of leaf beetles in plantations and for weed control. Leaf beetles are controlled where fortnightly monitoring shows they will have heavy impact on a plantation. Procedures and

Verifiers: Documentation of company policy/strategy outlining procedures involved in avoiding the use of pesticides.		thresholds are set out in the Insect Pest Monitoring Guidelines – Summer 2018-2019. Plantation management staff interviewed were able to explain the procedures followed.
<b>10.7.2</b> Chemical pesticides prohibited by FSC's Pesticide Policy are not used or stored in the Management Unit unless FSC has granted derogation.	C	Chemical storage depot was inspected at Perth office and no prohibited pesticides were found. Interviews with relevant staff responsible for spraying and storage confirmed awareness of FSC prohibited chemicals and a list of such were produced immediately upon request. FME reports that Leaf beetle infestations are treated using Alpha-cypermethrin, a prohibited chemical under the FSC Pesticide Policy. The FME holds a pesticide derogation: Use of Alpha-Cypermethrin in Australia FSC-DER-30-V1-1 EN dated 23 November 2016 to use this chemical.
<b>10.7.3</b> When pesticides are used: 1) The selected pesticide, application method, timing and pattern of use offers the least risk to humans and non-target species; 2) Objective evidence demonstrates that the pesticide is the only effective and practical way to control the pest; and 3) Documentation exists to demonstrate commitment, and/or participation in research to investigate means to avoid and reduce the volume and/or adverse effect of chemical usage.	C	Specifications for the application method, timing and pattern of use for pesticides used to control leaf beetles in plantations are set out in the Contractor Job Specification Aerial Spraying. The leaf beetle monitoring record sheets for Period 1 and 2 show some coupes have adult beetles in plague proportions, and these were targeted in the spray program. STT staff have published a suite of research papers which examine the feasibility of alternatives to chemical treatment of leaf beetles and support its current pesticide program, including: Technical Report 204, Review of options for managing chrysomelid leaf beetles in Australian eucalypt plantations, 2010; Technical Report 18/2010 Integrated Pest Management of leaf beetles by Forestry Tasmania: costs, benefits and future improvements; and Costs and benefits of a leaf beetle Integrated Pest Management Program 11. Cost-benefit analysis, Cameron et al 2018. STT is part of the Forest Pest Management Research Consortium, which has as its highest priority research project (as listed in FPMR Consortium Priorities 20181125.xls) research to address FSC Derogation requirements to find alternatives to insecticide, particularly Alpha-cypermethrin.
<b>10.7.4</b> Records of pesticide usage are maintained, including trade name, active ingredient, quantity of active ingredient used, period of use, location and area of use and reason for use. Verifiers: Documentation of applications of pesticides.	C	Details of actual pesticide use at each site are recorded on the relevant Contractor Job Specification and also entered in the Forest Operations Database. The auditors sighted completed Contractor Job Specification for WW057W HWP and WW055A HWP and map showing actual flight lines and a Ground Spraying Monitoring Form for weed control in Huon dated 25/1/19. The Annual Report page 74 summarises the quantities of active ingredients of pesticides applied during 2017-18. Annual Report records from previous years were also available.
<b>10.7.5</b> The use of pesticides complies with national, state and/or international guidelines, as well as those advised by the manufacturer, through provision of training, information and protective equipment to ensure adequate protection of workers or any other persons involved in the; 1) Transport of chemicals; 2) Storage and labelling of chemicals;	C	Pesticide use in Tasmania is regulated under the Agricultural and Veterinary Chemicals (Control of Use) Act 1995, under which the Code of Practice for Aerial Spraying and Code of Practice for Ground Spraying have been authorised. Pesticide applicators are required by law to hold a current ChemCert accreditation which is issued upon completion of training. STT uses accredited contractors to apply pesticides on its estate. The applicable General Services Contract requires the contractor to hold all the necessary qualifications and

3) Handling and application; and 4) Emergency procedures for clean-up following accidental spillages. Verifiers: Documentation of health and safety incident reporting. Relevant and up-to-date chemical safety data sheets. Training and accreditation records.		accreditation to carry out the work specified in the contract. Contractor certificates for ChemCert were verified for several coupes during the course of the audit. As part of the Planning Checklist in the site-specific Contractor Job Specification, a check of the currency of the STT contractor appraisal is conducted, and procedures for handling and application relevant to the job are included. The Pesticide Application SOP, v2, February 2015 covers requirements for chemical transportation and maintenance of relevant Safety Data Sheets.
<b>10.7.6</b> If pesticides are used, application methods minimise quantities used, while achieving effective results, and provide effective protection to surrounding areas, waterways and landscapes. Verifiers: Documentation of monitoring and relevant responses.	C	Methods for minimising quantities of pesticide application and protecting surrounding areas, waterways and landscapes are documented in the Pesticide Application SOP, v2, February 2015. This includes stakeholder notification to elicit information about values on neighbouring properties, assessment of waterways and other onsite values, the results of which are recorded in the Forest Operations Plan or Contractor Job Specification. The auditors sighted completed Contractor Job Specification for WW057W HP and WW055A HWP and interviewed the Plantation Management staff member responsible for the operation to assess the consistency of their approach against the SOP. Water quality testing is completed when pesticides are applied adjacent waterways, following the Water Sampling Procedure, v2.1, 10 April 2018. Records of water quality testing are reported on pg 74 of the Annual Report and show there were no identified exceedances of Australian Drinking Water Guidelines during 2017-18.
<b>10.7.7</b> Damage to environmental values and human health from pesticide use is prevented and mitigated or repaired where damage occurs. Verifiers: Documentation of health and safety reporting and relevant responses.	C	Vault records show there were no documented instances of damage to environmental values or human health resulting from pesticide application during the 2017-18 financial year. This result is also reflected in the Annual Report on pg 74.
<b>10.8 The Organisation shall minimise, monitor and strictly control the use of biological control agents in accordance with internationally accepted scientific protocols. When biological control agents are used, The Organisation shall prevent, mitigate and/or repair damage to environmental values.</b>	C	
<b>10.8.1</b> The use of biological control agents is minimised, monitored and controlled.	C	Forest Management staff explained that there is no use of biological control agents by STT on its estate.
<b>10.8.2</b> Use of biological control agents complies with internationally accepted scientific protocols.	C	See 10.8.1
<b>10.8.3</b> The use of biological control agents is recorded including type, quantity, period, location and reason for use.	C	See 10.8.1
<b>10.8.4</b> Damage to environmental values caused by the use of biological control agents is prevented and mitigated or repaired where damage occurs.	C	See 10.8.1
<b>10.9 The Organisation shall assess risks and implement activities that reduce potential negative impacts from natural hazards proportionate to scale, intensity, and risk.</b>	C	
<b>10.9.1</b> Potential negative impacts of natural hazards on infrastructure, forest	C	FME assesses such potential negative impacts including typical natural disturbance types for Tasmania forests. The most significant natural hazards identified are fire (natural and arson) and insect/diseases.



resources and communities in the Management Unit are assessed.		<p>The following documents including planning, preparedness and monitoring were provided and reviewed.</p> <p>PDF docs:</p> <ul style="list-style-type: none"> <li>• FMP, <i>Forest Protection</i>, pages 52-59.</li> <li>• 2018 STT Tactical Fire Management Plan</li> <li>• FIFMC Fire Prevention at Forest Operations 2018</li> <li>• FIFMC Preparedness Audit Form 2018</li> <li>• Northern Region Fire Action Plan 2018-2019 EXTERNAL V4</li> <li>• RIJ030D Regeneration Burn Plan</li> <li>• STT Southern Region Fire Action Plan 18_19 (External)</li> <li>• STT Strategic Fire Management Plan 2018</li> </ul> <p>Excel: Bushfire Report_20-03_2019</p>
<b>10.9.2</b> Where possible, management activities mitigate these impacts. Note: Please refer to preamble note regarding “where possible”.	C	Such mitigation efforts were noted during the audit and are discussed in the FMP. For example, climate change mitigation is discussed on page 49 of the FMP.
<b>10.9.3</b> The risk for management activities to increase the frequency, distribution or severity of natural hazards is identified for those hazards that may be influenced by management.	C	Yes, see 10.9.1 and 10.9.2.
<b>10.9.4</b> Management activities are modified and/or measures are developed and implemented that reduce the identified risks where possible. Note: Please refer to preamble note regarding “where possible”.	C	Such examples were noted in sites that were prescribed burned. The documentation and record-keeping for planning and implementation of prescribed burning were exemplary.
<b>10.10</b> The Organisation shall manage infrastructural development, transport activities and silviculture so that water resources and soils are protected, and disturbance of and damage to rare and threatened species, habitats, ecosystems and landscape values are prevented, mitigated and/or repaired.	C	
<b>10.10.1</b> Development, maintenance and use of infrastructure, as well as transport activities, are managed to protect environmental values identified in Criterion 6.1 and Cultural Sites identified in Criterion 3.5. Verifiers: Documentation of strategies and activities to protect environmental values.	C	<p>The FME constructs, maintains and uses roads and landings as part of its operations. Environmental and cultural protection relating to these aspects (except road maintenance) is addressed in Forest Practices Plans, which were inspected and verified to the extent possible during field visits. The auditors visited HP029A Hopetoun block, a new road construction and confirmed through document review and interview that special values assessments had been completed, and the road designed to minimize impacts to waterways and forest values. There were no identified cultural values identified in the Forest Practices Plan. The auditors noted environmental values were being managed in accordance with standards set out in the Code, observing well located alignment, appropriate drainage structures, minimal clearance widths, and appropriately battered cuts and fills. The auditors also inspected upgrade works on the Styx Bridge and interviewed the construction contractor about the planning and implementation of the bridge upgrade. In this case the contractor had completely avoided impacts to the river by using cranes from temporary pads built into the first land-based span of the bridge.</p>



<p><b>10.10.2</b> Silviculture activities are managed to protect the environmental values identified in Criterion 6.1 and Cultural Sites identified in Criterion 3.5. Verifiers: Documentation of strategies and activities to protect environmental values.</p>	C	<p>Forest Practices Plans are required to be prepared for all forest establishment and timber harvesting operations. Special values assessments are conducted for the development of all Forest Practices Plans using a range of comprehensive datasets, field-based observations and consultation where required. These assessments typically address both harvesting and establishment in one process. The auditors interviewed several Forest Practices Officers responsible for planning, reviewing with them the special values assessment processes for several coupes in detail (CM001B, SO094A, BO102A, SR107E). Protections specified in the Forest Practices Plans were observed to be implemented at all harvesting sites visited. The auditors also reviewed planning processes for regeneration with the Forest Management staff, looking at special values information used to plan regeneration activities at TY063C and CH036I and burning at KA006D. In all cases the Forest Practices Plan was used as a basis and updated as necessary.</p> <p>The auditors reviewed a Tasmanian Fire Service investigation report on a regeneration burn slop over into an area retained in coupe SR107G that had once been an active Grey Goshawk nesting site but was no longer considered suitable habitat due to a windthrow event. The burn had been conducted using a hand lit spot pattern and employed a mineral earth break around the nest site. Despite these efforts, fire had smouldered in the peaty soil adjacent the exclusion area and reignited several days after the burn. The slop over resulted in a low intensity fire trickling around under the tree with the old nesting site but did no damage to the tree itself. Interview with the Forest Practice Authority raptor expert explained that he had inspected the nest and concluded it was long inactive.</p>
<p><b>10.10.3</b> Disturbance or damages to water courses, water bodies, soils, rare and threatened species, habitats, ecosystems and landscape values are mitigated, repaired and restored in a timely manner, and management activities modified to prevent further damage.</p>	C	<p>The FME monitors the implementation of environmental protections during monthly harvesting monitoring. Environmental incidents are recorded in Vault and corrective actions required to be put in place. Event 1480 recorded in Vault describes a snig track with unacceptable soil rutting and puddling for a distance of over 20m. Corrective actions of additional cordoning and matting were immediately applied to mitigate the impacts.</p>
<p><b>10.11 The Organisation shall manage activities associated with harvesting and extraction of timber and non-timber forest products so that environmental values are conserved, merchantable waste is reduced, and damage to other products and services is avoided.</b></p>	C	
<p><b>10.11.1</b> Harvesting and extraction practices for timber and non-timber forest products are implemented in a manner that conserves environmental values as identified in Criterion 6.1 and Cultural Sites identified in Criterion 3.5 over the long-term. Verifiers: Documentation of training materials and procedures related to conserving environmental values and cultural sites.</p>	C	<p>Contractors interviewed during the audit consistently explained that environmental and cultural values specific to a site are communicated to them by STT during the coupe induction and via the FPP and map. The Special values photo guide was available for the auditors' review in harvesting documentation at several worksites, and the contractors interviewed had a good knowledge of the special values they are required to report and manage for. The auditors observed harvesting practices consistent with the Forest Practices Plans, including special values exclusions and location of coupe infrastructure at all coupes visited.</p>

		The FME documents checks relating to environmental impacts at monthly harvesting monitoring. This was sighted for coupe CM001B.
<b>10.11.2</b> Harvesting practices optimise the use of forest products and merchantable materials. Verifiers: Compliance records related to utilisation.	C	Forest Products staff and contractors explained that product specifications are issued with harvesting contracts (sighted in Harvesting Contract template). Only accredited log graders may grade sawlogs, and there is a price premium for higher value products to provide incentives for maximisation of value. Harvesting supervisors inspect value recovery at each coupe visit and the FME documents formally checks relating to forest product utilisation at monthly harvesting monitoring. This was sighted for coupe CM001B. The PowerBI reporting function which allows comparison of predictions vs actuals at a coupe level was demonstrated to the auditor. Levels of biomass waste left on site are visually high, however this material does not conform to product requirements for even low-grade products and there is at present no available market for this.
<b>10.11.3</b> Sufficient amounts of dead and decaying biomass and forest structure in native forests are retained to conserve environmental values with preference given to retaining biomass and structure of the largest sizes available.	C	The auditors observed that the amount of dead standing trees retained post-harvesting was minimal on a number of (but not all) clearfell sites inspected during the audit. As outlined in 10.11.2, considerable volumes of fallen biomass are left on coupes at the conclusion of harvesting, however this is generally subject to regeneration burn and substantially reduced. Dead and decaying biomass and forest structure is retained in exclusion areas and mature forest in the landscape. Interviews with Forest Practices Authority staff confirmed that there is little information to determine what is sufficient dead and decaying biomass and forest structure in native forests to conserve environmental values. See also 10.1.1 and 10.11.4, below.
<b>10.11.4</b> Harvesting practices minimise damage to standing residual trees, residual woody debris on the ground and other environmental values identified in Criterion 6.1 and Cultural Sites identified in Criterion 3.5	NC	<p>Standing residual trees at CM001B, WW034C, NL118G and MF056C appeared to be well protected during harvesting operations, and slash pulled away from these trees prior to regeneration burns. During several of these harvest operation visits the auditors inspected wildlife habitat clumps and wildlife habitat strips with all of these being in good condition after harvesting operations.</p> <p>However, observations at other harvest sites were that practices aimed at minimisation of damage to residual standing trees and residual coarse woody debris were not sufficient. Management activities do not sufficiently protect standing residual trees within harvest areas. Examples of such were residual trees damaged in adjacent stands and streamside reserves during burning operations, such as HA018C and KA006D (note, this list is not all inclusive of those observed during the audit experience burning damage to standing residual trees).</p> <p>See <b>Minor CAR 2019.19</b> for more detail.</p>
<b>10.12</b> The Organisation shall dispose of waste materials in an environmentally appropriate manner.	C	

<b>10.12.1</b> Collection, clean-up, transportation and disposal of all waste materials is done in an environmentally appropriate way that conserves environmental values as identified in Criterion 6.1.	C	Clean up of all waste materials and rubbish is covered in section F of each Forest Practices Plan as a standard clause. Sighted for coupe CM001B and EM005B. The monthly Harvest Monitoring form includes checks for compliance with this clause, sighted for coupe CM001B. The auditors observed no issues with waste clean-up whilst conducting field visits.
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**Annexes A, C, E, and G were evaluated. Annex D is not used for Australia.**

## **ANNEX B: Training Requirements for Workers**

<b>ANNEX B: Training Requirements for Workers (P2)</b> The list of training requirements in this Annex is intended for those workers with specific job responsibilities related to the implementation of the FSC Australia – Forest Stewardship Standard. Where applicable, training should be provided by credible providers to recognised or nationally accredited standards.		
<b>Clause</b>	<b>C/NC/ Obs/NA</b>	<b>Notes</b>
As applicable to their job-specific requirements workers shall be able to:		
1) Implement forest activities to comply with applicable legal requirements (Criterion 1.5);	C	Interviewed [name removed] - People and Culture Advisor FPOs complete Forest Practices for Supervisors, run by FPA for all of industry, they then need to do FPA training, ie Masked Owl Reviewed Training Folder, create a training record, carried out on 21-24/5/18, carried out when FO numbers are present (minimum 6 and max 5) Reviewed 12 attendees, of which 4 were STT employees ([name removed] issued 11 June Non-RTO Certificate # A16-049, A16-1047, [name removed] A16-053 and [name removed] A16-057). Reviewed course outline. FPA also contribute to the course. This is all prior to actually doing an FPO course. Course cancelled this year due to lack of numbers.
2) Understand the content, meaning and applicability of relevant workplace and industrial relations legislation (Criterion 2.1);	C	Work place and industrial: WIKI, reviewed Receipt of STT and Acknowledgement of STT Policies and Procedures, includes: Anti-Discrimination and Grievance, Code of Conduct, Whistle-blower Protection Policy, Privacy and Personal information Policy, Computer Usage Policy, Gift Benefit and Hospitality Policy. National employment Standards, STT EA 2018 and Individual contracts for people not identified under the EA. Reviewed [name removed] (Acknowledgement of STT Polices and Proc) 21/1/19, [name removed] 1/4/19 and, [name removed] 14/1/19).
3) Recognise and report on instances of sexual harassment and gender discrimination (Criterion 2.2);	C	Reviewed and described in main table.
4) Safely handle and dispose of hazardous substances to ensure that use does not pose health risks (Criterion 2.3);	C	Training is identified in the PRDP process, requests lodged (Professional Review and Development Process) people request Training [name removed] -requested weed identification training, completed Control

		Weeds, carried out by TasTafe ACHPMG301 8/5/19. No Chemcert training since 2017
5) Carry out their responsibilities for particularly dangerous jobs or jobs entailing a special responsibility (Criterion 2.5);	N/A	Most jobs of this nature are carried out by contractors. Cultural Heritage Training, no legal responsibilities of STT land. No native title on STT land
6) Identify where Indigenous Peoples have legal and cultural responsibilities related to management activities (Criterion 3.2);	N/A	[name removed] Question – Cultural Heritage Training, no legal responsibilities of STT land. No native title on STT land
7) Identify and implement applicable elements of UNDRIP and ILO Convention 169 (Criterion 3.4);	C	[name removed]. FPA offer Aboriginal Heritage training. Also, anti-discrimination policy signed on induction. Reviewed [name removed] (Acknowledgement of STT Polices and Proc) 21/1/19, [name removed] 1/4/19 and, [name removed] 14/1/19)
8) Identify sites of special cultural, ecological, economic, religious or spiritual significance to Indigenous Peoples and implement the necessary measures to protect them before the start of forest management activities to avoid negative impacts (Criterion 3.5 and Criterion 4.7);	C	Running a course on July 19. Reviewed last course Aboriginal Cultural Awareness Training dated 17/11/15 (1-day course) 36 attendees from STT, including [names for 4 individuals removed] -certificates in HR personnel files reviewed by auditor
9) Identify where local communities have legal rights related to management activities (Criterion 4.2);	C	Specific staff have the ability to interrogate the Property rights database and verify legal rights in contracts. No formal training, mainly on the job training
10) Carry out social, economic and environmental impact assessments and develop appropriate mitigation measures (Criterion 4.5 and 6.2);	C	STT have their own staff and use contractor FPOs as well, training records are maintained by the FPA
11) Implement activities related to the maintenance and/or enhancement of declared ecosystem services (Criterion 5.1);	NA	STT do not make any claims re declared eco system services
12) Handle, apply and store pesticides safely (Criterion 10.7); and	C	[name removed] – certificates to be put in shared drive
13) Implement procedures for cleaning up spills of waste materials (Criterion 10.12).	C	Also go thru spill clean-up with all staff, to be put on Shared drive

## ANNEX F: Monitoring Requirements

<b>ANNEX F: Monitoring Requirements (P8)</b> <b>Monitoring is scheduled in the Management Planning cycles, so that monitoring results can be used in decision-making at an early stage of the planning of a new cycle. Monitoring procedures shall be consistent and replicable over time, suitable for quantifying changes over time with spatial scales appropriate to the indicator and value, and suitable for identifying risks and unacceptable impacts beyond defined acceptable ranges. Monitoring shall include the changes of the conditions of the Management Unit, with and without interventions.</b>		
Clause	C/NC/Obs/NA	Notes
1) Monitoring in 8.2.1 is sufficient to identify and describe the environmental		

impacts of management activities, including where applicable:		
a) The results of regeneration activities (Criterion 10.1);	C	Tech Bulletin #6 Regeneration Surveys and Stocking Standards and # 10 Blackwood. Inspected regenerated eucalypt sites, interviewed Forest Management staff and reviewed relevant monitoring results at TY063C in Tyenna block, Wellers Road in Kara Block and blackwood sites at CH036I and CH044H in Christmas Hills Block. Reported in Table 17 of the Annual Report.
b) The use of ecologically well adapted species for regeneration (Criterion 10.2);	C	SOP for Native Forest Establishment, version 2, December 2018 and the Native Forests Quality Standards Manual 2018. Interviewed Forest Management staff and reviewed relevant seed source records for TY063C in Tyenna block, Wellers Road in Kara Block. Reported in Table 17 of the Annual Report.
c) Invasiveness or other adverse impacts associated with any exotic species within and outside the Management Unit (Criterion 10.3);	C	Environmental Weed Control Strategy, version 2, last reviewed August 2016. Interviewed Forest Management staff and reviewed weed spray records for North West and Huon Valley, which include all recorded locations in these areas. Some information about weeds and diseases is reported in Table 9 of the Annual Report.
d) The use of genetically modified organisms to confirm that they are not being used (Criterion 10.4);	C	The report Forestry Tasmania Eucalypt Breeding Program and Strategic Plan describes the STT tree breeding program, confirming that only material from STT seed orchards is used in the plantation program.
e) The results of silvicultural activities including areas harvested by forest type, and silvicultural method (Criterion 10.5);	C	Silviculture procedures as per 1b). SOP for Timber Harvesting and Sales, last reviewed 17 May 2018. Results reported in Table 14 Sustainable by nature Annual Report 2017-18 (Annual Report). Interviewed harvesting forest officers at CM001B, TY068G and CH042G, and Forest Management Staff as per 1a).
f) Adverse impacts to environmental values from the use of fertilisers (Criterion 10.6);	C	Table 7 of the Annual Report shows under 15kg of fertiliser were used in 2017-18. Interview with Forest Management staff confirmed the only current fertiliser use is basacote pellets placed in planting holes on refill planting areas in native forests. Any detected adverse impacts would be recorded in Vault, and there are none.
g) Adverse impacts to environmental values from the use of pesticides (Criterion 10.7);	C	SOP Pesticide Application, Version 2, February 2015 and Water Sampling Procedure, Version 2.1, April 2018. Interviewed Plantation and Forest Management staff about monitoring of pesticide impacts from insect and weed control program. Reviewed results of water quality sampling on pg 74 Annual Report. Any detected adverse impacts would be recorded in Vault, and there are none.
h) Adverse impacts to environmental values from the use of biological control agents (Criterion 10.8);	C	Not using biological control agents.



i) The impacts from natural hazards including areas burnt by forest type and fire severity (Criterion 10.9);	C	Northern and Southern Fire Action Plans 2018-2019 Reviewed weekly fire report showing fire number and area burnt. Also sighted fire severity mapping for large fires in 2019 which are captured in the Forest Operations Database. Total area of PTPZ burnt by wildfires is reported in Table 11 of the Annual Report.
j) The impacts of infrastructural development, transport activities and silviculture on rare and threatened species, habitats, ecosystems, landscape values, water and soils (Criterion 10.10);	C (OBS)	Road Works Procedure, v1, October 2017 and SOP for Timber Harvesting and Sales, 17/5/19 (relevant to landings) requires completion of operations monitoring forms on a monthly basis. Questions focus on compliance with Forest Practices Plans. Sighted NA019D Road Construction Monitoring Template, completed 29/4/19. Sighted completed monthly harvest monitoring form for CM001B. Unplanned impacts are recorded on the monitoring form and non-conformances entered in Vault. Impacts are not publicly reported by STT but non-compliances with Forest Practices Plans are addressed in Forest Practices Authority Annual Report 2017-18. See OBS 2019.9.
k) The impacts of harvesting and extraction of timber on non-timber forest products, environmental values, merchantable wood waste and other products and services (Criterion 10.11); and	C	Timber Harvesting and Sales, 17/5/19 (relevant to landings) requires completion of operations monitoring forms on a monthly basis. Questions focus on compliance with Forest Practices Plans and utilisation. Sighted completed monthly harvest monitoring form for CM001B. Unplanned impacts are recorded on the monitoring form and non-conformances entered in Vault. Impacts are not publicly reported by STT but non-compliances with Forest Practices Plans are addressed in Forest Practices Authority Annual Report 2017-18. Landscape Context Planning System Manual v3, 14/5/19 specifies monitoring methods to detect harvesting impacts on landscape level habitat values. Landscape Indicators Reports prepared in 2018 were sighted for ten forest blocks.
l) Environmentally appropriate disposal of waste materials (Criterion 10.12).	C	Same monitoring system applies as 1j).
2) Monitoring in 8.2.1 is sufficient to identify and describe social impacts of management activities, including where applicable:		
a) Evidence of illegal or unauthorised activities (Criterion 1.4);	C	Staff report illegal activities in the Vault system, which are collated and reported in the quarterly management reviews. Sighted SEG Incident Report for February – April 2019, which lists a number of illegal activities detected on the FMEs estate. Sighted Environmental Incidents Report 10/5/19 to Field Operations Team.

b) Compliance with applicable laws, local laws, ratified international conventions and obligatory codes of practice (Criterion 1.5);	C	Non-compliances with transportation laws, Forest Practices Plans and other laws are reported in Vault, and through a positive affirmation process at monthly management meetings. The FPA conduct annual compliance audits. Summary results from these audits are reported in the FPA annual report and compliance issues pursued with the relevant forest manager. The Truck Overload Management System (TOMS) notifies drivers if overloaded (doesn't print docket) and provides disincentive (don't get paid for overloaded weight).
c) Resolution of disputes and grievances (Criterion 1.6, Criterion 2.6, Criterion 4.6);	C	Complaints are recorded in the Consultation Manager and reported in quarterly reports to the Environment, Safety and Health Committee.
d) Employment practices and conditions for workers (Criterion 2.1);	C	As part of regular EA reviews, the FME conducts a comparison of the proposed EA with the Silviculture Industry Award to benchmark the employment conditions for workers (See also 2.4.2). Sighted the 2018 BOOT analysis. Not publicly reported.
e) Programs supporting gender equality, and actions addressing sexual harassment and gender discrimination (Criterion 2.2);	C	STT collects gender statistics in its AURION database, preparing analysis and reporting on initiatives and programs at the General Management Team meeting on a monthly basis. Unconscious bias training is recorded in AURION. Not publicly reported.
f) Programs and activities regarding occupational health and safety (Criterion 2.3);	C	All health and safety incidents (including near misses) involving staff and contractors are recorded in Vault. Sighted in SEG Incident Report for February – April 2019, which lists a number of relevant entries. Safety items are included in monthly monitoring for road construction and harvesting operations. A program of contractor safety audits is run annually for all harvest and haulage contractors. Incidents and non-conformances are reported on monthly to the General Management Team. Sighted the Workplace Health and Safety Report to General Management Team for May 2019. A summary of safety performance statistics is presented in Table 19 in the Annual Report.
g) Payment of wages (Criterion 2.4);	C	Wage payments are monitored via bank transaction summaries and rejected payments followed up. Sighted bank statements during the audit.
h) Workers' training (Criterion 2.5);	C	Worker training is recorded in AURION and for contractors in the ForestWorks database. Learning and development needs are recorded via the PRDP progression plans, which are aggregated by People and Culture and progress monitored and reported on a monthly basis to senior management in the People and Culture report. Not publicly reported.
i) Where pesticides are used, the health of workers exposed to pesticides (Criterion 2.5 and Criterion 10.7);	C	All pesticide applications are conducted by contractors. Contractors are required to notify STT of any incidents affecting worker health involving medical treatment or damage / failure of plant and equipment. These incidents are monitored and reported as per 2f).

j) The identification of Indigenous Peoples and local communities and their legal and customary rights (Criterion 3.1 and Criterion 4.1);	C	Monitored as per 2c.
k) Full implementation of the terms in binding agreements (Criterion 3.2);	NA	STT advise that no binding agreements relating to Indigenous Peoples exist.
l) Indigenous Peoples and community relations (Criterion 3.2, Criterion 3.3 and Criterion 4.2);	C	Monitored as per 2c.
m) Protection of sites of special cultural, ecological, economic, religious or spiritual significance to Indigenous Peoples and local communities (Criterion 3.5 and Criterion 4.7);	C	Monitored as per 1j). The number of aboriginal sites on PTPZ land is reported in Table 2 of the Annual Report.
n) The use of traditional knowledge and intellectual property (Criterion 3.6 and Criterion 4.8);	NA	STT report they are not using traditional knowledge or intellectual property.
o) Local economic and social development (Criterion 4.2, Criterion 4.3, Criterion 4.4,);	C	Monitoring of legal and customary rights of local communities and resolution of grievances is as per 2c). The FME periodically commissions a full social impact evaluation of its forest management activities. Sighted Social Impact Evaluation of Sustainable Timber Tasmania's Forest Management Activities, January 2019. These are not publicly reported. Table 22 of the Annual Report provides statistics on local purchasing.
p) Social impacts (Criterion 4.5)	C	Monitored as per 2o). Smoke from prescribed burns is monitored throughout burning season as part of the smoke management unit allocation system. Exceedances of national air quality standards and air quality complaints are reported in table 12 of the Annual Report.
q) The production of diversified benefits and/or products (Criterion 5.1);	C	Forest production statistics are monitored in the Power BI database, which contains a range of customised reports for operational monitoring of production. Demonstrated to the auditors by Forest Products staff. Table 15 of the Annual report includes wood production statistics.
r) The maintenance and/or enhancement of ecosystem services (Criterion 5.1);	NA	STT does not make claims regarding the maintenance/enhancement of ecosystem services.
s) Activities to maintain or enhance ecosystem services (Criterion 5.1);	NA	STT does not make claims regarding the maintenance/enhancement of ecosystem services.
t) Actual compared to projected annual harvests of timber and non-timber forest products (Criterion 5.2);	C	Required to be conducted at 5 yearly intervals under the Tasmanian Regional Forest Agreement. The monitoring methodology and results are documented in the Sustainable high-quality sawlog supply from Tasmania's Permanent Timber Production Zone Land, Review No. 5, July 2017. Monitored on a monthly basis using Power BI database – sighted by auditors.

u) The use of local processing, local services and local value added manufacturing (Criterion 5.4);	C	Sale of high-quality sawlog to local customers is monitored on a quarterly basis against a Yellow book target. Sighted by auditors. The FME periodically commissions a full social impact evaluation of its forest management activities. Sighted Social Impact Evaluation of Sustainable Timber Tasmania's Forest Management Activities, January 2019. These monitoring results are not publicly reported.
v) Long-term economic viability (Criterion 5.5); and	C	An operating budget is developed on an annual basis, using projected revenue from product sales and expenditure based on actual costs. The implementation of the budget is monitored on a monthly basis, with a Monthly Profit and Loss statement (sighted by the auditors for April 19). The Finance Report is tabled monthly at the Board meeting (sighted April 19 Financial Report 22/5/19). Financial data is comprehensively reported in the Annual Report.
w) High Conservation Values 5 and 6 identified in Criterion 9.1.	C	See 9.4
3) Monitoring procedures in 8.2.2 are sufficient to identify and describe changes in environmental conditions including where applicable:	C	The auditors note that a number of monitoring procedures for describing change in environmental conditions are addressed by Tasmanian government agencies such as the Forest Practices Authority and DPIPW.
a) The maintenance and/or enhancement of ecosystem services (Criterion 5.1) (when The Organisation makes FSC promotional claims regarding the provision of ecosystem services, or receives payment for the provision of ecosystem services);	NA	
b) Environmental values (Criterion 6.1); including the effectiveness of actions identified and implemented to prevent, mitigate and repair negative impacts to environmental values (Criterion 6.3);	C	<p>Landscape – The effectiveness of visual landscape management activities is assessed during annual compliance audits by the FPA and reported in the 2017-18 Forest Practices Annual Report.</p> <p>Atmosphere – The EPA prepare BLANKET reports on events that release smoke into the atmosphere including burning activities. Non-conformances causing smoke events exceeding national air quality standards are recorded in Vault and reported via the Yellow Book. Effectiveness review conducted and reported on periodically by the FPA.</p> <p>Soil – The effectiveness of soil protection mechanisms is monitored at a State level by the Forest Practices Authority. Sighted relevant examples in 2017-18 Forest Practices Annual Report.</p> <p>RTE – see 3c)</p> <p>Flora and fauna – see 3e)</p> <p>Habitat – see 3g)</p> <p>Water – see 3f)</p>
c) Rare and threatened species, and the effectiveness of actions implemented to protect them and their habitats (Criterion 6.4);	C	STT rely on the research and effectiveness monitoring program of the FPA to determine the effectiveness of prescribed actions on RTE species. STT contribute funding to this program. The approach to RTE effectiveness monitoring is set out in the report Developing

		a biodiversity effectiveness monitoring program for the forest practices system: identifying priority projects, October 2013. The FPA effectiveness monitoring program presentation summarises a range of relevant effectiveness monitoring results and current priorities to which STT is contributing. Interviews with the FPA Research Manager confirmed the validity of the information within the presentation.
d) Representative sample areas and the effectiveness of actions implemented to maintain, enhance and/or restore them (Criterion 6.5);	C	The FME has established a Long-Term Retention Reserve Monitoring program, where the severity of effects of burning, wind damage, exotic weeds, illegal wood cutting and other impacts are recorded for reserves within the PTPZ including Representative Sample Areas. The program includes establishment of 15-20 plots per block, with condition assessment and photo-point monitoring. The program is being progressively rolled out, with 6 blocks complete to date. Results presented in LTR Reserve Health and Integrity Assessment presentation, also reported in Table 9 of the Annual Report.
e) Naturally occurring native species, plant communities and habitat features, and the effectiveness of actions implemented to maintain, enhance and/or restore them (Criterion 6.6);	C	See 3c) d) and g). STT has established a bird survey monitoring project (sighted Monitoring the persistence of hollow-using birds in landscapes of varying mature habitat availabilities on PTPZ land, May 2019), which it is using to evaluate the effectiveness of long-term retention areas at a landscape scale in maintaining ecosystem health. Some preliminary results are presented in the presentation 'Investigating the persistence of native birds in landscapes of varying mature habitat availabilities, 14 Sept 2018'. The research and effectiveness monitoring program of the FPA described in 3c) includes projects relating to hollow bearing trees, mature forest and karst, to determine the effectiveness of prescribed actions on maintaining different habitat features.
f) Water courses, water bodies, water quantity and water quality and the effectiveness of actions implemented to maintain, enhance and/or restore them (Criterion 6.7);	C	The effectiveness of actions to maintain water values (including post-harvest assessment of erosion) is assessed during annual compliance audits by the FPA and reported in the 2017-18 Forest Practices Annual Report. This report also covers research projects conducted by the FPA and contributed to by STT. In 2017-18 these included a project on the effectiveness of the Class 4 stream guidelines in reducing sediment input into sub-catchments that support giant freshwater crayfish.
g) Landscape values and the effectiveness of actions implemented to maintain and/or restore them (Criterion 6.8);	C	The FME is implementing a Landscape Context Planning system, where it monitors maintenance of landscape heterogeneity, mature eucalypt availability, mature habitat fragmentation and forest connectivity and forest influence at a block level against its targets. Sighted 2018 reports for 10 blocks. These reports monitor the effect of tactical planning on landscape values. A summary Environmental Compliance Report 18 April 2019 provides an overview at a state level. Table 3 of the Annual Report provides a public summary of landscape context performance.



h) Conversion of native forest to plantations or conversion to non-forest (Criterion 6.9);	C	The Code requires all harvested forest within the permanent native forest estate (including PTPZ) to be effectively regenerated. Regeneration objectives and actions for each coupe are set out in the Forest Practices Plan, and required to be completed before the Forest Practices Plan is closed. See 1a) for more detail. Any area of understocked forest within each regenerated coupe is recorded in the Forest Operations Database (sighted for operations 470787). This information is aggregated, reported and reviewed annually in the Quality Standards reporting process.
i) The status of plantations established after 1994 (Criterion 6.10); and	C	STT records establishment and management activities for plantations in its Forest Operations Database, including dates of establishment. It has developed a conversion layer in its GIS, which defines the areas of plantation established by STT and its predecessor Forestry Tasmania after 1994. STT has a system for regularly reviewing the forest areas that are eligible for respective forest certification systems. The system includes monitoring attributes of plantation areas. Refer to Certification scope document. We don't convert so the conversion layer won't change.
j) High Conservation Values 1 to 4 identified in Criterion 9.1 and the effectiveness of actions implemented to maintain and/or enhance them.	C	See 9.4

## Appendix 7 – Chain of Custody Indicators for FMEs Conformance Table

REQUIREMENT	SCS	COMMENT/CAR
<b>1. Quality Management</b>		
1.1 The FME shall appoint a management representative as having overall responsibility and authority for the organization's compliance with all applicable requirements of this standard.	C	Page 5 of the CoC Manual states the Certification Manager has overall responsibilities for CoC implementation within STT
1.2 A system shall be implemented to track and trace all products that are sold with an FSC Claim. For group and multiple FMU certificates, this system shall also be documented.	C	Reviewed the Chain of Custody Procedure dated November 2018 implemented by STT to meet COC requirements.
1.3 The FME shall maintain complete records of all FSC-related COC activities, including sales and training, for at least 5 years.	C	Page 6 of the CoC Manual states that all records will be maintained for at least 5 years, Training records will be placed on the Aurion System by the Training Branch, Sales invoices will be stored on the Finance 1 system. Reviewed spreadsheet that lists archived records dating back to 2014

<p>1.4 The FME shall define its forest gate(s) (check all that apply):  <i>The forest gate is defined as the point where the change in ownership of the certified-forest product occurs.</i></p>	C	<p><input checked="" type="checkbox"/> <b>Stump</b>  <i>Stumpage sale or sales of standing timber; transfer of ownership of certified-forest product occurs <u>upon</u> harvest.</i></p> <p><input checked="" type="checkbox"/> <b>On-site concentration yard</b>  <i>Transfer of ownership of certified-product occurs at concentration yard under control of FME.</i></p> <p><input checked="" type="checkbox"/> <b>Off-site Mill/ Log Yard/ Port</b>  <i>Transfer of ownership occurs when certified-product is unloaded or paid for at purchaser's facility or a facility under the purchaser's control.</i></p> <p><input type="checkbox"/> <b>Auction house/ Brokerage</b>  <i>Transfer of ownership occurs at a government-run or private auction house/ brokerage.</i></p> <p><input type="checkbox"/> <b>Lump-sum sale/ Per Unit/ Pre-Paid Agreement</b>  <i>A timber sale in which the buyer and seller agree on a total price for marked standing trees or for trees within a defined area before the wood is removed — the timber is usually paid for <u>before</u> harvesting begins. Similar to a per-unit sale.</i></p> <p><input type="checkbox"/> <b>Log landing</b>  <i>Transfer of ownership of certified-product occurs at landing/yarding areas.</i></p> <p><input type="checkbox"/> <b>Other (Please describe):</b></p>
<p>1.5 The FME shall have sufficient control over its forest gate(s) to ensure that there is no risk of mixing of FSC-certified forest products covered by the scope of the FM/COC certificate with forest products from outside of the scope prior to the transfer of ownership.</p>	C	<p>Certification status is defined at the coupe level, meaning that coupes will either be 100% FSC certified or not certified. The STT sales system does not allow for mixing of products from multiple coupes to occur during transport to the forest gate.</p>
<p>1.6 The FME and its contractors shall not process FSC-certified material prior to transfer of ownership at the forest gate without conforming to applicable chain of custody requirements.  <i>NOTE: This does not apply to log cutting or de-barking units, small portable sawmills or on-site processing of chips/biomass originating from the FMU under evaluation.</i></p>	C	<p>The auditors confirmed in the field that there is no processing apart from debarking and cutting to length prior to change of ownership at the forest gate.</p>
<p>1.7 The FME has supported transaction verification conducted by SCS and Accreditation Services International (ASI) by providing samples of FSC transaction data as requested by SCS.  <i>NOTE: Pricing information is not within the scope of transaction verification data disclosure.</i></p>	N/A	<p>No requests for transaction verification.</p>
		<p><b>N/A, no verification requested</b></p>

<b>2. Product Control, Sales and Delivery</b>		
2.1. Products from the certified forest area shall be identifiable as certified at the forest gate(s).	C	All logs from the harvesting coupe are covered by delivery dockets which list the operation number the harvest area, the date, the harvesting contractor and the log identifications. (see below)
<p>2.2 Information about all products sold shall be compiled and documented for all FMUs in the scope of certification, including:</p> <ol style="list-style-type: none"> <li>1) Common and scientific species name;</li> <li>2) Product name or description;</li> <li>3) Volume (or quantity) of product;</li> <li>4) Information to trace the material to the source of origin harvest block;</li> <li>5) Harvest date;</li> <li>6) If basic processing activities take place in the forest, the date and volume/quantity produced; and</li> <li>7) Whether or not the material was sold with an FSC Claim.</li> </ol>	C	<p>All information in relation to products sold is maintained within STT's Sales Database. However, see CAR under 8.5.2 for more detail.</p> <p>As stated above the delivery docket is the originating document accompanying all loads of logs from the harvest area to the point of delivery.</p> <p>For example:          Delivery Docket 7176896          Dated 30/4/19          From Sustainable Timbers Tasmania          Coupe: CZ 016B – 473908          Delivered to Bridgewater – [name removed]          DA 151412          Species Eucalyptus delegatensis          Total volume 26.64 m<sup>3</sup>          Harvesting contractor [name removed]</p>
<p>2.3. The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the following information:</p> <ol style="list-style-type: none"> <li>a) name and contact details of the FME;</li> <li>b) information to identify the customer, such as their name and address;</li> <li>c) date when the document was issued;</li> <li>d) product name or description, including common and scientific species name(s);</li> <li>e) quantity of products sold;</li> <li>f) the FME's FSC Forest Management (FM/COC) or FSC Controlled Wood (CW/FM) code;</li> <li>g) clear indication of the FSC claim for each product item or the total products as follows:             <ol style="list-style-type: none"> <li>i. the claim "FSC 100%" for products from FSC 100% product groups; or</li> <li>ii. the claim "FSC Controlled Wood" for products from FSC Controlled Wood product groups.</li> </ol> </li> </ol>	C	<p>The COC procedures state that the Information Systems Branch is responsible for ensuring that the sale systems and E dockets provide an accurate reflection of the certification status of each harvested operation and the generated products</p> <p>Each delivery is managed under a Sales Agreement which is the overarching document for each sale,          Sales Agreement 1175/STT – [name removed]          Reviewed DA 151368 with [name removed] as the Harvester and carter          Dated 7/11/18          From Sustainable Timbers Tasmania          FSC certification SCS-CW/FM – 005775          Species:</p>
<p>2.4 If the sales documentation issued by the FME is not included with the shipment of the product and this information is relevant for the customer to identify the product as being FSC certified, the related delivery documentation has included the same information as required in indicator 2.3 and a reference linking it to the sales documentation.</p> <p><b>Note: 2.3 and 2.4 above are based on FSC-STD-40-004 V3-0 Clauses 5.1 and 5.3</b></p>	C	Each load of logs is accompanied by a delivery docket. RCTIs are generated electronically and sent to the clients

2.5 If the FME is unable to include the FSC claim and/or certificate code in sales or delivery documents, the required information has been provided to the customer through supplementary documentation (e.g. supplementary letters). In this case, the FME has obtained permission from SCS to implement supplementary documentation in accordance with the following criteria: a. there shall exist clear information linking the supplementary documentation to the sales or delivery documents; b. there is no risk that the customer will misinterpret which products are or are not FSC certified in the supplementary documentation; and c. where the sales documents contain multiple products with different FSC claims, each product shall be cross-referenced to the associated FSC claim provided in the supplementary documentation.	N/A	FME is not yet made claims for any FSC products.
2.6 The FME may identify products exclusively made of input materials from small or community producers by adding the following claim to sales documents: "From small or community forest producers." This claim can be passed on along the supply chain by certificate holders. <i>A forest management unit (FMU) or group of FMUs that meet(s) the small and low-intensity managed forest eligibility criteria (FSC-STD-1-003a) and addenda. A community FMU must comply with the tenure and management criteria defined in FSC-STD-40-004.</i>	N/A	
	N/A	N/A, not a small or community producer; or does not wish to pass along this claim.
<b>3. Labeling and Promotion</b>	N/A	<b>N/A, FME does not use/ intend to use trademarks and no trademark uses were detected during the audit.</b>
	N/A	<b>N/A, CW/FM certificates are not allowed to use FSC trademarks and no trademark uses were detected during the audit (Note: it is a Major nonconformity to 3.1 if CW/FM certificates are found to be using trademarks).</b>
3.1 The FME shall adhere to relevant trademark use requirements of FSC-STD-50-001 described in the <i>SCS Trademark Annex for FMEs</i> .	N/A	Refer to evidence cited in applicable trademark checklist(s) cited below.
<b>4. Outsourcing</b>	N/A	<b>N/A, FME does not outsource any COC-related activities, as confirmed via interviews, sales documentation, and field observation.</b>
	N/A	<b>N/A, FME outsources low-risk activities such as transport and harvesting, as confirmed via interviews, sales documentation, and field observation.</b>
4.1 The FME shall provide the names and contact details of all outsourced service providers.	N/A	
4.2 The FME shall have a control system for the outsourced process and agreement which ensures that: a) The material used for the production of FSC-certified material is traceable and not mixed with any other material prior to the point of transfer of	N/A	

legal ownership; b) The outsourcer keeps records of FSC-certified material covered under the outsourcing agreement; c) The FME issues the final invoice for the processed or produced FSC-certified material following outsourcing; d) The outsourcer only uses FSC trademarks on products covered by the scope of the outsourcing agreement and not for promotional use. e) The outsourcer does not further outsource the material. f) The outsourcer accepts the right of the certificate body to audit them.		
<b>5. Training and/or Communication Strategies</b>		
5.1 All relevant FME staff and outsourcers shall be trained in the FME's COC control system commensurate with the scale and intensity of operations and shall demonstrate competence in implementing the FME's COC control system.	C	During the audit process the auditors confirmed that STT has conducted COC training. The Certification Manager is trained to manage the CoC responsibilities onsite. Otherwise the CoC is electronic
5.2 The FME shall maintain up-to-date records of its COC training and/or communications program, such as a list of trained employees, completed COC trainings or communications, the intended frequency of COC training (e.g., training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks, etc.).	C	Interviewed people and Culture Advisor and Certification Manager confirming training records are maintained

## Appendix 8 – Trademark Standard Conformance Table

### SCS Trademark Annex for FMEs: FSC Trademarks, FSC-STD-50-001 V2-0

- ☐ N/A, does not use/intend to use FSC trademarks for any purposes (finished with this section); or  
☐ N/A, is fully integrated and all trademark uses are treated under the COC Annex to this report that includes a full review of FSC-STD-40-004 and FSC-STD-50-001.  
☒ Applicable, see below.

### PART I: General Requirements for Use of the FSC Trademarks

(FSC “checkmark-and-tree” logo, initials “FSC,” and/or name “Forest Stewardship Council”)

Description of how the FME currently uses, or intends to use, FSC trademarks and/or labels, including but not limited to printed materials, Internet applications, on-product labeling, and other public-facing media:	Use is projected only for: 1) promotional purposes, 2) sales documentation, and 3) internal communications/documentations.
<b>1.2 Trademark License Agreement and valid certificate</b> In order to use these FSC trademarks, the FME shall have a valid FSC trademark license agreement and hold a valid certificate. <i>Note: Consultations for certification Organizations applying for forest management</i>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs



<p><i>certification or conducting activities related to the implementation of controlled wood requirements, may refer to FSC by name and initials for stakeholder consultation.</i></p>	<p><b>Note: TLA is complete, no claims have been made pending certification.</b></p>
<p><b>1.6 Product Group List</b> The products intended to be labelled or promoted as FSC certified have been included in the FME's certified product group list.</p>	<p> <input checked="" type="checkbox"/> C  <input type="checkbox"/> NC  <input type="checkbox"/> C w/Obs         </p>
<p><b>Section 1.2 and 1.6 Evidence:</b> See intended product listing in FSC Product Classification in Section 1.1 of this report</p>	
<p><b>1.3 Trademark License Code</b> The FSC trademark license code assigned by FSC to the FME accompanies any use of the FSC trademarks. It is sufficient to show the code once per product or promotional material.</p>	<p> <input checked="" type="checkbox"/> C  <input type="checkbox"/> NC  <input type="checkbox"/> C w/Obs         </p>
<p><b>1.4 Trademark Symbol</b> The FSC logo and the 'Forests For All Forever' marks shall include the trademark symbol ® in the upper right corner when used on products or materials to be distributed in a country where the relevant trademark is registered. For use in a country where the trademark is not yet registered, use of the symbol ™ is recommended. The Trademark Registration List document is available in the FSC trade-mark portal and marketing toolkit. The symbol ® shall also be added to 'FSC' and 'Forest Stewardship Council' at the first or most prominent use in any text; one use per material is sufficient (e.g. website or brochure). <i>NOTE: The use of the trademark symbol is not required for FSC claims in sales and delivery documents, or for the disclaimer statement specified in requirement 6.2.</i></p>	<p> <input type="checkbox"/> C  <input checked="" type="checkbox"/> NC  <input type="checkbox"/> C w/Obs  <input type="checkbox"/> N/A, one or more noted exceptions apply  <b>See Major CAR 2019.20, CLOSED</b> </p>
<p><b>2.1 Restrictions on using FSC trademarks</b> The FME has not used the FSC trademarks in the following ways:</p> <ul style="list-style-type: none"> <li>a) in a way that could cause confusion, misinterpretation, or loss of credibility to the FSC certification scheme;</li> <li>b) in a way that implies that FSC endorses, participates in, or is responsible for activities performed by the FME, outside the scope of certification;</li> <li>c) to promote product quality aspects not covered by FSC certification;</li> <li>d) in product brand or company names, such as 'FSC Golden Timber' or website domain names;</li> <li>e) in connection with FSC controlled wood or controlled material – they shall not be used for labelling products or in any promotion of sales or sourcing of controlled material or FSC controlled wood; the initials FSC shall only be used to pass on FSC controlled wood claims in sales and de-livery documentation, in conformity with FSC chain of custody requirements.</li> </ul>	<p> <input checked="" type="checkbox"/> C  <input type="checkbox"/> NC  <input type="checkbox"/> C w/Obs         </p>
<p><b>2.2 Translations</b> The name 'Forest Stewardship Council' has not been replaced with a translation. A translation may be included in brackets after the name, for example: Forest Stewardship Council® (translation)</p>	<p> <input checked="" type="checkbox"/> C  <input type="checkbox"/> NC  <input type="checkbox"/> C w/Obs  <input type="checkbox"/> N/A, no translations         </p>
<p><b>Sections 1.3, 1.4, 2.1, and 2.2 Evidence:</b> Reviews of websites, sales documents (Timber Sale contracts) and other documents encountered during the audit.</p>	

<b>Sections 8 and 9 Graphic Rules</b> The FME has only used FSC logos that conform to the standard requirements governing: <ul style="list-style-type: none"> <li>• color and font (8.1-8.3);</li> <li>• format and size (8.4-8.9);</li> <li>• label placement (8.10); and</li> <li>• 'Forests For All Forever' marks (9.1-9.7).</li> </ul>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, not using FSC logo
<b>1.5 Trademark Use Approval</b> The FME has submitted all intended uses of the FSC trademarks to SCS for approval. OR The FME has an <b>approved trademark use management system</b> in place. (If the FME has a trademark use management system, complete Annex A.)  <i>4.6 FSC trademarks may be used to identify FSC-certified materials in the chain of custody before the products are finished. It is not necessary to submit such segregation marks for approval. All segregation marks shall be removed before the products go to the final point of sale or are delivered to uncertified organizations.</i>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
<b>Sections 1.5 Evidence:</b> Online use reviewed, most prominent 1 <sup>st</sup> use here <a href="https://www.sttas.com.au/forest-operations-management/our-operations/certifying-our-operations">https://www.sttas.com.au/forest-operations-management/our-operations/certifying-our-operations</a> . Other documents examined during normal course of the audit resulting in one logo related CAR, see section 4.1.	

## PART II: On-Product Use of FSC Trademarks

☒ N/A, not using on-product trademarks (skip Part II)

## PART III: Promotional Use of FSC Trademarks

☐ N/A, not using promotional trademarks (skip Part III)

<b>6.1 Catalogues, Brochures, and Websites</b> When the FSC trademarks have been used in catalogues, brochures, or websites, the following requirements apply: <ul style="list-style-type: none"> <li>• It is sufficient to present the promotional elements only once in catalogues, brochures, websites, etc.</li> <li>• If both FSC-certified and uncertified products are listed, then a text such as "Look for our FSC®-certified products" shall be used next to the promotional elements and the FSC-certified products shall be clearly identified.</li> <li>• If some or all the products are available as FSC certified on request only, this is clearly stated.</li> </ul>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, not using trademarks in catalogues/brochures/websites
<b>6.2 Sales and Delivery Documents</b> When the FSC trademarks are included on sales or delivery document templates that may be used for both FSC and non-FSC products, the following or a similar statement is included: "Only the products that are identified as such on this document are FSC certified". <i>NOTE: Use of the FSC claim and certificate code on invoices does not qualify as FSC trademark use.</i>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, not using trademarks on

	<input type="checkbox"/> templates for FSC & non-FSC products
<b>6.3 Promotional Items</b> All promotional items (e.g., mugs, pens, T-shirts, caps, banners, vehicles, etc.) have displayed, at minimum, the FSC logo and FSC trademark license code.	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, not labeling promotional items
<b>6.5 Trade Fairs</b> When the FSC trademarks are used for promotion at trade fairs, the FME has: a) clearly marked which products are FSC certified, or b) add an add a visible disclaimer stating "Ask for our FSC®-certified products" or similar if no FSC-certified products are displayed. <i>NOTE: Use of text to describe the FSC certification of the FME does not require a disclaimer.</i>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, not using trademarks at trade fairs
<b>Section 6.6 and 6.7 Investment/Financial Claims</b> When investment companies or others are making financial claims based on the FME's FSC certified operations, the FME has taken full responsibility for the use of the FSC trademarks. Any such claims have been accompanied by the disclaimer, "FSC is not responsible for and does not endorse any financial claims on returns on investments."	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, not making financial claims about FSC status
<b>7.1 and 7.2 Other Forestry Certification Scheme Logos</b> The FSC trademarks have not been used together with the marks of other forest certification schemes in a way which implies equivalence, or in a way which is disadvantageous to the FSC trademarks in terms of size or placement.	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, not using other scheme logos
<b>7.3 Business Cards</b> The FSC trademarks have not used on business cards to promote the FME's certification. The FSC logo or 'Forests For All Forever' marks are not used on business cards for promotion. A text reference to the FME's FSC certification, with license code, is allowed, for example "We are FSC® certified (FSC® C#####)" or "We sell FSC®-certified products (FSC® C#####)".	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, approval granted prior to July 1, 2011
<b>7.4 Promotion with CB Logo</b> FSC certified products have not been promoted using only the SCS Kingfisher and/or SCS Global Services logo.	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs
<b>Sections 6.1 - 6.3, 6.5-6.7, 7.1-7. 4 Evidence: Review of websites, promotional materials and other documents.</b>	
<b>Number of trademark uses reviewed and rationale that sample choice is sufficient to confirm requirements are met:</b> All TM uses and approval from prior year were reviewed. All current uses on contracts and other standard documents were reviewed.	

### Annex A: Trademark use management system

☒ N/A, not using a trademark management system

**Annex B. Additional trademark rules for group FM certificate holders**

☒ N/A, not a group FM certificate holder or group does not use any FSC trademarks

**Appendix 9 – Peer Review and SCS Evaluation Team Response to Peer Review****Peer Reviewer 1**

Peer reviewer's comments	SCS response
Clarity of the report in describing the evaluation that was conducted, the criteria that were employed, and the data that were collected.	
<p>The audit was comprehensive covering all aspects of FSC's P &amp; Cs with regards to STT forest management, and their practices. The report presentation was clear, precise, and easy to follow.</p> <p>The information and explanations provided in Section 2 "Description of Forest Management", provided an excellent background summary of all aspects of the STT company, where it sits in the landscape of Tasmania and Tasmania Forestry, and its systems.</p> <p>Where non-conformity occurs, the Evaluation Team have provided relative background information as to how they have reached their conclusions. Similarly, where STT has achieved conformance the relevant data supporting these decisions have been provided.</p> <p>In addition, the Evaluation Team have carried out in depth interviews with stakeholders covering a good cross section of interested parties, again, covering all aspects of the P &amp; Cs. These interviews were also an important conduit for decisions around the Major CARs. Thus, the Evaluation Team were able to further support their non-conformance evaluations.</p> <p>With respect to the Major non-conformances under Principles 6 and 9, the Evaluation Team has covered these breaches in depth and provided good cross-referencing of the problems.</p>	Accepted.
Adequacy of the report in clearly conveying the basis upon which the conformance decisions were reached.	
<p>As described previously the Evaluation Team have provided a well-defined process for assessing whether conformance has been achieved or not. Pertinent data is provided in most cases and it is easy to follow the decision reached.</p> <p>There are some conformance decisions which I feel requires further clarity and/or explanation.</p>	Accepted and additional reviewer observations requiring further clarify and/or explanation are addressed at those points where presented.
With regards to P&C 2.2, the findings state that STT have a	That information is included in Appendix 6, under indicators 2.1-2.9. Board gender breakdown was provided under 2.1.6, "The FME has



comprehensive system promoting gender equality and that >50% of the Board and Senior Management are female. It would be useful to know the actual gender breakdown of staff both at board and senior management level.	<p>four female board members and two female members on the General Management Team. Women are also represented on various workplace committees. The auditors sighted minutes showing both women and men attended decision making forums such as the Forest Management System Annual Management Review, 31 July 2018 and the Environment, Safety and Health Board Committee, 26 March 2019.”</p> <p>The audit team examined such detailed breakdown but may not have included all of the details in this audit report in the interest of brevity.</p>
4.5.1 refers to this being “N/A??” with no description or clarification of the findings for this. A comment providing clarification is recommended.	<p>The “L” stands for Low scale, intensity and risk (SIR). These are alternative indicators that typically apply to smallholders, which does not apply to this applicant. The question mark has been removed and has been clarified under 4.5.1, in Appendix 6.</p> <p>From the FSC-Australia FM Standard;</p> <p>“There are two ways that the Forest Stewardship Standard provides differentiation in requirements based on SIR. Firstly, by providing an alternative indicator, and secondly, by specifying an indicator as not applicable. Otherwise, all indicators* apply:</p> <ul style="list-style-type: none"> <li>• If Low SIR distinction is with an alternative Low SIR specific indicator*, it will have the same number as its alternate with an ‘L’ prefix. (e.g. L5.3.1).</li> <li>• Where Low SIR distinction is based on an indicator* not applying, a note will be at the start of the Criterion’s* indicators* to specify which indicators* apply.</li> </ul>
4.6.4 states fair compensation; did the evaluation team view that the compensation paid for the TU487T incident and found it to be fair. Also did the recipient of the compensation feel that they were fairly treated. If so, possibly a comment here to state that.	<p>Indicator 4.6.4 requires “Fair compensation is provided to local communities and individuals for damage proven to be caused by negative impacts of management activities.” This indicator does not necessarily require that recipients feel they are treated fairly. The audit team used professional judgement and audit experience to determine the compensation system and amounts were fair as part of a comprehensive review of the system. This stakeholder was not interviewed for this particular audit. Such an interview that would typically be reported in more detail during a surveillance audit which examines subsets of the total Standard and in more depth.</p>
In relation to the TU487T incident findings within P&C 6.6.4 state that appropriate remedial actions are taken. The Evaluation Team has done an excellent job in bringing these data to light. But, from their investigations of this incident are they able to state that the remedial work has or is being successful. If so, could they present that within their findings just to show that STT is	<p>Indicator 6.6.4 requires, “Where past management by The Organisation has eliminated plant communities or habitat features, management activities aimed at re-establishing such habitats are implemented.”</p> <p>The reviewer likely meant 4.6.4 which requires, “4.6.4 Fair compensation is provided to local communities and individuals for damage proven to be caused by negative impacts of management activities.”</p> <p>The audit team conducted an extensive interview and interrogation of the tracking system and staff responsible in order to understand the incident in question. The team was examining this relative the management system. This was an office database and system review and opportunity for field verification was not available during this</p>



achieving conformance in this criterion.	audit.
6.2: An example or examples provided in the findings of the actual processes and potential environmental impacts relevant to STT would provide a clearer understanding.	Numerous examples and field observations were made and included in prior indicators. A detailed description of processes were described in Section 2.1, Management Context, under 2.1.1, Regulatory and 2.1.2 Environmental Context. A broad range of extensive examples were provided under Section 3.1.1.
8.4.1: It is reported here that there is a deficiency in the monitoring result available publicly (from the findings) “adverse impacts associated with exotic species outside of plantations and reserves (1c), fertilisers (1f), infrastructure development (1j), disposal of waste materials (1l), illegal activities (2a), compliance with applicable laws (2b), resolution of disputes (2c), employment practices (2d), gender equality (2e), workers training (2h), local processing (2u), environmental values (3b), effectiveness of actions to maintain naturally occurring native species, plant communities or habitat features (3e) and effectiveness of actions to maintain waterways (3f).” Therefore, should there not be at least an observation to this regard, or a minor CAR asking for a more in depth publicly viewable data.	This finding was modified for clarity. This included notes by an individual auditor within the team. Later compilation of notes by the team found where such monitoring was being done and confirmed. Each of these items are drawn from Annex F and correspond to specific indicators. For example, waste monitoring was described under indicator 10.12 “Clean up of all waste materials and rubbish is covered in section F of each Forest Practices Plan as a standard clause. Sighted for coupe CM001B and EM005B. The monthly Harvest Monitoring form includes checks for compliance with this clause, sighted for coupe CM001B. The auditors observed no issues with waste clean-up whilst conducting field visits.” STT confirmed these are available to the public in various forms. The response to indicator 8.4.1 has been rewritten to clarify. Please see Annex F, Monitoring Requirements, 7 pages, which addresses all elements of 8.4.1.
Appropriateness of the Evaluation Team's conformance decisions in light of the information presented and the condition of the ownership's resource base, as described in the report and as known to the reviewers from other sources, including first-hand knowledge.	
<p>The Major CARS pertaining to forestry practices on endangered species and HCVF are justified. It appears that while STT has processes in place to protect RTE species and their habitat they do not always follow their own guidelines. In addition, they did not seek expert help in these matters when breaches occurred. The Evaluation Team has documented these non-conformities within their findings and CARs both in Principle 6 and where HCVF criteria were not met in Principle 9.</p> <p>Based on the Major and Minor CARs along with the observations and findings presented, the Evaluation Teams overall conclusions are clear and justified.</p> <p>In some instances, described above, additional clarification may be required. to ensure clear communication between parties. But while these additional requirements may provide more clarity, they will not affect the overall conclusion reached by the Evaluation Team.</p>	Accepted.
Other comments ( <i>optional</i> )	

<p>It is very easy as a reviewer to pick up on inaccuracies so please understand that this report is extremely well written and is clearly set out.</p> <p>There are some very minor grammatical (hyphenation which can be a personal call), e.g. conciseness “are able to” rather than “can”, “each individual” rather than “everyone” and spelling inaccuracies that do not detract from the report.</p> <p>e.g. Spelling:</p> <p>P 62 “oldgrowth to “old growth” or “old-growth”</p> <p>P 64 “publically” to “publicly”</p> <p>P 67 “modeling” to “modelling”</p> <p>P 77 “iauditor” to “auditor”</p> <p>P 105 “ofimplementing” to “of implementing” and “Managment” to “Management”</p> <p>P 125 “siviculture” to “silviculture”</p>	<p>These were reviewed and corrected except for “iAuditor”, which is the name of a specific safety program and not a misspelling.</p>
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## Peer Reviewer 2

Peer reviewer's comments	SCS response
Clarity of the report in describing the evaluation that was conducted, the criteria that were employed, and the data that were collected.	
Clear information was presented on the content, scope, and duration of the evaluation of the STT lands. Appropriate detail was provided to understand how Principles and Criteria were scored and the method of aggregation. The Evaluation Report provides a clear picture of forest management activities on the STT, including detailed information on conformance (or non-conformance) relative to the FSC Standards.	Accepted.
It is clear what data were used to draw conclusions for each criterion and the overall findings and conclusions for each Principle. The use of written correspondence, meetings, and interviews via phone or face-to-face were appropriate for collecting information from a range of stakeholders.	Accepted.
An effort was made to correspond with a diversity of stakeholders ensuring data triangulation and verification of findings. There is no indication that specific stakeholders, such as community members or Indigenous interests, were prohibited from participating in the evaluation. There is, however, no list of stakeholders consulted in the Appendix 4.	Accepted.
There is some question as to the extent to which community and conservation stakeholders choose to participate. For example, it is noted that nothing appears to have been raised concerning climate change, nor a wide array of biodiversity considerations (note that the Swift Parrot was exceptional), despite highly publicized and prominent issues being regularly raised in the Australian media (even before the current bushfire frenzy).	
Stakeholders ask questions about climate change and discussed a wide range of species of concern. In fact, the participation of stakeholders was extensive and broad. The peer reviewer may certainly posit that participation was not broad enough but SCS is subject to FSC, to whom the certifying body and conformity assessment team are accountable. The work done and approach to stakeholders followed FSC protocols and is justifiable and defensible within the FSC system. That said, the audit team has added a section within the stakeholder comments regarding climate change to make it more clear why it was not specifically addressed within the body of the audit report. To put it simply, climate change is beyond the scope of a single forest management unit audit. The following section explains further.	

For climate change, in most cases, the audit team was able to clarify and specify concerns about the forest resources managed by STT address those topics as elaborated below. It is important to note that “climate change” is referenced in only two (2) areas within the FSC-Australia National Forest Management Standard (NFSS). These are **5.2.1.12** and in the **Glossary under Restore/restoration**.

**5.2** The Organisation\* shall\* normally harvest products and services from the Management Unit\* at or below a level that can be permanently sustained.

5.2.1 Timber harvesting levels \* are based on an analysis of current Best Available Information\* on: 12) ***Impact from*** climate change, pests diseases and natural hazards. (bold, italic added for emphasis).

The expectation to **assess** impacts is in contrast for expectations for **restoration**. From the FSC-Australia NFSS, in the **Glossary** Section, under the definition of **Restore/restoration**, page 95:

The Organisation is not necessarily obliged to restore those environmental values that have been affected ***by factors beyond the control of The Organisation***, for example by natural disasters, ***by climate change***, or by the legally authorised activities of third parties, such as public infrastructure, mining, hunting or settlement. FSC-POL-20-003 The Excision of Areas from the Scope of Certification describes the processes by which such areas may be excised from the area certified, when appropriate. (bold italics added for emphasis).

It is worthwhile to take time and note that climate change is a large-scale, ecosystem-level phenomenon that crosses ownership boundaries, administrative authorities and other levels and factors outside of a forest management organization’s control. In this regard, it is similar to insect and disease outbreaks, catastrophic floods, and other disasters. In that regard, it is generally considered outside the scope of and FSC NFSS scope.

FSC-Canada presented a preparatory factsheet regarding climate change: *Managing For Climate Change*, November 2016, <https://ca.fsc.org/preview.managing-for-climate-change-fact-sheet.a-1340.pdf>>. Here it is explained that, “Integrating climate change adaptation into natural resource management requires an understanding of the known and potential impacts of climate change effects and the corresponding vulnerability of, and risks to, ecosystems and the people who rely on them. Four broad strategies to address climate change have been put forth in forestry literature: *Mitigation/attenuation, resistance, resilience, and response*. While the last three strategies fall into the category of **adaptation** to climate change, mitigation/attenuation aims to **reduce (or prevent)** climatic effects, and in so doing, addresses the causes of climate change instead of its consequences.”

We note the reviewer did not contest adequacy of Legal framework, financial stability, or accreditation/verification practices, but rather the adequacy of environmental and social impacts evaluation. In particular, translating the comment into relevant FSC topic areas, the issues relate essentially to planning and monitoring of environmental impacts with one question around yield calculations. To the extent that forest management entities must evaluate impact from climate change, STT did so as provided further below.

Below is a list of the areas accepted as related to climate change that are found within FSC NFSS, globally, and were addressed during this audit.

#### **Areas of climate change overlap with the FSC FM standards (international context)**

##### **Legal framework**

- Legal area definition
- Land tenure/ownership
- Land tenure disputes

- Norm mapping at local, national, and international level
- Law compliance at local, national, and international level
- Financial stability**
- Fair income distribution (partial)
- Financial health of organization
- Transaction cost lowering capacity
- Financial viability
- Enhancement of project region economy
- Management transparency (partial)
- Environmental & social impacts**
- Environmental and biodiversity baseline description
- Environmental and biodiversity impacts
- Environmental and biodiversity impacts monitoring
- Social baseline description
- Social impacts
- Social impacts monitoring
- Stakeholder consultation, grievance mechanism and transparency
- Identification and monitoring of High Conservation Value (HCV) Areas
- Climate change adaptation capacity (partial)
- Long-term viability of benefits (partial)
- Accreditation/ verification practices**
- Inclusion of basic ISO requirement for certification bodies
- Commitment to ISEAL requirements for Social and Environmental Labeling systems
- Existence of scheme specific requirements for C/V/VBs proportionate to the complexity of the system
- Direct insight in the performance of the scheme through the accreditation process
- Transparency in the performance of the system
- through access to certification/ accreditation reports and their public summaries
- Impact monitoring program to monitor the
- performance of the scheme

Each of these elements were reviewed and evaluated under related indicators for the STT audit. When this audit was conducted during 2019, climate change was not, proportionally, a focus of stakeholder concerns, compared to swift parrot protections. This was prior to the fires that now burn across Australia (2020) while still considered the beginning of the “fire season”. That it was not highlighted more prominently is not because STT does not adequately address these issues, but because the audit team did not highlight within the body of the audit report (both public and confidential sections). The audit team approach was to keep detailed notes, reference key documents, and address prominent stakeholder concerns based on prioritization and focus of limited time as determined by the audit team leader.

STT did address climate change in a number of program aspects. Easiest to list at this point are those items included in STT’s Forest Management Plan (STT FMP) and HCV Plan. We also note here, that STT forestry staff were conversant and knowledgeable about climate change.

STT addresses climate change specifically within its Forest Management Plan, available online with links provided in Section 2.1 of this report.

#### **4.4.2.1.4 Biodiversity monitoring and research**

*Baseline altitudinal monitoring plots. This project monitors biodiversity along an altitudinal gradient. This will enable the measurement of the impacts of climate change on flora and fauna.*

*Sustainable Timber Tasmania actively promotes the use of wood products from sustainably managed forests as a contributor to climate change mitigation. An important way to limit greenhouse gas emissions through forest management is to displace the burning of fossil fuels through the utilisation of wood products over alternative, more greenhouse gas-intensive materials, a process commonly referred to as the substitution effect.*

#### **4.4.2.3 Carbon - page 48**

*Sustainable Timber Tasmania recognises the significant role of forests in the global carbon cycle. Sustainable Timber Tasmania's Forest Carbon Policy commits the organisation to maintaining the carbon storage capacity of PTPZ land forests. Carbon storage capacity is maintained by managing the forest in accordance with sustainable yield calculations, maintaining Sustainable Timber Tasmania's informal reserve system, and harvesting and regenerating forests in accordance with forest practices plan prescriptions.*

*Carbon stocks on PTPZ land are estimated at five-yearly intervals coinciding with the five-year sustainable yield wood reviews.*

*Sustainable Timber Tasmania's most recent estimate of present and future carbon stocks on PTPZ land was undertaken in 2017. The estimate predicts carbon stocks in standing trees until 2050. The estimate was undertaken using the same methodology as previously, which was initially prepared by the MBAC Consulting Group in 2007.*

*Present standing tree carbon stocks are estimated to be 79 million tonnes. It is predicted that carbon stocks will remain in a fairly steady state until about 2025, before increasing to approximately 90 million tonnes in 2050. The estimate shows that reductions in carbon associated with harvesting are offset by growth in the forest as a whole.*

*The estimate does not consider the effect of landscape-level wildfire on carbon stocks. Such fires are a natural phenomenon and have the potential to significantly reduce existing carbon stocks in the short term. The scheduled five-yearly reviews will include the effects of any such events in future carbon stock estimates.*

*Sustainable Timber Tasmania actively promotes the use of wood products from sustainably managed forests as a contributor to climate change mitigation. An important way to limit greenhouse gas emissions through forest management is to displace the burning of fossil fuels through the utilisation of wood products over alternative, more greenhouse gas-intensive materials, a process commonly referred to as the substitution effect.*

#### **4.4.2.3.1 Managing fossil fuel emissions - page 49-50**

*The main energy inputs used in Sustainable Timber Tasmania's business activities are fuel (unleaded petrol and diesel) for the transport of staff and equipment, and electricity to power buildings and offices. Sustainable Timber Tasmania endeavours to reduce these emissions by implementing a Vehicle Selection Policy that considers the emissions ratings of fleet vehicles.*

*Sustainable Timber Tasmania monitors and reports on fossil fuel carbon dioxide emissions in its Annual Report.*

*The transport of products from the forest to customers also generates fossil fuel emissions. Much of this transport is conducted by a variety of contractors, which makes direct monitoring of emissions difficult to administer. However, Sustainable Timber Tasmania's harvest scheduling tools ensure distances between coupes and product destinations are minimised. The rate paid to haulage contractors is determined on the shortest appropriate cart route between the forest and the customer.*

*In cases of longer-haul transport, Sustainable Timber Tasmania continues to seek and implement opportunities for more efficient transport, such as rail and larger payload vehicles. Presently, the*



<p><i>State rail system is utilised to transport many of Sustainable Timber Tasmania's products from the south of the State to the export terminal at Bell Bay in northern Tasmania.</i></p>	
<p><b>Climate change is also recognized in STT's HCV Plan:</b> Climate change listed as a potential threat to some HCVs in HCV Plan, page 7; and Climate change discussed under <i>Contemporary refugia</i>, page 26</p>	
<p>I note that there is substantial coverage of the Swift Parrot, old growth and several other important issues with bearing on STT lands in several principles within the report. There is, however, also a considerable body of scientific literature reporting issues associated with fire, carbon, climate change, threatened species and ecological communities, alternative industries and landscape considerations that would likely have been addressed within various principles, with a broader spectrum of public involvement.</p>	<p>Given the 200+ indicators included in the Australia NFSS, the audit team had to, by necessity, focus and prioritize time and attention during an audit. The comprehensive review of forest management and administrative evaluation concluded that the organization has knowledgeable staff that inform the program including scientists from regulatory agencies. All of the reviewer listed issues were included in the audit review and are addressed by evaluators. The exception is climate change as explained in response above.</p>
<p>I note several citations in the body of the report. I am not certain as to whether such a report should include references, as the report is already over 150 pages long. However, if it does not, then the citations should be removed. From a personal perspective, I think a list of references should be included in the report, as it provides guidance as to the depth and width of the process, and whether there is any unintentional bias. Any unintentional bias could be more easily addressed in the review process with a list of references consulted.</p>	<p>Citations have been added, see new section 4.4.1.</p>
<p>While climate change does not receive attention in the [FSC] Australia procedure [Standard] , it does implicitly impact on many issues, and hence the principles under consideration. This is through interaction with management and other ecosystem processes. I am referring specifically to human induced climate change – the so-called 'climate emergency' (noting that the climate has always been changing). For example, several principles address the precautionary principle, monitoring, yield forecasting in relation to risk assessment, and sustainability. The sustainability of particular management practices must also be considered in regard to fire management, choice of plantation species, and approaches to old growth management.</p>	<p>Yield and sustainability were evaluated according to accepted norms. FSC does expect consideration of impacts so this question would be valid in future audits.</p>
<p>Adequacy of the report in clearly conveying the basis upon which the conformance decisions were reached.</p>	
<p>In all instances, decisions of conformance appear to be relevant based on the information presented. Places where additional information may be relevant are noted under each Principle. The Evaluation Team is to be commended for their transparency and articulating areas where additional clarification may be needed.</p>	<p>Accepted.</p>
<p>I am particularly satisfied with the level to which Principles 1, 2, 3, 4 and 5 have been addressed, both in the report and by STT. Further, no major CARs were presented for any of these principles.</p>	<p>Accepted.</p>

<p>Principles 6-10 are areas where STT appears to have invested insufficient resource, resulting in several major and minor CARs. Broadly, these can be considered within the general idea of <i>ecologically sustainable forest management</i>. They include issues associated with the endangered Swift Parrot as well as the particular issue of old growth. It has to be said that those areas receiving CARs are actually not easily addressed, as acknowledged in the report. I am therefore also comfortable with the basis upon which the conformance decisions were based in relation to principles 6-10.</p>	<p>Auditors avoid drawing conclusions as to causes of identified non-conformities. Other than that this is accepted.</p>
<p>Appropriateness of the Evaluation Team's conformance decisions in light of the information presented and the condition of the ownership's resource base, as described in the report and as known to the reviewers from other sources, including first-hand knowledge.</p>	
<p>It was recommended that STT not be awarded FSC certification as a "Well-Managed Forest".</p> <p>The audit concluded that SST has not demonstrated that their system of management is capable of ensuring all of the requirements of the applicable standards are met over the forest area covered by the scope of the evaluation.</p> <p>A total of 10 Major CARs, 5 Minor CARs, and 5 Observations were issued as a result of this full evaluation audit against FSC-STD-AUS-V1-2018. The Major CARs were related to a small number of specific issues that the audit team acknowledges are challenging and quite complex. I concur with the findings of the audit team.</p>	<p>Accepted.</p>
<p>I note that the audit team found that the STT personnel interviewed during the audit consistently demonstrated a high level of commitment to forest stewardship of the state lands under their management. The audit team suggested three components that substantively underscore positive aspects of the STT forestry program regardless of the certification decision. These were that:</p> <ol style="list-style-type: none"> <li>1. STT personnel demonstrate an ethos of responsible management for and stewardship of a robust array of values and resources found on the state lands under their charge.</li> <li>2. STT personnel interviewed during field audits demonstrated thorough and consistent knowledge of updated and new procedures, reinforced by specific related trainings on the subject matter.</li> <li>3. As an organization STT demonstrated a culture of innovation and adaptive management through dedication to continuous improvement. Significant changes and improvements are recognized from 2014 to 2019.</li> </ol> <p>I concur with these conclusions.</p>	<p>Accepted.</p>

<p>There are several areas associated with climate change, in particular, that were either not clear in the presentation of the report or that have not been well considered by STT (or both). These need clear articulation as they relate to the principles addressed. There is a need for articulation and response concerning the well-established threat of warming and drying in the region as they relate to principles addressed in this review of STT lands.</p> <p>Several papers outline the nature of the climate change challenges facing STT in particular and Tasmania more generally. I did not see a list of publications consulted in this review (though see above). I mention climate change because the issue of Tasmania being a separate entity from the remainder of (mainland) Australia was discussed in the report. This point gave the impression that Tasmania is not subject to the same vagaries of the climate as faced by the rest of southern Australia.</p> <p>The problem with Tasmania's climate is that north-westerly weather has a very strong influence on Tasmania, despite Bass Strait. This has led to very significant summer fires in the State in the recent past. The prognosis is, for a much greater influence, effect and extent of crown fires, with this influence increasing rapidly over the short-term future. This has no doubt already impacted on all aspects of forest management, including on the level of precaution involved. The impact will rapidly increase. There are numerous publications suggesting that the impact of crown fires is greater in younger than in old-growth or in old stands.</p> <p>Given that climate change is not specifically addressed in the Australian FSC Standards, three areas could be addressed within the principles under consideration without the need to explicitly mention climate change.</p> <ol style="list-style-type: none"> <li>1. The level of consideration of sustainability in the general management intent and planning, including application of the precautionary principle by STT.</li> <li>2. The challenges in delivering a scheduled yield forecast over a 90-year time-frame under consideration and associated steps to address the issue.</li> <li>3. The challenges of addressing the various environmental considerations in this review.</li> </ol>	<p>See prior response to questions regarding climate change.</p>
<p>I would have liked to see the yield forecasts in relation to the range of future projections available and how STT aims to deal with future challenges. The reason for this request is that many other components of sustainability are being impacted as a result of warming and drying in southern Australia. This particularly relates to Principles 6, 7, 8, 9 and 10.</p>	<p>This is a good observation and would apply equally as well to insect and disease catastrophes. In hindsight, there were "obvious". Yield forecasts at the time of the audit were done to accepted norms. This would certainly be a fair question in a future audit.</p>

Notwithstanding the previous points, considerable resources appear to have been invested in the area of <i>ecologically sustainable forest management</i> by STT, including in the areas of monitoring and public involvement. However, it should be noted that further discussion and evidence could and should have been presented on fire and climate change which would also have bearing on the non-conforming CARs presented. As a caveat, it should be noted that further consideration of the overall landscape context in which STT operates may have enabled their operations to be presented more positively. I am, however, uncertain as to whether non-conformity would have remained for the CARs listed.	See response above regarding STT's FMP and references to climate change.
Other comments (optional)	
I concur with the findings of what is clearly a well-balanced audit team with a broad knowledge base and considerable experience. This was clearly a challenging audit, covering a very large area, and of considerable significance generally to Australia and Tasmania in particular.	Accepted.
There are areas associated with climate change, fire, monitoring and endangered species that require further work by STT. These will not be easily or rapidly addressed. There are also a few observations and Minor CARs that are more readily addressed or that are mostly administrative in nature. The successful addressing of some of the major and minor CARs listed in the report may require an additional strategic objective by STT, to the four outlined on page 16 of the report. As it is, the strategic objectives listed by STT may be too limited to achieve best current practice <i>ecologically sustainable forest management</i> , though they do achieve short and perhaps medium term, financial viability (which is accounted for in the strategic objectives of STT). Note that viability is not the same as sustainability. I do note that such a recommendation is outside the scope of this peer review, and indeed of the overall review. Therefore, this point should be noted merely as an observation.	We agree, that these may be outside the scope of a peer review, and an audit. Several of these statements reflect professional judgement of the peer reviewer and are thus noted. In terms of objective evaluation, however, some of these statements constitute consultation, or otherwise telling the FME how they should manage their certification program, which is forbidden by FSC rules. STT is best positioned to determine their strategic, short- and mid-term objectives towards full conformity to the FSC FM Standard.
I note that this is one of the more challenging FST audits in which I have participated. This is because of the scale of the STT enterprise and the wide international coverage and hence opinion and understanding of the complexity of the issues involved. I commend the audit team on the highly professional approach that they have taken to this review.	Noted and thank you.

