

FOREST STEWARDSHIP COUNCIL (FSC) HANDBOOK for State Forests
By
Sierra Club Forest Certification and Green Building Team
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Introduction

The Forest Stewardship Council (FSC) is an international organization established to promote environmentally appropriate, socially beneficial, and economically viable management of the world's forests. FSC was founded in 1993 by a consortium of environmental groups, forward-thinking timber companies, and social interest groups concerned about the destruction of the world's forests. FSC's goal was and is to promote environmentally and socially responsible forest management practices globally.

This handbook covers FSC activities in the United States (<https://us.fsc.org/>) and is designed to provide basic information on how citizens can be involved in supporting good forestry and protect forest areas with high conservation value. We focus on FSC certification of state owned forests, although most of our comments apply to FSC in private forestry as well.

FSC Governance and Comparison to Other Systems

FSC is a membership based organization. Members can be individuals, businesses, or groups. Members are organized into three groups (or chambers). Each group has equal voting power. The environmental chamber is concerned with protecting forest ecosystems; the economic chamber is concerned with making a profit from the sale of forest products; and the social chamber is concerned with human and worker rights. Members elect a Board of Directors who run the operation.

The Sierra Club was a founding member and is an active voting member in the environmental chamber. Various countries have their own administrative organizations who are responsible for implementing FSC's principles within their own country. In the United States, this group is FSC US.

In 1994, alarmed by the formation of FSC, which gave environmentalists and social advocates a say in how forests should be managed, major North American timber companies, under the umbrella of their trade association, the American Forest and Paper Association (AF&PA), formed their own forestry rating system, called the Sustainable Forestry Initiative (SFI). SFI basically protects the timber industry status quo, routinely certifying as "sustainable" loggers who do little more than meet regulatory requirements in the jurisdiction where they operate. Its basic purpose was and is to defend the practice of industrial forestry – large-scale clearcutting and chemically-intensive tree-farming – which underpins the profits of giant forest products companies.

These practices are a highly “efficient” way to produce merchantable timber and pulpwood, but they tend to erode forest ecological health, biological diversity, soil and water quality, and the well-being of local communities.

People often ask about the differences between wood certified by the Forest Stewardship Council (FSC) and wood certified under the Sustainable Forestry Initiative (SFI). The line between the two, for many consumers, is fuzzy, but there are stark differences. Some of the biggest differences:

- FSC **prohibits** the use of genetically-modified organisms; SFI **allows** their use
- FSC **prohibits** the use of persistent and/or bio-accumulative pesticides; SFI **recommends "prudent" use** of pesticides
- FSC **prohibits** the conversion of natural forest to plantations; SFI **allows** that conversion and the certification of wood from those forests
- FSC's standards were developed by a **broad range of stakeholders**, including environmental and human rights activists and forest products representatives; SFI was developed **primarily by the forest products industries**
- FSC's audit results are made **public** and can be appealed; SFI's transparency and its appeals process is severely limited.
- The Sierra Club's official position, according to conservation director, Bruce Hamilton, is that while FSC is not perfect, it's the most credible source of sustainable wood and paper products.

FSC Standards for Forest Management

To achieve its mission and vision, FSC has developed a set of 10 principles and 57 Criteria that apply to FSC-certified forests around the world. By applying these standards through a third party, FSC operates as a seal of good forestry that consumers, businesses and governments can look to. The Sierra Club views FSC as the best available forest certification program.

The FSC system covers the many steps from tree to wood product to consumer. It can appear to be a complicated process with lots of terms and acronyms, but it is not necessary to understand the entire system to make a difference in protecting a forest near you.

Forests managers who want their forests certified through FSC must prepare a management plan that complies with a series of FSC requirements. The manager then must carry out that plan and be subject to periodic reviews (called audits) to ensure that requirements are continually met. FSC certifies privately owned and some publicly owned forests in the US. State and locally owned forest managers may apply for FSC certification but FSC does not certify National Forests. This handbook focuses on FSC certification in state owned forests. In FSC parlance, forests that apply for certification are called “**Forest Management Units**” with the acronym **FMU**.

Throughout the process of initial certification and later for audits for ongoing compliance, there are opportunities for citizen input.

FSC Forest Management Standards

FSC Forest Management Standards are guided by 10 principles. Those principles are summarized as:

1. Compliance with laws and FSC principles.
2. Tenure Use Rights and responsibilities
2. Indigenous people's rights
2. Community relations and worker rights
2. Benefits from the forest
2. Environmental impacts
2. Management plan
2. Monitoring and assessment
2. Maintenance of high conservation values
2. Plantation management

As you can see FSC management covers all elements of managing forest lands, including worker standards and indigenous rights. All of these principles are important, but for most Sierrans reviewing management of state forests, principles 6-9 will be most relevant.

In order to participate in the certification process the primary document you will need as reference is called "**FSC US Forest Management Standard**" go to :

<https://us.fsc.org/forest-management-certification.225.htm>. Then click on the document called "FSC US Forest Management standard v1.0 ". This is a 109 page document in Adobe format. Don't worry you will not need to read all of it! But it is the main reference for this handbook. We will also refer to optional side documents on specific topics also found on the same web page which provide additional details for further guidance.

Each **Principle** is described in more detail and clarified by several **Criteria** and **Indicators** which guide forest management. For example: Principle 6 covers environmental impacts. Criterion 6.2 covers protection of endangered and threatened species and their habitat. Indicator 6.2a requires a relevant survey to identify the presence of T&E species. This pattern is repeated throughout the document for each Principle.

There are also some separate guidance documents on specific topics, which we will reference in this handbook as they relate to given items.

The document also includes a glossary, a map of US ecological regions and some important **Regional Indicators**. The FSC US standard recognizes eight regions: Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, Northeast, Pacific Coast, Rocky Mountain, Southeast and Southwest regions. The standard includes regional specific Indicators in Appendixes C and D. These appendixes cover regional issues, opening sizes and streamside management. It is important to look at these sections also when they apply to your state forest.

There is also another separate guidance document for Pacific Coast region, see <https://us.fsc.org/forest-management-certification.225.htm> near bottom of right side of the page for a Standard Interpretation Pacific Coast guidance Indicator 6.3.

FSC certification and logging

If this is a first time FSC certification is being considered in your state forest and the state forest has not previously engaged in commercial logging, or if it is planning to significantly increase its logging program along with certification, then citizens need to be involved first in that basic decision. **FSC certification is not a process through which state policy decisions are made. Certification is only applied after the decision to manage with logging is made.**

FSC certification does not require logging and occasionally the process is used by managers who do no commercial logging. But certification can be time consuming and costly, so that most FSC certification is used by privately owned forests whose managers who engage in commercial logging. Managers of state owned may want to do the same.

FSC certification will help ensure that logging activities avoid or minimize environmental impacts. This includes retention of representative habitats and special protections for highly valued conservation areas. Certification will require meaningful limits on harvest volume as needed to maintain standards and long range viability.

But within these requirements there is variability for logging volume. What volume to try to achieve is largely up to the forest manager to decide, within the constraints of the FSC system. To impact your state's timber volume goals, citizens may benefit by engaging state forest agencies outside the certification process as well.

FSC Principle 5, is entitled "benefits from the forest". Obviously that includes timber, but it also covers products such as mushrooms, seeds, etc. Principle 5 encourages opportunities for local communities to benefit from forest products. Environmental attributes and recreation opportunities are also benefits.

Clearcutting is a controversial and often destructive logging practice when used in the context of industrial logging. Clearcutting is part of even age silviculture practice that can be useful when carefully applied in appropriate forest types. FSC permits clearcutting, but places restraints on its use. Regional indicators may limit acreage size of clearcuts. FSC environmental requirements will limit the magnitude, placement and frequency of any even age management activities. As you read through the FSC Principles and Criteria you will see many "tools" to use to move logging techniques away from excessive even age toward uneven age management. And to help limit logging volume overall.

Steps for optimal participation and commenting

Step 1. First, **know what federal and state laws**, regulations and common practices already apply to your state forests. FSC certification itself should not change anything about your state forest charter, its standards for public participation, its commitment to recreation, wildlife and other public benefits. What certification will do is enable the state to sell wood from its forests under the FSC label.

FSC principle 1 requires compliance with law and FSC principles. This means that forests approved for FSC certification must also comply with laws applicable to management (federal laws, state laws etc.) and FSC principles. Thus if your state forest is applying for FSC certification look to see if the state management is currently in compliance with existing laws such as the Endangered Species Act. The certification process is another opportunity to push issues of compliance with all applicable laws.

See <https://us.fsc.org/forest-management-certification.225.htm>, right side of the page, for a document guide to U.S. laws and policies relevant to forest management. If there is a significant issue of non-compliance that can be a barrier to certification.

Step 2. Get **involved in the process** and on the record. Ask your state forestry department if there will be public hearings, open houses, field trips and /or comment periods for public input into the certification process. Public outreach is required by FSC, and of course your state may have rules requiring it also. Ask for a copy of the proposed or draft management plan, but depending on how far along the department is this may not be available. Get on list to be notified every step of the process.

Certification is determined through a “**certifying body**” often just called **CBs**. A CB is a company with professionals qualified to evaluate a forest management plan against the ten FSC principles and determine which are met and which are not. The CB will advise the forest manager what needs improvement and will make the final decision as to whether the forest management plan “passes” FSC certification requirements.

In the U.S. two common certifying bodies are **Smartwood** (<http://www.rainforest-alliance.org/forestry/certification>) and **Scientific Certification Systems, SCS** (<http://www.scsglobalservices.com/fsc-certified-responsible-forestry>)

During the certification process members of the public may deal directly with employees of the CB or with state employees. Sometimes, especially if it is your state’s first experience with the certification process, there may be some confusion about who does what. You may need to be a bit persistent in getting questions answered. But public participation (aka stakeholder involvement) is required so your input is most likely to be welcomed.

Principle 4 concerns **community relations and worker’s rights**. Indicator 4.4d covers the special efforts required for public involvement when public forests are certified. Indicator 4.5b includes requirements for notification and involvement of local communities. These are good references to know in case your state forest is not forthcoming.

Principle 4 also involves requirements for fair and safe labor practices. This may be a chance to build alliances with workers involved in logging, reforestation etc. It can be an opportunity for requiring training on safe and environmentally appropriate logging, for example.

Step 3: evaluate the **management plan**. Some basic questions to ask are: Why did the state decide to seek FSC certification? Does the state expect to increase commercial logging volume as a result of certification? Or is the state planning commercial logging for the first time as part of certification? Has the state made, or does it expect to make any changes to protected areas, wild areas or other set asides as part of the certification process? Some level of protected areas are required in FSC (called high conservation value areas) but you want to make sure that you do not lose any existing protections under the excuse of a certification process.

One big advantage of FSC certification is that it requires a written management plan with short and long range plans -with mapped areas, identified habitats and special areas etc. If your state forest has had only haphazard planning and documents available to the public, then certification should provide more tools to understand your state forest and impact management. Principle 7 covers management plan requirements and reads as below.

FSC Principle 7 *“Management Plan: a management plan - appropriate to the scale and intensity of the operations- shall be written , implemented , and kept up to date. The long term objectives of management, and the means of achieving them, shall be clearly stated.”*

If your state is applying for FSC certification for the first time it will be developing a management plan. If your state is undergoing a FSC audit of an existing certified management plan, then it will be under review for continued compliance with FSC principles.

FSC management plans require many items that will be of importance to Sierrans such as: a rationale for rate of annual harvest and species selection, environmental safeguards, maps describing forest resources, protected areas, planned management activities and more. See Criterion C7.1 for more on what must be in a management plan.

Step 4: Look closely at **Principle 6 Environmental Impacts**. This principle includes the “nuts and bolts” of on the ground good conservation practices. Principle 6 reads: *Environmental Impact: Forest Management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and by so doing, maintain the ecological functions and the integrity of the forest.*

Principle six includes ten Criteria which lay out specific steps that need to be completed.

Criterion 6.1 requires assessments of environmental impacts prior to active management. It includes the need for evaluation of relevant and timely surveys of environmental resources before any active management.

Criterion 6.2 requires safeguards to protect species at risk and their habitats.

Criterion 6.3 requires protection, restoration and maintenance of ecological functions.

Criterion 6.4 requires identification of ecosystems which would naturally occur on the landscape and assesses their current representation in the landscape. **Representative Sample Areas (RSA)** are required to ensure that landscape diversity exists. RSAs are mapped or planned for and eventually established.

Criterion 6.5 requires written guidelines that are implemented to control erosion, minimize forest damage and protect water sources during logging, road construction and all other mechanical disturbances.

Criterion 6.6 requires management systems that promote non chemical, environmentally friendly pest management. Limitations are placed on the types of chemical pesticides that may be used. For more information see; <https://us.fsc.org/forest-management-certification.225.htm>, right side of the page, for document with details on FSC Pesticide policy.

Criterion 6.7 requires proper off- site disposal of any chemical, nonorganic wastes.

Criterion 6.8 sets limits standards for use of chemical and biological control agents. Prohibits use of GMOs.

Criterion 6.9 use of exotic species should be limited and shall be controlled and monitored to avoid ecological impacts.

Criterion 6.10 sets strict limits on forest conversions to plantations or non-forest uses. You can see that within these ten criteria there are many requirements that can help you influence good forestry in your state lands. Depending on the time you have, focus on the areas you think are most critical for the environmental health of your state forests. Also consider what areas past state management practices have been most problematic. Certification process gives you a chance to raise those issues and demand better.

Step 5: help your agency map and protect **High Conservation Value Areas (HCVAs)**. HCVAs are the term used in FSC to refer to areas of that have high conservation value which need to be mapped and protected. It is embodied in Principle 9 which reads:

Principle 9: Maintenance of high conservation value forests. Management activities in high conservation value forests shall always be considered in the context of a precautionary approach.

HCVA need not be limited to forests, grasslands, meadows, wetlands, glades etc., may be a HCVA or part of a HCVA. HCVAs are not necessarily off limits to logging. But any disturbance activity needs to be carefully considered and demonstrated as fully protecting conservation values. HCVA may overlap with some Representative Sample Areas (see step 4, criterion 6.4)

HCVA should include, but not be limited to, any existing recognized areas such as Wilderness, natural areas, sensitive areas or any other conservation designation. HCVA and RSA should not replace any of these existing protections. Any standards existing protected areas enjoy, such as no logging, no road building etc., should remain under certification. If your state managers try to make changes reducing existing protections, that is not something required or even encouraged by FSC certification.

Any such attempted changes should not be “hidden” within a certification application. Samples of HCVA attributes are areas of high biodiversity, endemism, endangered species, rare habitats, old growth etc. In addition areas that have special conservation value to local communities for recreation, study, cultural or traditional heritages, may be considered for HCVA status.

For more information see: <https://us.fsc.org/forest-management-certification.225.htm>, right side of page, for more details on characteristics of HCVAs.

Step 6: through **monitoring and assessment** plan ahead for success and continued public involvement.

Principle 8 reads: *“Monitoring shall be conducted- appropriate to the scale and intensity of forest management - to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts. “*

State forest managers need to have a plan and schedule in place to monitor and assess impacts of their activities. Examples of impacts could be, logging roads, skid trails, streamside protections, invasive species status, integrity of set asides and buffers, etc.

The monitoring plan should also include impacts of logging on trees species diversity and regeneration. The success of native forest biodiversity should of course be a major focus of concern. Ask for specifics on plans, schedules and places for monitoring. Of course events, such as weather impacts and disease, may change plans and priorities for monitoring.

Many state forests are weak on ongoing monitoring. That may be in part based on budget and staff, or just a lack of conservation priorities. But if your state forest agency wants to achieve FSC certification, it must include monitoring. So this is a good time to ask for the reviews and eventually controls that may have been lacking in past years. Help shape monitoring toward your priorities.

You may also tie forest monitoring to other issues such as recreation. Consider questions that concern you. Have logging roads contributed to illegal ATV use? How will increased logging impact deer browsing? Will logging impact other forest resources, such as mushrooming? Would this be a good time to ask for greater monitoring for sensitive species?

Step 7: are there **plantations** hidden in your state forest? Principle 10 applies to plantations, but since there are few true plantations on state forests it is unlikely you will need to refer to it. However, you may need to be on the lookout for plantation like characteristics in forest management. See the definition of plantation in glossary of the FSC US forest management document. Generally, a plantation is a forest stripped of important native biodiversity and ecological functions. It is managed to perpetuate that circumstance, often on short rotations of one dominant species.

If your state agency manages forest units to perpetuate one early successional, shorter lived species at greater relative numbers than would be characteristic of native forests in that location, you could raise the point that the forest is being pushed toward plantation like dimensions. While it is unlikely to be determined a true plantation it is a line to be considered and may help argue for a bar closer to more diverse and native forests.

Step 8: the resulting **decision on certification or an audit.** If your state forest is applying for FSC certification for the first time the CB will make a decision as to whether or not to grant FSC certification. If certification is approved, the certification will last until the next scheduled audit usually within 5 years. The result will include a complete written management plan available for the public to review.

The CB may include what are called **Critical Action Requests (CARs)** as part of the certificate. These are items which the CB has determined need improvement but do not provide cause to reject the entire plan. CARs include instructions and a timetable for correction. For example, the CAR may state that intermittent streams are not well mapped in a section of the forest. It could require better mapping within a specific timeframe and a limit on any disturbance activities until mapping is complete. You can then follow up to make sure the CAR is completed.

If your state forest has already been certified and is undergoing a scheduled audit the resulting decision will be either a continuation of certification or its suspension. In the audit process any CARs will be reviewed and new ones may be established. Ideally though there will be no CARs.

An audit review is also an opportunity to reopen any issues not covered well in the initial plan. It is a chance to bring up new issues based on new information, changing circumstance, new public concerns or uses of the forest.

If you are not pleased with the results of the final management plan or audit, there are several steps you can take. First register your complaints to your state forest agency and to the CB involved. Ask for a full explanation of the issues involved.

FSC's dispute resolution process can be found at :<https://ic.fsc.org/dispute-resolution.139.htm> Much can be accomplished through this avenue

Remember that while working with the CB and forest manager you may also have avenues of input and complaint through your normal state government process, such as state conservation commission, sunshine laws, etc. And if the issue is critical enough, public media is an option.

Beyond dispute resolution, FSC has a formal appeals process which is workable but detailed and some costs are involved. If you consider that method, contact the club's forest certification team and club's legal office.

At the end of certification you should have a written state forest management plan. That plan will cover relevant environmental issues involving forests and non-forest ecosystems. It should be available to the public. The plan may also include CARs, which indicate points in need of improvement. The plan should include schedules for ongoing monitoring and assessments. It will include a projected time for audit. If during the time before that audit, you have concerns about the implementation of the plan in relation to any FSC requirement, you can raise an issue through the dispute resolution process referenced above.

Misc. FSC terminology and concepts.

The FSC world can seem daunting and complex at times. That is because, taken as a whole, it is! But as this handbook has tried to outline, working with certification of a local forest need to be overwhelming.

The following is some additional information about FSC terms and concepts which rarely apply to state owned forests, but knowing about them may help as you read about FSC. The phrase "**appropriate to scale and intensity**" is frequently used in FSC parlance. FSC certifies large and small properties, including small holdings in the developing world where low impact technologies may be used. To respond to the wide variety of land types, sizes and ownerships, FSC has developed this concept to permit CBs to evaluate impacts of scale.

The "scale and intensity" concept could also apply to larger land holdings which may be certified under a management plan involving minimal land disturbance activities. For example, this could be a forest area owned by an educational institution that is managed with limited logging and used primarily for education and aesthetic purposes.

The "scale and intensity" issue is related to another concept of "**small, low intensity forest management**" and "**family forests**". Lands that meet these definitions may be assessed with guidelines tailored to small operations. Several small holdings in the

same area may join and apply for “**group certification**”, which is a certification process that helps defer costs.

Another option is “**partial certification**”. FSC expects a forest owner to certify his or her whole ownership. This is to avoid certifying a land owner who may manage some acres through destructive methods, while enjoying FSC certification on other acres. However, recognizing that some large land holdings with a history of varied past owners and practices may place current owners at a disadvantage in moving the whole ownership toward FSC certification. FSC may permit partial certification in such cases. The understanding in such cases is that the owner is committed to and is taking steps toward eventual certification for the whole ownership.

Chain of custody for wood and **controlled wood** are also two concepts frequently found in FSC documents. Chain of custody is, as in common use, a reliable process of keeping track of wood origins. Briefly, controlled wood is a standard used for non-certified wood processed, and sometimes mixed with, certified wood in common facilities. Neither of these concepts are likely to be significant in state forest certification.

For further information on a FSC related issue contact the Sierra Club’s Forest Certification and Green Building team through Caroline Pufalt, cpufalt@sbcglobal.net