



A Summary of FSC and SFI’s Approach to Responsible Forestry

There is a perception in the marketplace that FSC is the “gold standard” for responsible forestry and no other forest certification program in the world measures up to their “high” standards. This summary provides some context to analyze such claims and draw independent conclusions.

Forest Stewardship Council Standard(s)	Sustainable Forestry Initiative Standard
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Use of Interim Standards

FSC allows the use of unapproved “interim” standards.¹ There are 28 FSC-approved standards in 20 countries, and yet 79 countries report FSC-certified areas on the FSC database. This means there are more than 50 countries claiming FSC certifications where there are no fully endorsed FSC standards. Statistics on the FSC International website show that at least 86 million acres/35 million hectares of FSC-certified lands worldwide – 25% of total FSC-certified lands – are certified to draft or interim standards.² Fiber from these lands is used in products bearing the FSC label.³ Current estimates are that one-quarter of All FSC’s “certified” fiber comes from unendorsed standards.

FSC policy in *Structure, Content and Local Adaptation of Generic Forest Stewardship Standards* (FSC-STD-20-002 (V3-0) EN) 2009: ⁴ “In areas in which there is not yet an FSC-accredited Forest Stewardship Standard certification bodies may therefore carry out certification according to their own ‘generic’ standards, adapted to account for the local conditions in the country or region in which they are to be used with input from local stakeholders.”

The SFI Standard is used to certify about 197 million acres/80 million hectares across Canada and the United States. The SFI Standard setting process, certification and accreditation of certification bodies requirements are consistent with guidelines published by the ISO, a worldwide federation of national standards bodies. All certification bodies must be accredited by a North American member of the International Accreditation Forum, i.e. ANSI-ASQ National Accreditation Board (ANAB), American National Standards Institute (ANSI) or the Standards Council of Canada (SCC).

The SFI program does not allow the use of interim standards. The SFI Standard is endorsed by the Program for the Endorsement of Forest Certification (PEFC)⁵ which has standards developments and certification requirements based on ISO and IAF rules and guidelines.

The SFI Standard is revised every five years in an open transparent process. The SFI 2010-2014 Standard was the outcome of an 18-month public review process with two public comments periods (60 and 30 days), and was approved by the independent SFI Board of Directors.⁶ The SFI External Review Panel, an independent panel of experts, ensures that the development and revision of the SFI Standard embodies an open, fair and inclusive process that addresses the ideas forwarded through comments submitted. The SFI 2010-2014 Standard development process was launched in June 2008. SFI Inc. publicized the process at every step and during both public comment periods, SFI invited about 2,000 individuals and organizations to submit comments. The second comment period was supplemented by seven regional workshops.

Clearcutting

FSC Standards allow responsible clearcutting. Many FSC Standards do not specify a limit on clearcut size including FSC Canada’s National Boreal Standard, which represents nearly 25% of FSC-certified lands globally and over 50% of FSC-certified lands in Canada and the US, Russia (20% of FSC’s certified lands), Sweden and Brazil. The Southeastern US standard recommends a nonbinding 80-acre limit on clearcuts, but auditors routinely approve much larger openings - most recently a 100 acre average, little different from SFI’s 120-acre average.⁷

SFI Standards allow responsible clearcutting. Forestry experts the world over consider clearcutting an appropriate harvesting method. In fact, all forest certification standards allow the use of clearcutting where appropriate and when all other requirements (e.g. wildlife habitat, site productivity, biodiversity, size restrictions, green-up, buffer zones) are met. The SFI Standard has seven auditable indicators that place specific requirements on the use of clearcutting, including visual quality management, size, shape and placement, documentation and record keeping and green-up.

Chemical Use

FSC Standards allow chemical use. FSC audits⁸ indicate that not only are pesticides being used but in some cases their use does not meet the requirements of the FSC regional standard. For example, FSC audits show the following FSC-certified forests in the United States have derogations (exemptions) for the use of pesticides that are found on their “banned” list. Some of them, such as hexazinone, are commonly used in forestry in the United States and are approved for such use by the United States Environmental Protection Agency.

The SFI Standard allows the use of forest chemicals that have been approved by federal, state and local governments. The SFI Standard has six auditable requirements related to minimizing chemical use, including the use of least-toxic and narrowest spectrum pesticides necessary to achieve management objectives and use of integrated pest management wherever feasible. The standard also requires that pesticides be used in accordance with label requirements with the supervision of state/provincial-trained or certified applicators and that practices are appropriate for the situation, for example: notification of adjoining landowners or nearby residents concerning applications and chemicals used, designation of streamside and other needed buffer strips, monitoring of water quality or safeguards to ensure proper equipment use and protection of streams, lakes and other water bodies; and use of methods to ensure protection of threatened and endangered species.⁹

Plantations

FSC certifies plantations. Nearly 7% of all FSC's certified forests are plantation forests.

FSC International's website says plantations account for more than eight million hectares or about seven percent of the total area certified to FSC globally, primarily in Brazil, South Africa and the United Kingdom.¹⁰ They often involve non-native (exotic) species primarily Sitka spruce in the United Kingdom, lodgepole pine in Sweden, eucalyptus and radiata pine in Brazil, New Zealand, South Africa, Chile and others. Some FSC-certified plantations also use chemicals and clearcutting for final harvest.¹¹

FSC US notes that traditional plantation forestry in the United States does not have to meet FSC's "Principle 10 Plantation" requirements: "Conventional types of tree plantations—the vast majority of planting projects in the United States—are treated the same as natural forests under the FSC-US Standard."¹²

Conversion of Forests

FSC Standards allow for conversions of forests. Some FSC standards (FSC Canada's National Standard, FSC Regional Certification Standards for British Columbia, FSC Russian Standard) clearly allow for conversion of up to five percent of a certified area to plantations in Canada.¹⁵ Rates of up to two percent every five years are allowed in the U.S.¹⁶ for conversion to plantations or non-forest uses. Other FSC Standards (Brazil, Sweden) do not specify a maximum noting only "a very limited portion" of the forest management unit can be converted.

FSC treats conversion of forestland to non-forest uses in North America just like SFI: participants must exclude lands slated for development from certified areas.

Independent Third Party Certification

FSC has multiple, varied standards and allows certification of forests to draft standards or interim standards created by certification bodies. FSC certificates can be awarded despite an organization being found to have numerous outstanding 'minor' non-compliances related to issues such as First Nations consent, chemical use, areas of special ecological value and rates of harvest; sometimes giving companies years to meet the requirements.

FSC chose to create their own accreditation body to accredit FSC auditors: Accreditation Services International (ASI).¹⁹ FSC, in fact, touts this close linkage between standards setting and accreditation as being a strength: "FSC is the only global forest management certification system with an integrated accreditation program that systematically controls its certification bodies."²⁰

Forest Resources of the United States 2007, published by the U.S. Department of Agriculture says about eight percent of U.S. forests are planted forests and plantations, and nearly all planted stands are established with native species.¹³

All provisions of the SFI 2010-2014 Standard apply to plantations and managed natural forests alike: "The SFI 2010-2014 Standard applies to management of forests throughout North America where management intensities range from managed natural forests and plantation forestry, regardless of the forest products derived from management of such forests. Short rotation woody crop operations and other high-intensity forestry operations while they may serve a role in the production of bioenergy feedstocks, are beyond the scope of the SFI 2010-2014 Standard."¹⁴

Under SFI, forestland that is being converted to non-forest uses would not meet any of the SFI Standard requirements (prompt reforestation, biodiversity, etc.) and could not be certified. In addition, wood from forests being converted to non-forest uses cannot be counted as certified content in any of the SFI program labels.

In 2010, SFI issued an interpretation regarding conversion of forest types,¹⁷ clarifying that: "Conversions are not allowed except in justified circumstances where the program participant can document that ecological impacts are not significant if managing for a different species mix after a final harvest."¹⁸ SFI issued this interpretation to avoid confusion in the marketplace or amongst landowners who utilize our standards. SFI is transparent about the requirements regarding conversions.

In order to obtain a SFI certificate, an organization must meet the applicable requirements. While a small number of isolated minor non-conformances may be tolerated (with corrective actions identified), if the organization receives a single major non-conformance or many minor non-conformances, they do not get SFI certified, and no certificate is awarded.

SFI requires certification bodies to be accredited to conduct SFI certifications by independent accreditation bodies such as ANSI,²¹ ANAB²² and SCC.²³ These accreditation bodies must follow audit procedures and certification as required by the International Accreditation Forum (IAF).²⁴ Separation of the standard setting body (SFI) from certification and accreditation bodies helps prevent conflict of interest.

¹ Rotherham, Tony. 2011. Forest management certification around the world – Progress and problems. The Forestry Chronicle, Vol. 87, No. 5. 9p. <http://pubs.cif-ffc.org/doi/abs/10.5558/ffc2011-067> (pg. 610)

² FSC Certified Area: <http://www.fsc.org/facts-figures.html> and [FSC Approved Forest Stewardship Standards: http://www.fsc.org/standards](http://www.fsc.org/standards)

³ The area certified to draft or interim standards is likely low because it was calculated by subtracting the area certified in countries with an approved standard from the FSC total. In some cases, there are interim or draft standards in countries with an approved standard, e.g. Canada where the FSC Great Lakes-St. Lawrence Standard is still draft.

⁴ FSC policy document Structure, Content and Local Adaptation of Generic Forest Stewardship Standards (FSC-STD-20-002 (V3-0) EN) 2009 www.fsc.org/fileadmin/web-data/public/document_center/accreditation_documents/certification_bodies/FSC-STD-20-002_V3-0_EN_Structure_Content_Local_Adaptation_Generic_FSS.pdf (page 3)

⁵ www.pefc.org

⁶ <http://www.sfi-program.org/standard-development-process.php>

⁷ <http://fsc.force.com/servlet/servlet.FileDownload?file=00P4000000G6x6VFAR> (pg. 27)

⁸ SmartWood audit for Lake States Unit www.rainforest-alliance.org/forestry/documents/potatchforestholdingspubsum08.pdf & For the Red River Forests Partnership certification audit see info.fsc.org/servlet/servlet.FileDownload?retURL=%2Fapex%2FPublicCertificateDetails%3Fid%3Da0240000005bV0jAAE&file=00P40000005bV0jMEAU

⁹ SFI 2010-2014 Standard www.sfi-program.org/files/pdf/Section2_sfi_requirements_2010-2014.pdf (pg. 6)

¹⁰ FSC International website <http://www.fsc.org/plantations.html>

¹¹ FSC International website <http://www.fsc.org/plantations.html>

¹² FSC-US Questions and Answers for Family Forest Owners: Forest Plantations. March 2011. http://fsc.us/images/documents/standards/family%20forest%20program/FSC_Plantations_Q_A.pdf (pg. 1)

¹³ Forests Resources of the United States 2007 http://www.fs.fed.us/nrs/pubs/gtr/gtr_wo78.pdf (pg. 67)

¹⁴ SFI 2010-2014 Standard Section 1 Intro http://www.sfi-program.org/files/pdf/Section1_sfi_requirements_2010-2014.pdf (pg. 2)

¹⁵ FSC National Boreal Standard (Canada) 2004: www.fscscanada.org/docs/boreal%20standard.pdf?LanguageID=EN-US (pg. 91); FSC Regional Certification Standards for British Columbia (Main Standards) 2005: www.fscscanada.org/docs/bc%20standard.pdf?LanguageID=EN-US (pg. 42)

¹⁶ FSC-US Forest Management Standard (v1.0) 2010: fsc.us/images/documents/standards/FSC-US%20Forest%20Management%20Standard%20v1.0.pdf (pg. 48)

¹⁷ SFI Interpretations http://www.sfi-program.org/files/pdf/Interpretations_2010-2014_Requirements.pdf

¹⁸ SFI Interpretations 2.2 http://www.sfi-program.org/files/pdf/Interpretations_2010-2014_Requirements.pdf (pg. 5)

¹⁹ <http://www.accreditation-services.com/>

²⁰ <http://www.fsc.org/accreditation.html>

²¹ American National Standards Institute <https://www.ansica.org/wwwversion2/outside/PROgeneral.asp?menuID=1>

²² ANSI-ASQ National Accreditation Board <http://www.anab.org/accreditation/forestry.asp>

²³ Standards Council of Canada <http://www.scc.ca/en/accreditation/management-systems/environmental>

²⁴ www.iaf.nu