

7 August 2026

Mr Simon Dorries
Chief Executive Officer
Responsible Wood

Via email: sdorries@responsiblewood.org.au

CC: standards@responsiblewood.org.au

Dear Mr Dorries

RE: Review of AS/NZS 4708 Sustainable Forest Management Standard

The Green Building Council of Australia (GBCA) welcomes the opportunity to provide input to the review of the AS/NZS 4708 Sustainable Forest Management Standard (the Standard). We acknowledge the important role the Standard plays in stewarding forest management practices that can support a responsibly logged renewable timber supply, regional jobs, cultural values and community expectations.

About the Green Building Council of Australia

GBCA's purpose is to lead the sustainable transformation of the built environment. We do this primarily through our core functions:

- We advocate policies and programs that support our vision and purpose.
- We rate the sustainability of buildings, fitouts and communities through Australia's largest national, voluntary, holistic rating system, Green Star.
- We educate industry, government practitioners and decision-makers, and promote green building programs, technologies, design practices and operations.
- We collaborate with our members and other stakeholders to achieve our mission and strategic objectives.

Green Star is Australia's most widely used sustainability rating system for the design, construction and performance of buildings, including social infrastructure, fitouts and communities. Green Star aims to transform the built environment by:

- reducing the impact of climate change
- enhancing our health and quality of life
- restoring and protecting our planet's biodiversity and ecosystems
- driving resilient outcomes for buildings, fitouts, and communities
- supporting and rewarding the development and use of sustainable products and materials
- contributing to market transformation and a sustainable economy.

Feedback to proposed amendments to 4708:2021

GBCA has lodged comments on the Draft for Public Comment, DR AS/NZS 4708:2021 Amendment 1:2026, through the public comment submission form. This letter sets out the matters we consider most significant,

drawing on our review of the draft and our correspondence over recent years. The updates are welcome, including:

- The tightened definition for old-growth forest which is now closer to what GBCA sought in 2019 and consistent with PEFC ST 1003:2024 Clause 3.30 (primary forest).
- The deletion of 2021 Clause 11.1.4 (conversion of degraded native vegetation to plantation, subject to eight preconditions) to be replaced by an absolute prohibition on converting native forest to agricultural use, implementing PEFC 8.1.4.
- The new absolute prohibition on forest degradation (Clause 11.1.6), the strongest single old-growth provision in the draft (subject to the 11.1.3 clause conflict being resolved and the PEFC eligibility bars being reinstated – see detailed comments in the public comment submission form).

However, gaps remain in three key areas:

- Aligning the Standard further with Australian legislative changes related to protection of nature and biodiversity.
- Ensuring the Standard drives improved behaviour from licensees by increasing transparency over breaches and the corrective action taken, so that the underlying issues are addressed.
- Strengthening the requirements that protect sensitive sites and species.

Keeping pace with national environmental reform

The Standard is being finalised just as Australia's environmental regime is changing. This creates a unique opportunity to recognise these changes and ensure the Standard aligns with the framework that is now being rebuilt. A Standard silent on the *Environment Protection and Biodiversity Conservation (EPBC) Act*, the National Environmental Standards and the new regulator will read as dated the moment it is published. It will leave licensees managing two frameworks at once.

The *Environment Protection Reform Act 2025* sunsets the Regional Forest Agreement exemption on 1 July 2027. From that date, forestry operations likely to have a significant impact on a matter of national environmental significance will require approval under the EPBC Act and will be assessed against new National Environmental Standards, four of which are already in draft. The remaining reforms commence on or before 1 December 2026, administered by the National Environmental Protection Agency, which has operated as an independent regulator since 1 July 2026 with power to audit without notice and to publish registers of enforcement action. Within about a year of publication, a Standard anchored to state codes of practice will be overlaid by a Commonwealth regime, and certification claims will for the first time be checkable against public regulatory records.

This matters for AS/NZS 4708 in two concrete ways. First, the reformed EPBC Act will require residual significant impacts to be compensated to a net gain, so a mitigation hierarchy that ends at offset, as Clause 11.3.2 now does, will sit below the national legal threshold from the point those provisions commence.

We recommend that the amendment acknowledge this shift in its introductory text, require forest managers to identify and comply with their EPBC Act and National Environmental Standard obligations as those obligations commence, carry the mitigation hierarchy through to a net gain, and include a review trigger tied to the first forestry-relevant National Environmental Standard.

Driving better behaviour through transparency and accountability

Our letter of 17 July 2024, and our email in May 2026, asked what changes to the Standard, or to auditor guidance, Responsible Wood planned in response to media coverage and legal enforcement action involving licensees. You subsequently advised that you intended to address these matters through additional guidance for certification standards rather than by amending the Standard at that time. You then

informed us of the July 2025 update to the Scheme Rules (*Directive 2026-1*) and the amendments to the June 2025 *Requirements for Certification Bodies Auditing Forest Management Systems*.

We believe that the amendments show progress, but we are concerned that the revised Standard does not reference them entirely. Our concerns are threefold:

- The revision to the Standard does not reference or support the new audit and reporting rules, and nothing in it requires the public summary to record enforcement action or the corrective action taken. We ask that public reporting cover regulatory enforcement action, the nonconformities raised, and the corrective action taken and its effectiveness, tracked from year to year.
- Reporting of enforcement action is qualified by legal confidentiality, and how that qualification is applied in practice is unclear. Once legal action is lodged with a regulator or a court it is material to our members and should be disclosed in the audit report.
- Certification bodies are still transitioning to the new rules, so a certificate GBCA relies on may not yet be audited or reported against them. A recent [auditor report](#) confirms this, and we would welcome a clear transition timeline and assurance that certificates relevant to Green Star are already audited under the new requirements.

This lack of transparency has consequences. In March 2026, the NSW Land and Environment Court convicted a Responsible Wood certified forest manager, on its own plea of guilty, over the felling of six giant and three hollow-bearing trees at Wild Cattle Creek State Forest. The conduct, and the lack of transparency around it, has diminished the brand and reputation of Responsible Wood by association.

Appendix A expands on our points above.

Protecting sensitive sites and species

Protection for sensitive sites and species rests on three things: clear definitions; holding the Standard to the PEFC ST 1003:2024 benchmark it aims to meet, which means preventing deforestation and degradation; and going beyond that benchmark to protect Australia's rich old-growth forests. In summary,

- Strengthen the prevention of old-growth forest logging. These should be excluded from harvest or, at a minimum, record and disclose any harvesting on the certificate and auditor's report.
- Ensure no conversion of native forests is possible. There are conflicting clauses remaining in the Standard, and these should be amended to remove, or severely limit, the justified circumstances exception.
- Restore all eleven Significant Biodiversity Values criteria to a single mandatory list to ensure their consideration, and adapt guidance related to ecologically important non-forest ecosystems and trees grown outside of forests.
- For private native forestry, apply the environmental protections that apply on public land in the same jurisdiction, or demonstrate equivalent protection.
- Require a maintained geolocation inventory, as required by the European Union Deforestation Regulation (EUDR) and the Programme for the Endorsement of Forest Certification (PEFC) standard, not only upon request. As this has been an issue that has resulted in legal breaches, mandatory geolocation will assist licensees to ensure they are holding to their own requirements.

Appendix B expands on these items.

Other matters

The Standard would benefit from a section clearly explaining the different terms included in the glossary related to “forests, native forest, naturally regenerating forests, degraded native vegetation, deforestation, degradation, old-growth forests, plantation forests.” Poorly defined terms make the requirements difficult to understand, so consistent terminology across the standard matters. A further section should align the Standard’s terms with the regulatory terms used in both jurisdictions it applies to (such as how ‘matters of national significance’ aligns to ‘significant biodiversity values’).

The Standards Reference Committee draws on forest management, research, auditing, government, environmental groups, Indigenous stakeholders, industry and unions, but not on property, procurement or specification. We recommend the working group be expanded to bring in expertise from procurement and sustainability experts from the building sector, which is a significant driver of demand for timber.

Recognition of AS4708 under GBCA’s Responsible Products Framework

AS/NZS 4708:2021 is recognised under GBCA's Responsible Products Framework version A (the Framework). Recognition for the amended Standard will likely fall under the next version of the Framework (version B). We expect the revised AS4708 to reflect the matters set out in our review, in particular the transparency and enforcement provisions and the protection of sensitive sites and species, as these are mirrored in our revised Framework.

As noted in previous correspondence to Responsible Wood (see July 2024), we reserve the right to delist specific licensees where their behaviours are subject to repeated legal breaches. We note the revisions to AS4708 do not yet appear to include language related to when certification may be suspended in such a case. Legal breaches, for example, should be considered a major non-conformance and reported as such. We expect the new Standard to include language that addresses how suspension can happen for repeated legal breaches and that these are major non-conformances that must be reported. The trust the community places on standards and certification bodies such as AS4708 is significant, and licensees with repeated, ongoing breaches are a cause for concern.

GBCA values the constructive relationship we have built with Responsible Wood. This review is a welcome opportunity to revisit previous points of discussion and agreement in our shared goal of protecting forests and biodiversity while ensuring timber remains a sustainable resource.

To arrange a time, or for any clarification of the points made above, please contact Jorge Chapa, Chief Impact Officer, at jorge.chapa@gbca.org.au.

Yours sincerely

A handwritten signature in dark ink, appearing to read "D. Rooney". The signature is fluid and cursive, with a large loop at the end.

Davina Rooney
Chief Executive
Green Building Council of Australia

Appendix A: Review of transparency elements

As noted in your communications, there have recently been updates related to our concerns around the lack of transparency in the auditor's reports. In particular, a July 2025 update to the Scheme Rules (Directive 2026-1) and the amendments to the June 2025 *Requirements for Certification Bodies Auditing Forest Management Systems*.

Those documents now require the certification body (the auditors) to assess biodiversity and legal compliance at every annual audit (**Clause 7.1.3.6**), to report regulatory compliance and a summary of enforcement actions in the audit summary report (**Clause 7.4.4.2(h)(iii)**), to make that summary publicly available on the PEFC database (**Clause 7.4.4.6**), and to suspend or withdraw a certificate where a major nonconformity is not corrected in time or where a breach is deliberate (**Clauses 7.4.6.6 and 7.4.6.7**).

However, we are concerned that the Standard neither refers to these documents nor fully supports them. The transparency obligations sit in the Scheme Rules, which are in a two-year transition, and it is unclear whether they will carry through to the revised Standard.

Clause 7.4.3 of the Standard under review (4708) already requires the forest manager to make publicly available the certification body's audit summaries and a public summary of its management under **Clause 7.4.4**, but neither clause requires that summary to record regulatory enforcement action or the corrective action taken.

We ask that **Clause 7.4.4**, and the public availability list at **Clause 7.4.3**, be amended to require the public summary to include regulatory enforcement action relating to the defined forest area, the nonconformities it raises, and the corrective action taken and its effectiveness. The summary should also track progress against issues found in previous years, not only those found that year, and should make clear that auditor reports are to be available within 12 months of certification.

We also ask that the *Requirements for Certification Bodies Auditing Forest Management Systems* be listed in the Bibliography and clearly linked in the body of the 4708 standard (in **7.4.3** or **7.4.4**), so that a reader of the Standard can find the audit and reporting regime.

Appendix B: Detailed review around concerns for the protection of forests

The following items expand on our review of the elements for the protection of forests and biodiversity.

Old-growth forest. The amendment tightens the definition and, in its new Note 4, equates old-growth forest with primary forest under PEFC ST 1003:2024. Yet it remains a value to be managed rather than an area excluded from harvest, so selective harvesting is still permitted, which is difficult to reconcile with that definition. We ask that harvesting not occur in old-growth forest and, at a minimum, that any such harvesting be recorded and disclosed on the certificate.

Significant biodiversity values, Clause 3.89. Seven categories move from the mandatory list to a discretionary one, including wetlands, karst systems, refugia and in situ genetic resources. Five are mandatory elements of PEFC Clause 3.7, which Clause 8.4.2 requires to be identified, protected, conserved or set aside. We ask that all eleven be restored to a single mandatory list.

Separately, Appendix A and Table A2 have not been reviewed against the expanded framework for Trees outside Forests at PEFC Appendix 2, the largest single gap between the draft and the benchmark.

Conflicting conversion clauses, Clauses 11.1.3 and 11.1.7. As drafted, these clauses permit, in justified circumstances, conversion that Clauses 11.1.4 and 11.1.6, and PEFC Clauses 8.1.4 and 8.1.6, prohibit absolutely. A certification body could reach opposite conclusions on the same operation. We ask that Clause 11.1.3 be made expressly subject to both, and that the 5 per cent conversion cap, dropped from

Clause 11.1.3 but kept in Clause 11.1.7, apply consistently. The words “*unless in justified circumstances where the conversion*” should be defined with explicit boundaries or, preferably, removed.

Forest degradation, Clause 11.1.6. The draft adopts the PEFC prohibition and its exemption note but omits Notes 1 and 2, which make plantations established by converting old-growth or naturally regenerating forest after 31 December 2010 ineligible for certification. We ask that both be inserted.

Ecologically important non-forest ecosystems. The draft has no counterpart to PEFC Clause 8.1.7, which requires that afforestation of these ecosystems not occur other than in justified circumstances. The amendment does not implement this benchmark requirement.

Separately, the previous Clause **11.1.4**, which permitted conversion of degraded native vegetation to plantation subject to eight preconditions, has been replaced by a prohibition on converting native forest to agricultural use, which we support. We do not ask for the old clause to be reinstated. Where the degraded vegetation is still forest, its conversion is now caught by the absolute prohibition at Clause 11.1.6, which is the stronger position.

Two deleted safeguards, however, have no home in the new structure: that a conversion may not rely on degradation caused by the forest manager's own practices, and may not take place where the area is recovering. Without them, vegetation degraded below the forest threshold could be converted under Clause 11.1.3, letting a manager benefit from degradation of their own making. We ask that both be added to that clause.

Private native forestry. Following the end of public native forest logging in several jurisdictions, harvesting has shifted to private land, where oversight is weaker and, in Victoria, falls to local councils through planning permits. We ask that where a defined forest area is private native forest, the forest manager apply the environmental protections that apply on public land in that jurisdiction or demonstrate equivalent protection.

Location information. Meetings with Responsible Wood and its licensees have shown the importance of geolocation data for setting harvesting boundaries and identifying breaches. The revision requires geolocation data under Clause 7.4.5(h) only on request, where PEFC Clause 4.3.3 requires a maintained inventory. AS4708 should align with PEFC. We understand a maintained inventory is also required under the EUDR, to which the amendment is timed and under which timber operators of every size face a December 2026 application date.

Detailed feedback

Please see Attachment C - Public Comment Submission Sheet – AS/NZS 4708:2021 Sustainable Forest Management – Requirements - Amendment 1-2026