

Choosing a Forest Certification System: Why Is *One* So Much Better Than the Others?

INTRODUCTION

There are numerous organizations around the world that have created standards for how forests should be managed, that have set rules for verifying and certifying whether forests have met such standards, and that have established guidelines for what product labels, advertisements and other marketing claims can say about forest products produced from such forests. Efforts that combine these elements in various ways are known as “forest certification” systems, programs, or schemes. For many people, it is a challenge to tell the difference between them, and to determine which ones are credible and trustworthy – and effective – and which are not.

The pioneer of independent, third-party forest certification is the Forest Stewardship Council (FSC), an international non-profit, non-governmental organization established in 1993. The FSC took a comprehensive and balanced approach from the outset, convening environmental, social and economic stakeholders, setting global standards, and establishing rules for independent certification, for the accreditation of certifiers (also known as auditors or certification bodies), and for the labeling of forest products.

Since the FSC’s founding, other forest certification schemes have emerged around the world, most of them from forest industry or owner associations. However, none is equivalent to the FSC, and most differ markedly in numerous, critically important ways. In North America, the other programs are the Sustainable Forestry Initiative (SFI), the Canadian Standards Association (CSA), and the American Tree Farm System (ATFS). Internationally, the Programme for the Endorsement of Forest Certification schemes (PEFC) has formally recognized SFI, CSA and ATFS, among others.¹

Truly effective forest certification is arguably the most complex and challenging endeavor to ever emerge in the field of forest management. Yet it has already proved itself to be an indispensable tool in improving such management. Although the FSC is far from perfect, it is still the most credible and effective forest certification program in existence. This paper is designed to explain why, and to clearly describe the primary differences between the FSC and other certification programs.

¹ The American Forest & Paper Association (AF&PA) created the Sustainable Forestry Initiative in 1994 as a code-of-conduct for AF&PA members - the US forest industry. A third-party verification and certification option was added in 1998, a product label in 2001, and in 2007 the SFI became a separately incorporated forest certification organization. In Canada, in response to a request from forest industry organizations, the independent Canadian Standards Association developed a national forest certification standard for Canada in 1996. Although CSA (a broad, business-related standard-setting organization founded in 1919) created a forest-related certification logo in 2002, the logo has yet to emerge in the marketplace. The non-profit American Tree Farm System was founded in 1941 to promote and recognize certain management practices on small, privately-owned forests in the US, and is now part of the American Forest Foundation (AFF - chartered in 1981). The ATFS certification standards were developed by the AFF and went into effect in 2004. However, ATFS has no product label. The Programme for the Endorsement of Forest Certification schemes is a non-governmental organization established in 1999 by an association of European forest owners as a system for endorsing other certification systems (e.g., SFI, CSA, and ATFS). It licensed its logo for use on forest products in 2000.

Whether you are a retailer, a builder, a government procurement officer, or a homeowner, if you need confidence that the forest products you buy are the best they can be for people and the environment, you need a forest certification system that delivers the following:

MEMBERSHIP DIVERSITY, NUMBERS, CREDIBILITY and CLOUT

- **The FSC has the largest, most diverse, most independent membership of any forest certification system in the world: over eight hundred organizations, companies and individuals from nearly ninety countries.** This means that the FSC is accountable to a broad range of constituencies and can call on a diverse pool of experts and on-the-ground practitioners to ensure that its decisions are well-considered and its programs are as effective as they can be. In turn, its membership can deliver unrivaled power and influence in the marketplace.

FSC's membership structure is completely different from other certification systems, and has been from the beginning. The FSC was founded by a range of different stakeholders through a process that was completely independent of the timber industry, whereas the Sustainable Forestry Initiative (SFI) and the Programme for the Endorsement of Forest Certification schemes (PEFC) were both created by forest industry and/or owner associations. Many, if not most, of the schemes endorsed by PEFC originated from similar associations. The FSC is fully accountable to its members – all of them – by vote. By contrast, the SFI has no mechanism for organizations or individuals to join and vote like the FSC does. In fact, Article II of the SFI by-laws states: “The Corporation shall not have members.” The members of the PEFC are primarily the twenty-five separate legal entities representing certification schemes endorsed by PEFC.

See FSC membership list as of 17 December 2008: http://www.fsc.org/fileadmin/web-data/public/document_center/institutional_documents/FSC_Membership_List_-_ENG.pdf?PHPSESSID=7c91297871b1adb1681d5b56e334abd7; and the SFI by-laws at: <http://www.sfiprogram.org/>.

- **The FSC has the support of the majority of the world's most active and influential environmental organizations: over one hundred forty are FSC members.** The hallmark of credibility for any certification program is the extent of its support among environmental organizations, who are the strongest advocates for sustainable forest management and who continually push the FSC to deliver on its promises. No other certification program has comparable support among a tougher group of critics.

See FSC membership list (link above).

- **The FSC has more support from indigenous peoples and local, rural community organizations than any other forest certification system.** One of the FSC's most significant features is its respect for the rights and needs of indigenous peoples and local communities. They are the ones who depend most directly on forests for their survival and livelihood, who can often benefit the most from good forest management, and who typically suffer the most when it goes wrong. FSC's membership and support among such groups indicates that the FSC addresses these concerns more effectively than any other certification program.

See FSC membership list (link above).

DEMOCRATIC GOVERNANCE

- **The FSC gives its membership the fairest, most balanced and democratic, and most substantive role in decision-making of any forest certification system.** The FSC is directly accountable to all of its members, each of whom has a voice and vote. Voting procedures are carefully balanced at every level, so no single interest can ever dominate or exert undue influence. This structure, combined with a multi-layered array of other checks-and-balances, gives the FSC the ability to make better decisions, to solve its problems more effectively, to continually improve, and to win broader support for its policies and programs.

FSC's entire membership votes as a General Assembly on policies, standards, and the election of the board of directors, and can play a direct and active role via numerous other participatory mechanisms, at both international and national levels. Combined with a range of other procedural policies and dispute-resolution tools, this structure gives the FSC a system of checks-and-balances unmatched by any other certification scheme. In the FSC, for votes on all matters, both the membership and board are divided into three, equally balanced and weighted chambers (Environmental, Social, Economic) and North-South (developed and developing country) sub-chambers, ensuring that no single interest can ever dominate or bias decision-making. Finally, in the FSC the chamber definitions are clear, include the full range of interests within each category, and apply not only to the board but to the entire membership. For example, the FSC Social Chamber is intended to encompass a broad range of interests dealing with communities, employment, health and safety, and human rights. As such, this FSC chamber represents and is comprised of indigenous peoples, development and local community groups, and woodworkers' and labor organizations, among others; whereas the same chamber of the SFI board includes academics and representatives of government agencies, who may not represent or support the interests of any of those groups. It is particularly important to note that, for the SFI, the board of directors is the sole decision-making body (because the organization has no actual 'members'), and board members are nominated and appointed by the board itself. This means that its decisions are more prone to bias and narrow thinking, and raises the question of whom the board is accountable to. For the PEFC (the international organization that has endorsed the SFI), decisions are made in a General Assembly where timber producers have 2/3 of the voting power, and such members are accorded voting strength based on how much timber they cut, reinforcing the dominance of industrial timber interests over all other interests.

See FSC statutes and by-laws: http://www.fsc.org/fileadmin/web-data/public/document_center/institutional_documents/1_3_FSC_Statutes_2005.pdf?PHPSESSID=7c91297871b1adb1681d5b56e334abd7 -- http://www.fsc.org/fileadmin/web-data/public/document_center/institutional_documents/1_1_FSC_By_Laws_2006.pdf?PHPSESSID=7c91297871b1adb1681d5b56e334abd7; SFI governance documents at link above, and PEFC governance documents at: <http://www.pefc.org/internet/html/>.

BROADER GLOBAL REACH AND EXPERIENCE

- **The FSC is active on the ground in far more places than any other certification system – with formal organizational initiatives in over fifty countries and certificates in more than ninety.** The forest products marketplace is global, and the world's tropical, temperate and boreal forests all face unique challenges. The FSC's presence and experience across this spectrum is unequalled by any other certification program.

FSC forest management certificates have been awarded in over 80 countries, and “chain-of-custody” certificates (which track labeled products from their forest-of-origin) have been granted in 92 countries. The PEFC’s twenty-six endorsed certification schemes combined have granted forest management certificates in only 19 countries. The Canadian Standards Association (CSA) exists only in Canada, and ATFS only in the US. SFI is active primarily in the US and some in Canada.

See FSC general website: <http://www.fsc.org/>; facts & figures page: www.fsc.org/facts-figures.html; and list of FSC certificates as of December 2008: http://www.fsc.org/fileadmin/web-data/public/document_center/powerpoints_graphs/facts_figures/08-12-31_Global_FSC_certificates_-_type_and_distribution_-_FINAL.pdf; and PEFC statistics at link above.

- **In tropical forests, the FSC has a breadth of experience, proficiency, and extent of certified forest area that dwarfs all other systems combined.** The forests and people of the tropics, the most culturally and biologically diverse region on Earth, arguably face the world’s most daunting forest management challenges. The FSC is far ahead of any other forest certification program in addressing these challenges head-on.

FSC forest management certificates have been awarded in over thirty tropical countries, and official National Initiatives have been established in over twenty. PEFC-endorsed forest management certificates only exist in a single tropical country.

See FSC list of certificates and PEFC statistics (links above).

- **As the originator of comprehensive, full-service forest certification, the FSC has been in operation longer than, and has the most extensive experience of, any system.** With an endeavor as challenging as forest certification, experience counts. From its position at the vanguard, the FSC has been up and running, on all fronts, longer than any other certification program - to learn, adapt, solve problems, and get it right.

FSC was formally established as a comprehensive forest certification program, with an international membership, in 1993. The FSC’s international forest management standards (the Principles & Criteria – P&C) were approved in 1994. Significantly, these standards included a chain-of-custody requirement – considered a central and indispensable element of credible forest certification - from the very beginning. The FSC accredited its first four certifiers/auditors, approved its first forest management certificates, and licensed the use of its logo in 1996. SFI was established in the US as a program of the American Forest and Paper Association in 1994, but did not become a certification program with a product label until 2001, and was not an independent organization until 2007. The CSA published its forest management standard in 1996, and the first forest was certified to that standard in 1999, but its forest certification logo has not yet emerged in the marketplace. The PEFC was established in 1999 as a system for endorsing other certification systems (including SFI, CSA, and ATFS), and licensed its logo for use on forest products in 2000. Finally, it is important to note that, for many years, all of the FSC’s competitors criticized and opposed the idea of chain-of-custody tracking, which they claimed was too intrusive, too expensive, and unworkable, and refused to incorporate it into their own programs. Eventually, many of them have developed their own versions of product tracking in the face of the FSC’s continued success, and most of those only after the FSC’s chain-of-custody system had been in operation for a decade.

STRICTER, MORE PRESCRIPTIVE FOREST MANAGEMENT STANDARDS

- **The FSC has the toughest, most performance-based standards of any certification system, with stricter and more explicit thresholds for compliance throughout.** Unless the text of a certification standard requires specific actions and results, it is highly unlikely to ever achieve concrete results in the forest. Also, while many certification systems may require forest managers to have a lot of plans and procedures in place, they may not require actual *performance* or execution of those plans in a way that produces specific, verifiable results in the forest. The FSC's standards are the best in the business - on paper, and on the ground.

By examining the texts of their standards side-by-side, the differences between certification systems become readily apparent. The FSC's primary standards (P&C) were carefully written to establish performance requirements for forest managers that are as unambiguous as possible. Thus the language is explicitly designed to produce tangible results, requiring that specific actions be carried out or prohibited, or that specific conditions "shall be... maintained... [or] established". Finally, in seventeen countries FSC members and stakeholders have developed a total of thirty, more detailed field certification standards for timber and non-timber forest products. These standards contain more specific requirements (Indicators) tailored to the unique ecological attributes of the forests in the area – a level of precision and rigor completely absent from the SFI and ATFS.

By contrast, the requirements of the SFI Standard contain an abundance of un-measurable or unverifiable terms, weak or vague verbs, and numerous qualifiers (e.g., "where practical") that permit a much greater degree of flexibility and discretion in their interpretation and implementation by forest managers and certifiers alike. Thus the results on the ground are likely to be highly variable and unpredictable. Most SFI Indicators measure only whether some form of "system... program... plan [or] documentation" is present, rather than whether a specific, verifiable condition or result is being achieved *in the forest*. And rather than require forest managers to actually *do* something specific, the SFI Standard often simply requires them to vaguely "address... support... promote... encourage... [or] contribute to" something. Clearly, if the language of the standard itself fails to explicitly require tangible and measurable results *in the forest*, then specific forest management outcomes can never be assured.

Similar examples can be found in the standard of the ATFS, which contains provisions requiring forest owners to make only "a reasonable effort", "where practical", to "consider and address opportunities", "consistent with [the] forest owner's objectives". Because both SFI and ATFS have been endorsed by the PEFC, the SFI considers wood fiber from ATFS-certified forests to meet all SFI labeling and chain-of-custody requirements, meaning that SFI labels can be placed on wood from ATFS-certified forests. Furthermore, the ATFS standard is so weak that it not only raises further doubts about the SFI, but it calls into question all of the schemes that have been endorsed by the PEFC, including CSA - because a PEFC endorsement implies equivalence.

See FSC P&C: http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/standards/FSC_STD_01_001_V4_0_EN_FSC_Principles_and_Criteria.pdf; SFI's 2005-2009 Standard at link above; and the ATFS Standard at: <http://65.109.144.60/>.

- **Unlike some certification systems, the FSC ensures that its forest management auditing standards cannot be modified by forest owners.** Surprisingly, some certification systems actually allow the forest manager to create or modify the standards that will be used to evaluate the manager’s own forest. This not only undermines the concept of independent, third-party certification, but the very purpose of standards as an objective benchmark for evaluating and comparing the performance of forest management operations.

The FSC standards can only be changed through a formal process involving the FSC membership. By contrast, the PEFC-endorsed SFI Standard can be changed *by the forest owner*. In the SFI 2005-2009 Standard, page 21, Section 5.1.2, the following language appears: “Program Participants [certified landowners], with consent of the certification body, may substitute or modify indicators to address local conditions...” According to the Definitions contained in the SFI Standard, Indicators are the tool “used to assess conformance” with Performance Measures. What this means is that even the primary assessment tool in the standard can be changed by a forest manager who may dislike the original. A variant of this loose and mutable approach can be found in the CSA system, where the operative forest management standard is effectively different for every certified forest. This is because each forest owner sets the “values, objectives, indicators and targets” for his/her forest through a process involving a group of interested parties unique to that forest.

Within a single system, the FSC is able to ensure not only greater consistency worldwide, but also specialized applicability within a given nation or region. For example, in contrast to the PEFC, which was created to ‘recognize’ a wide range of highly-variable standards crafted by completely unrelated entities in different countries, the FSC standards are based on a single, international set of core Principles and Criteria with which all forest management operations must comply. At the same time, in recognition of the significant ecological variety and socio-cultural diversity around the world, the FSC requires forest managers to comply with a more detailed set of indicators that is developed especially for the nation or region in question. The process for developing such indicators, for example in the United States and Canada, involves the FSC’s uniquely balanced membership as well as other interested stakeholders, and final approval requires a vote of both the national and international FSC boards.

See SFI Standard (link above) and CSA Standard: www.csa-international.org/product_areas/forest_products_marking/program_overview/.

- **The FSC has considerably stricter and more explicit requirements in its standards for the protection of biological diversity, endangered species, forests of high conservation value, indigenous peoples’ and workers’ rights, and local communities than any other system.** The natural forest resources most vulnerable to poor forest management are animal and plant species, especially those that are already endangered. The local people who live in and near the forests, and the workers who labor in them, are also especially vulnerable to the consequences of poor management decisions. Substantial sections of the FSC standards are devoted to ensuring the strongest protections of any forest certification program for these natural treasures and important human constituents.

Regarding biodiversity, the FSC Principles and Criteria are clear, comprehensive and detailed. Examples of requirements include: “Forest management shall conserve biological diversity and its associated values... Safeguards shall exist which protect rare, threatened and endangered species and their habitats... Conservation zones and protection areas shall be established... Ecological

functions and values shall be maintained intact, enhanced, or restored, including... [g]enetic, species, and ecosystem diversity... Representative samples of existing ecosystems within the landscape shall be protected in their natural state... [and] Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests.” The P&C also provide a detailed definition of “High Conservation Value Forests” and their numerous attributes that require special management attention. Finally, it is important to emphasize that maintaining healthy forest ecosystems requires concerted attention to detail, and to the entire complement of animal and plant life across a forest management unit. It can not be accomplished with generalized encouragements, or with narrowly-focused approaches to only those species labeled ‘endangered’ or ‘imperiled’. Through both its P&C and its national and regional standards and indicators, the FSC provides greater attention to the finer points of ecosystem management and biodiversity protection than any other forest certification program.

By contrast, the SFI Standard requires only that certified landowners vaguely “manage” wildlife habitats and “contribute to” or “promote” (rather than ‘protect’ or ‘maintain’) the conservation of biodiversity, and most of the associated indicators require only programs, plans, methodologies, or information collection rather than measurable results in the forest. Apart from requirements for “measures” and “plans” to protect riparian zones, water bodies, and undefined “special sites”, the SFI Standard does not actually require the establishment or set-aside of protected areas. Nor does it preclude management activities that put specified high conservation values or features at risk, or require the protection of such values or features throughout certified forest units. SFI also interprets the meaning of some of its standards quite loosely, with numerous opportunities for a landowner to adopt alternative approaches. For example, a key SFI Interpretations document contains the following qualification regarding the conservation of critically imperiled or imperiled species and communities: “In the rare case where the protection of an individual species or community carries exceptionally high costs or disproportionate impact and where the [certified landowner] is unable to implement any of the conservation strategies in a reasonable period of time (perhaps 3-5 years), and where laws or regulations do not apply, the [landowner] is free to implement other management or operational alternatives.” The ATFS Standard is not only vague but entirely up to the landowner to interpret or define: “Where practical, management plans consider and address opportunities to protect rare species and special habitat features... management activities must maintain or enhance habitat for owner’s designated fish, wildlife, and plant species... [and] for owner’s target game and non-game fish and wildlife species... Special sites are managed in a way that recognizes their unique characteristics... in a manner consistent with forest owner’s objectives.”

As for indigenous peoples, the FSC P&C contain numerous criteria protecting their rights, claims and properties, and requiring their prior informed consent for certain management activities. By contrast, SFI shifts much of the responsibility elsewhere: “The certification of sustainable forestry is primarily directed towards land stewardship practices. It is the role of governments to develop policies that recognize people’s rights including those of First Nations” (from SFI Interpretations).

Regarding workers and local communities, the FSC standard contains numerous requirements for forest managers to consult with them; to respect their rights and property and provide fair compensation for loss or damage; to protect their health, safety and livelihoods; to provide job opportunities and protect their right to organize under international labor conventions; to conduct social impact assessments; and to protect forest resources communities rely on. The SFI and ATFS standards’ primary requirements in this regard are compliance with the law, worker training and insurance.

See FSC P&C, the SFI Standard and Interpretations document, and the ATFS Standard (links above).

- **Unlike any other system, the FSC has explicit requirements in its standards prohibiting the use of a range of specified toxic chemicals, prohibiting the use of genetically modified organisms, and prohibiting almost all conversions of natural forests to either plantations or non-forest land use.** Some forest management practices are widely acknowledged to damage or threaten forest ecosystems more than others. The FSC not only acknowledges this, but explicitly prohibits such practices in its standards.

The FSC standards are very explicit in defining specific prohibitions against forest conversions, listing specific types and formulations of prohibited pesticides, and establishing a complete prohibition on the use of genetically modified organisms (GMOs). By contrast, SFI does not restrict the use of any specific, named chemicals or categories of chemicals, does not prohibit or limit forest conversions, and has no restrictions on the use of GMOs. Neither plantations nor conversions are defined in any explicit way in the SFI Standard, and in contrast to the FSC standards, there is no clear and measurable performance language in the SFI Standard requiring that existing ecosystem, species and genetic biodiversity be *maintained* throughout the forest management unit. Thus, nothing in the SFI Standard would preclude a certified landowner from completely replacing diverse and even rare native ecosystems, including old-growth forests, with simplified ecosystems like plantations that contain only a single tree species – and to continue to do so over an expanding landscape over time. Finally, there is a notable absence of language specifically *limiting* conversions. The ATFS Standard does not address conversions and GMOs, and does not restrict any named chemicals. The CSA Standard does not address chemical use and GMOs, and does not prohibit the conversion of natural forests to plantations.

See FSC P&C and SFI, CSA and ATFS Standards (links above), and FSC Pesticides Policy and list of prohibited pesticides (FSC-GUI-30-001 v2-0): http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/guidance_documents/FSC_GUI_30_001_V2_0_EN_FSC_Pesticides_Policy_Guidance_2007.pdf; and FSC Advice Notes on conversion: http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/advice_notes/FSC_ADV_30_602_EN_Conversion_of_plantation_to_non_forest_land_2004_03_29.pdf; http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/advice_notes/FSC_ADV_31_001_EN_Interpretation_of_C10_9_2002_12_03.pdf.

- **Unlike other systems, the FSC in its North American standards explicitly prescribes requirements for the protection of old-growth forests and for significant limitations on the size and purpose of clear-cuts.** In some regions, certain ecological features (such as old-growth forests) are particularly rare and threatened, and certain harvesting practices (such as clear-cutting) are considered particularly damaging. Thus, in its more detailed US and Canadian national standards, the FSC adds explicit requirements to protect such rare features and to place strict limits on such harvesting practices.

The FSC's requirements regarding clear-cuts and old-growth forest do not reside within the international Principles & Criteria, but within each regional or national standard (which are based on the P&C). Each such standard contains geographically-specific variation, guided by the

ecological requirements of the specific forest type under management, as to how it addresses these and other management issues. In the US, where eight, regionally-specific standards were developed, consistency across the regions was maintained through a set of National Indicators. [NOTE: The FSC-US is currently combining its regional standards into a single national standard that will feature additional indicators to address regional variation where necessary.]

An example of the FSC's approach to the protection of old-growth forest can be seen in the following requirements contained in the FSC-US Southeast Standard: *“Due to the scarcity of old-growth forests in the Southeast states, they are normally designated as High Conservation Value Forests [HCVF]... Conservation zones are established to protect and/or maintain all managed, HCV old-growth forests... In intact old-growth forests... the precautionary principle requires that no active management is conducted unless it is ecologically necessary to maintain or enhance HCVF values, which includes old-growth attributes... Certified old-growth forests not designated as High Conservation Value Forest are managed to maintain or recruit: (1) the existing abundance of old-growth trees, and (2) the landscape and stand-level structures of old-growth forests, consistent with the composition and structures produced by natural processes. Limited timber harvest is permissible, provided these characteristics are retained or enhanced.”* A Canadian example regarding old-growth forest can be found in the following indicators from the FSC National Boreal Standard: *“Management strategies maintain average landscape and/or regional distributions or amounts of the full age-range of old forests identified through [an analysis of pre-industrial conditions]...”* ; and: *“Large areas (thousands of hectares) of contiguous core forest habitat, representative of the habitat types of the landbase, exist and are maintained in the management unit... Large cores consist primarily of mature and old forest...”* It should be noted that the Boreal Standard also requires significant restoration of forest to pre-industrial conditions.

An example of how the FSC has addressed clear-cutting can be found in the following requirements in the US Rocky Mountain Standard regarding even-aged timber management (the most common goal of clear-cutting): *“Even-aged management... does not include clearcutting (the complete removal of trees from the harvest unit), as it does not emulate natural disturbances... [It] is used... only when it is ecologically appropriate to the forest type.”* In some FSC standards there are also explicit limitations on the size of individual clear-cuts, as illustrated by the following requirement from the FSC-US Pacific Coast Standard: *“... harvest blocks in even-aged stands average 40 acres or less. No individual block is larger than 60 acres”.* Significantly, across the US regional standards, the FSC requires that some proportion of live trees and native vegetation must be retained within each harvest area in order to maintain natural ecological processes, unless a different approach is required to restore the ecosystem. In Canada, an example of an ecologically-based approach to clear-cutting can be found in the following requirement of the FSC Maritimes Region Standard: *“If clear-cutting is used it is intended to restore natural forest types to natural configurations on the landscape rather than being intended to mimic catastrophic disturbances.”*

The SFI Standard's clearcut requirements state: *“Average size of clearcut harvest areas does not exceed 120 acres, except when necessary to respond to forest health emergencies or other natural catastrophes”.* With this formula, calculations of “average size” could easily permit extremely large and damaging clearcuts as long as the forest owner combines them with smaller cuts in order to maintain the average. The SFI Standard does not explicitly require certified landowners to protect old-growth forest, requiring only their *“Support of and participation in plans or programs for the conservation of old-growth forests in the region of ownership.”* In other words, they need only participate in unspecified plans or programs, and such participation need have no relation of any

kind to their own certified forest land – even if it contains old-growth forest. Neither the CSA nor the ATFS Standard mentions either old-growth forests or clear-cutting or related concepts.

See SFI, CSA and ATFS Standards (links above), and FSC Southeast Standard:

http://fscus.org/images/documents/2006_standards/se_10.0_NTC.pdf; Rocky Mountain Standard:

http://fscus.org/images/documents/standards/STND_RM_final_V2.PDF; and Pacific Coast

Standard: http://fscus.org/images/documents/2006_standards/pcwg_9.0_NTC.pdf; and the

Canadian Maritimes Standard: <http://www.fsccanada.org/Maritimes.htm>; and National Boreal

Standard: <http://www.fsccanada.org/NationalBoreal.htm>.

- **Unlike other certification systems, the FSC’s forest management standards explicitly embody precaution and risk-avoidance in order to minimize environmental impacts.** Forest management in the real world is not an exact science. There are many uncertainties regarding the long-term impacts of certain management decisions. The FSC not only understands this, but includes explicit requirements in its standards to evaluate, avoid and reduce the risks associated with these uncertainties and to build in safeguards and preventative measures.

Prominently included in the FSC Principles and Criteria are the following fundamental requirements: “Environmental impacts shall be assessed prior to commencement of site-disturbing operations.... Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach... The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable [high] conservation [value] attributes consistent with the precautionary approach.” As an example of the SFI’s alternative approach, a key SFI Interpretations document explains that the SFI Standard “does not require a ‘survey’ [to identify sites of special value] before management can take place... There is not an expectation that a [landowner] be required to conduct surveys to determine the presence or absence of such sites prior to conducting management activities...” In effect, the FSC chooses to look before it leaps, where the SFI does not.

See FSC P&C (link above), and SFI’s “Interpretations Questions & Answers for the 2005-2009 Sustainable Forestry Initiative Standard (SFIS), Update March 2008” at link above.

TANGIBLE RESULTS - and IMPROVEMENTS - ON THE GROUND

- **The FSC requires explicit, tangible, deadline-bound corrective actions in any audited forest management operation that falls short of meeting its standards, and thus can provide greater assurances of higher quality, and of measurable improvements to management, on the ground.** FSC-accredited certifiers/auditors require forest managers to fix problems and to improve their management practices in order for an FSC certificate to be awarded. The FSC requires that these improvements and fixes not only be specific, with deadlines attached, but that the certifier verify whether the corrections have been made and disclose the results in publicly-available reports. The result is that it is easier for consumers to trust that FSC certifications produce results.

A particularly telling comparison can be made by examining cases where a landowner has engaged both FSC- and SFI-accredited certifiers to conduct a “dual-certification” audit (to both sets of

standards), and by comparing both the FSC and SFI public summary reports for each such certification. In these cases the differences stand out: The FSC corrective action requirements are significantly more numerous and substantive (suggesting a higher level of rigor in the FSC standards) and call for concrete improvements by a date-certain. By contrast, the language in the publicly available SFI summary reports is typically more in the form of observations of non-conformity (i.e., non-compliance with the standard), in most cases with no explicit requirements for actual corrective action and no deadlines for improvement, and dealing more often with management plans and procedures rather than concrete actions and outcomes. FSC corrective actions routinely use words like “must... shall... [and] implement” to describe the actions the landowner is required to take, terms usually absent from SFI reports. For FSC corrective actions, it is the certifier who specifies the action that the landowner must take to fix the problem, whereas the SFI often permits landowners to produce their own plans for remedial action and to craft the response featured in the public report. Finally, the publicly available summary reports of SFI certifications are typically extremely brief and imprecise, and do not provide a satisfactory means of determining whether corrective actions are implemented, audited, or lead to improvements in management.

GREATER TRANSPARENCY AND STAKEHOLDER CONSULTATION

- **The FSC has explicit requirements for public disclosure and transparency regarding the content of forest management plans and the results of forest audits and monitoring.** Trust is an important component of effective forest certification, but so is verification. Therefore, the FSC requires that several key forest management and auditing documents be made publicly available. This enables everyone to see more clearly whether an FSC-certified forest has met the FSC standards.

One place where this difference is readily apparent is in the FSC and SFI standards. The FSC P&C require a publicly available summary of specific components of the forest management plan and of the results of monitoring specific management indicators. The SFI Standard contains no such requirements. Regarding certification audit reports, the FSC’s content requirements for public summaries are considerably more detailed than SFI’s, and not surprisingly the available SFI summaries vary widely in length, substance and detail, with most being only a few pages in length and containing information insufficient to determine with any confidence the adherence of the certified forest management operation to the SFI Standard. Significantly, while the FSC requires that public summary reports be written by the independent certifier/auditor, the SFI not only permits but requires that they be written by the forest owner/manager who is being audited. The FSC also requires that updates be published after each subsequent surveillance audit. Both systems require that the reports be published on a website, although some SFI reports are missing from the SFI website. (The FSC also requires an independent expert peer review of every full certification report at the confidential draft stage, a requirement that is absent from SFI policy documents.) The ATFS has no requirements for disclosure or transparency. In fact, the only way to find information about individual ATFS certifications is to be a mill owner, manufacturer or wood dealer and pay \$400-1,500 per year to gain access to the ATFS On-Line Certification Verification Service database “to confirm the certification status of ATFS certified properties.”

See the SFI and ATFS Standards (links above), and the FSC standard on public summaries: http://www.fsc.org/fileadmin/web-data/public/document_center/accreditation_documents/certification_bodies/FSC_STD_20_009_V2_1_EN_forest_certification_public_summaries.pdf; as well as the FSC’s “General Requirements for FSC Accredited Certification Bodies: Application of ISO/IEC Guide 65:1996 - FSC-STD-20-001 (Version 2-1): http://www.fsc.org/fileadmin/web-data/public/document_center/accreditation_documents/certification_bodies/FSC_STD_20_001_V2_1_EN_General_requirements_for_FSC_CBs.pdf; and the FSC standard for full certification reports (FSC-STD-20-008 V2-1): http://www.fsc.org/fileadmin/web-data/public/document_center/accreditation_documents/certification_bodies/FSC_STD_20_008_V2_1_EN_Forest_certification_reports.pdf.

- **For every certified forest, the FSC explicitly requires consultation by the landowner with stakeholders who may be affected by management operations, and additional consultation in all cases involving forests of high conservation value.** The FSC firmly believes that by requiring forest managers to ask both experts and concerned citizens what they think about proposed forest management decisions, unintended impacts will be reduced and management will improve.

FSC explicitly requires landowners to consult with stakeholders in its P&C, Criteria 4.4 and 9.2. The FSC has produced additional advice for Criterion 9.2 (FSC-ADV-30-901 Interpretation of Criterion 9-2), which states: “FSC Criterion 9-2 requires that the forest manager should consult with stakeholders on the identification of the High Conservation Values, and the management options thereof. During evaluation for certification the certification body should consult to confirm whether the manager’s consultation was adequate.” The FSC has also produced a detailed standard outlining the obligations of the certifier to conduct thorough consultation with stakeholders during the forest audit (FSC-STD-20-006 V2-1), as well as a guidance document that covers consultations with indigenous peoples (FSC-GUI-30-004). For SFI, the strongest language in the SFI Standard related to consultation concerns only the relationship between indigenous peoples and government-owned public lands, stating that the landowner “shall confer with affected indigenous peoples” (Performance Measure - PM 12.4); while PM 12.5 says that the landowner “shall establish... procedures to address concerns raised by... the public...”, but specifies nothing further. SFI requires no additional consultation specifically regarding forests of high conservation value. The ATFS has no requirements for consultation.

See FSC P&C and SFI and ATFS Standards (links above), as well as the FSC documents on high conservation value forests: http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/advice_notes/FSC_ADV_30_901_EN_Intpretation_of_Criterion_9_2_2003_04_28.pdf; on stakeholder consultation by certifiers: http://www.fsc.org/fileadmin/web-data/public/document_center/accreditation_documents/certification_bodies/FSC_STD_20_006_V2_1_EN_Stakeholder_consultation_for_forest_evaluation.pdf; and on consultation with indigenous peoples: http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/guidance_documents/FSC_GUI_30_004_EN_Guidance_on_FSC_P2_and_P3_2005.pdf.

- **Unlike other systems, the FSC requires the prior informed consent of indigenous peoples regarding management operations on their lands and territories or involving their traditional knowledge, and fully protects their lands and rights, whether legally established or customary.** Indigenous peoples have long had deep relationships with forests, and often depend on them for their survival. At the same time, such peoples have been the victims of severe discrimination, oppression and human rights violations the world over. No other certification program holds indigenous peoples, their lands and their rights in as high regard, or accords them the degree of respect, as the FSC does.

The FSC explicitly requires this in its P&C, primarily in Principles 2 and 3, and in particular Criteria 3.1 and 3.4. SFI has no such requirements. The FSC also has a separate, 35-page guidance document providing detailed operational interpretation of its requirements on these issues, FSC-GUI-30-004. In Canada, the FSC has gone a step further by establishing a fourth membership and voting chamber exclusively for indigenous, or aboriginal, peoples.

See FSC P&C and SFI Standard (links above), and the FSC guidance document:

http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/guidance_documents/FSC_GUI_30_004_EN_Guidance_on_FSC_P2_and_P3_2005.pdf

GREATER ASSURANCE OF FOREST PRODUCT SOURCE AND CONTENT

- **The FSC has the tightest controls over its certificates, labels, claims, product content and sourcing of any forest certification system.** This gives consumers a higher level of confidence not only in FSC-labeled products, but in the condition of the forest source of those products. What's more, the FSC also enables consumers to find out for themselves by connecting a specific label to a specific, certified forest-of-origin.

FSC pioneered the requirement that the entire chain-of-custody of a labelled product must be verifiably traceable back to its certified forest-of-origin. This is one of the cornerstones of credible forest certification. The FSC's Chain of Custody tracking and labelling policy assures buyers that only products that meet the FSC's forest management standards and product content requirements can carry an FSC label, and that this has been verified by an independent auditor/certifier. Furthermore, each FSC product label must contain the unique FSC Certification Code of the company that labelled the product, enabling consumers to verify the claim on any label and trace the product back through the entire supply chain (chain-of-custody) to the originally certified forest or reclamation site (in the case of recycled fiber content).

The FSC also originated the concept of "Controlled Wood", which provides an extra layer of protection to screen out certain controversial, un-certified wood/fiber materials from manufacturing operations that are FSC Chain-of-Custody-certified. This screen applies to manufacturing processes that combine materials from several different sources into a single product (called mixed-source products). In such cases, the FSC requires verification that any FSC-labelled product containing a portion of un-certified material does *not* contain material from any of the following objectionable or controversial sources: from harvesting that is illegal or in violation of traditional or civil rights; from the conversion of forest to plantation or non-forest use; from forests where genetically modified trees have been planted; or from forests where high conservation values are threatened.

The FSC has two separate Controlled Wood standards to address both forest management and manufacturing operations, and is involved in creating a global database of forest areas at high risk from such controversial activities (a “risk registry”). Although these are challenging policies to implement, the FSC believes strongly that they are essential to credible certification and continues to seek improvements to its Controlled Wood and chain-of-custody control procedures.

The SFI product labelling requirements have weaknesses and loopholes that in some cases make it impossible to connect an SFI-labelled product to a specific forest-of-origin. For example, SFI does not require their product labels to feature a certification code that would enable such a connection to be verified. Regarding manufacturing operations that produce mixed-source products, the SFI’s standards fall far short of the FSC approach to Controlled Wood. For processing or manufacturing operations that buy un-certified wood from US and Canadian sources and wish to be SFI-certified, there are no SFI requirements regarding how the forests-of-origin of the wood should be managed, and no prohibitions of objectionable management practices such as those enumerated in the FSC’s Controlled Wood standards. Operations that purchase wood from outside the US and Canada are required only to assess and vaguely “address” any risks that their purchase may be from “illegal logging” (which SFI narrowly defines as “timber theft”) or from “countries without effective laws” dealing with worker rights and safety and indigenous peoples’ rights. The SFI “Certified Fiber Sourcing” label makes no claims about certified content, meaning that some SFI-labelled forest products can come from uncertified forests where virtually no controls or management standards apply. Compliance with the law is the only fundamental requirement. Similarly, the only screen PEFC applies to manufacturing operations is against products from “illegal or unauthorized harvesting”, which makes products from many objectionable sources fully acceptable under the PEFC label.

Finally, according to SFI, the fact that both SFI and ATFS have been endorsed by the PEFC program “means fibre from ATFS-certified forests meets all SFI labeling requirements”. According to ATFS, this means that “wood harvested from American Tree Farm System certified lands processed into products is eligible to carry the PEFC and/or the SFI product labels [and] can be included under PEFC, Canadian Standards Association (CSA) and the Sustainable Forestry Initiative’s (SFI) Chain of Custody Systems.” Essentially this means that all four of these certification systems accept each other’s wood as meeting their own standards, and that no further verification of any kind is required.

See the FSC Chain of Custody standard (FSC-STD-40-004 V2), Controlled Wood standards (FSC-STD-30-010 V1 and FSC-STD-40-005 V2), and on-product labelling standard (FSC-STD-40-201): http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/standards/FSC_STD_40_004_V2_0_EN_Standard_for_CoC_Certification_2008_01.pdf; http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/standards/FSC_STD_30_010_V2_0_EN_Controlled_Wood_standard_for_FM_enterprises.pdf; http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/standards/FSC_STD_40_005_V2_1_EN_Company_Evaluation_of_Controlled_Wood.pdf; http://www.fsc.org/fileadmin/web-data/public/document_center/international_FSC_policies/standards/FSC_STD_40_201_V2_0_EN_FSC_on_product_labelling_requirements.pdf; and the global risk registry: <http://globalforestrisk.nepcon.net/?page=home>.

MORE INCLUSIVE - and EFFECTIVE - COLLABORATION AND PROBLEM-SOLVING

- **The FSC has an unparalleled track record of bringing together, in a common forum, representatives from significant, widely divergent, and formerly antagonistic constituencies for collaborative problem-solving and dispute-resolution. For this reason, the FSC is far more likely to effectively reduce conflict, reduce business risk, and bring peace to the marketplace than any other forest certification program.** Some have called the FSC's approach truly revolutionary. Because of its diverse membership, its democratic structure and policies, and its explicit requirements for consultation at multiple international and national levels, the FSC has, since its founding, broken down barriers, charted new ground, and bridged old divides that have long existed in forest policy arenas around the world. The FSC has brought people together who have never even sat at the same table, much less worked together before. This kind of collaboration has promise and power that other certification programs cannot match.

These skills are a highly valuable asset in regions where conflict, corruption and forest plunder and mismanagement are widespread and chronic – particularly in many developing countries.

HIGHER MARKETPLACE PROFILE AND PREFERENCE

The FSC has higher visibility in global and North American policy-making institutions, professional associations, and the forest products marketplace than any other forest certification system. The clearest evidence of this is that numerous prominent corporations and high-volume forest products buyers specify in their procurement policies that the FSC is either their only choice or their preferred highest standard when it comes to certified forest products. Combined with all of the FSC's other attributes, this makes the FSC the recognized leader, and an economic force to be reckoned with.

Examples include: http://www.ikea.com/ms/en_GB/about_ikea/PDF/Miljgb.pdf;
http://www.lowes.com/lowes/lkn?action=pg&p=PressReleases/wood_policy.html;
http://www.rona.ca/content/forest-products-procurement-policy_annual-reports-other-documents_investor-relations; <http://www.domtar.com/en/sustainability/environmental/2275.asp>;
http://www.hp.com/hpinfo/globalcitizenship/environment/envprogram/paperpolicy.html?jumpid=reg_R1002_USEN; http://corporate.homedepot.com/wps/portal/Wood_Purchasing;
<http://www.staples.com/sbd/content/about/soul/environmentallypreferableproducts.html>;
<http://www.thebodyshop.com/en/ww/services/pdfs/AboutUs/Environmentalprinciples.pdf>;
http://www.telecomitalia.com/cgi-bin/tiportale/TIPortale/ep/contentView.do?channelId=-8681&LANG=EN&contentId=33104&programId=9599&programPage=%2Fep%2FTImedia%2FTISearch_advanced.jsp&tabId=6&pageTypeId=-8663&contentType=EDITORIAL;
<http://www.kingfisher.com/index.asp?pageid=47>;
<http://www2.canada.com/montrealgazette/news/business/story.html?id=88337131-364e-4f6b-a9fb-95f3bf8ff76a&k=74204>.

The Forest Stewardship Council is the only forest certification program in the world that does all these things. As such, the FSC is not only the leader but the only credible system available.