FSC FM/COC Compliance assessment of SCS Global Services at Hancock Victorian Plantations Pty Ltd, Australia, 2025

ASI Final Assessment Report

FSC ACCREDITATION PROGRAM		
SCS Global Services - FSC Assessment		
FSC FM/COC		
Australia - June 30, 2025 to July 4, 2025		
Assessment No. A-20250549013		
Drafted by:	ASI Assessor	July 4, 2025
Reviewed by:	Technical Reviewer	August 19, 2025
Finalized by:	ASI Assessor	August 31, 2025
Signed off by:	Program Manager	August 30, 2025

Description

CAB	SCS Global Services
Accreditation Code	ASI-APP-002
Technical Scopes of Accreditation	FSC FM/COC
Geographical Scopes of Accreditation	Worldwide (excluding Belarus, Myanmar and Russian Federation)
Type of Assessment	Compliance
Technical scope of this assessment	FSC FM/COC
Site Visited	Victoria
Applicable Standards	
Checklist used	
Objective	The purpose of this assessment was: 1. Evaluation of the Conformity Assessment Body (CAB) performance in implementing their Certification system in accordance with all relevant Accreditation Requirements; 2. Verification of the adequacy of the CAB's previous audit methods, findings and conclusions, and resulting certification decision, through an evaluation of the Certificate Holder (CH)'s conformity with applicable certification requirements; in this case, the FSC National Forest Stewardship Standard of Australia (FSC-STD-AUS-01-2018); 3. Evaluation of stakeholder comments or complaints received by ASI in relation to this CAB and/or operation; and, 4. To provide a conclusion in the final Assessment Report as to whether the evidence from the Assessment supports either recommending awarding, maintaining, suspending, extending or reducing ASI approval. 5. To provide the follow-up assessment following recommendations of COMP 926. 6. To undertake an initial field evaluation of COMP 974.
Assessment Language	English

Background

Certificate Holder Background:

Hancock Victorian Plantations (HVP, the CH) is the holder of certificate SCS-FM/CoC-007709. This certificate is a single management unit of 239,976 ha scattered across the state of Victoria in Austalia. It is divided into three management regions (Gippsland, Northern and Western), with a total of 8 separate districts within the three regions. The total area in timber production is 170,000 ha (70% of total) with 48,000 ha (20% of total) in native forest and protected for conservation. The dominant plantation species is radiata pine (140,700 ha). The management regime for pine includes two thinnings and a clearfell at about 30 years. There is 10,700 ha of plantation of several species of Eucalypts, but these are only in the Gippsland region, and are being replaced by radiata pine. The regime for eucalypts is one thinning and a clearfell between 20 and 30 years. The CH uses ground based harvesting systems on flat and gentle terrain and cable yarding including tethered machines on the steep terrain. Most sites are prepared for planting using pesticides or machines, and fertilizers and pesticides are applied in many stands post-stand establishment.

In 2024, the CH harvested approximately 4900 ha and thinned 8500 ha. The annual harvest was about 3 million m3 of sawlogs and pulp logs annually for domestic production. The CH planted 6 million radiata pine on 7200 ha. The CH has 230 employees, about 45% female, and 680 direct contractor employees.

In the south-east of the state, the Gippsland region supports about 2/3 of the timber harvest in the MU and has the majority of the environmental and cultural values and controversies, and the only plantations with native eucalypts species. The terrain, especially in the Strzelecki portion of Gippsland is steep and very wet, and contains remnants of the once extensive cool and warm temperate rainforest ecological communities. The two rainforest communities are considered threatened ecological communities and they provide habitat for several rare and threatened plants (for example, Slender Tree Ferns) and invertebrates (for example, Strzelecki Burrowing Crayfish).

The managed forest in Gippsland is now predominantly radiata pine (85% of the plantations). Approximately 14% of the plantation area is in 5 different species of eucalypts, predominantly eucalyptus nitens (72%), eucalyptus regnans (18%) and eucalyptus globulus (two subspecies) (8%). The area of eucalypts is declining annually as the CH stopped planting eucalypts after harvest about 10 years ago and now plants radiata pine to replace the harvested eucalyptus plantations. There are small areas of 9 other eucalyptus and 9 species of conifers or non-eucalyptus (total of 1% of the plantations).

The other two regions are almost exclusively radiata pine with scattered older trials of eucalyptus and exotic species. They are on predominantly flat and dry terrain although there are some plantations that are on very steep terrain. These areas are considered less controversial than Gippsland with fewer planning and operational challenges.

The CH has identified HCV areas in all six categories of HCV with HCV areas found in all regions. The MU sits within the traditional territories of 5 recognized Aboriginal communities.

The CH have been FSC certified since 2004. In the 2023 re-certification audit there were 2 Observations. In the first annual surveillance in 2024, there was 1 Major NCRs (which is appealed and on hold) and 4 Minor NCRs.

CAB Background:

The CAB is registered in California, USA and has been ASI accredited since 2012 for FSC Forest Management and FSC Chain of Custody certification worldwide. The CAB currently manages around 200 FM certificate holders worldwide and approximately 4000 COC certificates.

In Australia, the CAB has 7 FM/CoC certificates, and approximately 115 chain of custody certificates, including some large group CoC certificates. The CAB FSC FM certification activities in Australia are managed from the CAB head office in USA. They use Australian and New Zealand based auditors on contract and staff auditors based in USA.

ASI Assessment:

This ASI compliance assessment was a special on-site FM/CoC compliance assessment. It was initiated in response to a recommendation from an ASI complaint investigation report, COMP 926. It is the assessment follow-up to the recommendations from that investigation. It also provided some initial observations in regard to COMP 974. It was carried out between June 25 and July 4, 2025

The assessment was conducted with the assistance of a local Technical Expert (TE) and was joined by a CAB Observer and an Observer from FSC ANZ.

The assessment focussed on the evaluation of the CAB re-certification audit in November 2023 and the first annual surveillance audit conducted in November 2024 and February 2025. The report of the surveillance audit in December 2022 and public summary reports for the years 2022 to 2024 were also reviewed. Both the 2023 and 2024 assessments used the 2018 FSC National Forest Stewardship Standard of Australia (FSC-STD-AUS-01-2018). The scope of the ASI audit included Criteria 1.6, 2.3, 3.1, 3.2, 5.2, 6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.7, 7.2, 7.5, 7.6, 9.1, 9.2, 9.3, 10.7, 10.10, 10,11 and 10.12.

The LA and TE visited 15 different sites in 11 different forests in 2 of the CH 3 regions in Victoria (Gippsland and Western Regions) during three field days. This sample of sites included coupes suggested by stakeholders and a diversity of coupes selected by the LA to provide a broad diversity of sites representative of the MU. These sites included both eucalyptus and radiata pine coupes on a variety of terrain ranging from very flat to very steep. They included currently active and recent past logging with both ground-based and cable yarding systems. The sites also included areas of site preparation, pesticide applications, planting and thinning sites as well as wetlands and HCV areas.

The coupes included sites that included cool and warm temperate rainforest ecological communities in gullies in the Strzelecki area of the Gippsland Region and very dry, low rainfall sites in other parts of Gippsland and in Western Region. Several HCV sites and coupes with koala and rare species of fauna and flora were visited. At each site, observations were made in regard to the CH protection of environmental values, logging practices, road construction and maintenance, waste, erosion on slopes and roads, protection of riparian zones and wetlands and native forest, and retention of native vegetation and residual trees.

The LE met with 25 CH staff in interviews or in meetings or on site and with approximately 8 different logging and silviculture contractors and their employees. Representatives of the CH and contractors met the team on every site visited to discuss operations.

The LE interviewed 13 stakeholders by video call, and met in the field on one coupe with three of these stakeholders who had filed the two complaints to ASI about the harvest planning and impact assessment, protection for rare species, the logging operations, and the silvicultural plans for the coupe. The 13 stakeholders included 3 ecologists, an auditor, two local government representatives, four neighbours, and representatives of 3 representatives of environmental organizations or community groups. Many of these stakeholders had specific expert knowledgeable of the rainforests communities and the rare and threatened species in the Strzelecki region of the Gippsland operations and had interacted with the CH in regard to plans. Several stakeholders provided maps and detailed information about some of the coupes visited by the ASI team

The CAB Observer and the FSC Observer participated in all the field work and in some of the interviews with stakeholders.

In the Closing Meeting with the CAB Observer, the ASI Lead Assessor summarized the assessment findings and described one Major Non-Conformities (NC) and 2 Minor Non-conformities. At the Closing Meeting, he LA agreed with the CAB Observer that one item of evidence for the Major NC was more appropriately a Compliance Follow-up (CFU).

The Summary of Findings sent to the CAB included one Major NCR, two minor NCRs and the CFU. The CAB requested and was granted a one-week extension to provide EOF. The LA responded to the long EoF from the CAB. The grading of the non-conformities was maintained. Edits were made to the text of the Evidence to address points raised by the CAB.

Prior to the Opening Meeting, the LA held an informal meeting by video call with a CH representative and the CAB Observer on June 6, 2025 to explain the role of ASI, the compliance assessment process and to answer questions about the relationship between the compliance assessment and COMP 926 and 974. The LA also outlined a request for documents and a schedule for field visits, that was followed-up with a detailed email request. The LA had extensive communication with the CH in regard to planning the three days of field-work.

Positive Feedback:

The CAB was very thorough and diligent in responding to requests for documents and providing information. The CAB Observer participated fully in the assessment.
The CH was also co-operative and participated fully in the assessment. They provided many staff and contractors on site for the field observations. They were very helpful with logistics, transport and field visits and with provision of documents.

Conclusions

Accreditation maintained.

Agenda

Date	Time	Activity	Location
2025-07-04	16:00	Feedback Meeting with CH. LA, TE, CAB observer and ASI Observer attended with CH representatives.	HVP office, Melbourne
2025-06-28	16:30	Lead auditor arrived in Melbourne in evening	O/N at Melbourne airport
2025-07-04	08:00	Interviews with forest ecologist and shire council reps. Review of health and safety records, pesticide use and HCV assessment process.	HVP office, Melbourne.
2025-06-30	09:00	Introductory Meeting with CH with ASI TE, CAB Observer, FSC ANZ Observer and 15 CH representatives	HVP office, Churchill
2025-06-25	09:00	Stakeholder interviews	Off site telephone or email or video interviews
2025-06-30	08:30	Opening meeting with CAB. CAB observer and Local Expert attended but not CH	HVP office Churchill (to be confirmed)
2025-06-30	09:30	Presentation by CH	HVP office, Churchill
2025-06-30	10:30	Break	HVP Office, Churchill
2025-06-30	17:00	End of Day	HVP Office Churchill O/N Churchill
2025-06-30	10:45	Organization of field work logistics for Tues, Wed, Thurs in Gippsland and Ballarat	HVP office Churchill
2025-06-30	11:00	Start of audit - document reviews and interviews. Criteria 2.3, 3.1, 3.2, 7.2, 7.5 and 7.6	HVP office, Churchill
2025-06-30	12:30	Lunch Break	Off-site
2025-06-30	13:30	Continued document review and interviews. Criteria 5.2, 6.1, 6.2, 6.3, 6.4, 6.7, 9.1, 9.2	HVP office, Churchill
2025-07-01	08:00	Field Day 1 Gippsland sites in Boola, Glencoe, Flynn, Stadbroke and Carrajung Forests. Criteria 2.3, 6.3, 6.4, 6.5, 6.6, 6.7, 9.3, 10.7, 10.10, 10.11, 10.12	Field sites in Gippsland
2025-07-02	08:00	Field Day 2. Gippsland sites, Fella's Track Coupe, Turtons Forest and Olsens Road. Criteria 2.3, 6.3, 6.4, 6.5, 6.6, 6.7, 9.3, 10.7, 10.10, 10.11, 10.12.	Field sites in Gippsland
2025-07-03	08:00	Field day 3. Ballarat sites Petticoat, Bradvale, Irrewillipe and Retreat Valley Forests. Criteria 2.3, 6.3, 6.4, 6.5, 6.6, 6.7, 9.3, 10.7, 10.10, 10.11, 10.12	Field sites in Western region
2025-07-03	16:00	Travel from Ballarat to Melbourne	O/N in Melbourne area
2025-07-04	13:00	Auditor preparation for Closing Meeting and Feedback Meeting	Off site
2025-07-04	15:30	Closing meeting with CAB. LA, TE, CAB Observer and FSC Observer attended.	HVP Office, Melbourne
2025-07-04	16:30	End of assessment	O/N Melbourne
2025-06-29	14:00	Lead auditor met TE, CAB Observer and FSC Observer and travelled from Melbourne to Churchill	O/N Churchill.
2025-07-02	15:30	Departed Gippsland and travelled to Ballarat area	O/N Ballarat area
2025-07-05	11:00	Auditor and TE departed Melbourne	Melbourne airport

Opening meeting

The Lead Assessor (LA) held an Opening Meeting with the CAB Observer on Monday, June 30, 2025. The ASI local Technical Expert (TE) and an Observer from FSC Australia/New Zealand (ANZ) also attended. The relationship and the differences between this compliance assessment and Complaints 926 and 974 were explained. LA confirmed the compliance assessment scope and the agenda. The CAB was advised that:

- The assessment scope and plan will be reviewed on an ongoing basis. If changes are needed these will be communicated to the CAB.
- All information is treated in confidence and assessment records are held securely.
- ASI may gather personal data in the form of video, or audio footage or in the form of images to assist in evaluating conformance to relevant requirements.
- A Summary of Findings (SOF) will be shared with the CAB within 5 calendar days of the Closing Meeting.
- The CAB will be given 10 calendar days to identify and file Errors of Fact (EOF).
- The final Assessment Report may be shared with the respective Scheme Owner (SO) and/or may be made public as stipulated in the SO requirements or Assurance Service Agreement.
- The CAB has the opportunity to challenge the findings.

Following the Opening Meeting with the CAB, the LA held an Introductory Meeting with 16 representatives of the certificate holder (CH) on Monday June 30, 2025 in the CH office. The TE, the CAB Observer and the FSC Observer attended. The LA presented information about the role of ASI in FSC certification and the compliance assessment process and explained the relationship between this compliance assessment and complaints 926 and 974. The LA responded to questions from the CH. Following the ASI presentation, the CH provided an introduction to the certified forest in a powerpoint presentation.

Closing meeting

At the conclusion of the Assessment on Friday July 4, 2025, the LA held a Closing Meeting with the CAB Observer, the TE, and the FSC Observer. The LA thanked the CAB Observer, the FSC Observer for being present throughout the assessment.

In the Closing Meeting, the ASI LA summarized the following:

- The planned assessment activities were all carried out.
- The assessment followed the procedures set out in the ASI Witness and Compliance Assessments Procedure (ASI-PRO-20-111 V2.6), the ASI Findings Procedure (ASI-PRO-20-106 V7.0) and the ASI- Assessor Handbook (ASI-PRO-10-102 V5.1).
- The Assessment results are based on a sample and a limited scope. Therefore, not all Non-conformities (NCs) may have been identified.
- The assessment results provided in the Closing Meetings Findings template and at the Closing Meeting will be recorded in the Summary of Findings (SOF). A copy will be forwarded to the CAB within 5 calendar days.
- The CAB has 10 calendar days from the date of issuance of the SOF to file Errors of Fact (EOF). They may request an extension.
- The final Assessment Report will be issued to the CAB within 40 calendar days of the Closing Meeting. The number, wording, normative reference, and grading of findings may change following ASI technical and program manager review.
- The CAB should inform ASI of any potentially confidential information contained in the ASI report that should not be placed in the public domain.
- The ASI Findings Procedure (ASI-PRO-20-106 V7.0) should be followed by the CAB when responding to ASI findings, including associated deadlines and implications due to grading.
- If the CAB disagrees with the findings presented in the final Assessment Report, they may challenge the decision in accordance with the ASI Challenges & Appeals Procedure (ASI-PRO-20-103 V7.3).
- The CAB will also receive a questionnaire and may provide comments on the conduct of the assessment.

In the Closing Meeting, the LA presented three findings – one Major Non-Conformity (NC) with several pieces of evidence and two Minor NC – in the ASI Findings template and verbally described the evidence for each. Based on discussion and feedback from the CAB, ASI agreed that one piece of evidence from the Major NC would be removed and a separate finding graded as a Compliance Follow-up (CFU) would be issued.

Findings

Major Nonconformity	Minor Nonconformity	Opportunity for Improvement	Total
1	2	0	3

No.	Grade	Subject	Status
206753	Minor Nonconformity	Investigation of complaint	Open
206754	Minor Nonconformity	Interviews with stakeholders	Open
206755	Major Nonconformity	Detection of non-conformity	On hold
206756	Compliance Follow-up	Accident frequency rates	Open

Findings Details

Finding No.	206753	**Date detected**	July 4, 2025
Grade	Minor Nonconformity	**Status**	Open
Subject	Investigation of complaint		
Detected by	ASI Assessor		
Normative Reference and Requirement	FSC-STD-20-001-V4-0:1.9.9.d)		
Description	The CAB did not investigate the allegations in a complaint.		
Evidence observed	A complaint was submitted to the CAB on 04 April 2024 about the CH activities at the Fellas Track Coupe in Victoria, Australia. The CAB response was a CAB Investigation Report dated 24 June 2024 and a surveillance audit report dated 10 March 2025 that included field observations at the coupe on 19 February 2025. The complainant then filed a complaint with ASI (COMP 926) about the CAB investigation. The ASI Investigation Report for COMP 926 identified non-conformities with 8 Indicators of the FSC National Forest Stewardship Standard of Australia (FSC-STD-AUS-01-2018). This compliance assessment has confirmed the findings of the ASI Investigation Report into COMP 926. The CH did not fully investigate the complaint and the CAB response in the Investigation Reports and the Audit Report failed to identify CH non-conformities with Indicators 6.2.3, 6.3.3, 6.4.2, 6.5.1, 7.5.2, 7.6.3, 9.1.2, and 9.2.3 of the FSC National Forest Stewardship Standard of Australia (FSC-STD-AUS-01-2018). The CAB investigation of the complaint did not "investigate the allegations in the complaint or specify all the proposed actions to respond to the complaint" as required by Section 1.9.9d of FSC-STD-20-001-V-4-0. This is a minor non-conformity as defined in FSC-STD-20-001-V-4-0 Section 4.3.13a. It is a temporary lapse in the CAB investigation procedure and is not systematic.		

Finding No.	206754	**Date detected**	July 4, 2025
Grade	Minor Nonconformity	**Status**	Open
Subject	Interviews with stakeholders		
Detected by	ASI Assessor		
Normative Reference and Requirement	FSC-STD-20-007-V3-0:5.4.4		
Description	The CAB did not interview a sufficient variety and number of people affected by or involved in forest management.		
Evidence observed	In three assessments between 2022 and 2024, including the re-assessment in 2023, the CAB interviewed a total of 10 external stakeholders who were not either contractors or employees of contractors employed by the CH. The names and affiliations of these 10 individuals are listed in Appendix 1 of the 2022 and 2024 surveillance audit reports, and were provided by the CAB for the 2023 re-assessment. The stakeholders interviewed include representatives of 1 national ENGO, 2 representatives of a local NGO that had filed a complaint, 2 representatives of one of the many shire councils, 1 representative of a landcare group, 1 representative of FSC Australia, and 3 neighbours. This CH has a large FMU of 240,000 hectares and operations widely distributed across several regions of Australia (Gippsland, the north around Shelley, the Ballarat area, and the Green Triangle near Mt Gambier in the south-west). Some of CH policies and some its operations are controversial for various reasons. They affect many neighbours. The 10 individuals interviewed do not include: - Any representatives of the six Registered Aboriginal owners (First Nations) who are the traditional owners of the land now owned or managed by the CH. - Any representatives of outdoor recreation groups such as walkers, mountain bikers or motorized bikers who use or have an interest in using the CH lands for recreation. - Any of the 9 individuals or groups who are recorded in the CH data base as submitting compliments. - Any academics or researchers with interests in the environmental values in the CH forests. - Any of the approximately 180 individuals who are recorded as contacting the CH (sometimes more than once) about a wide diversity of issues in the CH stakeholder data base. The interviewees included: - Only 1 of the 22 different individuals who are recorded in the CH data base as filing complaints with the CH. - Only three neighbours, two of whom are a single family. - Representatives of only 1 of the local and regional NGO's (ie "Friends of" groups) with interests in one of more of the CH operating regions. - Representatives of only 1 of the many shire councils that interact closely with the CH and provide regulatory oversight of CH activities. Section 5.4.4 of FSC-STD-20-007-V4-0 requires as follows: "5.4.4. The auditor(s) shall interview a sufficient variety and number of people affected by or involved in the forest management of each FMU as to make direct, factual observations as to conformity with all the indicators of the applicable Forest Stewardship Standard that are under evaluation at that FMU and for which such consultation is a necessary means of verification, over the range of conditions under management by the applicant forest management enterprise." The number and variety of stakeholders, conducted over a period of three audits including the re-assessment in 2023, was not sufficient to meet the requirements of Section 5.4.4 on a large, widely separated and diverse management unit with First Nations, recreational interests, complainants, and numerous neighbours and local governments. It was not sufficient consultation to verify conformity with Indicators in Principles 3, 4, 6 and 9. This Finding is a potential duplicate of closed Finding 204019. However, the subject matter is different. Finding 204019 is about the methodology and sampling of the communities which was insufficient to make the majority of the communities aware of the FSC certification process and to identify conflicts. This Finding 206754 is about the number and variety of stakeholders. This is a minor non-conformity as defined in FSC-STD-20-001-V-4-0 Section 4.3.13a. It is a temporary lapse in the CAB audit procedures and is not systematic.		

Finding No.	206755	**Date detected**	July 4, 2025
Grade	Major Nonconformity	**Status**	On hold
Subject	Detection of non-conformity		
Detected by	ASI Assessor		
Normative Reference and Requirement	FSC-STD-20-007-V3-0:8.1		
Description	The CAB did not identify CH non-conformities with requirements specified in the applicable Forest Stewardship Standard and FSC normative documents.		
Evidence observed	Over the three most recent assessments (2022, 2023 and 2024) the CAB did not identify CH non-conformities with Indicators 6.2.3, 6.3.3, 6.4.2, 6.5.1, 7.5.2, 7.6.3, 9.1.2, and 9.2.3 of the FSC National Forest Stewardship Standard of Australia (FSC-STD-AUS-01-2018). Those non-conformities that were not detected by the CAB are discussed separately under 7 sub-headings. Evidence 1. Indicator 6.2.3 of the FSC National Forest Stewardship Standard of Australia. Evidence of non-conformity with Indicator 6.2.3 was presented in COMP 926 and was confirmed in this assessment as follows. Indicator 6.2.3 requires an environmental impact assessment to identify and assess the impact of management activities on environmental values identified in the environmental assessment required in Criterion 6.1. The indicator requires as follows: "6.2.3 The environmental impact assessment* identifies and assesses the impacts of the management activities prior to the start of site-disturbing activities." This ASI assessment included a desk-based review of the CH planning system for conducting assessments, interviews with planning staff, and field reviews of the Site Values Checklists and Timber Harvest Plans that are developed as an output of the impact assessment system. This ASI assessment determined that this system works well in CH coupes which involve harvest of planted pine stands on gentle terrain or adjacent to agricultural properties or other plantations. However, the system is not equivalent to an environmental impact assessment that assesses impacts as required by Indicator 6.2.3 in the complex gullied terrain in parts of the Strzelecki Ranges in the Gippsland management unit where Threatened species and Threatened Ecological Communities (TECs) such as Endangered rainforest communities occur. It does not conform to the Glossary definition of "environmental impact assessment." The CH approach to environmental assessment of these sites is identified in the CH document "Operating standard for the identification and protection of rainforest on company land, Version 9, 2018" and the CH document "Procedure for Managing Rainforest Forest management system, RATSAC Habitats, Version 2.0, 2024". The CH Operating Standard does not follow the guidance for assessment of rainforest communities provided by David Cameron, the recognized authority on rainforest in Victoria, in the Victoria Ministry of Sustainability and Environment handbook "A Field Guide to Rainforest Identification in Victoria" (the Cameron Field Guide). This floristic guide, published by the Ministry was developed by Mr Cameron specifically to recognize that some areas of rainforest have lost key canopy species (such as Myrtle Beech and Sassafras) but have otherwise retained their floristic rainforest integrity. The CH operating standard, however, defines rainforest at the broad structural level as follows: "Rainforest is defined ecologically as closed (greater than 70% projected foliage cover) broad-leaved forest vegetation with a more or less contiguous		

rainforest tree canopy of variable height, and with a characteristic composition of species and life forms of at least 1000 square metres (0.1ha) in area." This definition is based on a "closed" and "more or less continuous canopy" and is not consistent with the currently accepted, ecologically-based, definition that recognizes that a "more or less contiguous" canopy is not always present. The CH operating standard then states "The Company considers the following attributes in assessing the long-term viability of the vegetation where the projected foliage cover of the Myrtle Beech, Sassafras and Blackwood canopy species is less than or equal to 70%: ✓ The rainforest canopy species at the site includes Myrtle Beech present as mature individuals with evidence of regeneration. Sassafras may or may not be present; and ✓ The stand is at least 40 metres wide (measured horizontally) and greater than 3 hectares in area; and ✓ In addition to Myrtle Beech and Sassafras, populations of at least 5 differential Rainforest understory species are present. The Cameron Field Guide to Rainforest Identification does not include these limitations (particularly the third one) and is not based on structural attributes such as the presence of canopy species. Thus, application of the field assessment process described in the CH Operating Standard fails to identify key rainforest areas that are defined floristically in the Cameron Field Guide. In addition, the drone surveys used by the CH for initial identification of rainforest for further evaluation are not an appropriate method to assess and identify rainforest, and the impacts of management activities on this community in the field. The proper application of the assessment approach in the Cameron Field Guide requires field assessment. As a result of using inappropriate definitions and inappropriate techniques and tools for identification, the CH did not identify existing rainforest and told ASI that rainforest was not found in several coupes (for example Fella's Track coupe) where qualified ecologists, including the ASI technical expert, have identified rainforest as being present. The Cameron Field Guide is accepted as the authoritative document. It specifically requires on-ground field assessment by a knowledgeable ecologist to identify areas of rainforest and the boundaries between rainforest and other vegetation types (regardless of the presence of Myrtle Beech and/or Sassafras). The author of the Field Guide, David Cameron, told the ASI assessment team that the operating procedures use by the CH would rarely, if ever, identify rainforest regardless of whether rainforest was present or not. This explains why CH planning staff do not identify any rainforest within those gullies where expert ecologists using the diagnostic floristic keys in the Cameron Field Guide for identification of rainforest in Victoria do identify rainforest communities. To meet Indicator 6.2.3 in the Strzelecki, the environmental impact assessment requires on-ground field assessment, rather than a reliance on drone surveys as an initial screening tool to determine the presence of rainforest. This is important given the Endangered status of this community and the known presence of the Critically Endangered species, Slender Tree-fern, as well as several other Threatened taxa, and Threatened Ecological Communities that are not identifiable using drone surveys of the canopy. When rainforest boundaries are mapped and marked in the field, based on the Cameron Field Guide, appropriate buffers that prevent impacts can be determined. Indicator 6.2.3 requires that this work must be carried our prior to any site-disturbing activities. That requires prior to earth-moving, roading re-construction, or clearing of vegetation in the area. The requirement to complete the assessment prior to those site-disturbing activities were not met in at least one coupe, as identified in COMP 926. The CH "Operating Standard for the identification and protection of rainforest" and the CH "Procedure for Managing Rainforest" do not provide an environmental impact assessment that identifies and assesses impacts that meets the requirements of Indicator 6.2.3. ASI identified this non-conformity which leads to the failure of the CH to identify rainforest in coupes in the field. The CAB visited the same coupe as the ASI assessment at Fella's Track but did not identify this non-conformity. The ASI assessment visited additional coupes in the field to confirm the non-conformity. This non-conformity was not identified by the CAB in any coupe in the 2022, 2023 or 2024 audits. Evidence 2. Indicator 6.3.3 of the FSC National Forest Stewardship Standard of Australia This ASI Assessment concluded, based on observations in several coupes and with the input from knowledgeable stakeholders that included photos, maps and descriptions in interviews, that CH operations in plantations adjacent to or including native forest vegetation have caused damage to environmental values. The 2024 audit of compliance with the Code of Timber Harvesting Practice conducted for the South Gippsland Shire Council reported that, "Some individual Slender Tree-ferns are within 10 meters of the boundary. The auditor considers that these individual tree ferns are likely to have been indirectly impacted by the changed environment that results from harvest activity". The close proximity to the boundary is an impact because the Slender Tree-Ferns are known to be highly sensitive to direct sun's light and micro-climate change along boundaries. The audit report also states that "The auditor observed no direct loss of Slender Tree Ferns, however, given the proximity of known plants to harvest operations, there is a likelihood that some Slender Tree Ferns may have been lost during harvest activities." It is evident from the audit found that a patch of native vegetation was removed in this coupe. Similar situations were observed by the ASI assessment team in other coupes. The shire audit was undertaken in June 2024, and provided to the CH by email from the shire in August 2024. It was not considered by the CAB in February 2025 field assessment of Fella's Track. David Cameron, the regional expert in rainforest ecology and in the measures needed to provide protection for rainforest communities, told the ASI team that without proper surveys to identify site values and without wider buffer zones to protect sensitive Critically Endangered Species (Slender Tree-fern) and Endangered and Threatened ecological communities (Cool Temperate and Warm Temperate Rainforest), damage to these species and communities will occur. The CH has not been able to mitigate or repair damage that has occurred in any coupe or to have taken measures to prevent similar damage in similar situations in future. This is a non-conformity with Indicator 6.3.3. ASI and the CAB auditors both visited the Fella's Track coupe but the non-conformity was not detected by the CAB in the 2024 surveillance audit conducted in February 2025. Evidence 3. Indicators 6.4.2 and 6.5.1 of the FSC National Forest Stewardship Standard of Australia Indicator 6.4.2 requires as follows: "6.4.2: Best Available Information, including expert opinion and targeted field surveys, is used to identify specific locations of habitat of endangered and critically endangered species that are present or likely to be present within and adjacent to the Management Unit." Indicator 6.5.1 requires as follows: "6.5.1 Best Available Information" is used to identify native ecosystems* that exist within the Management Unit* including assessments of the conservation status* and value of the ecosystems* at the landscape* level. Both indicators require the CH to use "Best available information" which is described in the Glossary of the FSC Standard for Australia as follows: "Best Available Information: Data, facts, documents, expert opinions, contact information and results of field surveys, review of publicly available records or consultations with stakeholders that are most credible, accurate, complete, and/or pertinent and that can be obtained through reasonable effort and cost, subject to the scale and intensity of the management activities and the Precautionary Approach" This definition is confirmed in a Box that immediately follows Indicator 6.4.2 which states: "Best Available Information includes where applicable: …. 2) A review of the assessment of rare and threatened species undertaken by a locally knowledgeable expert independent of The Organisation." The ASI assessment team identified four situations where the CH was provided with information about the presence of the Critically Endangered Slender Tree-fern and the Endangered Threatened Ecological Communities (TEC) Cool Temperate Rainforest in two different coupes but did not use the information. First, two neighbours with knowledge of the Slender Tree-fern provided the CH with information about Slender Tree-ferns and about rainforest in and adjacent to Fella's Track coupe in the period between November 2023 and February 2024 before the coupe was logged. Second, a qualified ecologist, retained by the South Gippsland Shire Council, visited the Fella's Track coupe accompanied by a representative of the CH. He confirmed the presence of the Slender Tree-fern in the coupe and reported that some of the coupe being considered as plantation was actually native forest. His report of 27 February 2024 was provided to the CH by the shire council on 23 April 2024 and warned that there were "a range of risks to the Cool Temperate Rainforest and associated populations of Slender Tree-fern along the gullies". Third, the Shire council wrote to the CH on 6 May 2024 advising the CH of the discovery and confirmation of Slender Tree-ferns in two gullies of the coupe and requesting an appropriate buffer to enable their long term protection. The CH chose not to use this information or to make any changes to their plans. They declined to cease operations or to submit a new plan as requested. Fourth, two ecologists identified Slender Tree-ferns and Cool Temperate Rainforest in an area immediately adjacent to a different coupe on Livingstone Creek Road that was being planned for harvest in early 2025. They prepared a report titled "Vegetation Survey of Cool Temperate Rainforest Occurring within the Turton's Creek Scenic Reserve". This report was provided to the CH on 20 December, 2024 but the CH did not accept their offer to provide further information and advice. In all four of these examples, the CH failed to "use" this best available information. The CH told the ASI assessment that they acknowledge the presence of Slender Tree-ferns in these two coupes, but do not agree that there is any Cool Temperate Rainforest. They did not use the information provided to make any changes to their operational harvesting plans. The CAB did interview the 2 complainants (example 1) and did interview a manager at the shire council (example 3) and had access to the report of the consultant (example 2). Thus the CAB interviewed the people and had access to the documents accessed by ASI. They also had an opportunity to interview additional experts as ASI did. The CAB did not identify these non-conformities with Indicators 6.4.2 and 6.5.1 in the 2024 surveillance assessment which was conducted between 29 and 29 November 25-29, 2024 and on 17 and 20 February 2025. Evidence 4. Indicator 7.5.2 of the FSC National Forest Stewardship Standard of Australia Evidence of non-conformity with Indicator 6.2.3 was presented in COMP 926 and was confirmed in this assessment as follows. The CH has regularly declined requests to provide affected stakeholders, including neighbouring property owners, with copies of Site Values Checklists and Timber Harvesting Plans for coupes. The CH has also taken actions to prevent the South Gippsland Shire Council from providing the documents provided to the Shire Council to affected stakeholders. During this assessment, the CH confirmed that the CH considers the entire contents of these documents to be proprietary and designated as "commercial in confidence" when submitted to the shire. They confirmed that it is company policy not to provide them to any stakeholders. This is not in compliance with Indicator 7.5.2 which requires that: "7.5.2 Relevant components of the Management Plan*, including relevant supporting information, excluding confidential information*, are available to affected stakeholders* on request at the actual costs of reproduction and handling." Management Plan is defined in the FSC Australia standard as "the collection of documents, reports, records and maps that describe, justify and regulate the activities carried out by any manager, staff or organisation within or in relation to the Management Unit." The Site Values Checklists and Timber Harvesting Plans and associated maps of coupes are part of that "collection of documents that describe, justify and regulate the operational activities carried out by the CH on coupes. Indicator 7.5.2 allows the CH to "exclude confidential information", but requires that relevant components of the plans that are of interest to affected stakeholders are available upon request. Those components include the environmental values, including Threatened species and Threatened Ecological Communities (TECs) found in the CH forest, and the description of harvesting plans and measures to protect those environmental values. Those components are not proprietary confidential information. The blanket refusal of the CH to provide any information about operational coupe-level Timber Harvesting Plans and Site Values Checklist despite many requests from one interested group of stakeholders is a non-conformity with Indicator 7.5.2. These stakeholders were adjacent property owners who were "affected stakeholders" as defined in the FSC Australia standard. This non-conformity has not been detected by the CAB in the 2022, 2023 and 2024 assessments. Evidence 5. Indicator 7.6.3 of the FSC National Forest Stewardship Standard of Australia Evidence of non-conformity with Indicator 6.2.3 was presented in COMP 926 and was confirmed in this assessment as follows. Interested and affected stakeholders told this ASI assessment that they have not been provided with an opportunity to provide input into the planning processes on coupes that affect their interests. The CH confirmed that their normal process to notify stakeholders of planned activity is to provide form letters notifying of proposed activities including operating dates, hours, and truck routes. Affected stakeholders, including neighbours of the Fellas Track coupe, who sought to provide input about environmental values and to be involved in the planning of the coupe were not provided with that opportunity. As an example, a consulting ecologist with expertise related to Slender Tree Ferns offered to assist two affected stakeholders representing a local environmental group in collecting information about the Fella's track coupe that would be provided to the CH. The CH denied permission to visit the site and advised the group that it "is neither a regulator nor an FSC auditor. It has no wider role in the management of this property". Indicator 7.6.3 requires that these affected stakeholders are provided with an opportunity for engagement in planning and monitoring, but that was denied. The two ecologists who prepared the report titled "Vegetation Survey of Cool Temperate Rainforest Occurring within the Turton's Creek Scenic Reserve" on Livingstone Creek Road that was being planned for harvest in early 2025 offered to provide input into the planning of that site. This was also not accepted by the CH. The South Gippsland Shire Council is also an affected stakeholder and told the ASI assessment team that they also sought to provide input to the coupe level planning at Fellas Track. They wrote to the CAB to provide an expert report and to suggest that an appropriate buffer be established but this input was not accepted. This is a non-conformity with Indicator 7.6.3 which requires: "7.6.3 Affected stakeholders* are provided with an opportunity for culturally appropriate* engagement* in monitoring and planning processes of management activities that affect their interests." As with Evidence 3 above, the CAB auditor did interview the same people and had access to the same documents as ASI but did not detect the non-conformity in the 2024 surveillance assessment. Evidence 6. Indicator 9.1.2 of the FSC National Forest Stewardship Standard of Australia In 2020, the CH retained a consultant to provide a "Sidescan assessment" of High Conservation Values (HCVs) across the management unit in Victoria. This document – "Assessment of High Conservation Values Across the Hancock Victoria Plantations Estate in Victoria, Version 3, 14/12/2020" – identifies the presence and location of High Conservation Values in each of the 6 main Categories and their sub-categories on the CH estate. There is no evidence that the CH's consultant engaged in any way with any interested and affected stakeholders in the preparation of this "desk top assessment". The Table of Contents does not mention any engagement with stakeholders, and the report does not include a list of parties that were consulted. The CH was unable to provide a list. The statement in the third paragraph on Page 1 of the report states: "This initial desktop assessment results will be augmented based on inputs from stakeholders and relevant experts." This confirms that the assessment was an "initial assessment" and that no consultation occurred. A CAB document titled "HVP Environmental Impact Assessment Management, April, 2025 "states as follows: "HVP has conducted an assessment for HCVs across its estate and recorded that information in the document titled Assessment of High Conservation Values Across the Hancock Victoria Plantations Estate in Victoria, dated 22 May 2020. The in-depth, 46-page assessment includes reviews of scientific studies, regional management plans, relevant legislation and water catchment strategies." There is no mention of that any stakeholders were consulted in this document. The failure of the CH to consider results from consultation with affected and interested stakeholders in the assessment of High Conservation Values is a non-conformity with Indicator 9.1.2 that was not detected by the CAB. Evidence 7. Indicator 9.2.3 of the FSC National Forest Stewardship Standard of Australia Evidence of non-conformity with Indicator 9.2.3 was presented in COMP 926 and was confirmed in this assessment as follows. The HCV assessment – "Assessment of High Conservation Values Across the Hancock Victoria Plantations Estate in Victoria, Version 3, 14/12/2020" – does not identify any management strategies to protect the identified HCVs. Instead, the CH has prepared a number of documents called "Operating Procedures" or "Management Plans", for some of the HCVs identified in the Assessment Report. Indicator 9.2.3 requires that "interested or affected stakeholders and regional experts with knowledge of the conservation of HCVs" are consulted "in the development of management strategies and actions to maintain and/or enhance the identified High Conservation Values". During the assessment the CAB was unable to provide any information, or a list of stakeholders consulted, or any other evidence that interested and affected stakeholders were consulted in the development strategies. The pre-eminent authority and respected regional expert on rainforest in the State of Victoria told the ASI assessment team that he has not been consulted by the CH since 2010 and was not consulted about management strategies for the Cool Temperate or Warm Temperate Rainforest HCVs during the preparation of, or since, the Assessment Report was completed in 2020. More recently, individuals who have been identifying Cool Temperate Rainforest, Slender Tree-ferns and other HCV species and TECs in gullies adjacent to CH coupes have not been consulted about management strategies for this identified HCV. For example, in 2024, two local expert ecologists surveyed Slender Tree-ferns and Cool Temperate Rainforest in an area adjacent to a coupe on Livingstone Creek Road. The CH was given a copy of the report on 20 December 2024, and a representative attended a public presentation on 20 February 2025, but the CH did not engage in any consultation with these regional experts. The failure to consult with interested or affected stakeholders and regional experts with knowledge of the conservation of HCVs in the development of management strategies is a non-conformity with Indicator 9.2.3 that was not detected by the CAB. Collectively, the CH non-conformities that were not detected by the CAB in audits over the three-year audit period, 2022-2024 are a major non-conformity on the part of the CAB as described in FSC-STD-20-001-V4-0, Section 4.3.13b. These failures have continued over a long period of time and affect the integrity of the FSC system. This non-conformity with Indicator 9.2.3 is quite different from the non-conformity with Indicator 9.1.2. Indicator 9.1.2 refers to the collection of information about high conservation values during the assessment phase of preparing an HCV assessment and required consideration of the results of culturally appropriate engagement with interested and affected stakeholders". The non-conformity with Indicator 9.3.2 is about the strategies implemented– which is a second important part of the HCV process in PP. The non-conformity with Indicator 9.2.3 is that the CH did not consult with relevant experts and affected stakeholders in the development of strategies.

Finding No.	206756	**Date detected**	July 4, 2025
Grade	Compliance Follow-up	**Status**	Open
Subject	Accident frequency rates		
Detected by	ASI Assessor		
Normative Reference and Requirement	ASI-PRO-20-111-V2.5:9.2.9.3		
Description	The CAB shall follow-up to assess CH conformance with Indicator 2.3.5 in the FSC National Forest Stewardship Standard of Australia (FSC-STD-AUS-01-2018).		
Evidence observed	This ASI assessment determined that the CH incident frequency rate, based on the total number of incidents, and the incident frequency per million hours worked have increased steadily for both the Lost Time Incidents (LTI) and Medical Treatment Incident (MTI) over the period from April 2023 to June 2025. The severity of incidents, measured as lost days per lost time injury, has also been increasing over the same period. The result is that the CH is now above the industry average rate for incidents. This is a non-conformity with Indicator 2.3.5 that requires: "2.3.5 The trend and severity of incidents are generally decreasing over time". In the ASI assessment, the CH explained that some of the increases are due to the introduction of new measures to track incidents and some unique situations, but also stated that, in July 2025, there is a real increase in the numbers of incidents and their severity. The CAB identified this situation in the 2024 surveillance audit report. The audit report states: "2.3.5 Auditor reviewed the Health Safety and Environment report Q1, Lost time injury frequency rate (LTIFR) increased since Jan 2024, HS Manager notes that this is due to a change in reporting to include all injuries involving lost time not only those signed off by a GP/medical officer (as previously). LTIFR high due to one worker having extended period off due to tree/sapling falling on him". This CAB evaluation of CH conformity with Indicator 2.3.5 was conducted on November 25, 2024. Thus, the trend of increasing frequency of accidents that is not entirely related to a reporting change and was reported to this ASI assessment in July 2025 was not observable by the auditor at the time of the audit in November 2024. This is a Compliance Follow-Up. It is a potential duplicate of Compliance Follow-up Finding 204010 but the subject matter is different.		

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