**Project Report**

# A REVIEW OF FOREST MANAGEMENT AND CHAIN OF CUSTODY CERTIFICATION IN AUSTRALIA

**May 2025**

# A review of forest management and chain of custody certification in Australia

Prepared for

**Forest & Wood Products Australia**

by

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# Publication: A review of forest management and chain of custody certification in Australia

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# Foreword

**Declaration**

Indufor Asia Pacific (Australia) Pty Ltd (Indufor) has prepared this report at the request of Forest and Wood Products Australia (FWPA) (the Client).

This report presents the findings from a review of forest certification schemes in Australia. This review was conducted between November 2024 and February 2025, based principally on a desktop comparison of publicly available documentation on certification systems, and forest management certification standards. Consultation was limited to interviews during this period with the Scheme managers for the two predominant forest management certification schemes operating in Australia, complemented by several interviews with forest management agencies and companies with experience in obtaining or maintaining forest management certification and chain of custody certification under both schemes. Interviews and related engagements were conducted to inform the focus for the review of standards and certification systems documentation and did not constitute the provision of any primary data or attributable findings.

This report provides a comparative review of the two predominant forest certification schemes operating in Australia, mainly at the principle and criteria level. It does not provide an evaluation review and was not intended to do so. This review has noted the extensive range of indicators applicable under each scheme; however, it was beyond the scope for this review to conduct a detailed comparison of the schemes at the indicator level or analyse specific case studies.

**Acknowledgements**

Indufor would like to acknowledge the support and input provided by Responsible Wood and Forest Stewardship Council Australia for the preparation of the report. Both scheme managers were generous with their time for this review and provided guidance to relevant scheme documentation on their respective forest management standards and governance arrangements. The findings, interpretations, and conclusions presented in this report do not necessarily reflect the views of these key stakeholders; however, their support for the project and inputs to the review are gratefully appreciated.

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# Glossary of key terms and abbreviations

**AFS**            Australian Forestry Standard (now Responsible Wood)

**ASI**            Assurance Services International

**CB**             Certification Body

**COC**            Chain of Custody

**DFA**            Defined Forest Area

**FM**             Forest Management

**FMU**            Forest Management Unit

**FPIC**           Free, Prior and Informed Consent

**FSC**            Forest Stewardship Council

**GBCA**           Green Building Council of Australia

**HCV**            High Conservation Value (as defined under the FSC International program)

**HHP**            Highly Hazardous Pesticides

**IAF**            International Accreditation Forum

**IGI**            International Generic Indicators

**ISEAL**          International Social and Environmental Accreditation and Labelling Alliance

**ISO**            International Standards Organisation

**PEFC**           Program for Endorsement of Forest Certification

**RWCS**           Responsible Wood Certification Scheme

**SBV**            Significant Biodiversity Value (as defined under the RWCS)

**SDG**            Standards Development Group

**SDO**            Standards Development Organisation

**SFM**            Sustainable Forest Management (as defined under the RWCS)

**WHO**            World Health Organization

# Executive Summary

Forest management certification ('forest certification') provides voluntary, independent third-party assurance of responsible forest management, with performance requirements that align with or exceed minimum requirements set by local laws and policies.

There are two globally recognised forest certification schemes operating in Australia. These are the Responsible Wood certification scheme (RWCS), which is mutually recognised by the Programme for the Endorsement of Forest Certification (PEFC), and the Forest Stewardship Council (FSC) certification scheme, which maintains a nationally adapted forest management standard for use by forest managers in Australia.

As a national office of FSC International (the parent scheme organisation), FSC Australia manages the development of standards in Australia and ensures FSC International requirements and policies are upheld. In contrast, PEFC recognise and have endorsed Responsible Wood as its national governing body, and the Responsible Wood forest management and chain of custody certification standards as equivalent to PEFC international benchmark requirements. Together, these schemes provide for forest certification across a wide range of forest types, from native forests to plantations, and contribute directly to promoting biodiversity conservation, socio-economic benefits for communities, and climate resilience.

**Purpose of this review**

This review of forest certification in Australia presents an update on the status of forest certification schemes and standards, including a comparison of these schemes in terms of governance, standards development and performance requirements, with a primary focus on forest management standards.

This report also provides an updated comparative analysis of these certification frameworks, in terms of their market access and uptake, and observed benefits of forest certification in Australia.

This review was conducted through a desktop assessment between November 2024 and February 2025. It comprised an extensive review and comparison of relevant standards and publicly available documentation on certification systems, accompanied by consultation through a select set of interviews with Scheme managers and certificate holders. The interviews were structured to inform the focus of the desktop review of the standards and certification systems documentation, rather than provide new primary data or attributable findings.

**Key findings**

The total area of certified forests in Australia has expanded significantly in its extent over the past two decades. The RWCS and FSC certification scheme are now well established, and both provide internationally recognised frameworks and rigorous assessment systems for forest certification and chain of custody systems. In 2025, their combined coverage accounts for effectively all of Australia's large-scale plantation holdings, and most of the public native forests managed for multiple uses including timber production (the latter provided for by the RWCS specifically) as well as some private native forests.

The two predominant schemes have followed quite different development pathways, and there are some specific differences between their respective forest management standards, which reflect their origins and legacy settings. However, there is also evidence of convergence in the ongoing development of the two schemes' forest management standards, as reflected in their most recent versions.

This review has identified a range of key common features of the schemes as well as some apparent differences. Both schemes include the following key common features:

- Internationally recognised and globally benchmarked forest management standards.
- Broad stakeholder representation and input during standards development and revision processes.

- Auditing and conformance assessment to certification standards is undertaken independently from scheme managers and standards setting.

- Independent accreditation and oversight of Certification Bodies.

- Performance and sustainability requirements that cover a comprehensive hierarchy of principles, criteria, and indicators aligned with sustainable forest management, including clear requirements related to International Labour Organisation (ILO) conventions, and the principles of Free, Prior and Informed Consent (FPIC).

- Forest management standards that have embedded principles of continuous improvement and adaptability to ensure ongoing performance in response to changing settings.

- Clear restrictions on the conversion of native vegetation and forests to plantations, as well as prohibiting the use of certain pesticides and genetically modified organisms.

In addition, most major plantation forest managers in Australia are now certified under both schemes.

The most notable apparent differences include the following:

- Structurally different governance and development pathways for the two schemes, and in broad terms the FSC program reflects a more 'top-down', global governance model, while the RWCS reflects a more 'bottom up', national governance model.

- There is some variation in the emphasis placed on a systems-based approach of the RWCS compared to a more prescriptive and performance-based approach by FSC.

- While respective forest management standards share a high degree of comparable coverage at the principle and criteria level, there are apparent differences in certification requirements related to:

  o *Treatment of conversion from natural forests*: While both schemes have principles based on excluding areas converted from natural forests to plantations, there are differences in the specified cut-off dates after which conversion areas are considered ineligible for certification.

  o *Remedy frameworks*: The FSC has introduced a Remedy Framework, creating the scope for certification of forest land converted from natural forest after it's specified cut-off date *if a sufficient* remedy for social and environmental harms caused by the conversion is provided. Responsible Wood applies a different approach to remediation or restoration of past conversions where areas converted after the cut-off date are generally ineligible for certification.

  o *Delegation of control:* While both schemes incorporate FPIC requirements, there is some variance in their application of this principle to the delegation of control to third parties. The FSC standard includes specific provisions for indigenous and non-indigenous communities that have forest management responsibilities to maintain or delegate control, with the process of delegation itself requiring FPIC. The RW standard does not specifically cater for delegations of control of forest management activities but does require FPIC be sought where traditional knowledge is used, or where there is potential to infringe on the rights, responsibilities and values of indigenous communities.

  o *Tracking and tracing systems*: FSC's National Forest Management Standard requires a tracking and tracing system for demonstrating the source and volumes of forest products are in proportion to projected outputs, whereas Responsible Wood utilises their separate Chain of Custody Standard for tracking and trace system requirements related to forest products and their Forest Management Standard for determination of sustainable yields.

  o *Prohibition of chemical pesticides*: While both schemes require forest managers to use integrated pest management and silvicultural systems that avoid or eliminate the use of

chemical pesticides, the FSC maintains an FSC Pesticides Policy with an extensive set of criteria, indicators and thresholds for identifying highly hazardous pesticides and lists chemical pesticides to be prohibited. The RWCS refers instead to the exclusion of WHO Class 1A and 1B pesticides and requires forest managers to undertake additional site/forest specific risk assessments for the use of all chemicals, to determine potential adverse social and environmental impacts, and manage chemical use to alleviate and minimise risks.

- In addition, there appears to be nuanced variances in the way the two schemes and their respective accredited CBs manage or resolve disputes from stakeholders related to either the certification process, CBs, or the certified organisations.

- In relation to total areas of certified forest management, RWCS has certified all state-managed public native forests in Australia, while FSC has not yet certified public native forests in any state and the extent of certification for private native forests is comparatively minimal.

## Conclusions

This review of forest management and chain of custody certification in Australia has observed that the commonalities between forest certification schemes are often put aside as the market tends to focus on points of difference. In this context, there are apparent differences between the two schemes and their performance standards, which can be identified and considered with varying levels of granularity. The extent to which each of these differences are deemed significant will depend largely on the viewpoints and preferences of individual stakeholders.

However, there are also clear similarities and comparable features in the two schemes. Most notably, these comparable features include key aspects of their governance frameworks to manage independence and impartiality, their standard setting processes, and their broad range of performance requirements for forest managers seeking to obtain or maintain certification under each scheme.

The intent for this review is to inform stakeholders of the status of the two predominant schemes including their key features and their coverage. With this objective, it has highlighted that Responsible Wood and FSC both provide internationally recognised frameworks for forest certification in Australia, and in 2025, their combined certified areas account for effectively all the large-scale plantation holdings and most of the public native forests managed for multiple uses including timber production (the latter provided for by the RWCS specifically) as well as some private native forests.

Key benefits arising from forest certification in Australia include the focus on continuous improvement in forest management, maintaining credible product certification in increasingly competitive markets for policy support, investment and consumer preferences for structural and non-structural products; and assisting forestry companies to address their other corporate reporting requirements, beyond its voluntary certification commitments, especially where they comprise mandatory reporting obligations.

Looking ahead, both scheme managers in Australia have expressed interest in working with a broader base of forest managers in Australia to explore further forest certification opportunities in forests not necessarily managed for timber production, including conservation reserve forests. The FSC scheme already contains optional procedural requirements for forest managers seeking endorsement in relation to the provision of ecosystem services. The RWCS also recognises ecosystem services, though is currently focusing more on managing forests to maintain biodiversity, water quality, soil health, and carbon storage as inherent components of sustainable forestry. Their respective positioning in relation to certification for the provision of ecosystem services reflects both the similarities and variances between the two schemes.

Together, the RWCS and FSC certification schemes are advancing Australia's leadership in forest management systems and practices and are continuing to contribute significantly to promoting environmental, social, and economic resilience.

# 1.  Introduction

## 1.1  The role of forest certification

Imagine walking into a store to buy some timber or paper products, and seeing a label that says the product is from a sustainably managed forest. What does that label mean? And why should we care?

In Australia, these labels often come from forest certification schemes such as FSC (Forest Stewardship Council) or Responsible Wood, which is part of the global Programme for the Endorsement of Forest Certification scheme (PEFC).

These certification schemes serve as a promise or a clear assurance— a way to re-assure consumers, businesses, and governments, that the wood or paper products they are buying are sourced from supply chains that meet rigorous environmental, social, and economic standards. For everyday Australians, it's a simple way to be assured their purchases are not contributing to deforestation or poor labour practices. Certification covers everything from protecting biodiversity and endangered species to ensuring Indigenous peoples' rights are respected and forest workers are treated fairly.

However, understanding and trust in these labels vary. Some people see them as gold standards for sustainability. Others, particularly within certain communities, may be sceptical or unsure of what the certifications truly guarantee. The distinction between the two main schemes is also often unclear.

Despite this, forest certification remains a vital mechanism for promoting responsible forest management and responsible sourcing of forest and wood products, including supply chains extending between timber production from forests to end users. They give us tools to demand accountability and support sustainable industries and best practice.

Forest certification is a voluntary, market-based instrument, implemented primarily through two separate but linked processes: forest management certification and chain of custody certification. In broad terms:

- *Forest management (FM) certification* provides assurance that forests are managed in accordance with robust environmental, social and economic requirements. It verifies compliance with leading forest management standards such as FSC and Responsible Wood or PEFC, promoting biodiversity conservation, worker rights, and responsible forest management. Certification helps prevent deforestation, protects ecosystems, and assures consumers that wood products come from well-managed forests, supporting long-term sustainability and ethical forestry practices.

- *Chain of custody (CoC) certification* ensures that forest products are sourced responsibly and can be traced through every stage of production, from harvesting through to the sale of end products. It verifies compliance with forest management certification standards such as FSC and Responsible Wood or PEFC, preventing illegal logging and promoting ethical sourcing. CoC certification helps businesses and consumers identify responsibly sourced products, supporting forest conservation, transparency, and sustainable trade while reducing environmental and social impacts.

Certification provides third-party assurance to consumers that certified products meet rigorous environmental, social, and economic standards, often beyond local legal and regulatory requirements. CoC certification complements this process by ensuring traceability of certified products through the downstream supply chains.

## 1.2    Purpose of the review

In 2006, a review of forest management and chain of custody certification schemes in Australia[1] provided a detailed comparison and useful insights into the emergence of two global schemes within the Australian market at that time.

Over the two decades since that review, Australia's forest certification landscape has matured significantly. The two dominant certification schemes globally, the PEFC and the FSC, continue to provide forest management and chain of custody certification standards to Australian forests and wood products. However, the standards available to forest managers, processors and retailers have evolved since the 2006 review, and the governing bodies involved in the development and administering of forest certification standards have also evolved and grown over this time.

This report provides an updated summary of the current schemes in use in Australia, their arrangements and processes, and a high-level analysis focussing primarily on the comparability between the forest management standards. On this basis, it is intended to provide insights into their comparative market status and contributions to responsible forest management in Australia.

## 1.3    Methodology

This review was conducted between November 2024 and February 2025. It comprised a desktop review and comparison of publicly available documentation on certification systems, and forest management certification standards, accompanied by interviews with senior staff of FSC Australia and New Zealand (ANZ) and Responsible Wood. In addition, several interviews were conducted with a selected list of forest management agencies and companies, some of which hold forest management certification under both schemes, as well as dual certified CoC certificate holders. The interviews were structured to inform the focus of the desktop review of standards and certification systems documentation, rather than provide any primary data or attributable findings.

This approach provided the basis for a comparative review of the two predominant forest certification schemes operating in Australia, with a primary focus on the forest management standards and side-by-side comparisons made mostly at the principle and criteria level. This review noted the extensive range of indicators applicable under each scheme (with both schemes having more than 220 indicators or individual performance requirements); however, the scope and project boundaries for this review precluded the capacity to conduct a detailed comparison of the schemes at the indicator level.

Furthermore, this review focussed primarily on a comparative review of the two schemes, and identifying key aspects of commonality and differences, rather than an evaluation review designed to assess and rate the performance on the schemes. This means the review provides a description of both schemes and a side-by-side comparison to identify key commonalities and notable differences, in their governance and implementation processes; but has not sought to assess or determine whether one scheme is superior to the other in any respect. This approach recognises that the current schemes reflect their different development pathways, governance arrangements and key stakeholder preferences, and that views on their respective strengths and weaknesses will depend largely on individual stakeholder preferences and points of engagement with the schemes.

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[1]Crawford, H (2006) *A review of forest certification in Australia*. Report prepared for the Forest & Wood Products Research & Development Corporation. Online: https://fwpa.com.au/wp-content/uploads/2006/12/Final-Certification-Comparison-Report-September-2006v2.pdf

# 2. Forest certification schemes in Australia

There are essentially two main forest certification schemes operating in Australia. The following section outlines these schemes, their respective operating models and the recognised certification standards.

## 2.1 Globally recognised forest certification schemes

There are two predominant global forest certification schemes, which have both been operating for more than 25 years and extending their global reach over this period.

**Programme for Endorsement of Forest Certification**

The PEFC is a global, non-profit organisation dedicated to promoting sustainable forest management through independent third-party certification. Founded in 1999 as the Pan-European Forest Certification program, the organisation was created to provide a framework for recognising and endorsing national forest certification systems, with an initial focus on European schemes. Currently covering about 298 million hectares[2] (ha) of certified forests across more than 55 countries, PEFC is now the world's largest forest certification system by area of certified forest.

PEFC does not have a binding performance-based system, and operates through a stakeholder-driven governance model, involving forest owners, businesses, NGOs, Indigenous groups, and governments. Its transparent processes are based on ISO standards, emphasising accountability through public consultations and independent assessments. This decentralised approach recognises the critical role of local expertise in developing credible, regionally relevant standards.

PEFC's framework for adopting and recognising local schemes or standards provides flexibility and adaptability, whilst maintaining alignment with national ecological, cultural and legislative contexts. This in turn supports market access for certified products, empowering small and large landholders to promote sustainable forest management and build consumer trust through its certification labels, globally.

PEFC recognises and endorses Australia's Responsible Wood Certification Scheme (RWCS) and its Sustainable Forest Management and Chain of Custody Standards.

**Forest Stewardship Council**

The FSC is a globally recognised non-profit organisation dedicated to promoting responsible forest management. Established in 1993, the FSC currently has certified approximately 159 million ha of forests worldwide[3], spanning over 90 countries. FSC's global framework contrasts with systems like the PEFC, which endorses regionally developed standards. FSC implements its own standard based on a global set of principles and criteria (P&C), which have been developed with consideration of the 1995 Montréal Process, Criteria and Indicators for the conservation and sustainable management of temperate and boreal forests[4]. FSC applies a model of adapting its International Generic Indicators (IGIs) to suit local settings, i.e. at the national or regional level. FSC's unified approach ensures consistent application of its P&C regardless of geographic location, making it especially effective for global brand recognition and marketability.

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[2] PEFC Global Statistics, September 2024.

[3] FSC Connect – Facts and Figures, December 2024. Online: https://connect.fsc.org/impact/facts-figures

[4] The Montréal Process - *Criteria and Indicators for the Conservation and Sustainable Management of Temperate and Boreal Forests*. Refer online: https://montreal-process.org/documents/publications/techreports/MontrealProcessSeptember2015.pdf

FSC's governance is structured around a distinctive three-chamber model that brings together appointed representatives of environmental, social, and economic interests. This approach is intended to ensure that decision-making balances diverse stakeholder perspectives and upholds the integrity of the certification process.

The accreditation and monitoring of certification bodies (CBs), including those accredited to conduct audits in Australia, is managed by Assurance Services International (ASI), an independent subsidiary organisation headquartered in Germany. ASI was established by FSC International to ensure high levels of competence, impartiality and capability of certifying organisations against its recognised standards. Like FSC, ASI is a member of the International Social and Environmental Accreditation and Labelling Alliance (ISEAL Alliance) and additionally, is a member of the International Accreditation Forum (IAF).

By fostering trust through rigorous certification and inclusive governance through an international Assembly, FSC has developed strong recognition as a standard for promoting sustainability, protecting forest ecosystems, and supporting communities worldwide.

**FSC in Australia**

FSC Australia is a subsidiary of FSC International and operates under the FSC International governance structure, which emphasises participation, democracy, and equity, in alignment with its global principles.

FSC Australia is the national governing body for FSC International in Australia and is responsible for administering FSC International standards within the country, including the development and revision of national standards. This process involves establishing a three-chambered Standards Development Group (SDG), comprising representatives of environmental, social, and economic interests. The SDG collaborates to adapt international standards and IGIs to the Australian context, ensuring relevance and applicability. Once the SDG finalises a national standard, it undergoes a comprehensive review and approval process by FSC International to ensure alignment with its global P&C, which cannot be altered.

FSC Australia also actively monitors business that have been certified by FSC-accredited CBs to use their trademark and label on forest products. FSC trademarks are owned by FSC International and registered with Intellectual Property (IP) Australia.

**Other forest certification schemes**

Since 2006, most other certification schemes operating around the world, including national schemes from the US, Canada, Europe and Asia, have been recognised and endorsed under the PEFC scheme. None of these other schemes have developed standards applicable to Australia. In 2025, the global forest certification market is dominated by FSC and PEFC-endorsed schemes, and likewise this is the situation for Australian forest managers and growers, downstream processors and manufacturers, and retailers that recognise certified forest products.

## 2.2   Australian schemes

**Responsible Wood**

Responsible Wood is the registered trading name for the Australian Forestry Standard Limited (AFSL), which is a not-for-profit standards development organisation accredited by Standards Australia to develop standards. In 2004, the AFSL joined the PEFC, becoming one of the first non-European certification systems to be endorsed by the PEFC. Since re-branding as Responsible Wood in 2018, Responsible Wood has remained the national governing body for PEFC in Australia, whereby it can oversee and administer the implementation of PEFC forest certification standards in Australia (and New Zealand).

Responsible Wood also operates and manages the Responsible Wood Certification Scheme (RWCS), which is based on the Australian Forestry Standard (and subsequent versions of AS:4708) and Chain of Custody (CoC) Standards (AS:4707), in conjunction with accreditation programs and independent third-

party certification. The RWCS aims to demonstrate that products produced under those standards are sourced from sustainably managed forests. Like the FSC's Principles and Criteria, the Responsible Wood FM standard (comprising system-based and performance requirements) has been developed with consideration of the Montréal Process and its criteria and indicators for sustainable forest management[5]. The RWCS and its standards are endorsed and mutually recognised by PEFC, providing international market access for forest products certified to either of the RWCS standards. To achieve endorsement, the RWCS standards are subject to assessment by PEFC to confirm they were developed in line with international best practice and meet global expectations and the PEFC International benchmark sustainability standards.

Under the RWCS, organisations are assessed by independent certification bodies for ongoing compliance against the standards. The Joint Accreditation System of Australia and New Zealand (JAS-ANZ) provides independent accreditation for CBs to ensure they are competent, impartial and capable of certifying organisations against its recognised standards. JAS-ANZ is also a member of the IAF and the Association of Accredited Certification Bodies (AACB) and was established via an international treaty between Australia and New Zealand with the purpose of enhancing national, Trans-Tasman and international trade via accreditation to international standards.

Responsible Wood owns the Responsible Wood certification trademarks, and these trademarks are registered with the ACCC, demonstrating to consumers that Responsible Wood certified products have also met standards specified by the ACCC.

## 2.3  Recognised standards

**Forest Management**

In Australia, the two leading schemes are underpinned by two primary forest management certification standards. These are:

1.  *Responsible Wood's Sustainable Forest Management Standard AS/NZS 4708:2021* (the Responsible Wood Standard) [6]. Responsible Wood has developed this standard in its capacity as an independently accredited standards development organisation, and the standard was developed specifically to Australian and New Zealand conditions and regulatory settings. PEFC has endorsed the use of this sustainable forest management standard in Australia.

2.  *FSC's National Forest Stewardship Standard of Australia FSC-STD-01-2018* (the FSC National Standard) [7]. This standard is a national adaptation of the FSC International Standard (FSC-STD-01-001 V5.3) adopting its global Principles and Criteria for Forest Stewardship and responsible forest management, but with nationally adapted and tailored IGIs.

FSC also offers a separate 'Controlled Forest Management' standard otherwise referred to as the 'Controlled Wood' Standard (FSC-STD-30-010), which certifies that wood is not supplied illegally, not from High Conservation Value (HCV) forests or areas where traditional and civil rights have been violated. Organisations can only be certified to the FSC Controlled Wood Standard for five years, as the standard is designed as a stepping stone to certification to the full forest management standard. Forest and wood products from FSC-STD-30-010 forests can be sourced by CoC certificate holders to blend with material from forests certified to the FSC National standard as 'FSC Mix' products.

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[5] *Ibid*.

[6] Australian/New Zealand Standard (AS/NZS 4708:2021) – Sustainable Forest Management Requirements (2021).

[7] The FSC National Forest Stewardship Standard of Australia (FSC-STD-AUS-01-2018 EN), Forest Stewardship Council (2018).

The PEFC and RWCS offer substantively equivalent provisions for assessing 'controlled sources' within their respective CoC standards, though do not offer a partial or limited-scope forest management standard like FSC. However, all three schemes have developed and operate with CoC certification standards to complement their forest management standards, ensuring traceability and sustainability of forest-based products throughout the supply chain.

**Chain of Custody**

CoC certification systems ensure traceability and sustainability of forest-based products throughout the supply chain, allowing businesses and consumers to confirm that forest-based products labelled with the certification scheme logo have originated from sustainably managed forests. In Australia, the two main CoC certification standards are those developed and recognised by the RWCS/PEFC and the FSC.

The Responsible Wood CoC Standard is an Australian Standard® (AS:4707-2021) and aligns with the globally recognised PEFC CoC Standard (PEFC:2002-2020). It focuses on robust tracking mechanisms to ensure the integrity of certified materials, preventing the inclusion of illegal or uncontrolled sources. The RWCS and PEFC system is particularly significant for Australian producers exporting to international markets, as PEFC's endorsement provides access to global supply chains while emphasising local adaptation for Australia's forest management conditions.

The FSC CoC Standard (FSC-STD-40-004) is a global standard and has not been locally adapted into a national standard for Australia. It is also particularly important for access to overseas markets for certificate holders, operating within FSC's broader certification framework, emphasising transparency, traceability, and adherence to stringent environmental and social criteria. FSC-certified organisations must implement rigorous systems to segregate certified, non-certified, and controlled materials throughout the production process. The FSC CoC standard also integrates controlled wood requirements, and like the Responsible Wood CoC Standard, includes core labour requirements built from the ILO conventions, ensuring that uncertified inputs do not come from unacceptable sources, such as illegally logged forests, areas of high conservation value or those relying on child labour.

A summary of the key forest management and chain of custody certification standards used in Australia is set out below in Table 2-1.

**Table 2-1:** Summary of key forest management and chain of custody certification standards used in Australia

| Type | FSC Australia | Responsible Wood |
|---|---|---|
| **Forest Management** | • FSC National Forest Stewardship Standard of Australia (FSC-STD-AUS-01-2018)<br>• FSC Controlled Forest Management (FSC-STD-30-010) | • Responsible Wood Sustainable Forest Management (AS/NZS-4708-2021)<br>• PEFC Sustainable Forest Management (PEFC-ST:1003-2010) |
| **Chain of Custody** | • Chain of Custody Certification (FSC-STD-40-004)<br>• FSC Product Classification (FSC-STD-40-004a)<br>• Chain of Custody Certification of Multiple Sites (FSC-STD-40-003)<br>• FSC Standard for Project Certification (FSC-STD-40-006)<br>• Requirements for Sourcing FSC Controlled Wood (FSC-STD-40-005) | • The Australian Standard® for Chain of Custody of Forest Products (AS-4707-2021)<br><br>• The PEFC Standard for Chain of Custody of Forest and Tree Based Products (PEFC-ST:2002-2020) |
| **Trademarks, Labelling and Logo Use** | • Requirements for the use of the FSC trademark by certificate holders (FSC-STD-50-001) | • PEFC Trademark Rules (PEFC-ST:2001)<br>• The Responsible Wood Scheme and Logo Use Rules (2018) |

A summary of the respective governance arrangements and key components of these forest certification schemes is set out in the schematic below (Figure 2-1). This summary illustrates that at a scheme level, despite some differences in structural and authorising arrangements, there is broad alignment in terms of international benchmarking, independent standards development oversight, and the role of independent Accreditation Bodies and CBs. It also shows that several of the CBs conduct audits for both schemes in Australia.

**Figure 2-1:** Forest management and chain of custody certfication scheme arrangements in Australia
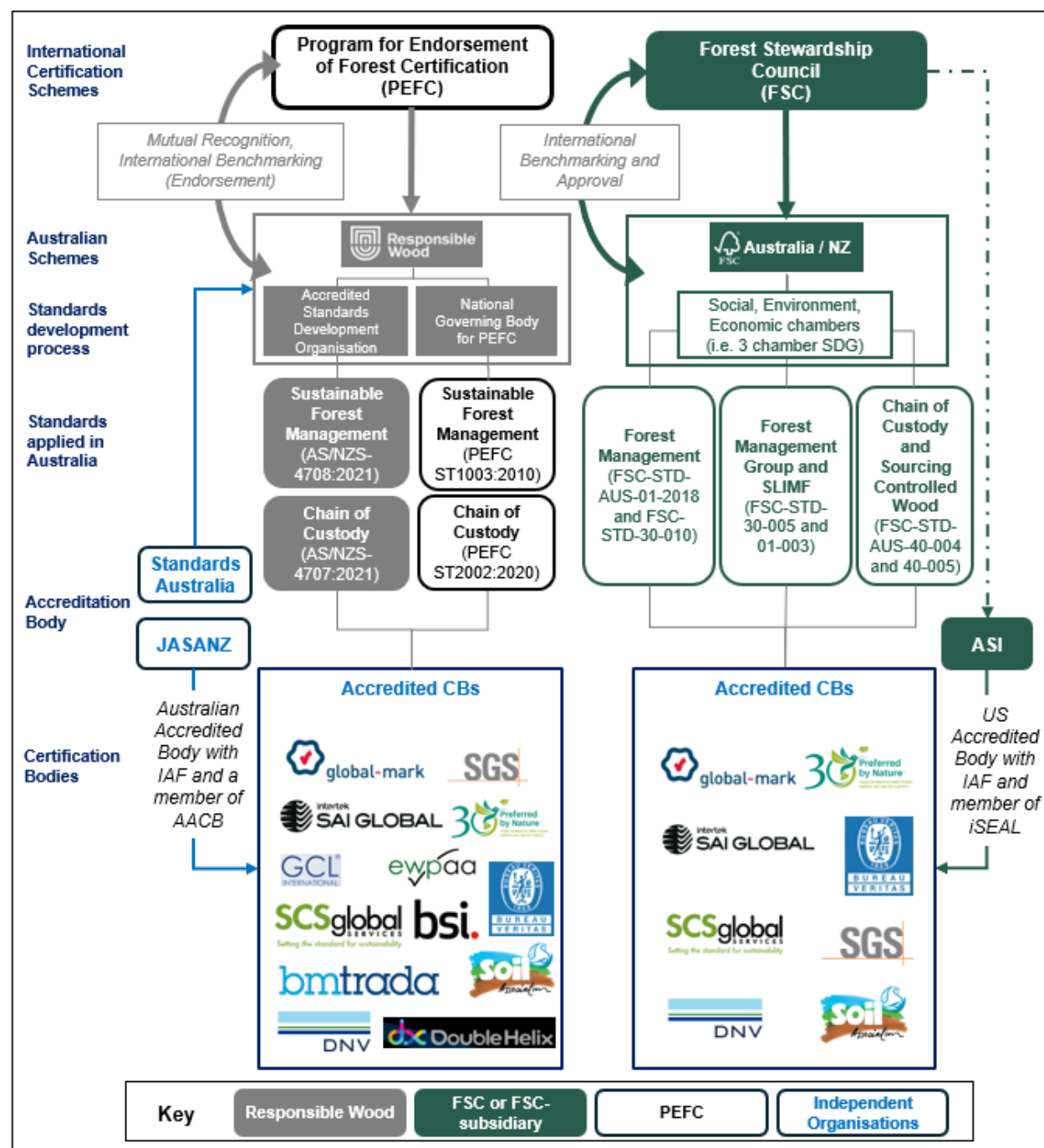


Source: Indufor, 2025

# 3.    Current state of the market

An overview of current levels of forest management certification and CoC certification in Australia is provided below, with some commentary on trends in certification activity over the past two decades.

## 3.1    Certified forest areas

Australia currently has approximately 17.3 million ha of FM-certified forests, comprising predominantly multiple use native forests (approximately 89%), together with approximately 1.9 million ha of plantation forests (11%) (Figure 3-1).

**Figure 3-1:** Forest areas certified in Australia, by forest type and certification scheme, as of December 2024
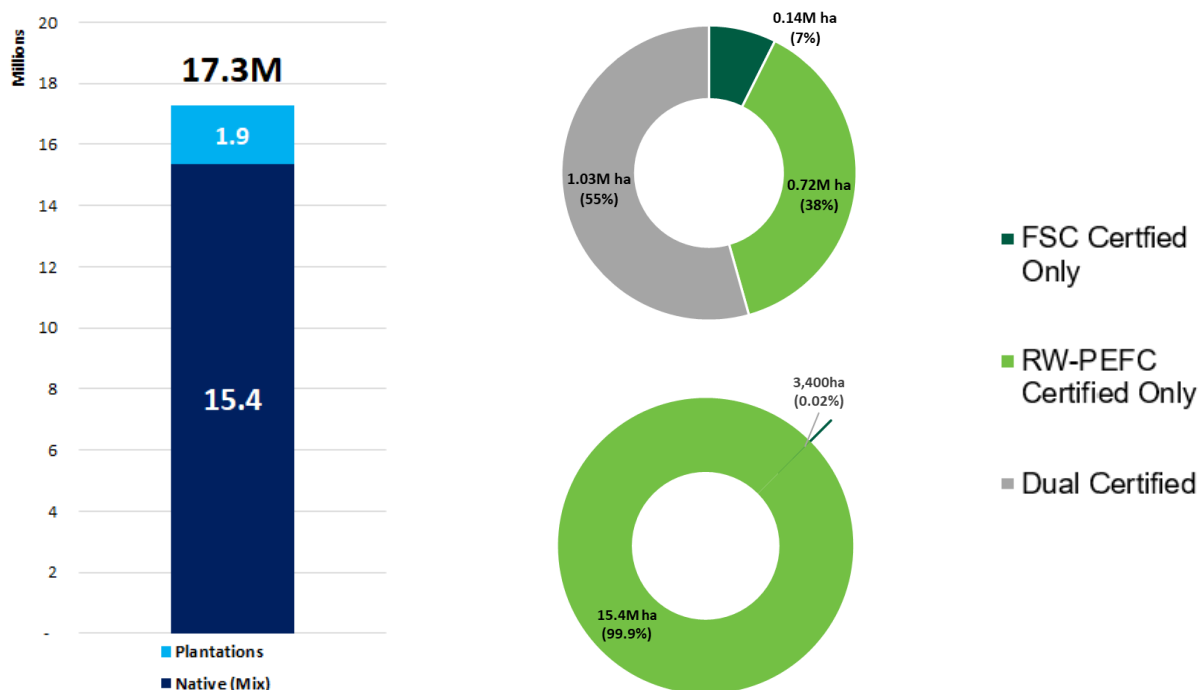


Source: Responsible Wood (Data supplied 2024), and FSC Connect (Stats and Facts 2024)

FSC certified areas are predominantly limited to plantation forests, although some small areas of native forests have been certified, particularly under the FSC scheme's 'group management' certification standard. Approximately 1.2 million ha of plantation forests in Australia are certified under FSC's National Standard (FSC-AUS-STD-001-2018) as of December 2024 (refer Figure 3-2).

Responsible Wood certification covers most of the certified native forests and plantation areas (or a mix) in Australia. There is only a very small proportion of native forests that are certified by FSC (<0.02% of the 15.4 million ha of certified native forests).

Of the entire area of certified forests in Australia, around 99% (17.2 million ha) is certified to the Responsible Wood Standard (AS/NZS:4708-2021), including 1.8 million ha of timber plantations; and 7% (1.2 million ha) is certified to the FSC National Standard.

**Figure 3-2:** Certified forest area by Scheme, in hectares, and predominant forest type
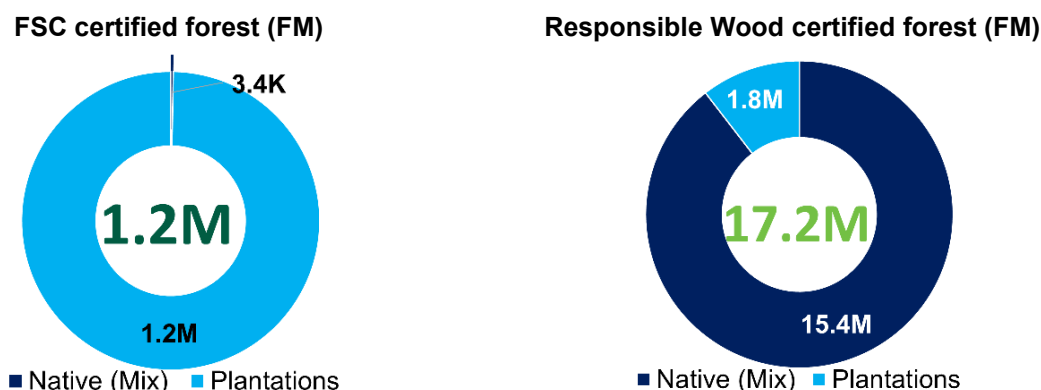


Source: Indufor, FSC Australia, Responsible Wood (2025)

As of December 2024, certified forest areas in Australia comprise estates managed by at least 27 forest growers or forest managers including three who manage group certificates on behalf of several forest managers. A summary list of organisations who carry forest certification under each scheme is presented below (Table 3-1).

**Table 3-1:** Current list of forest manager or grower organisations with full forest management certification in Australia

| Forest Type | FSC | Responsible Wood/PEFC |
|---|---|---|
| **Plantations** | • Australian Bluegum Plantations Pty Ltd<br>• Ents Forestry Pty Ltd<br>• Forico Pty Ltd*<br>• Hancock Victorian Plantations Pty Ltd*<br>• HQ Plantations Pty Ltd*<br>• PF Olsen (Aus) Pty Ltd*<br>• SFM Environmental Solutions Pty Ltd*<br>• Timberlands Pacific Pty Ltd*<br>• WA Chip & Pulp Co Pty Ltd (WAPRES)* | • AKS Forest Solutions<br>• AWT Forest Management Pty Ltd<br>• B.R & K.F Muskett & Sons Pty Ltd<br>• Forico Pty Ltd*<br>• Forestry Corporation of NSW^<br>• Forestry SA<br>• Green Triangle Forest Products<br>• Hancock Victorian Plantations Pty Ltd*<br>• Hume Forests Pty Ltd<br>• HQPlantations Pty Ltd*<br>• Midway Limited<br>• Neville Smith Forest Products<br>• OneFortyOne Plantations<br>• PF Olsen (Aus) Pty Ltd*<br>• Reliance Forest Fibre Pty Ltd<br>• SFM Environmental Solutions Pty Ltd*<br>• Timberlands Pacific Pty Ltd*<br>• WA Chip & Pulp Co Pty Ltd (WAPRES)* |
| **Native (Mix)** | • Forest Strategy Pty Ltd (Group Certificate)<br>• Australian Sustainable Timbers | • DAF Forestry (Queensland)<br>• Forest Products Commission (WA)<br>• Forestry Corporation of NSW<br>• Neville Smith Forest Products Pentarch Forestry<br>• Private Forestry Services QLD Inc<br>• Sustainable Timber Tasmania |

Source: Responsible Wood, Dual certified project data (July 2024)

^ Organisation manages softwood plantation areas and native hardwood areas on separate certificates and DFAs.

* Organisation with forest certification under both scheme standards for forest management.

## 3.2 Notable changes in certified forest areas

The expansion of forest area certified to the FSC National Forest Stewardship Standard (from 0.5 million ha in 2006 to about 1.2 million ha in 2024) has largely comprised plantation forests across the eastern Australian states of Tasmania, Victoria, South Australia, and Queensland. Very limited areas of native forest have received certification under FSC's National Standard.

Since 2006, when the first review of forest certification in Australia was conducted, areas certified to the Responsible Wood Standard have more than tripled (refer Figure 3-3), which is attributable largely to certification of public native forest managers in NSW, Western Australia and Queensland. In addition, numerous plantation managers have sought and achieved forest management certification under the RWCS during this time.

Forest areas certified to the Responsible Wood Standard reached up to 21 million ha in recent years, including 3.2 million ha of state forests in Victoria managed by VicForests, which held certification to the Responsible Wood Standard (AS:4708-2021) until the agency and commercial timber harvesting in state forests were discontinued by the Victorian Government in early 2024.

**Figure 3-3:** Comparison of forest areas currently certified with area reported in 2006
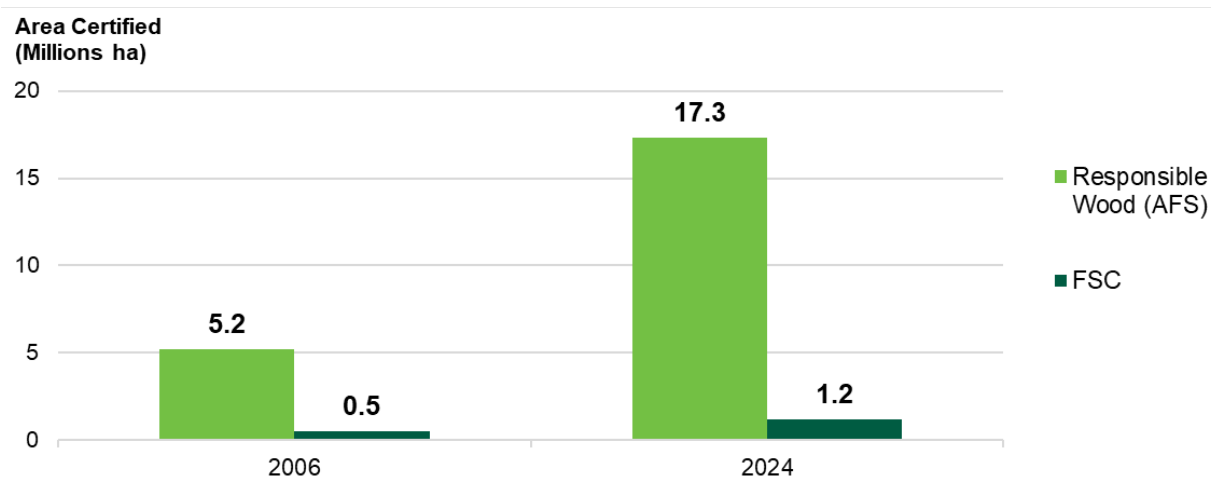


Source: Crawford (2006) pg. 10, Responsible Wood (data supplied) and FSC Connect (Stats and Facts, December 2024)

## 3.3 Chain of Custody Certificate holders

Since 2006, CoC certification uptake has expanded significantly under both the Responsible Wood (including the PEFC) and FSC CoC standards, with a combined total of 24 certificates issued under both schemes in 2006 and more than 470 certificates issued as of December 2024 (refer Figure 3-4).

FSC reports that there have been 269 CoC certificates issued by CBs under the FSC scheme in Australia as of December 2024 [8]. This is understood to include single and multi-site certificates, and group certificates whereby multiple participants may be covered.

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[8] FSC (2025) *FSC Connect - Facts and Figures*. Online: https://connect.fsc.org/impact/facts-figures

**Figure 3-4**: Number of Chain of Custody certificates issued by scheme
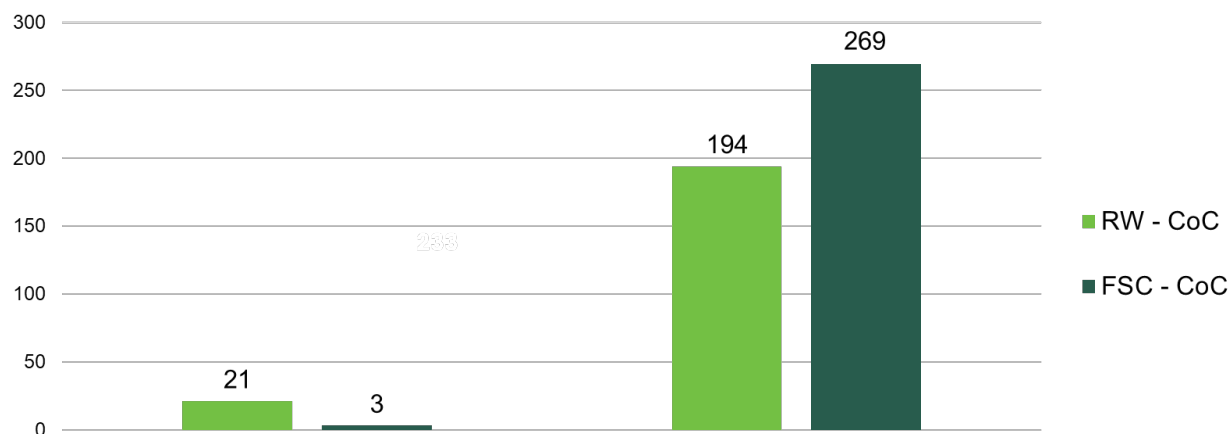


Source: Crawford (2006), Responsible Wood (data supplied) and FSC Stats and Facts (December, 2024)

Similarly, CoC certificates issued under either Responsible Wood's CoC standard (AS:4707-2021) or the PEFC CoC standard (PEFC:2002-2020) have increased to 194 individual, multi-site or group certificates as of December 2024. This figure comprises three group certificates, covering an additional 41 participant businesses.

CoC certification for forest products spans all Australian states and territories and a broad range of organisations, including small and larger growers or forest managers, timber and pulp or paper processors, manufacturers, wholesalers and retailer business.

# 4. Comparison of the schemes

This comparative analysis comprised a high-level desktop review and comparison of relevant standards and publicly available certification systems documentation, accompanied by some consultation through selected interviews. The analysis comprised the following elements:

- A description and high-level comparison of the standard development and review processes
- An analysis of the comparable standard structures and terminology used by both schemes
- A comparative assessment of the performance requirements, including equivalent coverage and comparability of the Responsible Wood FM Standards' criteria with FSC's Principles and criteria
- A description and high-level comparison of the implementation arrangements for certification bodies and auditing to determine certification.

## 4.1 Standards development and revision processes

### FSC

FSC International establishes the normative requirements and associated guidelines for the development of certification standards and associated revision processes. The Principles and Criteria (P&Cs) are applied consistently across all regions and cannot be altered, while the International Generic Indicators (IGIs) are reviewed by an independent, three-chambered Standard Development Group (SDG) representing environmental, social, and economic interests equally, which can choose to adopt, adapt, or exclude them to suit Australian conditions.

Additionally, the SDG has the flexibility to introduce new indicators if needed. The standard developed or revised by the SDG must be approved by FSC Australia's chamber-balanced Board and, subsequently, by a chamber-balanced committee, mandated to take approval decisions on Forest Stewardship Standards developed by SDGs, on behalf of FSC International's Board. This is intended to ensure balanced input and decision-making throughout the process, whilst maintaining FSC's global credibility.

The development and revision of FSC's national standards also involve extensive stakeholder consultation, including public comment periods, and engagement with affected and interested parties such as Indigenous communities, environmental organisations, and forest managers. Feedback is reviewed transparently, and decisions are made through consensus where possible, with dispute resolution mechanisms in place if needed. However, the ultimate approver role resides with FSC International providing direct oversight and final approval of FSC Australia's standards. This centralised governance is designed to ensure consistency with global FSC policies while allowing for regional adaptation. Unlike its forest management certification standard, FSC's CoC system is governed by international standards with no local adaptation, ensuring consistency, traceability and credibility across supply chains globally.

The independence of FSC's processes is reinforced by its reliance on third-party auditors (CBs) accredited by ASI. While ASI is a subsidiary of FSC International, it maintains an independent board and governance protocols to maintain impartiality. ASI's role is critical for maintaining independence, ensuring compliance monitoring and a globally consistent approach to issues raised at the national level. FSC maintains an Accreditation Standard (FSC-STD-20-001) to provide the general rules and requirements for the CBs[9].

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[9] Report on the Structure of the FSC Certification System, Version 3, March 2019.

**Responsible Wood**

As a standards development organisation (SDO) accredited by Standards Australia (one of only five in Australia), Responsible Wood is responsible for the development and revision of its forest certification standards, within its nationally and internationally recognised RWCS. Like FSC, it aspires to review and revise its standards at least every five years.

RWCS standards are developed and maintained through a transparent and consensus-driven process that adheres to Standards Australia development protocols, ensuring impartiality, consistency, and alignment with national and international best practices, including ISO standards. Governance for the standards development and revision processes is provided by a Standards Reference Committee (SRC), comprising a multi-stakeholder group representing environmental, economic, social, and Indigenous interests. This is designed to ensure a broad range of perspectives is incorporated into the standard. Public consultations, formal calls for submissions, and stakeholder engagement are also integral to the process, allowing all interested parties to contribute meaningfully.

At the international level, Responsible Wood interacts with PEFC, which endorses its standards after assessing them for compliance with global sustainability benchmarks. This endorsement allows Responsible Wood certified forest products to access international markets and ensures that the standards remain consistent with evolving positions on best practices globally. While FSC uses ASI for centralised oversight of CBs, Responsible Wood relies on JAS-ANZ accreditation, reflecting alignment with Australian and New Zealand conformity assessment systems.

The role of JAS-ANZ is critical to maintaining the independence and credibility of Responsible Wood certification. JAS-ANZ accredits CBs that audit and certify forest operations and supply chains against the RWCS standards. This external accreditation ensures that CBs operate independently and consistently, adhering to ISO-based guidelines for conformity assessment. This model separates governance (structurally), accreditation, and certification functions, enhancing the impartiality of the system.

This multi-layered governance structure — anchored by Standards Australia's impartiality protocols, JAS-ANZ accreditation, and a separate PEFC endorsement process — has been established and refined to ensure that Responsible Wood certification is both credible and suited to the Australian context.

**Apparent observations from comparative assessment**

Both schemes have comparable standards development processes and governance arrangements in place to ensure rigorous, relevant and credible standards are developed. The following points outline some of the common features as well as key differences between the two schemes' approach to standards development:

- Both RWCS and FSC maintain an aspirational 5-yearly review and revision cycle for their standards.

- Responsible Wood relies on a nationally driven governance model emphasising local development within Australian context and an internationally recognised framework. RWCS standards are developed with oversight and accreditation from Standards Australia and mutual recognition by PEFC through its endorsement processes.

- FSC operates a globally centralised and integrated model, with FSC International approving and ISEAL membership protocols ensuring transparency, consistency, and assurance across its network.

- ASI also provides assurance related services on behalf of FSC International, with impartiality controls embedded in its governance arrangements to ensure CBs meet auditing standards. In comparison, JAS-ANZ is independent of Responsible Wood and PEFC, accrediting certification bodies to its own and internationally recognised standards.

- As an accredited SDO with Standards Australia, Responsible Wood directly approves its standards, which are endorsed by PEFC, while FSC International is the ultimate approver of FSC standards developed in Australia. Standards Australia's role is to accredit Responsible Wood as an SDO and ensure compliance with procedural requirements, whereas ISEAL provides additional oversight for FSC International as part of its global governance.

- The RWCS standards are endorsed by PEFC, enabling global recognition and market access for certified products, while FSC's globally unified and approved standards benefit more directly from FSC's internationally established brand recognition.

## 4.2 Comparative structure and terminology

A comparison of structure and terminology was limited to a consideration of the structural hierarchy of each standard's performance requirements, and a high-level scan of terms used within the standard.

Both schemes have retained a similar three-tiered approach to outlining the performance assessment requirements, albeit adopting differing terminology or framing, as outlined below (Table 4-1).

**Table 4-1:** Comparative hierarchical framework terminiology for perfrmance assessment

| Tier | FSC (AUS-STD-001-2018) | Responsible Wood (AS/NZS:4708-2021) |
|---|---|---|
| **Tier One** | Principles | System and Sustainability Criteria Areas |
| **Tier Two** | Criteria (Criterion) | Criteria (Criterion) |
| **Tier Three** | Indicators | Conformance requirements |

Both scheme standards adopt similar phrasing or language to indicate mandatory versus less stringent requirements, such as: *'Shall'*, indicating strict must do requirements to demonstrate conformance; and '*should'*, '*may'* or '*can'* for more flexible recommendations, permissibility or practicality considerations.

Both scheme standards also rely on a range of normative references, terms and definitions, some of which vary in their meaning and others that appear to be broadly comparable or equivalent in meaning. Some of the key comparable or contrasting terms, along with their respective definitions from the standards are included in **Annex 1**.

For example, FSC rely on a term called *High Conservation Value* (HCV) which specifically caters to six sub-categories of biodiversity, cultural or social values requiring identification, assessment, protection and/or management.

In comparison, the Responsible Wood (and the PEFC equivalent) standard separate cultural and heritage values requirements from biodiversity and other environmental values, under their own criterion and use a term called '*Significant Biodiversity Value'* (SBV) to emphasise more important biodiversity values from other environmental values. In that regard, SBV and HCV are broadly comparable, particularly in their respective coverage of biodiversity-related values.

Similarly, terms like '*Management Unit'* used by FSC and '*Defined Forest Area'* used by Responsible Wood reflect comparable meaning and intent to define the land area in which forest management is being applied and the scope of certified activities.

Other terms, which would appear the same in both standards, such as '*forest'* and '*Indigenous people'*, have differing definitions that possibly stem from differences in the standard origins and standards development processes whereby FSC's globally adopted generic terminology and context versus Responsible Woods' bottom-up approach, which incorporates Australian legal and bio-physical context more directly. It is not unambiguously clear if these differing definitions play an important role in achieving forest certification under each scheme.

The Responsible Wood Standard (AS/NZS:4708-2021) and the FSC National Standard (FSC-AUS-STD-001-2018) P&C offer comparable frameworks for forest management performance, albeit differing somewhat in their structure and areas of emphasis.

A quantitative analysis of the performance requirements within the respective scheme standards has shown that there is also a comparable number of specific 'shall' requirements within each standard, as summarised below (Table 4-2).

**Table 4-2:** Count of criteria and indicators between FSC and Responsible Wood performance hierarchies.

| Forest Management Standard | FSC (AUS-STD-001-2018) | RW (AS/NZS:4708-2021) | | |
|---|---|---|---|---|
| | | *System^* | *Sustainability Criteria* | *Total* |
| **Principles or Criteria Areas** | 10 | 7 | 7 | 14 |
| **Criteria or Criterion** | 70* | 39 | 61 | 100 |
| **Indicators or conformance requirements** | 224 | 74 | 152 | 226 |

*Note that a separate FSC Ecosystem Services Procedure contains a set of optional criteria catering for forest managers wanting to certify the provision and management of ecosystem services.

^Note that Responsible Wood Standard includes a separate set of seven system 'shall' requirements as part of its Plan-Act-Check-Do framework of the Standard.

Conformance with FSC's 10 principles requires assessment of 70 mandatory criteria, with approximately 224 nationally tailored indicators or individual performance requirements. The number of criteria under each principle, and the number of indicators under each criterion, are illustrated below (Figure 4-1), with numbers specified in brackets.

**Figure 4-1:** FSC certfication assessment requirements (FSC-AUS-STD-001-2018)
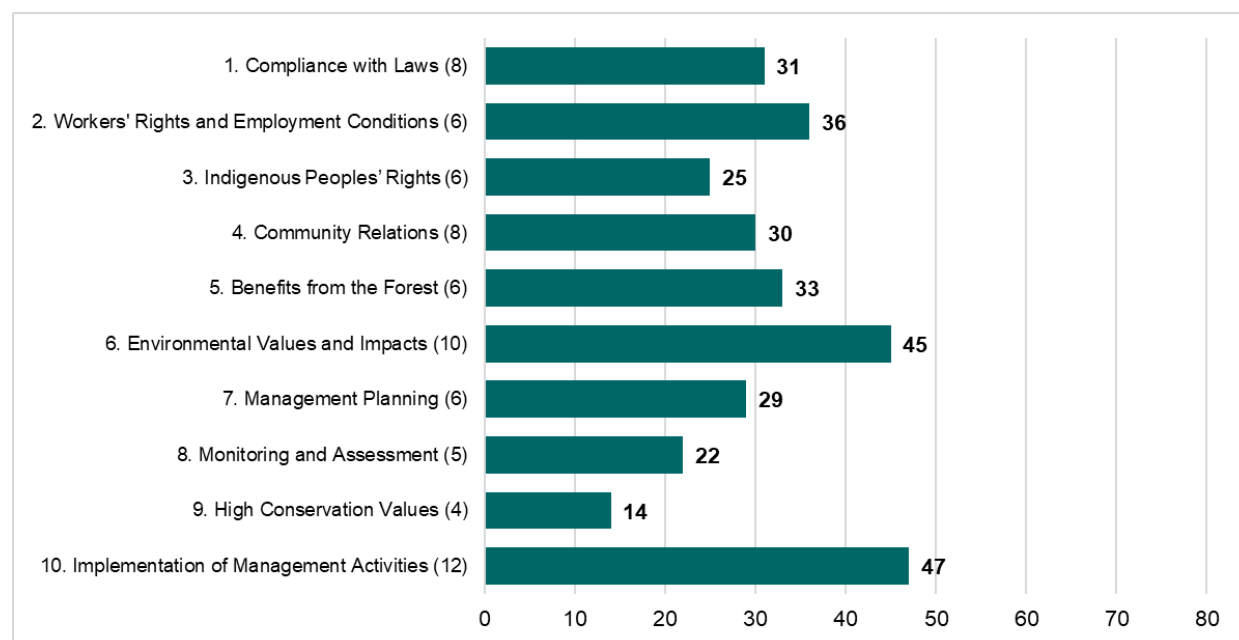


Source: Indufor, 2025

The Responsible Wood Standard relies on seven sustainability criteria areas and a separate set of seven system requirement areas, under its 'Plan-Act-Check-Do' model and systems-based framework. There are approximately 226 individual conformance requirements (or indicators) within AS/NZS:4708-2021 (refer Figure 4-2), which includes 74 separate 'system' requirements and 152 sustainability criteria area requirements.

**Figure 4-2:** Responsible Wood certification assessment requirements (AS/NZS:4708-2021)
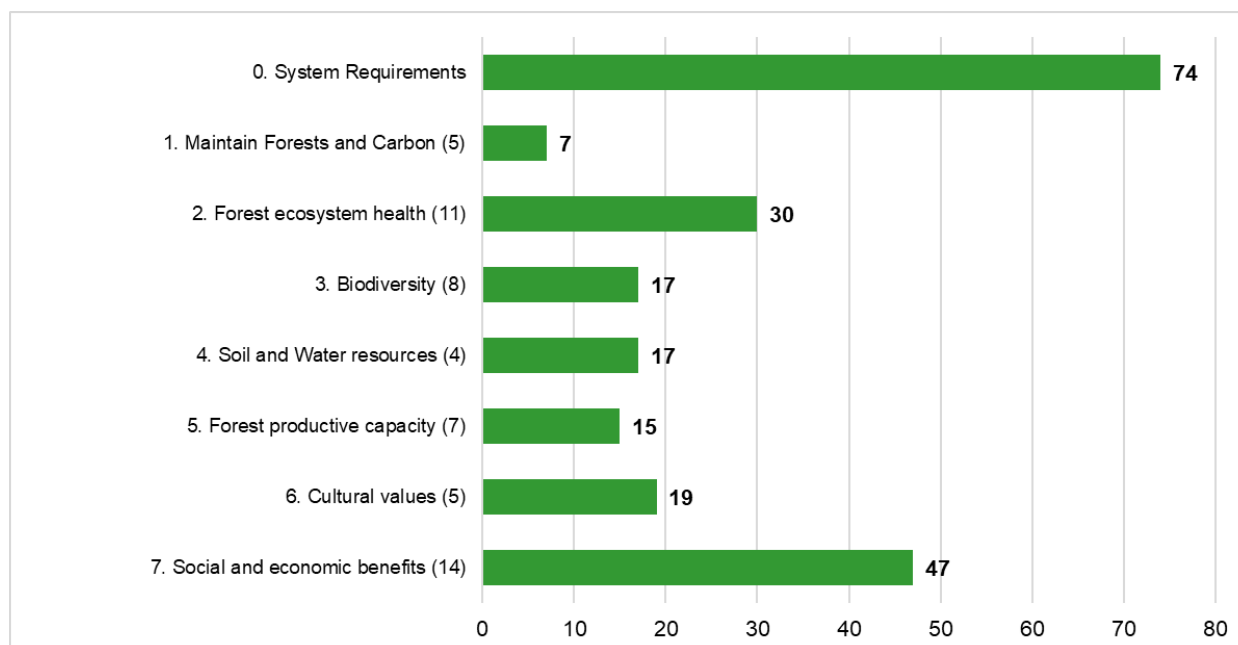


Source: Indufor, 2025

## 4.3   Comparative assessment of performance requirements

To assess the relative coverage and comparability between the two standards, the management system and sustainability criteria requirements of the Responsible Wood Standard (AS/NZS:4708-2021) were mapped to the 10 Principles and 70 Criteria of the FSC National Standard (FSC-STD-001-2018).

At the Tier One and Tier Two level of performance requirements (i.e. the 10 FSC Principles and 70 criteria associated with these principles), a high-level side-by-side scan of the Responsible Wood Standard's system and sustainability criteria requirements, to compare coverage relative to FSC's P&C. Where detail was insufficient at that level, applicable Tier Three 'conformance requirements' were reviewed.

For the assessment of the extent of comparability of the Responsible Wood Standard criteria and requirements with the FSC National Standard criterion, the following rating system was applied:

- *Broadly comparable*: the 'shall' requirements are broadly aligned, congruous, and not conflicting with each other, with the scope and objectives and/or coverage of issues or requirements broadly matching, allowing some variation in specific performance requirements or terminology.

- *Comparable with notable variance:* the topic or criteria area is somewhat covered, but there are minor elemental differences between 'shall' requirements.

- *Low comparability:* major elemental differences between 'shall' requirements or the requirements are severely conflicting in nature.

A summary of the number of FSC criteria covered in this comparative assessment is set out in Table 4-3. The assessment found that 64 of the 70 FSC criteria had 'broadly comparable' coverage within the Responsible Wood Standard, with six (6) somewhat comparable in coverage but with notable differences. This assessment did not identify any of the FSC's criteria to have 'low comparability' requirements within the Responsible Wood Standard.

**Table 4-3:** Number of FSC's criteria with comparable coverage within Responsible Wood's AS-NZS:4708-2021

| FSC Principle | Total no. of FSC criteria | No. with 'broadly comparable' coverage within AS-NZS:4708 – 2021) | Number with 'notable variance' in coverage within AS-NZS:4708 – 2021) |
|---|---|---|---|
| 1. **Compliance with the Laws** | 8 | 7 | - |
| 2. **Workers' rights and employment conditions** | 6 | 6 | - |
| 3. **Indigenous People's rights** | 6 | 5 | 1 |
| 4. **Community relations** | 8 | 7 | 1 |
| 5. **Benefits from the forest** | 6 | 5 | - |
| 6. **Environmental values and impacts** | 10 | 9 | 2 |
| 7. **Management planning** | 6 | 6 | - |
| 8. **Monitoring and assessment** | 5 | 4 | 1 |
| 9. **High Conservation Values** | 4 | 4 | - |
| 10. **Implementation of management activities** | 12 | 12 | 1 |
| **Totals** | **70** | **64** | **6** |

Source: Indufor analysis, 2025.

A summary of the comparable system and sustainability criteria requirements mapped to each of FSC's 10 Principles is set out below (Figure 4-3), and a more detailed acquittal of the 70 FSC criteria presented in **Annex 2**.

This assessment highlights that the coverage of the Responsible Wood Standard, and its breadth of system and sustainability requirements, is broadly comparable with the P&C of the FSC National Standard. FSC's P&C are addressed in some way by the Responsible Wood Standard requirements, albeit with apparent differences observed in emphasis, required approach, cut-off dates or terminology, the impact of which has not been evaluated as part of this review

One example of where criteria were assessed as broadly comparable but there was some variance in emphasis using specific terminology is the extent to which legal compliance requirements specifically encompass *transportation and trade of forest products* within FSC criteria 1.5. Equivalent requirements within the Responsible Wood Standard make no specific reference to 'transportation or trade of forest products'; but instead place compliance obligations on forest managers more broadly to '*its practices and those of its contractors and sub-contractors*'. In this instance, it is assumed that transportation and trade practices are well covered under Responsible Wood's broader phrasing, despite the lack of specificity in language or terminology when compared to FSC.

**Figure 4-3:** Mapping of Responsible Wood System requirements & Sustainability Criteria to FSC Principles

| FSC-STD-001-2018 | RW AS/NZS 4708:2021 | |
| --- | --- | --- |
| **FSC Principles** | **Management System Requirements** *(Sections 4-10 of the Standard)* | **Sustainability Criteria** *(Sections 11 of the Standard)* |
| **1 Compliance with Laws** | Section 4 (Context of the Forest Manager); Section 5.2 (SFM policy); Section 6.1 (Planning); Section 7.4 (Engagement) | 11.2.10 Unauthorised and illegal activities; 11.6.2 Indigenous people's rights, responsibilities and values; 11.6.4 Legal and traditional uses; 11.7.2 Health and safety; 11.7.3 Workers Rights; 7.7 Ethical behaviour. |
| **2 Workers' Rights and Employment Conditions** | Section 6 (Planning, Compliance), with linkages to Sections 2 and 3; Section 7.2 (Competence); Section 7.4 (Stakeholder engagement) | 11.7.2 Health and Safety; 11.7.3 Workers rights; 11.7.4 Equal Employment; 11.7.5 School age employment; 11.7.6 Remuneration and conditions. |
| **3 Indigenous Peoples' Rights** | Section 6.1 (Compliance obligations); Section 7.4 (Stakeholder engagement) | 11.6.2 Indigenous people's rights, responsibilities and values; 11.6.3 Indigenous cultural values; 11.6.4 Legal and traditional uses; 11.6.5 Traditional knowledge and management practices. |
| **4 Community Relations** | Section 7.4 (Stakeholder engagement) | 11.6.1 Heritage values; 11.6.5 Traditional knowledge and management practices; 11.7.1 Human rights and needs; 11.7.11 Sound economic performance; 11.7.12 Public access; 11.7.13 Community wellbeing. |
| **5 Benefits from the forest** | Section 6.1 (Compliance obligations); Section 7.4 (Stakeholder engagement) | 11.5.2 Harvest rate; 11.5.3 Manage non-wood products; 11.6.1 Heritage values; 11.7.4 Equal employment; 11.7.8 Local procurement; 11.7.10 Local industry support and development; 11.7.11 Sound economic performance. |
| **6 Environmental values and impacts** | Section 4 (Context of the Forest Manager); Section 9 (Monitoring and evaluation) | 11.1.3 conversion of natural ecosystems; 11.1.5 reforestation; 11.2.1 Identify and manage forest ecosystem health; 11.3.1, 11.3.2, 11.3.3, 11.3.4, 11.3.5, 11.3.6, 11.3.7 (Biodiversity); 11.4.1, 11.4.2, 11.4.3, 11.4.4 (Soil and water resources) |
| **7 Management Planning** | Section 5.2 (SFM Policy); Section 6 (Planning); Section 7.4 (Stakeholder engagement); Section 9.1, 9.2, 9.3 (Evaluation, Management Objectives and Monitoring); Section 10.3 (Continuous improvement) | 11.6 (Cultural values); 11.7.12 Public access |
| **8 Monitoring and Assessment** | Section 9.1 (Performance evaluation and monitoring); Section 9.3 (Management review) | 11.3.7 Monitor biodiversity |
| **9 High Conservation Values** | Section 6 (Planning); Section 7.4 (Stakeholder engagement) | 11.3.1 Identification of significant biodiversity values at clear risk of adverse impacts; 11.3.2 Actions to maintain or enhance significant biodiversity values; 11.3.7 Monitor biodiversity; 11.6.1 Heritage values; 11.6.2 Indigenous people's rights, responsibilities and values. |
| **10 Implementation of Management Activities** | Section 4.4 (Forest management system); Section 6.1 (planning); Section 6.2 (Mangement objectives); and Section 8 (Operation). | 11.2.2 Invasive and pest species; 11.2.3 Integrated pest management; 11.2.4 Pesticides; 11.2.5 Fertilsers; 11.2.11 Waste management; 11.4.1 Idenify soil and wtaer values; 11.4.2 Protect soil properties; 11.4.3 maintain water values; 11.4.4 infrastructure; 11.5.6 Species selection; 11.5.7 Silviculture. |

Source: Indufor analysis, 2025.

The FSC criteria where more notable differences were observed relate to the following:

- *Conversion from natural forests to plantations*:
  - o Both standards include clear requirements for demonstrating that the defined forest area does not include areas converted from native vegetation to plantations after specified dates. FSC addresses conversion of natural forests at criterion 6.9 while Responsible Wood addresses related requirements under its Section 11.1.3 Sustainability criteria.
  - o However, the specified dates differ in the two schemes, with the FSC criteria 6.10 establishing a cut-off date of 1 December 1994 and Responsible Wood adopting a cut-off date of 31 December 2006 (with varying scope for exceptional circumstances).
  - o In 2023, FSC moved to strengthen its position on ending deforestation by publishing a FSC Remedy Framework – a set of requirements for remedying past social and environmental harms. This framework defines permanent and effective measures required for remedying past social and environmental harm caused by conversion between 31 December 1994 and 31 December 2020. This motion[10] included a new cut-off date of 31 December 2020 with the possibility to certify land converted between 1 December 1994 and this date, if remedy for social and environmental harms caused by the conversion is provided.
  - o RWCS applies a different approach to remediation or restoration of past conversions where areas converted after the cut-off date are generally ineligible for certification. Its address of conversion of natural vegetation is based largely on the cut-off date threshold, while ensuring that currently certified forests meet sustainability criteria, including biodiversity conservation, soil and water protection, and responsible management practices.

- *Specific requirements for indigenous and non-indigenous communities regarding delegation of control*
  - o FSC includes specific provisions for indigenous (FSC criteria 3.3) and non-indigenous communities (FSC criteria 4.2) with forest management responsibilities to maintain or delegate control, with the process of delegation itself also requiring FPIC. The RW standard does not specifically cater for delegations of control of forest management activities, instead requiring FPIC where traditional knowledge is used or there is potential to infringe on the rights, responsibilities and values of indigenous communities.

- *Specific requirements for a tracking and tracing system for all products from the Management Unit*:
  - o FSC criterion 8.5 specifically requires a tracking and tracing system for *demonstrating the source and volumes are in proportion to projected outputs*, whereas the Responsible Wood Standard requires monitoring of harvesting rates without specifically stating how this should be achieved. Responsible Wood utilises their separate CoC Standard for tracking and tracing system requirements related to forest products and their Forest Management Standard for the determination of sustainable yields.

- *Prohibition of certain chemical pesticides:*
  - o While both schemes require forest managers to use integrated pest management and silvicultural systems that avoid or eliminate the use of chemical pesticides, the FSC maintains a Pesticides Policy with an extensive set of criteria, indicators and thresholds for identifying highly hazardous pesticides and lists chemical pesticides to be prohibited. The RWCS refers instead to the exclusion of WHO Class 1A and 1B pesticides and requires forest managers to undertake additional site/forest specific risk assessments for the use of all chemicals, to determine potential adverse social and environmental impacts, as well as manage chemical use to alleviate and minimise risks.

These examples illustrate the nature of ways in which there are both commonalities and differences in the two certification schemes, with nuanced variance observable at the principle, criteria or indicator level.

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[10] FSC (2023) FSC strengthens position on conversion and encourages remedy for harm with new documents. Online: https://fsc.org/en/newscentre/general-news/fsc-strengthens-position-on-conversion-and-encourages-remedy-for-harm-with

## 4.4 Implementation arrangements

A review of the comparative implementation arrangements between each scheme considered their respective governance surrounding the accreditation of certification bodies (CBs) and auditing to assess and determine certification. As limited consultation was undertaken with CBs, forest managers and CoC certificate holders, this review focussed mainly on documented standards and guidance material publicly available from FSC and Responsible Wood's respective websites.

**FSC**

FSC International established ASI, as an independent subsidiary, to accredit and oversee CBs responsible for auditing and certifying forest managers to FSC standards. ASI accredits CBs based on ISO/IEC 17065 conformity assessment standards and additional FSC-specific requirements. ASI performs regular oversight, including annual reviews and field audits of CBs, to ensure consistent application of FSC standards and adherence to impartiality principles. FSC International establishes the framework for certification but does not directly engage in CB operations or decision-making.

FSC is responsible for the standards development but remain independent of CB operations, which include the undertaking of initial assessments; annual surveillance audits and re-certification audits every five years to ensure conformance to the FSC principles and criteria.

Audit findings are addressed based on severity, whereby a major non-conformance requires immediate corrective actions, and if not rectified in required timeframe, certification is usually suspended or withheld until resolved. Minor non-conformances may also result in a continuation of certification with conditions, requiring corrective actions within a specified timeframe. Outstanding minor non-conformances are upgraded to major status if unresolved within 12 months.

Stakeholder engagement is also a fundamental component of FSC audits, ensuring diverse perspectives are considered when investigating possible non-conformances and to verify conformance requirements are met. FSC's general requirements for FSC accredited CBs makes provisions for disputes resolution and grievances, including options to elevate directly to ASI or ultimately to FSC International where they cannot be resolved at the CB level.

**Responsible Wood**

Responsible Wood's approach to accreditation, oversight, and certification relies on collaboration with JAS-ANZ (Joint Accreditation System of Australia and New Zealand), which accredits CBs to assess conformance to RWCS standards.

Like ASI for FSC, JAS-ANZ accredits CBs for the Responsible Wood scheme, to ensure compliance with ISO/IEC 17065 but also assesses compliance with ISO/IEC 17021-1 (Requirements for management system certification bodies). JAS-ANZ performs routine oversight, including audits of CBs, to ensure impartiality, consistency, and technical competence. Responsible Wood is responsible for the development of the standard but remains independent of CBs operations, ensuring clear separation between standard-setting and certification activities.

CBs conduct initial certification audits, annual surveillance audits, and recertification audits every five years. As with FSC, Initial certification assessments require rigorous process involving document reviews, on-site inspections, stakeholder consultations to verify conformance to the standard's system requirements and its environmental, cultural and social criteria.

Responsible Wood have a disputes resolution procedure, which steps out its obligations and approach to managing disputes raised regarding standards development and revision, or disputes raised related to the certification process and CBs, whereby Responsible Wood has no influence or authority.

Annual surveillance is also required to ensure ongoing compliance and to verify the implementation of any corrective actions from previous major or minor non-conformances. As with FSC, unaddressed minor-non-conformances can escalate to major status. Major non-conformances that are not addressed in a timely manner as per the CB's policy, can also result in suspension or withdrawal of the certificate.

**Notable observations**

Key aspects of commonality and difference between the two schemes in their implementation arrangements including the following:

- There is a difference in the nature of the relationship between FSC and ASI, and Responsible Wood and JAS-ANZ, as the scheme managers and Accrediting Bodies of CBs, respectively; however, the governance controls for ensuring independence and impartiality is considered comparable.

    o Responsible Wood and JAS-ANZ operate as entirely independent entities, with no ownership or other vested interests in each other, and a clear separation of functions and independence.

    o In the case of FSC and ASI, while there is historical connection as a wholly owned subsidiary of FSC International, impartiality and independence is managed through functional role separation and governance controls.

- Both schemes rely on accredited, independent CBs for auditing and certification decisions, with governance structures designed to manage impartiality, credibility and consistency.

- All accredited CBs for FSC are also accredited CBs for the RWCS and PEFC schemes. However, some CBs accredited to RWCS/PEFC are not accredited to the FSC scheme.

- Both systems use similar frameworks for addressing non-conformances, with minor non-conformances requiring timely corrective actions and major non-conformances leading to suspension or withholding of certification.

- Both schemes have supporting guidance or standards for CBs that give similar and comparable consideration to the timing and frequency of auditing, both requiring at least annual surveillance auditing and five-yearly re-certification audits.

- Both schemes' standards and their supporting guidance for CBs require audit program planning to consider the timing and seasonality of operations, and to schedule during periods of active operations. However, FSC's forest management evaluation standard[11] appears to go further in this respect, by placing particular emphasis on timing audits to align with periods of significant forest activity and prioritising high-risk activities over low-risk impact operations.

- In addition, there appears to be nuanced variances in the way the two schemes and their respective accredited CBs manage or resolve disputes related to the certification process, CBs, or the certified organisations. FSC's general requirements [12] for FSC-accredited certification bodies includes provisions for disputes relating to certification process or CBs to be elevated to ASI and ultimately, FSC International. In contrast, Responsible Wood does not involve itself in these types of disputes, with unresolved issues being elevated to JAS-ANZ if unable to be resolved by the CB.

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[11] FSC (2023) Forest Management Evaluations FSC-STD-20-007 V4 EN.
[12] FSC (2015) General requirements for FSC accredited certification bodies FSC-STD-20-001 V4 EN.

# 5. Key benefits of certification

The Crawford review of forest certification in Australia in 2006 noted that forest certification facilitates several long-term benefits to sustainable forest management. These were identified as:

- *Continuous improvement:* Firstly, the focus on continuous improvement in all aspects of forest management provides a powerful agent for ongoing change. Creating a culture of always looking to improve offers significant opportunities for forest management into the future.

- *Depoliticising forestry issues:* Secondly, certification provides an opportunity to de-politicise forestry issues. Certification schemes spell out the key criteria for sustainable forest management. If a forest manager can demonstrate compliance with these criteria, as assessed, by an independent third party, then the community can be assured that the forest is being managed to internationally accepted standards, regardless of whether it is a native forest or a plantation.

- *Industry leadership:* Thirdly, certification for forestry was seen to confer significant leadership over other competing industry sectors that impact heavily on our natural environment; with the potential to provide a significant market competitive position in a future marketplace which favours materials and products that are sustainable – in their production, application and wider life cycle impacts.[13]

The first two of these key benefits continue to be prominent in the development of forest certification in Australia. The second of these key benefits, relating to depoliticising forestry issues, can be seen as broadly encompassing the scope and potential benefit of supporting and maintaining a '*social licence*' for forest management. Recent observations on the status of these and other benefits are discussed below.

In addition, there are two other key benefits that are important to recognise in this review. These are:

- *Market access for forest products:* This benefit relates to the extent to which forest certification creates, enables or influences access to forest product markets or market preferences that may not be realisable without certification.

- *Platform for other corporate reporting requirements.* This benefit relates to the extent to which forest certification systems can significantly assist forestry companies to address their other corporate reporting requirements, beyond its voluntary certification commitments, especially where they comprise mandatory reporting obligations.

These potential benefits are discussed in turn below.

## 5.1 Continuous improvement

The 2006 review noted:

> *'It is one thing for an organisation to do enough to get over the line and become certified – but signing on to a commitment to continuous improvement is a significant step beyond. Creating a culture of always looking to improve offers significant opportunities for forest management into the future'.*[14]

Both forest certification schemes in Australia facilitate continuous improvement processes by setting environmental, social, and economic standards for forest management, and requiring certified entities to adhere to best practices and demonstrate ongoing efforts to enhance their performance.

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[13] Crawford (2006) *op cit.*

[14] *Ibid.*

Both schemes have standards requirements that relate directly to continuous improvement. Terminology varies to an extent, but they are considered broadly comparable in this respect.

The Responsible Wood Standard has a specific section on *continual improvement* (Section 10.3), which requires the forest manager to *continually improve the suitability, adequacy and effectiveness of the forest management system to enhance performance*.

The FSC National Standard links continual improvement to adaptive management ('*systematic process of continually improving management policies and practices by learning from the outcomes of existing measures*') and then states that *the management plan shall be implemented and kept up to date based on monitoring information in order to promote adaptive management* (Principle 7).

More broadly, both schemes encompass the following components relating to continuous improvement:

- *Audits and monitoring*: Regular independent audits (including internal auditing) assess compliance with certification standards. These audits identify areas for improvement and ensure managers address deficiencies.

- *Stakeholder engagement:* The schemes require consultation with a broad range of stakeholders, fostering dialogue and collaborative problem-solving to refine practices.

- *Adaptive management:* As noted above, the certification criteria incorporate adaptive management principles, encouraging forest managers to evaluate and adjust operations based on new scientific insights, technological advancements, and performance monitoring data.

- *Transparency and reporting:* Certified entities must publicly report on their performance, promoting accountability and incentivising improvements to maintain certification status.

- *Training and capacity building:* Certification encourages investment in workforce training, equipping managers and workers with skills to adopt innovative and sustainable practices.

By promoting accountability, stakeholder input and adaptive strategies, forest certification schemes drive a culture of continuous improvement, which enhances a broad suite of forest management practices.

## 5.2   Depoliticising forestry

The 2006 review also observed the following:

> '*Certification provides an opportunity to de-politicise forestry, particularly with respect to native forests, where philosophical, political and sustainability issues have been intertwined for years'.*

The extent to which this key benefit has been demonstrated since that time is mixed.

For plantations, there is generally strong policy support at the national level and state level; notwithstanding more variance at local government levels which can reflect a broad range of sentiments; from strong support for all the economic and social benefits that plantations provide to some cases of localised concerns about plantations resulting in land use change that can unsettle regional communities.

At the national level, strong policy support is reflected in Australia's National Forest Industries Plan (published in 2018)[15], which is focussed on expanding the plantation estate by encouraging the planting of one billion new trees over a decade to meet future timber demand and support regional economies.

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[15] Department of Agriculture and Water Resources (2018) *Growing a better Australia – A billion trees for jobs and growth*, Canberra. Available at agriculture.gov.au/forestry

At the state level, various State governments have supported the expansion of timber plantations. For example, the NSW Forestry Industry Roadmap[16] emphasises the need to review barriers to investment in new plantations and ensure a sustainable and reliable timber supply to meet growing demand. Other states have established roadmaps and strategies featuring similar levels of support for timber plantations.

Furthermore, all of Australia's larger-scale plantation forests are certified (with 93% of which certified to the Responsible Wood standard and 61% certified to FSC), and forest certification is now clearly an established feature of the operational settings for plantation management and timber supply in Australia.

For native forests, the purported benefit of forest certification depoliticising forestry is less apparent. Australia's State of the Forests Report has observed a long term decline (over the period between 1960 and 2021) in the area of native forest available and suitable for wood harvesting on leasehold, private and multiple-use public forest tenures; and has attributed this to '*several factors including, changes in tenure (such as transfers of multiple-use public forests to nature conservation reserves), continuing increases in the area of multiple-use public native forest to which harvesting restrictions apply, and reclassification of forest to non-forest based on improved mapping techniques.*'[17]

Some of these factors, (notably transfers of multiple-use public forests to nature conservation reserves) can in turn be partly attributed to 'politicised' factors.

The decline in area of native forest available and suitable for wood harvesting on multiple-use public forest tenures has continued over the past two decades, during which time effectively all the State forests in Australia have achieved and maintained FM certification under the RWCS.

Furthermore, over the past five years since 2019, State government policy decisions in Victoria and Western Australia have led to the cessation of commercial timber production in public native forests, from 2024 onwards. In Queensland, there has been policy positions and land use allocations that have indicated an intent to transition towards cessation of native forest harvesting in certain regions; however, the future of native forest timber harvesting in public native forests is currently under review.

These are policy decisions that have or may fundamentally change the forest management arrangements for public native forests and cease native forest timber harvesting; notwithstanding forest management agencies in these states having maintained Responsible Wood certification (previously AFS) for more than 10 years. Therefore, it is apparent that forest certification has not de-politicised forestry in multiple use native forests, at least under the RWCS.

The capacity for FSC certification to de-politicise native forest management has not yet been fully tested in Australia, with no public native forest manager yet attaining full forest management certification under the FSC scheme. Until such time that large scale native forest estates are able to attain full FSC certification in Australia, this potential benefit is moot.

## 5.3   Industry leadership

In 2006, the availability of sustainability certification for forestry was seen to confer significant leadership over other industry sectors that impact on our natural environment, where environmental and social outcomes are not well understood or actively managed.

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[16] NSW Department of Primary Industries. (2016) *NSW Forestry Industry Roadmap*. Retrieved from
https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0009/711855/plantation-forest-forestry-roadmap.pdf
[17] Montreal Process Implementation Group for Australia (MIG) and National Forest Inventory Steering Committee (NFISC) (2024), *Australia's State of the Forests Report*, Australian Bureau of Agricultural and Resource Economics and Sciences, Canberra, October. CC BY 4.0.

This observation was drawn from the comparison with agricultural industries as well as the mining and manufacturing industries, including those that produce steel, concrete, aluminium and plastic products.

In 2025, this perspective has shifted, in that sustainability standards are increasingly prominent across other industries. For example, Australia's agricultural industries are increasingly engaging with sustainability certification programs to demonstrate their commitment to environmentally responsible, socially equitable, and economically viable practices. Several certification schemes now play key roles in promoting sustainability across different sectors of agriculture. These include:

- *Australian Certified Organic (ACO):* one of the most widely recognised programs for organic farming.

- *Sustainable Agriculture Initiative (SAI) Platform:* a global initiative promoting sustainable practices.

- *Rainforest Alliance Certification:* Rainforest Alliance promotes the sustainability of agricultural products like coffee, cocoa, tea, and bananas through rigorous environmental and social criteria. In Australia, it is used primarily in the coffee industry.

- *Responsible Wool Standard (RWS):* The Responsible Wool Standard ensures that wool is sourced from farms that meet high standards of animal welfare, land management, and sustainability. It is particularly significant in Australia's wool industry, which is one of the largest in the world.

Likewise, Australia's mining industry has programs that include:

- *Initiative for Responsible Mining Assurance (IRMA):* IRMA is a voluntary certification program focused on ensuring responsible mining practices. It evaluates companies on aspects such as community relations, environmental stewardship, and workers' rights.

- *Australian Standard for Sustainable Mining (AS 4827):* This standard provides guidelines for Australian mining operations to assess and improve their sustainability efforts, focusing on environmental and social criteria. It is used by companies looking to enhance their sustainability credentials within domestic and international markets.

These programs are increasingly important for enhancing industry reputation, meeting regulatory requirements, and responding to growing consumer and investor demands for more sustainable mining practices.

In this context, the status of forest certification in Australia may no longer confer significant leadership over other industry sectors in the way it did 20 years ago. However, maintaining forest management certification under one or both schemes is seen as vitally important to industry credibility, in increasingly competitive markets for policy support, investment and consumer preferences.

## 5.4   Market access

Today, forest certification schemes are seen to play a fundamental role in facilitating and enhancing market access for forest products. Independent certification to internationally recognised standards provides a level of assurance to consumers and businesses that forest products are sourced sustainably, which is increasingly demanded in both domestic and international markets.

International policy and regulatory developments over the past 20 years directed at global sustainability initiatives - including for example, combatting illegal logging and more recently avoided deforestation - have led to regulatory frameworks that recognise and give clear preference to imported timber products with FSC or PEFC certification, as internationally recognised and credible certification schemes – as

reflected in Australia's *Illegal Logging Prohibition Rules 2024*[18]. Both certification schemes have worked on ensuring close alignment with the requirements of these regulatory frameworks and positioning certified wood products to be preferred products, based on conformance to standards that meet key requirements of these frameworks, e.g. the EU Deforestation Regulation[19,20].

Similarly, many large corporations and government entities have adopted sustainability policies that prioritise certified products. For instance, multinational companies, retailers, and construction firms may now often specify FSC or PEFC certification in their procurement policies to ensure the products meet environmental, social, and ethical standards. This is supported by a growing base of Australian architects and specifiers, many of whom have become more familiar with forest certification schemes and may now specify the requirement for wood products to be sourced from FSC or PEFC certified forests.

Focussing specifically on the built environment, the Green Building Council of Australia (GBCA) has recognised the standards of both the FSC and Responsible Wood in its Responsible Products Program[21], which acknowledges and awards initiatives that certify products available use in the built environment. These initiatives are required to demonstrate compliance with the minimum expectations and a selection of the technical criteria. Once these expectations have been met, the GBCA assigns Responsible Product Values to initiatives and these are passed onto the products they recognise, i.e. FSC-certified and Responsible Wood-certified wood products. In this way, forest certification under both schemes is continuing to support market access by providing specific and distinctive recognition of 'responsible products' for the built environment.

More broadly in domestic markets, there is increasing interest if not demands for independent certification from Australian businesses and consumers, who are becoming more sustainability-conscious in their purchasing decisions. With growing awareness of environmental issues, buyers are increasingly choosing certified products to align with sustainability values. Certification is a powerful marketing tool that helps producers differentiate their products and meet the ethical expectations of a broad range of consumers.

Overall, forest certification schemes significantly improve access to both international and domestic markets by providing credibility, promoting transparency, and aligning products with the growing demand for sustainable and responsible sourcing. Literature reviews and key stakeholder engagement across the sector indicate there is limited evidence of premium prices being paid for certified wood, but certification is required to provide preferred market access into building projects in Australia and key export markets.

## 5.5 Systems platform for other reporting requirements

Another benefit of forest certification that has become increasingly apparent is the improved capacity for forest managers to address an increasing array of enterprise performance and monitoring requirements. Over the past two decades, the sustainability performance expectations of forest managers and their reporting obligations have continued to evolve and be shaped by regulatory and market forces. These performance expectations and reporting obligations may now encompass ESG reporting and mandatory disclosures of climate-related financial information in annual sustainability reports.

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[18] For example, refer to Australia's *Illegal Logging Prohibition Rules 2024*, which make specific provision for recognition of the FSC and PEFC forest management standards.

[19] For example, refer to FSC (2025) *FSC & EUDR*. Online: https://fsc.org/en/fsc-eudr

[20] For example, refer to PEFC (2025) *PEFC – your partner for the EUDR*. Online: https://www.pefc.org/eudr

[21] GBCA (2025) *The Responsible Products program*. Online: https://new.gbca.org.au/green-star/the-responsible-products-program/

Both the FSC National Standard and the Responsible Wood Standard incorporates extensive requirements to implement practices that support the environmental, social and governance (i.e. ESG) aspects of sustainability. Given this, forest managers who are certified under one or both these schemes have established systems in place to create or tailor reporting on ESG performance expectations and demonstrate their commitment to ESG principles.

Furthermore, in relation to climate-related financial information, both standards require forest managers to maintain and enhance carbon sequestration through sustainable (or 'responsible') forest management practices, such as promoting reforestation and afforestation. More specifically on carbon sequestration and ecosystem services:

- The Responsible Wood Standard incorporates requirements for the forest manager to have a sci*entifically justified estimate of the current and future carbon storage on the DFA* (section 11.1.1) and the forest manager shall implement '*climate positive practices*' and *take action to minimise anthropogenic greenhouse gas emissions* (section 11.1.2).

- Under the FSC standard, *ecosystem services* include the sequestration and storage of carbon which contributes to the mitigation of climate, and the forest manager is obliged to *maintain, conserve and/or restore ecosystem services and environmental values of the Management Unit* (Principle 6).

More broadly, both schemes operating in Australia have identified how they are helping to achieve a range of targets under the United Nation's sustainable development goals (also known as SDGs)[22,23]. The broad environmental, social, and economic focus of both schemes can be directly aligned with a range of the sustainable development goals, including those focused on:

- (#1) No poverty (with forests contributing to livelihoods and economic growth across value chains)

- (#3) Good health and well-being (by regulating the climate as well as providing recreational benefits)

- (#5) Gender equality (and equality more broadly)

- (#6) clean water and sanitation

- (#8) providing decent work and economic growth

- (#12) Responsible consumption and production.

Through the mapping and identification of this alignment with forest certification standards, both Responsible Wood and FSC are assisting companies with certified forests to specify how they are contributing towards the global sustainable development goals.

As forest management entities become increasingly sophisticated in their reporting on a broad range of sustainability initiatives, the attribution of benefits arising directly from forest certification systems to meet these other requirements may reduce over time. Conversely, continuous improvement practices should continue to support the utility of forest management systems to improve enterprise performance.

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[22] Responsible Wood (2025) *Sustainable Development Goals*: Refer online:
https://www.responsiblewood.org.au/what-we-do/sustainable-development-goals/

[23] FSC (2025) *FSC Contributions to Achieving the Sustainable Development Goals*. Refer online:
https://anz.fsc.org/impact/sustainable-development-goals

# 6. Summary of findings

Over the past two decades, the extent of forest certification in Australia has effectively tripled in terms of forest areas under management. This expansion in certified areas reflect the significant growth and development of the two leading certification schemes.

Responsible Wood's certified forest area – which encompasses almost all the certified areas of multiple use native forests – has more than tripled; while FSC's certified area – comprising predominantly plantations – has more than doubled since 2006.

As of December 2024:

- all (100%) industrial-scaled plantation forest estates in Australia are certified under one or both the two schemes, with approximately 55% of Australia's plantations being dual certified.

- all publicly managed native forest where timber production is currently permitted and practiced (approximately 15.4 million ha) is certified to the Responsible Wood Standard. In contrast, there are no substantial estates of FSC-certified native forests being managed for multiple uses including commercial timber production in Australia.

Most of this expansion occurred during the 2000s and the early 2010s, by which time, most of the multiple use public native forests had obtained forest certification (under Responsible Wood), and similarly, most of the large-scale plantation estates managed by State-owned forestry agencies, institutional investors and corporate owners had obtained forest certification (also under Responsible Wood and FSC). Over the past decade, the extent of forest certification has been generally stable, and the focus for the scheme managers has been promoting sustainable forest management with continuous improvement and strengthening the certification systems and brands that support certified forest estates.

## 6.1 Common features across the schemes

This review of forest certification in Australia has observed there are many common features and attributes shared between the two schemes and their corresponding standards, with increasing levels of convergence in both schemes' consideration of key forest management requirements. Prominent examples of these common features comprise the following:

- Both schemes operating in Australia are either recognised by or benchmarked to internationally recognised global schemes.

- Both schemes rely on independently accredited certification bodies to undertake audits and assess conformity to certification standards.

- Both schemes include broad stakeholder representation and input during standards development and revision processes.

- Both schemes incorporate an extensive set of principles, criteria, and indicators (or performance assessment requirements) covering contemporary forest management requirements.

- Despite different structural arrangements, both schemes rely on separate entities responsible for accrediting certification bodies (auditors). The FSC-aligned entity responsible for accrediting certification bodies (ASI) is wholly owned by FSC International, which stands in contrast to JAS-ANZ being entirely independent of Responsible Wood and PEFC International. However, FSC International has set up ASI and its governance structures to operate entirely separately from FSC standard setting processes, maintaining impartiality and independence.

- Both schemes have issued and maintained forest certification certificates for most of the major plantation forest managers in Australia.

- Both schemes' FM standards adopt the eight recognised ILO conventions for workers, contractors and sub-contractors, and reinforce requirements to comply with all relevant national and local laws.

- Both standards include specific provisions for recognising the rights, responsibilities and values of Indigenous people based on their connection to or ownership of the forests and land - and both require the principles of Free, Prior and Informed Consent (FPIC) and associated practices to be applied. However, there is variation in the specific emphasis on certain terms, such as FSC's use of 'customary practices' and 'customary rights', which may be perceived to go beyond the recognition of 'existing rights' referred to within the Responsible Wood Standard. Both include strong provisions for engagement to identify, protect and maintain sites or values of cultural or spiritual significance, but may differ on who with and how to manage. At the P&C level, the recognition and respect for Indigenous Peoples' rights, responsibilities and values is considered broadly comparable.

- Both scheme standards include clear requirements for demonstrating that the defined forest area (of certified forest management unit) does not include areas converted from native vegetation to plantations after specified dates.

- Both scheme standards for sustainable forest management include a prohibition on the use of specified chemical pesticides, albeit the lists of prohibited pesticides may differ.

- Both scheme standards for sustainable forest management include a prohibition on the use of genetically modified organisms or trees.

In summary, there appears to have been increasing levels of convergence and comparability over time as respective standards have undergone review and updates since 2006. The latest versions appear to be more aligned than previous versions, notwithstanding there are some differences reflecting the way in which the schemes have evolved, their respective governance arrangements and stakeholder base.

## 6.2  Apparent differences across the schemes

While the two predominant schemes in Australia have much in common, and are broadly comparable in many respects, there are apparent differences that can be observed in the governance structures, the standards development the performance assessment requirements for forest management, and to a lesser extent, in the auditing and implementation processes. Notable differences include the following:

*Top-down* and *bottom-up* models for governance and standards development

- The development of the predominant schemes in Australia has followed differing pathways and there is a difference in the origins of the respective standards and program governance arrangements. The development of the FSC program in Australia can be characterised generally as a 'top down' model for governance and standards development (i.e. led by FSC International), while the development of the Responsible Wood Certification Scheme reflects a nationally based, 'bottom up' model supported by Australian (and New Zealand) standards development bodies.

- The FSC's National Forest Stewardship Standard for Australia was based on the FSC's Principles and Criteria of Responsible Forest Management, which represent the international standards. The national office for FSC in Australia engage a Standards Development Group to develop the National Forest Stewardship Standard by applying the international principles and criteria and following FSC International normative standards and procedures to tailor its IGIs to Australian conditions. Any locally proposed variations to indicators or verifiers at the national level must first be approved by FSC International based on its alignment with FSC's global requirements.

- FSC's standards development utilises a distinctive three-chamber model (Environment, Social and Economic), where decisions require consensus across all three chambers. This international model is replicated in Australia.

- In comparison, RWCS standards were developed in Australia, with systems and sustainability criteria requirements specifically framed within Australian policy, legislative and bio-physical settings. Responsible Wood is independently accredited as a SDO by Standards Australia and has managed the process of developing the Responsible Wood Standards and periodic revisions and updates.

- To support internal recognition of its Australian Standard, Responsible Wood separately seeks PEFC endorsement for international benchmarking, whereas FSC International approves all its nationally developed standards.

**Systems and prescriptive performance approach**

- There is also some variation in the emphasis placed on a systems-based approach of the RWCS compared to a more prescriptive and performance-based approach by FSC.

- Responsible Wood's systems-based framework uses Australian and New Zealand legislation and regulations as foundational requirements, allowing for flexibility and local adaptation, with emphasis on demonstrable systems and processes that drive continuous improvement in practice and outcomes. Furthermore, the RWCS incorporates the principles of ISO management systems, particularly ISO 14001 (environmental management) and ISO 9001 (quality management). It aligns with these standards by requiring certified entities to establish structured systems that emphasise continual improvement, legal compliance, and stakeholder engagement. The scheme integrates risk-based thinking, evidence-based decision-making, and clear documentation practices aligned to ISO frameworks.

- The Responsible Wood Standard also incorporates a 'plan-do-check-act' model to ensure continual improvement and supplement a broad set of sustainability criteria to ensure conformance overall.

- The FSC's National Forest Stewardship Standard incorporates elements that align with ISO management system principles; however, it is not explicitly framed as an ISO-based system to the same extent as the Responsible Wood Standards. FSC instead rely on the ISEAL Code of Good Practice for sustainability systems, with its standard emphasising principles such as continual improvement, stakeholder engagement, and transparent decision-making. Therefore, while there is a substantial overlap in principles, the FSC standard focuses specifically on responsible forest management and sustainability, with its specific social, environmental, and economic criteria tailored to forestry, rather than being a direct adaptation of ISO frameworks.

**Differences in specific performance criteria**

- The comparison of performance requirements at the P&C level found the two predominant scheme standards to be broadly comparable, with almost all FSC's criteria covered in some way by the Responsible Wood Standard requirements. However, there were differences observed.

  o Both standards prohibit certification of areas converted from native vegetation to plantations but use different cut-off dates: FSC (1 Dec 1994) and Responsible Wood (31 Dec 2006, with some exceptions). In 2023, FSC also introduced the Remedy Framework, allowing certification of land converted between 1994 and 2020 if past social and environmental harms are remedied.

  o FSC includes specific provisions for indigenous and non-indigenous communities with forest management responsibilities to maintain or delegate control, with the process of delegation itself also requiring FPIC. The RW standard does not specifically cater for delegations of control of forest management activities, instead requiring FPIC where traditional knowledge is used or there is potential to infringe on the rights, responsibilities and values of indigenous communities.

  o While both standards require forest managers to use integrated pest management and silvicultural systems that avoid or eliminate the use of chemical pesticides, the FSC maintains an FSC Pesticides Policy with an extensive set of criteria, indicators and thresholds for

identifying highly hazardous pesticides (HHPs), and lists chemical pesticides to be prohibited, while the RWCS refers instead to exclusion of WHO Class 1A and 1B pesticides and emphasises the need for documented risk assessments to minimise adverse social and environmental impacts.

o   FSC's National Forest Management Standard requires a tracking and tracing system for demonstrating the source and volumes of forest products are in proportion to projected outputs, whereas Responsible Wood utilises their separate Chain of Custody Standard for tracking and trace system requirements related to forest products and their Forest Management Standard for determination of sustainable yields.

**Certification coverage of native forests**

- Perhaps the most notable variance observable in the two forest certification schemes in Australia is the coverage of native forests. While all State forest management agencies managing multiple use native forests have attained and maintained certification under the Responsible Wood Standard, no public native forests have been certified under the FSC National Standard; and the relatively small area of private native forests certified under the FSC National Standard is very limited in its extent.

- There is no simple explanation or clear structural difference for why this is the case, other than they have not been able to demonstrate conformance to the FSC standard. However, the following contextual factors can be observed:

    o   Australia's leading conservation advocacy organisations are highly engaged in discussion forums, debates and campaigns pertaining to native forest management in Australia, with some adopting the dual positions of supporting FSC certified native forest management but not Responsible Wood certified forest management.

    o   Furthermore, Australia's forest managers are required to operate under comprehensive state and federal regulations, which already impose stringent protections for biodiversity, Indigenous rights and workers' rights. The Responsible Wood standard was developed with direct reference to and specific recognition of these regulatory settings. In contrast, the FSC National Forest Stewardship Standard of Australia was developed to apply the international Principles and Criteria, which can increase the complexity of overlapping legal and regulatory requirements.

**Auditing and certification assessments**

- It would appear there has been more emphasis under the FSC program on auditors engaging directly with stakeholders to discuss disputes and stakeholder issues associated with the performance standards and to confirm conformity with FSC requirements. In comparison, the RWCS audits and performance standards appears to place more emphasis on assessing the forest manager's stakeholder engagement systems, the provision of opportunities for stakeholders to engage, and how the forest manager handles complaints or grievances. It is unclear from the desktop review how much emphasis the 'precautionary approach' within each standard is given when assessing adequacy of management strategies or engagement mechanisms to resolve or manage stakeholder perspectives.

- Furthermore, consultation conducted with auditors and certificate holders for this review has observed that there tends to be more stakeholder engagement associated with FSC audits, including through the audit process as well as following CB decisions, which can include disputes, complaints and grievances with the process, the CB or the certified organisation.

- Stakeholder disputes and resolution procedures also vary between the two schemes, where RWCS CBs generally manage disputes related to certification or elevate to JAS-ANZ, whereas FSC CBs are required to manage the certification process and stakeholder disputes to reach some form of resolution or elevate unresolved issues to ASI or ultimately FSC International.

## 6.3 Conclusions

This review of the status of forest management and chain of custody certification in Australia is based on a desktop comparison of publicly available documentation on certification systems and forest management certification standards. It provides a comparative review of the two predominant forest certification schemes, Responsible Wood and FSC, primarily at the principle and criteria level. It is important to note that this review has not sought to compare the schemes at the indicator level nor investigate the implementation of these schemes.

The intent for this review is to inform the forest and wood products sector in Australia and interested stakeholders of the status of the predominant forest certification schemes including their key features and their respective coverage of contemporary forest management principles.

This review has highlighted that Responsible Wood and FSC both provide internationally recognised frameworks for forest certification in Australia, and in 2025, their combined certified areas account for effectively all the large-scale plantation holdings across the country, and most of the public native forests managed for multiple uses including timber production (the latter provided for by the RWCS specifically) as well as some private native forests.

In 2006, the review of forest certification of Australia observed that commonalities are often put aside as the market focuses on points of difference[24]. This observation appears to be equally relevant today. In this context, there are apparent differences between the two schemes and their performance standards, which can be considered with varying levels of granularity, i.e. at the principle, criterion or indicator levels. The extent to which these differences are considered significant will depend largely on the viewpoints and preferences of individual stakeholders.

However, there are also clear similarities and comparable features in the two schemes, notably in their governance frameworks to manage independence and impartiality, their standard setting processes, and their requirements for forest managers seeking to obtain or maintain certification under each scheme. The two schemes share many common features and attributes and, having entered a more mature phase of development, are tending towards increasing levels of convergence in many aspects.

Responsible Wood's FM and COC standards both reflect their development with a systems-based approach aligned with ISO management systems, while FSC's more prescriptive standards ensure globally recognised benchmarks for environmental and social sustainability.

Together, they advance Australia's leadership in sustainable forest management and contribute to long-term environmental and economic resilience, with clear alignment to the United Nations' sustainable development goals.

Looking ahead, both scheme managers in Australia have expressed interest in working with a broader base of forest managers in Australia to explore further forest certification opportunities in forests not necessarily managed for timber production, including conservation reserve forests. The FSC scheme already contains optional procedural requirements for forest managers seeking endorsement in relation to the provision of ecosystem services. The RWCS also recognises ecosystem services, though is currently focusing more on managing forests to maintain biodiversity, water quality, soil health, and carbon storage as inherent components of sustainable forestry. Their respective positioning in relation to certification for the provision of ecosystem services reflects both the similarities and variances between the two schemes.

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[24] Crawford (2006) *op cit*.

# ANNEX 1

**Notable terms and definitions in the standards**

## Annex 1 – Notable terms and definitions under the standards

| FSC (AUS-STD-001-2018) | Responsible Wood (AS/NZS:4708-2021) |
|---|---|
| **Principles** | |
| FSC refer to Principles as the essential rules or elements of environmentally appropriate, socially beneficial and economically viable forest management. These include:<br>1. Compliance with the Laws<br>2. Workers' rights and employment conditions<br>3. Indigenous People's rights<br>4. Community relations<br>5. Benefits from the forest<br>6. Environmental values and impacts<br>7. Management planning<br>8. Monitoring and assessment<br>9. High Conservation Values<br>10. Implementation of management activities | Responsible Wood adopt four key elements of sustainable forest management, and three key principles of forest certification as embedded within its standard.<br><br>Key elements include:<br>• Cultural sustainability<br>• Economic sustainability<br>• Environmental sustainability<br>• Social sustainability<br><br>Together with principles of:<br>• Governance<br>• Quality<br>• Inclusiveness and transparency |
| **High Conservation Values** are any of the following values:<br><br>**HCV 1:** Species diversity. Concentrations of biological diversity including endemic species, and rare, threatened or endangered species, that are significant at global, regional or national levels.<br><br>**HCV 2:** Landscape-level ecosystems and mosaics. Intact Forest Landscapes, 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.<br><br>**HCV 3:** Ecosystems and habitats. Rare, threatened, or endangered ecosystems, habitats or refugia.<br><br>**HCV 4:** Critical ecosystem services. Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes.<br><br>**HCV 5:** Community needs. Sites and resources fundamental for satisfying the basic necessities of local communities or Indigenous Peoples (for example for livelihoods, health, nutrition, water), identified through engagement with these communities or Indigenous Peoples.<br><br>**HCV 6:** Cultural values. 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. | **Significant Biodiversity Value** is a term covering any of the following biodiversity values:<br>1. known or likely occurrences of threatened species and their known and potential habitat<br>2. threatened communities (including forest, non-forest and non-terrestrial communities)<br>3. old-growth forest and/or other forest types which are rare or depleted (generally less than 10% of extant distribution).<br>4. under-represented vegetation communities:<br>  i. vegetation communities (including forest, non-forest and non-terrestrial) that are currently reserved at less than 15% of their pre-European distribution or equivalent benchmark time<br>  ii. old-growth vegetation communities (including forest, non-forest and non-terrestrial communities) that are currently reserved at less than 60% of the extant area.<br>5. sensitive ecosystems such as wetlands and karst ecosystems<br>6. areas with regionally or nationally significant concentrations of native species that are at risk from current, planned or potential management activities<br>7. globally, regionally and nationally significant large intact forest landscapes with natural distribution and abundance of naturally occurring species<br>8. disjunct or outlier populations, refugia and centres of endemism<br>9. endangered or protected genetic in situ resources and/or other natural areas important for conservation of important genes |

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| | 10. areas with significant seasonal concentrations of species (e.g. areas important to the lifecycle or migration paths of migratory and communal breeding species, including native fish spawning sites) |
| | 11. remnants in extensively cleared landscapes and mature forest in degraded landscapes. |
| **Management Unit**<br><br>A spatial area or areas submitted for FSC certification with clearly defined boundaries managed to a set of explicit long-term management objectives which are expressed in a Management Plan. This area or areas include(s):<br><br>• All facilities and area(s) within or adjacent to this spatial area or areas under legal title or management control of, or operated by or on behalf of The Organisation, for the purpose of contributing to the management objectives; and<br><br>• All facilities and area(s) outside, and not adjacent to this spatial area or areas and operated by or on behalf of The Organisation, solely for the purpose of contributing to the management objectives. | **Defined Forest Area**<br><br>An area (including land and water) to which the requirements of the standard are applied and over which the forest manager demonstrates control. |
| **Indigenous People** | |
| People and groups of people that can be identified or characterised as follows:<br>• The key characteristic or Criterion is self-identification as Indigenous Peoples at the individual level and acceptance by the community as their member<br>• Historical continuity with pre-colonial and/or pre-settler societies<br>• Strong link to territories and surrounding natural resources<br>• Distinct social, economic or political systems<br>• Distinct language, culture and beliefs<br>• Form non-dominant groups of society<br>• Resolve to maintain and reproduce their ancestral environments and systems as distinctive peoples and communities. | In Australia, people who are:<br><br>• Individuals of Australian Aboriginal or Torres Strait Islander descent who identify as being of Aboriginal or Torres Strait Islander origin. |
| **Definition of Forest** | |
| A tract of land dominated by trees. | An area of land, incorporating all living and non-living components, that is dominated by trees having usually a single stem and a mature or potentially mature stand height exceeding 2 m and crown cover or potential crown cover of overstorey strata about equal to or greater than 20%. |

# ANNEX 2

**Comparability mapping between the standards**

| # | FSC Criteria (AUS-STD-01-2018) | RW Criterion and conformance requirements (AS/NZS 4708:2021) | Rating | Comment |
|---|---|---|---|---|
| **Principle 1 - Compliance with Laws** | | | | |
| 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) | Section 4.1 and 4.3 of the Standard (Determining the scope of the certified forest management system) is a comparable requirement: The forest manager shall determine the boundaries and applicability of the forest management system and define its scope. When determining this scope, the forest manager shall consider: (a) the external and internal issues referred to in Clause 4.1; (b) the compliance obligations referred to in Clause 4.2; (c) its defined forest area; (d) its activities, services and products; (e) the point of sale or transfer of its products; and (f) its authority and ability to exercise control and influence. The forest manager shall demonstrate control and influence through documented legal land ownership or control arrangements and a commitment to sustainable forest management. The forest manager shall define the scope and include all activities, products and services of the forest manager that are within the forest management system. | Broadly comparable | Section 4 of the RW standard requires the forest manager to consider its 'authority and ability to exercise control and influence', through documented legal land ownership or control arrangements. |
| 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. | Section 4.3 of the Standard (Determining the scope of the certified forest management system) requires the forest manager to consider this context. | Broadly comparable | Equivalent terminology is 'defined forest area' over which entity demonstrates control. There are comparable system requirements under Standards Plan-do-check-act model. |
| 1.3 | 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 Organisation* shall* pay the legally prescribed charges associated with such rights and obligations. | Section 4.3 of the Standard (Determining the scope of the certified forest management system) is a comparable requirement: *The forest manager shall determine the boundaries and applicability of the forest management system and define its scope. When determining this scope, the forest manager shall consider: (a) the external and internal issues referred to in Clause 4.1; (b) the compliance obligations referred to in Clause 4.2; (c) its defined forest area; (d) its activities, services and products; (e) the point of sale or transfer of its products; and (f) its authority and ability to exercise control and influence. The forest manager shall demonstrate control and influence through documented legal land ownership or control arrangements and a commitment to sustainable forest management. The forest manager shall define the scope and include all activities, products and services of the forest manager that are within the forest management system.*<br><br>Section 6 of the Standard (Planning) - includes specific requirements. 6.1.2 Compliance obligations provide comparable coverage for legal obligations - *The forest manager shall: (a) determine and have access to the compliance obligations related to its activities; (b) determine how these compliance obligations apply to the organisation; and (c) take these compliance obligations into account when establishing, implementing, maintaining and continually improving its forest management system. The forest manager shall maintain documented information of its compliance obligations.* | Broadly comparable | There is no equivalent sustainability criteria, however the comparable requirements are covered under the RW Standards 'Plan-do-check-act' System requirements. |
| 1.4 | 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. | Section 4.3 of the Standard (Determining the scope of the certified forest management system) includes comparable requirements: *The forest manager shall determine the boundaries and applicability of the forest management system and define its scope. When determining this scope, the forest manager shall consider: (a) the external and internal issues referred to in Clause 4.1; (b) the compliance obligations referred to in Clause 4.2; (c) its defined forest area; (d) its activities, services and products; (e) the point of sale or transfer of its products; and (f) its authority and ability to exercise control and influence. The forest manager shall demonstrate control and influence through documented legal land ownership or control arrangements and a commitment to sustainable forest management. The forest manager shall define the scope and include all activities, products and services of the forest manager that are within the forest management system.*<br><br>**Sustainability Criteria**<br>11.2.10(1) The forest manager shall address unauthorised or illegal activities, including notifying the relevant authorities of such activities. | Broadly comparable | The Responsible Wood Standard includes comparable requirements within its system (Section 4.3) and sustainability criteria (section 11.2) requirements. |

| # | FSC Criteria (AUS-STD-01-2018) | RW Criterion and conformance requirements (AS/NZS 4708:2021) | Rating | Comment |
|---|---|---|---|---|
| 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. | Section 6 of the Standard (Planning) includes specific requirements. <br> *6.1.2 Compliance obligations - The forest manager shall:* <br> *(a) determine and have access to the compliance obligations related to its activities;* <br> *(b) determine how these compliance obligations apply to the organisation; and* <br> *(c) take these compliance obligations into account when establishing, implementing, maintaining and continually improving its forest management system.* <br> *The forest manager shall maintain documented information of its compliance obligations.* <br><br> **Sustainability Criteria** <br> Comparable coverage relating to practices of forest manager and its contractors concerning ILO conventions related to all 'forest practices' and OHS requirements. <br> 11.7.2(1) Forest managers shall foster a safe working environment by developing systems which ensure that work is carried out in a safe and healthy manner and ensuring health and safety management conforms to relevant laws and codes of practice. <br> 11.7.3(1) Forest managers shall ensure that its practices and those of its contractors and sub-contractors comply with the fundamental ILO conventions. | Broadly comparable | No specific reference to *'transportation or trade of forest products'* within the RW Standard. <br> However, the transportation and trade practices involved are presumed to be covered under 11.7.3(1)..."*its practices and those of its contractors...*" and under Section 6 of the Standard as part of Responsible Wood's 'Plan-do-check-act' model provisions - which includes compliance obligations with all relevant Australian and State laws, regulations and ILO conventions. |
| 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*. (Low SIR: Only 1.6.2 and 1.6.4 Apply) | Section 7.4.1 of the Standard (Stakeholder engagement and communication - General) includes engagement and dispute resolution process requirements. <br><br> **Sustainability Criteria** <br> 11.6.2 Indigenous peoples' rights, responsibilities and values <br> 11.6.4(1) The forest manager shall allow existing legal and traditional uses in the forest to continue. | Broadly comparable | There appears to be slightly more emphasis in FSC on resolution of disputes, in contrast to having a 'dispute resolution process' and processes for managing grievances with stakeholders in the RW standard, otherwise considered broadly comparable. |
| 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. | **Sustainability Criteria** <br> 11.7.7(1) The forest manager shall demonstrate a commitment to ethical behaviour by: <br> (a) engaging suppliers of goods and services with fair contracts; and <br> (b) implementing anti-corruption measures. | Broadly comparable | Despite some terminology differences, anti-corruption and ethical behaviour requirements in RW standard are considered comparable to FSC's requirements. |
| 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 commitment shall* be contained in a publicly available* document made freely available. | Section 5.2 of the Standard (Sustainable Forest Management Policy) requires the forest manager to establish, implement and maintain a sustainable forest management policy, within the defined scope of its forest management system that: <br> *(d) includes a commitment to fulfil its compliance obligations, including conformance with the requirements of this standard.* | Broadly comparable | There are comparable and equivalent requirements related to adherence to RW standard (as opposed to the FSC principles and criteria) are covered under the RW Standards 'Plan-do-check-act' System requirements. There is no equivalent sustainability criteria. |
| **Principle 2 - Workers' Rights and Employment Conditions** | | | | |
| 2.1 | 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. | As per Section 2 (Normative References) and section 3 (Definitions), ILO conventions captured under definition of compliance obligations, and therefore requirements captured under the meaning of 'compliance obligations' within Section 6.1.2 (Planning, Compliance Obligations) requires forest mangers to: <br> *(a) determine and have access to the compliance obligations related to its activities;* <br> *(b) determine how these compliance obligations apply to the organisation; and* <br> *(c) take these compliance obligations into account when establishing, implementing, maintaining and continually improving its forest management system.* <br><br> **Sustainability Criteria** <br> 11.7.2 Health and Safety <br> 11.7.3 Workers' Rights (includes ILO conventions); <br> 11.7.4 Equal Employment. | Broadly comparable | There is strong alignment in the requirements of both standards to uphold rights at work as per the eight ILO conventions. |

| # | FSC Criteria (AUS-STD-01-2018) | RW Criterion and conformance requirements (AS/NZS 4708:2021) | Rating | Comment |
|---|---|---|---|---|
| 2.2 | The Organisation* shall* promote gender equality* in employment practices, training opportunities, awarding of contracts, processes of engagement* and management activities. | **Sustainability Criteria**<br>11.7.3 Workers' Rights;<br>11.7.4(1) The forest manager shall:<br>(a) commit to, promote and ensure that all workers are afforded equal treatment, non-discrimination and freedom from workplace harassment;<br>(b) use qualifications, skill, experience and merit as the basis for recruitment and advancement; and<br>(c) give special consideration to opportunities for training and employment of local people, including Indigenous peoples. | Broadly comparable | |
| 2.3 | 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) | **Sustainability Criteria**<br>11.7.2(1) Forest managers shall foster a safe working environment by developing systems which ensure that work is carried out in a safe and healthy manner and ensuring health and safety management conforms to relevant laws and codes of practice.<br>11.7.3 Workers' Rights (all), i.e., 11.7.3(1) Forest managers shall ensure that its practices and those of its contractors and sub-contractors comply with the fundamental ILO conventions. | Broadly comparable | Despite the difference in specific ILO Code of practice reference in FSC, the RW standard makes specific refence to 'relevant laws and codes of practice', of which there are several in Australia. The broader ILO conventions are also upheld. Strong alignment and comparability. |
| 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*. | **Sustainability Criteria**<br>11.7.3 Workers' Rights;<br>11.7.6(1) The forest manager shall monitor, ensure, and demonstrate that:<br>(a) all workers are engaged freely and duly compensated;<br>(b) it, and its contractors and subcontractors are in compliance with legal obligations creating minimum employee entitlements, including but not limited to those set out in national legislation and collective bargaining agreements;<br>(c) wages of workers shall meet or exceed at the least legal minimum wage or, where applicable collective bargaining agreements or, a living wage where this is considered higher than the legal minimum wages;<br>(d) wages, salaries, superannuation and other entitlements and employment contracts are paid on time; and<br>(e) working hours and leave shall comply with state or national legislation, or applicable collective agreements. | Broadly comparable | There are strong alignment and comparability regarding workers rights and employment conditions. |
| 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&C V4) | Section 7.2 of the Standard (Competence) also provides comparable coverage of this requirement:<br>*7.2 Competence - As a precondition for management planning and practices, the forest manager shall:*<br>*(a) determine the necessary competence of person(s) doing work under its control in relation to its forest management activities and its ability to fulfil its compliance obligations, including where applicable nationally endorsed competencies and/or qualifications for conducting hazardous activities;*<br>*(b) ensure that these persons are competent on the basis of education, training or experience;*<br>*(c) determine training needs associated with its forest management system;*<br>*(d) where applicable, take actions to acquire and regularly update the necessary competence;*<br>*(e) identify opportunities to support employment and skills development of workers, including, but not limited to, nationally endorsed and or recognised competencies and qualifications where appropriate;*<br>*(f) implement identified opportunities for workers e.g. through provision of appropriate training and development actions;*<br>*(g) evaluate the effectiveness of the actions taken.*<br><br>**Sustainability Criteria**<br>11.7.4(1) The forest manager shall:<br>(a) commit to, promote and ensure that all workers are afforded equal treatment, non-discrimination and freedom from workplace harassment;<br>(b) use qualifications, skill, experience and merit as the basis for recruitment and advancement; and<br>(c) give special consideration to opportunities for training and employment of local people, including Indigenous peoples. | Broadly comparable | There are strong alignment and comparability regarding workers rights and employment conditions. This includes recognition for and provisions for training needs and ensuring correct qualifications and skills. |

| # | FSC Criteria (AUS-STD-01-2018) | RW Criterion and conformance requirements (AS/NZS 4708:2021) | Rating | Comment |
|---|---|---|---|---|
| 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*. | Section 7.4 of the Standard (Stakeholder engagement and communication) provides comparable coverage:<br>7.4.1(f) having mechanisms for managing complaints and disputes in a timely manner, including processes for:<br>(i) receiving complaints or disputes;<br>(ii) investigating and reviewing;<br>(iii) taking corrective and remedial action where necessary; and<br>(iv) communicating outcomes.<br><br>**Sustainability Criteria**<br>11.7.2(1) Forest managers shall foster a safe working environment by developing systems which ensure that work is carried out in a safe and healthy manner and ensuring health and safety management conforms to relevant laws and codes of practice.<br>11.7.6(1) The forest manager shall monitor, ensure, and demonstrate that:<br>(a) all workers are engaged freely and duly compensated;<br>(b) it, and its contractors and subcontractors are in compliance with legal obligations creating minimum employee entitlements, including but not limited to those set out in national legislation and collective bargaining agreements;<br>(c) wages of workers shall meet or exceed at the least legal minimum wage or, where applicable collective bargaining agreements or, a living wage where this is considered higher than the legal minimum wages;<br>(d) wages, salaries, superannuation and other entitlements and employment contracts are paid on time; and<br>(e) working hours and leave shall comply with state or national legislation, or applicable collective agreements. | Broadly comparable | The RW standard treats 'stakeholders holistically, so despite non-specific reference to dispute resolution processes for 'workers', the RW standard must have processes for all stakeholders, which include workers/ employees. |

**Principle 3 - Indigenous Peoples' Rights**

| # | FSC Criteria (AUS-STD-01-2018) | RW Criterion and conformance requirements (AS/NZS 4708:2021) | Rating | Comment |
|---|---|---|---|---|
| 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. | **Sustainability Criteria**<br>11.6.2 Indigenous peoples' rights, responsibilities and values;<br>11.6.3 Indigenous cultural values; and<br>11.6.4 Legal and traditional uses | Broadly comparable | Responsible Wood's standard is comparable in its requirements to identify and recognise existing rights, values and needs and emphasises requirements to engage with indigenous peoples. There appears to be slightly less emphasis on contested rights and customary rights that may not yet be recognised or 'existing' under law, meaning engagement processes have more work to do to identify and manage rights. |
| 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*. | **Sustainability Criteria**<br>11.6.2 Indigenous peoples' rights, responsibilities and values; i.e.,<br>11.6.2(1) The forest manager shall recognise rights, responsibilities and values of Indigenous people based on their recognised connection and ownership, where applicable, to the forests and land, including but not limited to the established framework of legal, customary and traditional rights such as outlined in ILO No.169, the Treaty of Waitangi and the UN Declaration on the Rights of Indigenous Peoples. These rights shall not be infringed upon without free prior and informed consent.<br>11.6.3 Indigenous cultural values; and<br>11.6.4 Legal and traditional uses;<br>11.6.5(2) Where traditional knowledge is used, free prior and informed consent is obtained from the knowledge custodian and the benefits of application are equitably shared. | Broadly comparable | There is less emphasis on circumstances where delegation of control over management activities may exist or be developed, but otherwise it has been assumed that the recognition of rights, responsibilities and values and FPIC requirements where these may be infringed upon in RW standard, is considered broadly comparable with decisions by Indigenous communities to delegate control of any rights or responsibilities for forest management. |
| 3.3 | 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. | **Sustainability Criteria**<br>11.6.2(1) The forest manager shall recognise rights, responsibilities and values of Indigenous people based on their recognised connection and ownership, where applicable, to the forests and land, including but not limited to the established framework of legal, customary and traditional rights such as outlined in ILO No.169, the Treaty of Waitangi and the UN Declaration on the Rights of Indigenous Peoples. These rights shall not be infringed upon without free prior and informed consent. | Comparable with notable variance | FSC includes specific provisions for the retention or 'delegation of control' of forest management, requiring FPIC processes. RW standard doesn't specifically cater for delegations of control of forest management activities, instead requiring FPIC where potential to infringe on the rights, responsibilities and values of indigenous communities. |
| 3.4 | 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). | **Sustainability Criteria**<br>11.6.2(1) The forest manager shall recognise rights, responsibilities and values of Indigenous people based on their recognised connection and ownership, where applicable, to the forests and land, including but not limited to the established framework of legal, customary and traditional rights such as outlined in ILO No.169, the Treaty of Waitangi and the UN Declaration on the Rights of Indigenous Peoples. These rights shall not be infringed upon without free prior and informed consent. | Broadly comparable | Strong alignment, as Section 2 (Normative references) and Section 3 (Definitions) of the RW standard make clear that compliance obligations include ILO conventions. Compliance obligations are also covered specifically under section 6.1.2 of the Standard and criteria 11.6.2. |

| # | FSC Criteria (AUS-STD-01-2018) | RW Criterion and conformance requirements (AS/NZS 4708:2021) | Rating | Comment |
|---|---|---|---|---|
| 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*. | **Sustainability Criteria**<br>11.6.3(1) The forest manager shall identify, record and protect Indigenous peoples' cultural, religious, spiritual and social heritage places and values, respecting requirements for confidentiality and intellectual property;<br>11.6.3(2) The forest manager shall consult with the relevant Indigenous peoples or their representative bodies to:<br>(a) identify and record the significance of Indigenous peoples' cultural places and values;<br>(b) protect these cultural places and values, wāhi taonga, wāhi tapu and treasures of national heritage;<br>(c) identify areas fundamental to meeting the health and subsistence needs of Indigenous peoples and communities; and<br>(d) manage these areas in a way that takes due regard of their significance. | Broadly comparable | Slightly less emphasis placed on 'agreement' between the organisation (Forest Manager) and Indigenous peoples, and more on having a process of identifying, engaging and managing values. Customary rights/laws may vary in level of sophistication across Australian states and for some non-registered aboriginal groups that lack formal 'recognition' or rights within formal legislative frameworks yet. However, the broad intent of a requirement to engage, identify and recognise rights is comparable. |
| 3.6 | 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. | **Sustainability Criteria**<br>11.6.5(1) The forest manager shall identify and apply traditional knowledge, experience, innovations and practices, where appropriate;<br>11.6.5(2) Where traditional knowledge is used, free prior and informed consent is obtained from the knowledge custodian and the benefits of application are equitably shared. | Broadly comparable | RW includes comparable requirements for the use of traditional knowledge and acknowledges that 'traditional' can include local communities and other non-indigenous peoples. |

**Principle 4 - Community Relations**

| # | FSC Criteria (AUS-STD-01-2018) | RW Criterion and conformance requirements (AS/NZS 4708:2021) | Rating | Comment |
|---|---|---|---|---|
| 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*. | **Sustainability Criteria**<br>11.7.1(1) The forest manager shall respect human rights as defined by the Universal Declaration on Human Rights in conducting its activities.<br>11.7.12(1) The forest manager should allow public recreational access provided it does not conflict with ownership and cultural rights, safety and the rights of others, the effects on forest resources and ecosystems, and other functions of the forest.<br>11.7.12(2) The forest manager shall use its established stakeholder engagement mechanisms to negotiate with affected parties to address any access issues that might be inconsistent with forest management objectives or the requirements of this standard. | Broadly comparable | Assuming 'public access' and the rights of 'others' is equivalent in capturing the 'local communities' within certified forest areas, then equivalent criteria are broadly comparable with requirements of FSC criteria 4.1. FSC recognises that indigenous customary rights in Australia take precedent, but customary rights of non-indigenous Australian's require consideration. |
| 4.2 | The Organisation* shall* recognise and uphold* the legal* and customary rights* of local communities* to maintain control over management activities 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*. | **Sustainability Criteria**<br>11.6.5(2) Where traditional knowledge is used, free prior and informed consent is obtained from the knowledge custodian and the benefits of application are equitably shared. | Comparable with notable variance | Noting 'local communities' is an undefined term in the RW standard, the use of traditional knowledge, which requires FPIC, is noted as including knowledge of local communities and non-government organisations (i.e., in addition to indigenous communities).<br>However, there would appear to be additional consideration by FSC for local communities to maintain control or delegate control, and these processes also require FPIC. |
| 4.3 | 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. | **Sustainability Criteria**<br>11.7.11(2) The forest manager shall identify opportunities that allow the forests within the defined forest area to play an environmental, economic, social and cultural role in rural and regional development; and give due regard to the role of forestry in local economies;<br>11.7.13(1) The forest manager shall contribute to the health and wellbeing of local communities. | Broadly comparable | There is less emphasis given to training services to community (beyond workers and contractors), otherwise broadly comparable requirements. |
| 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. | **Sustainability Criteria**<br>11.7.11(2) The forest manager shall identify opportunities that allow the forests within the defined forest area to play an environmental, economic, social and cultural role in rural and regional development; and give due regard to the role of forestry in local economies;<br>11.7.12(1) The forest manager should allow public recreational access provided it does not conflict with ownership and cultural rights, safety and the rights of others, the effects on forest resources and ecosystems, and other functions of the forest.<br>11.7.12(2) The forest manager shall use its established stakeholder engagement mechanisms to negotiate with affected parties to address any access issues that might be inconsistent with forest management objectives or the requirements of this standard. | Broadly comparable | There is no specific consideration of scale or proportionality, but otherwise broadly comparable requirements. |

| # | FSC Criteria (AUS-STD-01-2018) | RW Criterion and conformance requirements (AS/NZS 4708:2021) | Rating | Comment |
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| 4.5 | The Organisation*, through engagement* with local communities*, shall* take action to identify, avoid and 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. | **Section 7.4 of the Standard (Stakeholder communication and engagement)**<br>The forest manager shall establish, implement and maintain the process(es) needed for facilitating effective, culturally appropriate, meaningful and timely stakeholder engagement ....<br><br>**Sustainability Criteria**<br>11.7.12(1) The forest manager should allow public recreational access provided it does not conflict with ownership and cultural rights, safety and the rights of others, the effects on forest resources and ecosystems, and other functions of the forest.<br>11.7.12(2) The forest manager shall use its established stakeholder engagement mechanisms to negotiate with affected parties to address any access issues that might be inconsistent with forest management objectives or the requirements of this standard. | Broadly comparable | Note there are no specific requirement to 'avoid' significant negative impacts, noting the emphasis is placed on engaging and negotiating where conflicts may occur. Note also there is subjectivity in determining 'significant' impacts (while recognising this term is defined within the current FSC standard). However, the RW Standard has multiple, aligned criteria relating to social and economic benefits. |
| 4.6 | The Organisation*, through engagement* with local communities*, shall* have mechanisms for resolving grievances and providing fair compensation* to local communities* and individuals with regard to the impacts of management activities of The Organisation*. | There is comparable coverage within Section 7.4 of the Standard (Stakeholder communication and engagement)<br>*The forest manager shall address relevant communications from stakeholders on its forest management system. This will include:*<br>*(e) considering and incorporating (as appropriate) stakeholder feedback into the forest management system; and*<br>*(f) having mechanisms for managing complaints and disputes in a timely manner, including processes for:*<br>*(i) receiving complaints or disputes;*<br>*(ii) investigating and reviewing;*<br>*(iii) taking corrective and remedial action where necessary; and*<br>*(iv) communicating outcomes.*<br><br>**Sustainability Criteria**<br>11.7.12(2) (stakeholder engagement mechanisms to negotiate and address access issues) | Broadly comparable | There would appear to be more emphasis in FSC criteria placed on 'resolving' grievances and provisions for compensation to affected parties, where RW requires mechanisms for managing complaints and a focus on the processes for receiving, reviewing, actions and communicating outcomes, regardless of whether as issue is resolved. There is otherwise broadly comparable intent and requirements to demonstrate mechanisms are in place. |
| 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*. | **Sustainability Criteria**<br>11.6.1(1) The forest manager shall identify, protect and maintain cultural, religious, spiritual and social heritage places and values;<br>11.6.1(2) The forest manager shall regularly consult with appropriate bodies to:<br>(a) identify and record the significant cultural places and values; and<br>(b) protect and maintain these cultural places and values in a way that takes due regard of their significance. | Broadly comparable | The process of determining customary rights or sites of significance may vary slightly (consult with 'appropriate bodies' in contrast to engage with local communities). Management and protection by 'agreement' in FSC, whereas RW emphasis is placed on protect and maintain in a way that takes 'due regard' of their significance. |
| 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) | **Sustainability Criteria**<br>11.6.5(1) The forest manager shall identify and apply traditional knowledge, experience, innovations and practices, where appropriate;<br>11.6.5(2) Where traditional knowledge is used, free prior and informed consent is obtained from the knowledge custodian and the benefits of application are equitably shared. | Broadly comparable | Both standards require FPIC to use acquired knowledge and a process by which traditional knowledge is identified and applied (where appropriate). RW standard notes that traditional knowledge may include non-government organisations and non-indigenous local community knowledge, which is comparable to FSC's consideration of local communities and use of the phrase 'traditional knowledge'. |
| **Principle 5 - Benefits from the Forests** | | | | |
| 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* in order to strengthen and diversify the local economy proportionate to the scale* and intensity* of management activities. | **Sustainability Criteria**<br>11.7.9 Optimal use - the forest manager shall harvest forest products in a manner that optimises value recovery and minimises waste; and<br>11.7.11(1) The forest manager shall operate on sound economic principles, taking into account possibilities for new markets and economic activities in connection with all relevant goods and services of forests. | Broadly comparable | The proportionality in terms of scale and intensity is not a specific factor in conformance. |
| 5.2 | The Organisation* shall* normally harvest products and services from the Management Unit* at or below a level that can be permanently sustained. | **Sustainability Criteria**<br>11.5.2(1) The forest manager shall determine the harvest rate for forest products commensurate with the long-term productive capacity of the forest. The harvest rate shall be justified and based on inventory and growth and yield estimates, considering the potential cultural, economic, environmental and social impacts;<br>11.5.2(2) The forest manager shall ensure that the harvesting levels do not exceed the productive capacity in the long term, with the understanding that salvage operations may require exceeding the productive capacity in the short term; and<br>11.5.3(1) The forest manager shall ensure that commercial use of biological non-wood forest products is consistent with regulatory requirements and does not impact long-term sustainability. | Broadly comparable | Both standards require consideration and demonstration of sustainable harvest levels, including for wood and non-wood products. |

| # | FSC Criteria (AUS-STD-01-2018) | RW Criterion and conformance requirements (AS/NZS 4708:2021) | Rating | Comment |
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| 5.3 | The Organisation* shall* demonstrate that the positive and negative externalities* of operations are included in the Management Plan*. | Section 6.1.1 of the Standard (General - Actions to address obligations, risks and opportunities) of the Standard requires the forest manager to consider certain elements when 'planning', including:<br>Section 6.1.1(h) *their contribution to cumulative landscape or catchment scale impacts.*<br>Section 7.4.4(d) of the Standard (Public summary) requires "a description of forest values and an overview of how they will be managed to both provide benefits and minimise harm" to be made publicly available. | Broadly comparable | There is no equivalent sustainability criteria, however the comparable requirements are covered under the RW Standards 'Plan-do-check-act' System requirements. |
| 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. | **Sustainability Criteria**<br>11.7.8(1) Where cost, quality and capacity of non-local and local options are at least equivalent, the forest manager shall:<br>(a) use local goods and service providers, where available; and<br>(b) support and encourage establishment of local capacity where such goods and service providers are not available.<br>11.7.10(1) Subject to forest product supply constraints, the forest manager shall:<br>(a) engage proactively with local and regional forest products processors and consider their needs for supply;<br>(b) support and encourage the establishment of local processing and value-added activities where these are not currently available;<br>(c) develop metrics to demonstrate conformance with this requirement. | Broadly comparable | |
| 5.5 | The Organisation* shall* demonstrate through its planning and expenditures proportionate to scale, intensity and risk*, its commitment to long term* economic viability*. | **Sustainability Criteria**<br>11.7.11 Sound economic performance | Broadly comparable | No specific proportionality requirements - sound economic performance may provide more flexible interpretation for demonstrating conformance. |
| **Principle 6 - Environmental Values and Impacts** | | | | |
| 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) | **Sustainability Criteria**<br>11.3.1(1) The forest manager shall identify significant biodiversity values (SBVs) that are within and/or ecologically connected to the defined forest area.<br>11.3.1(2) SBVs at clear risk of adverse impacts from forestry management practices within, and within the vicinity of, the defined forest area shall be determined through a documented risk assessment process involving scientific experts (e.g. ecologists, species specialists, foresters). The clear risk of both short-term and long-term impacts will be determined and considered.<br>11.3.2(3) The forest manager shall map areas of SBVs within and in the vicinity of the defined forest area that are identified for protection or conservation through active management; and<br>11.3.7 Monitor biodiversity. | Broadly comparable | FSC uses different terminology and framing for assessment, but both standards cover environmental values (including equivalent HCV categories within the meaning of SBV), and require a risk-based assessment approach. RW also specifically factors in the involvement of scientific expertise. FSC includes consideration of appropriate 'frequency' of assessment, whereas RW doe not include a temporal aspect to repeating assessments. |
| 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*. | **Sustainability Criteria**<br>11.2.1(1) The forest manager shall:<br>(a) identify and assess potential damage agents and threatening processes that could impact forest ecosystem health. This shall include consideration of climate change impacts;<br>(b) implement practices to support the maintenance of forest ecosystem health;<br>(c) ensure that operations are conducted in a way that does not cause lasting damage to ecosystems; and<br>(d) monitor forest health and take action to control damage agents (or eradicate), where practicable and feasible.<br>11.3.1 Identification of significant biodiversity values at clear risk of adverse impacts (3.1.2) | Broadly comparable | RW focuses on broad ecosystem health and vitality rather than environmental values; but otherwise broadly comparable consideration of impacts from operations and external factors. |
| 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. | **Sustainability Criteria**<br>11.2.1(1) The forest manager shall:<br>(a) identify and assess potential damage agents and threatening processes that could impact forest ecosystem health. This shall include consideration of climate change impacts;<br>(b) implement practices to support the maintenance of forest ecosystem health;<br>(c) ensure that operations are conducted in a way that does not cause lasting damage to ecosystems; and<br>(d) monitor forest health and take action to control damage agents (or eradicate), where practicable and feasible.<br>11.3.1 Identification of significant biodiversity values at clear risk of adverse impacts; and<br>11.3.2 Actions to maintain or enhance significant biodiversity values; and<br>11.3.5(2) Wherever necessary, the forest manager shall restore habitat where biological diversity has been damaged by the forest operation. | Broadly comparable | |

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| 6.4 | 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*. | **Sustainability Criteria**<br>11.3.1(2) SBVs at clear risk of adverse impacts from forestry management practices within, and within the vicinity of, the defined forest area shall be determined through a documented risk assessment process involving scientific experts (e.g. ecologists, species specialists, foresters). The clear risk of both short-term and long-term impacts will be determined and considered.<br>11.3.2 Actions to maintain or enhance significant biodiversity values. | Broadly comparable | |
| 6.5 | 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. | **Sustainability Criteria**<br>11.2.9(1) The forest manager shall identify sites within the defined forest area that are degraded, and facilitate a prioritised economically feasible programme for rehabilitation;<br>11.3.2(2) The forest manager shall develop and implement a plan where viable but degraded SBVs remain, to maintain and enhance them. | Broadly comparable | Despite no apparent reference to 'representative sample' areas specifically, the RW standard is broadly comparable, with a focus more on degraded examples of native areas or SBV areas to enhance, maintain etc. |
| 6.6 | The Organisation* shall* effectively maintain the continued existence of naturally occurring native 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. | **Sustainability Criteria**<br>11.3.3(1) The forest manager shall maintain or enhance genetic diversity, vegetation types, stand structural elements and growth stages of native vegetation;<br>11.3.4(1) The forest manager shall maintain habitat diversity at a landscape scale by:<br>(a) contributing to the maintenance, improvement and restoration of ecological connectivity;<br>(b) maintaining or enhancing remnants.<br>11.7.12(1) The forest manager should allow public recreational access provided it does not conflict with ownership and cultural rights, safety and the rights of others, the effects on forest resources and ecosystems, and other functions of the forest. | Broadly comparable | There are no specific requirements regarding hunting, fishing or trapping; but under 'public access' criteria, there are requirements to consider conflicts between recreational access and activities, with ecosystem health and other functions of the forest. |
| 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. | **Sustainability Criteria**<br>11.3.6(1)c) - requires any required infrastructure construction to consider aquatic habitat and riparian zones and minimising impacts to these.<br>11.4.3 Maintain water values. | Broadly comparable | RW's 'maintenance of water value' criteria is broadly comparable. |
| 6.8 | 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*. | **Sustainability Criteria**<br>11.1.5(1) The forest manager shall reforest after timber harvesting or other disturbances to ensure the quantity and quality of the forest resources. Where areas are not reforested, the forest manager shall justify and demonstrate that the decision is consistent with their long-term commitment to sustainable forest management.<br>11.5.2(1) The forest manager shall determine the harvest rate for forest products commensurate with the long-term productive capacity of the forest. The harvest rate shall be justified and based on inventory and growth and yield estimates, considering the potential cultural, economic, environmental and social impacts.<br>11.5.7(1) The forest manager shall use silvicultural systems and stocking rates, appropriate for the forest type, site conditions and management objectives.<br>11.5.7(2) The forest manager shall implement operations in a timely manner to effectively establish or regenerate forests, promote growth and maintain appropriate species composition. | Broadly comparable | No specific requirements regarding size, spatial scales relative to landscape values. No specific mention of resilience, but generally captured through consideration of impacts (both costs and benefits)<br>Section 6 of the Standard (Planning) also requires consideration of (Section 6.1.1(h)) their contribution to cumulative landscape or catchment scale impacts. |

| # | FSC Criteria (AUS-STD-01-2018) | RW Criterion and conformance requirements (AS/NZS 4708:2021) | Rating | Comment |
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| 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: 1. Affects a very limited portion* of the area of the Management Unit*, and 2. 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*. | **Sustainability Criteria** 11.1.3(1) The forest manager shall demonstrate that the defined forest area does not include areas converted from native vegetation to plantations after 31 December 2006, (excluding where legal approvals were obtained prior to that date), unless in justified circumstances where the conversion: (a) was in compliance with national and regional policy and legislation agreements and directives applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority; and (b) was established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision making on conversion through transparent and participatory consultation processes; and (c) did not adversely impact significant biodiversity values (SBVs), culturally and socially significant areas, other protected areas or areas of native vegetation that are part of legally recognised offsets; and (d) entailed a small proportion (no greater than 5%) of ecosystem type within the certified area; and (e) did not destroy areas of significantly high carbon stock; and (f) made a contribution to conservation, economic and social benefits. | Comparable with notable variance | The RW standard doesn't include a comparable blanket restriction on conversion of native forest to plantation or to non-forest land uses - with emphasis placed on demonstrating that any conversion undertaken after 2006 was appropriately justified. FSC does provide for exceptions to conversion after its 1994 cut-off date, but also includes a Remedy Framework for past harms caused by conversion. |
| 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: 1. Clear and sufficient evidence is provided that The Organisation* was not directly or indirectly responsible for the conversion, or 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&C V4) | **Sustainability Criteria** 11.1.3(1) The forest manager shall demonstrate that the defined forest area does not include areas converted from native vegetation to plantations after 31 December 2006, (excluding where legal approvals were obtained prior to that date), unless in justified circumstances where the conversion: (a) was in compliance with national and regional policy and legislation agreements and directives applicable for land use and forest management and is a result of national or regional land-use planning governed by a governmental or other official authority; and (b) was established based on a decision-making basis where affected stakeholders have opportunities to contribute to the decision making on conversion through transparent and participatory consultation processes; and (c) did not adversely impact significant biodiversity values (SBVs), culturally and socially significant areas, other protected areas or areas of native vegetation that are part of legally recognised offsets; and (d) entailed a small proportion (no greater than 5%) of ecosystem type within the certified area; and (e) did not destroy areas of significantly high carbon stock; and (f) made a contribution to conservation, economic and social benefits. | Comparable with notable variance | RW includes a comparable restriction on certification based on conversion of native forest or natural forest areas, however relies on a different conversion cut-off date (2006 vs 1994). The extent to which this date alone affects certification status in Australia was not assessed. |
| **Principle 7 - Management Planning** | | | | |
| 7.1 | 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. | Section 5.2 of the Standard (Sustainable Forest Management Policy) requires the forest manager to establish, implement and maintain a sustainable forest management policy, within the defined scope of its forest management system that: *(a) is appropriate to the purpose and context of the forest manager, including the nature, scale and sustainability impacts of its activities, products and services; (b) provides a framework for setting sustainability objectives; (c) includes a commitment to a long-term systematic approach to sustainable forest management, including minimising harm, providing benefits from the forest, and other specific commitment(s) relevant to the context of the forest manager; (d) includes a commitment to fulfil its compliance obligations, including conformance with the requirements of this standard; (e) includes acknowledgement of the positive contribution of stakeholders and a commitment to proactive engagement with stakeholders; and (f) includes a commitment to continual improvement of the forest management system to enhance its performance. The sustainable forest management policy shall: (i) be maintained as documented information; (ii) be communicated within the organisation; and (iii) be available to stakeholders.* | Broadly comparable | There is no equivalent sustainability criteria, however the comparable requirements are covered under the RW Standards 'Plan-do-check-act' System requirements. |

| # | FSC Criteria (AUS-STD-01-2018) | RW Criterion and conformance requirements (AS/NZS 4708:2021) | Rating | Comment |
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| 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. | Standard Sections 6 (planning) and Section 7.4 has comparable requirements.<br>*7.4.4 Public summary*<br>*The forest manager shall make available a public summary of its management that is appropriate to the system scope, scale and management intent of the defined forest area. The forest manager shall ensure that the public summary includes:*<br>*(a) an overview of the context of the organisation, its activities and the compliance framework in which the forest manager operates;*<br>*(b) a description of the defined forest area, including the forest management unit(s) and vegetation types (as applicable) and access to maps at appropriate scale;*<br>*(c) an outline of the forest management objectives;*<br>*(d) a description of forest values and an overview of how they will be managed to both provide benefits and minimise harm;*<br>*(e) a rationale for silvicultural regimes;*<br>*(f) a description of operational planning and control processes;*<br>*(g) a description of the processes for monitoring condition and performance; and*<br>*(h) an outline of stakeholder engagement processes, including procedures for obtaining further information.*<br>*The forest manager shall:*<br>*(i) periodically review and update the public summary; and*<br>*(ii) ensure that stakeholder views are considered during the review.*<br>*Note 1: The public summary may exclude confidential or sensitive information.*<br>*Note 2: The public summary of management may be referred to as the forest management plan. However, the main intent of the summary is to provide stakeholders with information about the forest manager's system. It is acknowledged that a forest manager may have multiple plans for different purposes.* | Broadly comparable | There is no equivalent sustainability criteria, however the comparable requirements are covered under the RW Standards 'Plan-do-check-act' System requirements. |
| 7.3 | The Management Plan* shall* include verifiable targets* by which progress towards each of the prescribed management objectives* can be assessed. | Section 9 of the Standard (Performance evaluation) incudes comparable requirements:<br>*9.1.1 The forest manager shall monitor, measure, analyse and evaluate its performance.*<br>*For the relevant requirements of the standard, the forest manager shall determine:*<br>*(a) what needs to be monitored, its performance criteria, and appropriate indicators;*<br>*(b) the methods for monitoring, analysis and evaluation, as applicable, to ensure credible and valid results;*<br>*(c) when the monitoring shall be performed; and*<br>*(d) how the results from monitoring shall be analysed and evaluated.* | Broadly comparable | There is no equivalent sustainability criteria, however the comparable requirements are covered under the RW Standards 'Plan-do-check-act' System requirements. |
| 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&C V4) | Sections 9.3 of the Standard (Management review) and 10.3 (Continual improvement) includes comparable requirements to review and update, monitor and evaluate and improve its forest management system and procedures. | Broadly comparable | There is no equivalent sustainability criteria, however the comparable requirements are covered under the RW Standards 'Plan-do-check-act' System requirements. |
| 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. | Section 7.4.4 of the Standard (public Summary) includes comparable requirements:<br>*The forest manager shall make available a public summary of its management that is appropriate to the system scope, scale and management intent of the defined forest area. The forest manager shall ensure that the public summary includes:*<br>*(a) an overview of the context of the organisation, its activities and the compliance framework in which the forest manager operates;*<br>*(b) a description of the defined forest area, including the forest management unit(s) and vegetation types (as applicable) and access to maps at appropriate scale;*<br>*(c) an outline of the forest management objectives;*<br>*(d) a description of forest values and an overview of how they will be managed to both provide benefits and minimise harm;*<br>*(e) a rationale for silvicultural regimes;*<br>*(f) a description of operational planning and control processes;*<br>*(g) a description of the processes for monitoring condition and performance; and*<br>*(h) an outline of stakeholder engagement processes, including procedures for obtaining further information.*<br>*The forest manager shall:*<br>*(i) periodically review and update the public summary; and*<br>*(ii) ensure that stakeholder views are considered during the review.*<br>*Note 1: The public summary may exclude confidential or sensitive information.*<br>*Note 2: The public summary of management may be referred to as the forest management plan. However, the main intent of the summary is to provide stakeholders with information about the forest manager's system. It is acknowledged that a forest manager may have multiple plans for different purposes.* | Broadly comparable | There is no equivalent sustainability criteria, however the comparable requirements are covered under the RW Standards 'Plan-do-check-act' System requirements. RW standard doesn't specifically refer to costs of provision to the public, but covers similar considerations and exclusions of sensitive information, and notes that a public summary may be referred to as a forest management plan. |
| 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. | Section 7.4 of the Standard (Stakeholder engagement and communications) includes comparable requirements.<br><br>**Sustainability Criteria**<br>11.7.12(2) The forest manager shall use its established stakeholder engagement mechanisms to negotiate with affected parties to address any access issues that might be inconsistent with forest management objectives or the requirements of this standard. | Broadly comparable | Despite non-specific references to planning and monitoring processes, the RW standard includes comparable requirements to engage stakeholders and make available a summary of its monitoring processes. Slightly more emphasis in RW is placed on the Forest manager self-determining the processes and communicating them, compared to FSC's involving stakeholders in its processes. |

| # | FSC Criteria (AUS-STD-01-2018) | RW Criterion and conformance requirements (AS/NZS 4708:2021) | Rating | Comment |
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| **Principle 8 - Monitoring and Assessment** | | | | |
| 8.1 | 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*. | Section 9 of the Standard (Performance evaluation) incudes comparable requirements:<br>9.1.1 The forest manager shall monitor, measure, analyse and evaluate its performance.<br><br>**Sustainability Criteria**<br>11.3.7(2) The forest manager shall document biodiversity monitoring objectives and methods. The monitoring results will be used to evaluate and improve the effectiveness of the biodiversity management. | Broadly comparable | The RW standard includes system and sustainability criteria requirements regarding monitoring, verification and evaluation,on. |
| 8.2 | 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. | Section 9 of the Standard (Performance evaluation) incudes comparable requirements:<br>9.1.1 The forest manager shall monitor, measure, analyse and evaluate its performance.<br><br>**Sustainability Criteria**<br>11.3.7 Biodiversity monitoring | Broadly comparable | The RW standard includes system and sustainability criteria requirements regarding monitoring, verification and evaluation. |
| 8.3 | The Organisation* shall* analyse the results of monitoring and evaluation and feed the outcomes of this analysis back into the planning process. | Section 9 of the Standard (Performance evaluation) incudes comparable requirements:<br>9.1.1 The forest manager shall monitor, measure, analyse and evaluate its performance.<br><br>Section 10 of the Standard (Continuous improvement) includes comparable requirements:<br>The forest manager shall continually improve the suitability, adequacy and effectiveness of the forest management system to enhance performance. | Broadly comparable | The monitoring, evaluation and continuous improvement philosophy is well covered by the RW's Standards *Plan-do-check-act model* with comparable requirements in Section 9 - Performance evaluation and monitoring and Section 10 - continuous improvement. |
| 8.4 | The Organisation* shall* make publicly available* a summary of the results of monitoring free of charge, excluding confidential information*. | Section 7.4.4. of the Standard (Public summary**)** includes some comparable requirements of the management system to be publicly available.<br>Section 9.1.1(3) The forest manager shall make available to interested parties the monitoring methodology and results of monitoring, (excluding confidential information), upon reasonable request. | Broadly comparable | The RW Standard makes no specific mention of 'free of charge'; but otherwise includes a near identical requirement within section 9.1.1 to make monitoring results available. |
| 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. | Section 9 of the Standard (Performance evaluation) - partial coverage, with the monitoring general provisions requiring monitoring of performance, which presumably includes monitoring actual harvest rates vs projected harvest rates as determined under sustainability criteria 5.2. | Comparable with notable variance | There appears to be no equivalent requirement for a tracking and trace system linked to sustainable yield/harvest rate within the Responsible Wood FM standard.<br>There is partial coverage under *11.5.2* and requirements to determine and monitor harvest rate to demonstrate sustainable and within productive capacity, but otherwise the specific requirement for a tracking a trace system is covered separately within RW's chain of custody certification standard. |
| **Principle 9 - High Conservation Values** | | | | |
| 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: (HCV1, 2, 3,4,5,6) | **Sustainability Criteria**<br>Comparable coverage under Strategic Biodiversity Values (SBVs) which covers 11 sub-categories of biodiversity values inclusive of the 6 HCVs.<br>11.3.1 Identification of significant biodiversity values at clear risk of adverse impacts;<br>11.3.2 Actions to maintain or enhance significant biodiversity values.<br>11.6.1 Heritage values | Broadly comparable | Despite different terminology used (e.g. SBV vs HCV), both standards require engagement and assessment to identify and manage significant biodiversity or other environmental values. (Noting cultural values may be covered separately under RW's Sustainability Criteria 11.6). |
| 9.2 | 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. | Section 6.2.1 of the Standard  (Planning actions to achieve management objectives)<br>Section 7.4 of the Standard (Stakeholder engagement and communication)<br><br>**Sustainability Criteria**<br>11.3.1 Identification of significant biodiversity values at clear risk of adverse impacts<br>11.3.2 Actions to maintain or enhance significant biodiversity values | Broadly comparable | The development and implementation of effective strategies are similar, comparable requirements in the standard regarding HCV and/or significant biodiversity values. |
| 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. | **Sustainability Criteria**<br>11.3.2(1) The forest manager shall develop and implement effective strategies to maintain, or enhance SBVs, including the control of potential adverse impacts. This shall involve the application of the precautionary approach. | Broadly comparable | Both standards include the application of 'precautionary approaches' to their strategies and actions surrounding maintenance and enhancement of important biodiversity values. |

| # | FSC Criteria (AUS-STD-01-2018) | RW Criterion and conformance requirements (AS/NZS 4708:2021) | Rating | Comment |
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| 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. | Section 9 (Performance evaluation) and Section 10 (continuous Improvement) of the Standard comprise relevant requirements for monitoring and adapting approaches.<br><br>**Sustainability Criteria**<br>11.3.7 Monitor Biodiversity | Broadly comparable | The Responsible Wood Standard includes comparable requirements within its monitoring and evaluation sections (system requirements) and its continuous improvement section specifies an intent to adapt and improve. The Responsible Wood Standard also includes specific biodiversity monitoring conformance requirements under 11.3.7. |
| **Principle 10 - Implementation of Management Activities** | | | | |
| 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*. | **Sustainability Criteria**<br>11.5.7(2) The forest manager shall implement operations in a timely manner to effectively establish or regenerate forests, promote growth and maintain appropriate species composition. | Broadly comparable | |
| 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. | **Sustainability Criteria**<br>11.5.6(1) The forest manager shall select and use species and genotypes that are suited to site and proposed end uses;<br>11.5.6(2) The forest manager shall ensure that any potential adverse impacts (including undesirable hybridisation) of the deployment of selected non-endemic species have been scientifically evaluated and can be managed;<br>11.5.6(3) The forest manager shall regenerate native vegetation with species and genotypes that are native to the area, or from an equivalent locality, as far as reasonably practicable, to maintain local gene pools, species mixes, quantity and quality of forest resources. | Broadly comparable | |
| 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. | **Sustainability Criteria**<br>11.2.2 Invasive and pest species;<br>11.2.3 Integrated pest management; and<br>11.5.6 species selection | Broadly comparable | |
| 10.4 | The Organisation* shall* not use genetically modified organisms* in the Management Unit*. | **Sustainability Criteria**<br>11.5.6(5) The forest manager shall not use genetically modified trees. | Broadly comparable | Unlike the findings in the 2002 (Indufor-Oy) and 2006 (Crawford) reviews, both standards now include requirements restricting the use of GMOs. |
| 10.5 | The Organisation* shall* use silvicultural practices that are ecologically appropriate for the vegetation, species, sites and management objectives*. | **Sustainability Criteria**<br>11.5.7 Silviculture | Broadly comparable | There are several specific conformance requirements within Sustainability criteria 11.5.7 'silviculture' that provide comparable coverage of the FSC requirements. |
| 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. | **Sustainability Criteria**<br>11.2.5 Fertiliser;<br>11.4.3(1)b) The forest manager shall protect and maintain water quality (physical, chemical and biological) by minimising movement of pesticides and fertilisers into waterbodies and surrounding areas; | Broadly comparable | There are several specific conformance requirements within Sustainability criteria 11.2.5 'Fertiliser' that provide comparable coverage of the FSC requirements. |
| 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. | **Sustainability Criteria**<br>11.2.3(1) The forest manager shall use integrated pest management to minimise the use of pesticides;<br>11.2.3(2) Pesticides should only be used in conjunction with other methods, or where other methods are ineffective; and<br>11.2.4 Pesticides | Comparable with notable variance | Note: 11.2.4(3) specifically prohibits use of World Health Organization (WHO) Class 1A and 1B pesticides, except where no other viable alternative is available, the pesticide is legally approved for use, listed in Appendix D, and the additional conditions in Appendix D have been met. There may be some differences in allowable pesticides list. FSC allows for derogations in emergencies, requiring an application to the certification body and completion of an Environmental and Social Risk Assessment (ESRA) prior to use, whereas RW permits certain prohibited pesticide use providing not illegal and specific risk mitigation actions implemented and no viable alternative. |
| 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*. | **Sustainability Criteria**<br>11.2.3 Integrated pest management; and<br>11.2.4 Pesticides. | Broadly comparable | There appears to be less emphasis on consideration of '*internationally accepted*' scientific protocols in the RW Standard, but otherwise broadly comparable requirements and considerations to strictly control and/or minimise use of biological controls within both standards. |

| # | FSC Criteria (AUS-STD-01-2018) | RW Criterion and conformance requirements (AS/NZS 4708:2021) | Rating | Comment |
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| 10.9 | The Organisation* shall* assess risks* and implement activities that reduce potential negative impacts from natural hazards* proportionate to scale, intensity, and risk*. | **Sustainability Criteria**<br>11.2.1 Identify and manage forest ecosystem health;<br>11.2.4(1) The forest manager shall have documented risk assessments for the pesticides it uses and implement preventative measures to minimise adverse social and environmental impacts;<br>11.2.6(3) Where planned fire is used for training personnel or the management of slash, the forest manager shall undertake an evaluation and risk assessment process and implement measures to ensure the extent of the fire is contained to the target area and manage on-site and off-site impacts;<br>11.3.1(2) SBVs at clear risk of adverse impacts from forestry management practices within, and within the vicinity of, the defined forest area shall be determined through a documented risk assessment process involving scientific experts (e.g. ecologists, species specialists, foresters). The clear risk of both short-term and long-term impacts will be determined and considered;<br>11.7.2(2)a) The forest manager shall identify hazards and determine risks. | Broadly comparable | No specific reference to consideration of scale or intensity, but several requirements relate to assessment and/or consideration of risks, threats and impacts from own activities and externalities. |
| 10.10. | 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*. | **Sustainability Criteria**<br>11.3.6 The forest manager shall construct and maintain infrastructure (including waterbody crossings) with the aim of minimising adverse biodiversity impacts. This shall include (but not be limited to) consideration of:<br>(a) SBVs;<br>(b) migration patterns of key species; and<br>(c) aquatic and riparian zone habitats.<br>11.4.4(1) The forest manager shall construct and maintain infrastructure (including waterbody crossings) with the aim of minimising adverse soil and water impacts. This shall include (but not be limited to) consideration of:<br>(a) bare soil exposure;<br>(b) introduction of soil and debris into waterbodies; and<br>(c) effective operation of drainage structures. | Broadly comparable | The RW standard includes broadly comparable requirements regarding infrastructure and managing their construction or use to minimise impacts on biodiversity-related values and soil and water values. |
| 10.1 | 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. | **Sustainability Criteria**<br>11.4.1 identify soil and water values;<br>11.4.2 Protect soil properties;<br>11.4.3 Maintain water values.<br>11.7.9(1) The forest manager shall harvest forest products in a manner that optimises value recovery and minimises waste. | Broadly comparable | Both standards require identification, management and monitoring of these values and processes in place to minimise or avoid damages and waste. |
| 10.1 | The Organisation* shall* dispose of waste materials* in an environmentally appropriate manner. | **Sustainability Criteria**<br>11.2.11(1) The forest manager shall ensure that hydrocarbons and other non-biodegradable waste and litter from forest management activities shall be cleaned up, collected and stored in designated areas and removed in an environmentally responsible manner;<br>11.7.9(1) The forest manager shall harvest forest products in a manner that optimises value recovery and minimises waste. | Broadly comparable | Both standards consider appropriate waste disposal and management, with RW standard additionally considering 'optimisation' of value recovery as part of waste minimisation. |