



environment, forestry & fisheries

Department:
Environment, Forestry and Fisheries
REPUBLIC OF SOUTH AFRICA

A.4. Existing forest industry frameworks

A number of existing forest data resources and certification schemes have been suggested to be suitable for inclusion and/or adaption for reporting and accounting requirements under the C Tax Act:

- a) The Forestry Economics Services (on behalf of DEFF) collects all plantation and timber production data as legally required in terms of Regulation 19 made by the Minister of Agriculture, Forestry and Fisheries under the provisions of Section 6(1) and Section 6(3) of the National Forest Act, 1998 (Government Gazette No 32185, dated 29 April 2009). This data is submitted by all company and state owned plantations in electronic format on a form referred to as the “Green Mamba” form. This is the primary data source on forestry statistics, such as the Forestry South Africa Handbook. The project has considered the inclusion of data in the reporting format outlined in the Green Mamba forms. Forest products chain of custody standards (COC) and certification (PEFC and FSC) demonstrates that registered company produces source timber from controlled, well managed forest resources. The forestry industry suggests that COC or certification should be used as a proxy for sustainable timber production, preservation of forest C stocks and that these mechanisms could be incorporated in an accounting framework. However, this approach has drawbacks:
 - Since COC or certification uses sustainability indicators to assess adherence to the schemes, this is often misinterpreted that timber is sustainably produced, while at best it could be described as responsible management with no causative link with carbon sequestration as an ecosystem service. For example, FSC criteria², under the S.A. standard, does not assess harvest relative to volume increment, a core sustainability indicator linked to forest C budgets (Grassi et al, 2018). Moreover, C sequestration is not listed as one of the ecosystem criteria under the FSC standard.
 - The assumption that certified plantations would not be a net emission for any reporting period does not hold. In fact, nearly 60% of the worlds certified forests and plantations are in Europe. Some member state GHG inventories report that net emissions or a decline in forest C stocks since 1990 (UNFCCC³). The same can be seen in the emission/removal trends for the South African, which shows that annual forest stock changes are a net emission and that C stocks have generally declined despite participation on COC and certification schemes.
 - Not all timber suppliers to the processing facilities are certified⁴. In South Africa approximately 76% of the plantations areas are owned or managed by large companies, 95% of which are certified. Another 20 % of the plantation area is owned by commercial farmers or family companies (typically between 100 and 5,000 ha). Only 30% of these areas are covered by one of the four certification schemes and nearly no small growers are covered by a scheme. This means that even if certification was used as a proxy to ensure harvested 3rd party and non-registered forest areas

² <https://fsc.org/en/document-centre/documents/resource/319>

³ <https://unfccc.int/process-and-meetings/transparency-and-reporting/reporting-and-review-under-the-convention/greenhouse-gas-inventories-annex-i-parties/national-inventory-submissions-2019>

⁴ Source SA Forestry Online http://saforestryonline.co.za/articles/environment/how_effective_is_forest_certification/