

The FSC US Certification Standards -- Still Superior to SFI

January, 2022

When it comes to core environmental, social, and supply chain objectives, the independent Forest Stewardship Council (FSC) certification system remains superior to the Sustainable Forestry Initiative (SFI), the forest products industry's competing certification system in North America.¹ This is despite the FSC's imperfections – and updates to the SFI Standards that go into effect in January, 2022.

The following notes highlight the FSC's relative strength in the United States on topics important to the climate and biodiversity crises, and to identifying forest products associated with genuinely well-managed forests.² The FSC also remains superior in areas such as governance, auditing, and accountability.³

Forest Management Certification

Forest certification is typically associated with assessments of forest management practices in specific forests. In the United States, this is covered by the FSC US Forest Management (FM) Standard, along with supplemental national and international policies.⁴ The following notes are based on the bottom-line requirements of the FSC US FM Standard and other applicable policies. This Standard is in the process of being updated, and in some cases, likely changes are noted.

Climate Change and Climate Smart Forestry:

While they could do more, the FSC Standard's requirements relevant to climate change and climate smart forestry go much further than the SFI and most regulations applicable to industry forests.

Unlike the SFI, the FSC Standard requires protection of most old growth and some late successional forests, and encourages protection of other primary forests, all of which are typically among the more significant high carbon forests remaining in the United States. The Standard also begins to encourage restoration of old growth forests. Pending improvements to the Standard may also further recognize high carbon forests as High Conservation Values (HCVs) that must be maintained and enhanced.

The FSC Standard also clearly requires that logging maintain net timber stocking levels over time, unlike the SFI. Inasmuch as timber volumes are partial proxies for forest carbon, this should help maintain forest carbon levels, relative to baseline conditions when each forest is first certified.⁵ In some cases, the Standard also encourages the use of longer timber harvest rotations, which can help improve carbon stocking, timber productivity, and habitats, and minimize watershed impacts.

¹ The SFI is also the PEFC endorsed certification system for North America.

² The notes highlight the FSC's strengths relative to the SFI, and do not cover all FSC requirements or shortcomings.

³ See for example: *Peeling Back the Eco-Labels*, Stand, January, 2015; *Destruction Certified*, Greenpeace International, 2021; *Do Private Regulations Ratchet Up?*, Judge-Lord, McDermott, & Cashore, *Organization & Environment*, vol 33(1), 2020.

⁴ *FSC US Forest Management Standard*. FSC-STD-USA-1.1. Forest Stewardship Council US. February, 2018.

⁵ In some cases, significant soil carbon losses may still result due to logging.

Incremental gains in carbon storage and sequestration may also result from other elements of the FSC Standard, depending on the region and state, and their baseline forestry practices. For example, in the Pacific Coast region, the Standard explicitly requires more retention of live and dead trees in clearcuts than do many state forestry rules and the SFI, and also requires buffers along streams and other water bodies that are wider and apply to more stream segments than the buffers required by some states' Best Management Practices (BMPs) and the SFI.⁶

Relative to the SFI and business-as-usual industrial forestry, the FSC Standard often requires management for more natural forest diversity, composition, and structure. Such attributes can help maintain and restore forests' natural resilience to climate change and other disturbances.

Biodiversity, Endangered Species, and Rare Ecosystems:

The FSC Standard's requirements for biodiversity and imperiled species and ecosystems are more comprehensive, protective, and outcome-oriented than those of the SFI and most regulations for industrial forests.

The FSC Standard covers rare, threatened and endangered (RTE) species more inclusively as: those listed by federal and state agencies as threatened, endangered, or sensitive; those listed as critically imperiled, imperiled, or vulnerable, including all G1-G3 and S1-S2 species; and S3 species that are candidates for federal or state listing.⁷ Assessments for RTE species are required at site, management unit, and landscape scales, and if leading databases or experts suggest the likely presence of RTE species, then surveys are required or the sites must be managed as if the species are present. If any National Forests are certified, then site surveys for RTE species are mandatory prior to logging and other site-disturbing activities.

Unlike the SFI, the FSC Standard clearly requires management "to maintain, restore or enhance the extent, quality and viability of the species and their habitats" whenever RTE species are present or assumed to be present. Similar measures are required for rare ecological communities. For medium and large public forests, management plans and operations must also meet species recovery goals.

The FSC Standard also requires maintaining or restoring habitats for "well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape... to the extent feasible within the size of the ownership," and encourages consideration of species of concern rather than generalist species.

Old Growth, Intact Forest Landscapes, and Primary Forests:

While there is room for improvement, the FSC Standard has relatively strong requirements for protecting old growth and primary forests, and the ongoing Standard revision process should also result in strong protections for Intact Forest Landscapes (IFLs).⁸ This is in stark contrast to the SFI.

⁶ See for example: *Tradeoffs in Timber, Carbon, and Cash Flow under Alternative Management Systems for Douglas-Fir in the Pacific Northwest*. Diaz, D. et al., July 2018. www.mdpi.com/journal/forests.

⁷ Species listed as G1/S1, G2/S2, or G3/S3 are considered critically imperiled, imperiled, or vulnerable at the global or subnational scales, respectively.

⁸ Primary forests are forests established naturally, and which have never been significantly altered by industrial society. They include primeval old growth, as well as younger stands.

The FSC Standard clearly requires protection of old growth stands that have never been logged if they are larger than 3 acres. Any old growth remnants in other stands must also be maintained when the stands are larger than 20 acres.⁹ Forest managers are also encouraged to consider other individual old growth trees for optional protection as legacy trees. Equally important, the FSC Standard requires late successional stands to be maintained when they are under-represented relative to natural conditions, which is often the case in the United States.

The FSC Standard also recognizes the importance of primary forests, regardless of whether they are old growth, and encourages their maintenance as “High Conservation Values” (HCV). Intact Forest Landscapes (IFLs) are a relatively new concept, and IFLs are expected to be protected in the revised FSC US FM Standard. In the meantime, the FSC’s international policies require protection of a minimum of 80% of each IFL that might remain in certified forests.¹⁰

Indigenous Rights and Free, Prior, Informed Consent:

“Free, Prior and Informed Consent” (FPIC) is the international norm for activities affecting Indigenous Peoples’ traditional rights and resources. The FSC Standard already covers some elements of FPIC, and the ongoing Standard revision is expected to more fully incorporate FPIC. The FSC’s international policies also prohibit any certified company from violating Indigenous Peoples’ traditional and human rights, and can provide recourse for any affected Indigenous Peoples.¹¹

The FSC Standard’s recognition of Native Americans is also more comprehensive and inclusive than the SFI’s approach. The FSC Standard recognizes “Indigenous Peoples” as including “...recognized members of American Indian tribes, Native American, Nations, Bands, Rancherias, and Tribal Corporations, recognized by those particular tribes... [and] may include groups that have not been officially recognized by the Federal government....”

The FSC Standard also requires consultation with Native American representatives to identify sites of “current or traditional cultural, archeological, ecological, economic or religious significance...,” which include but are not limited to hunting and fishing areas, plants used for food, medicine, or cultural use, archaeological and cultural sites, etc. Unlike the SFI, consultation is required for the identification and protection of such sites regardless of whether the Native Americans have recognized legal rights to the sites, and regardless of whether the forest is publicly or privately owned.

Forest Conversion:

The FSC Standard clearly prohibits conversion of natural forests to plantations and non-forest land uses, except where the conversion involves a “very limited portion” of a management unit, does not involve High Conservation Values (HCVs), and enables “substantial, additional, secure, long term conservation benefits across the... management unit.”¹² The FSC Standard also restricts plantation conversion by

⁹ Qualified exceptions for are allowed on Native American lands, including where old growth remains more prevalent, there is a history of tribal stewardship, and old growth structure is maintained.

¹⁰ *FSC Directive on FSC Forest Management Evaluations*. FSC-DIR-20-007. Forest Stewardship Council. August, 2021. This FSC policy also prohibits reducing IFLs below the threshold size of 50,000 ha.

¹¹ *Policy for the Association of Organizations with FSC*. FSC-POL-01-004 V2-0. Forest Stewardship Council. September, 2011.

¹² “Very limited portion” is defined as less than 2% of a management unit, over rolling five-year periods.

calling for local species to be used in tree planting (except when non-local sources better address disease or climate change) and for native species to “normally” be used in all cases. In contrast, the SFI does not prohibit land use conversion whatsoever, and its restrictions on plantation conversion are only likely to be triggered in limited circumstances.

Unlike the SFI, the FSC Standard also restricts conversion resulting from forest degradation, not just cover type changes. While it is open to interpretation, the Standard outlines some practices that degrade natural forests to plantation conditions without changing the primary tree species, such as very short rotations, systematic reliance on chemicals, and reduction of naturally multi-species forests to single-species.

The FSC Standard also begins to require the restoration of forest ecosystems affected by existing plantations – unlike the SFI. In management units containing plantations, the FSC Standard requires 10 to 25% of the units be maintained or restored to natural or semi-natural cover, depending on the units’ size, while in public forests, all plantations must be restored to natural forest conditions.

The FSC also has partial safeguards against companies avoiding its conversion restrictions by excluding converted areas from their certificates. Here an FSC international policy provides recourse where companies cause “significant” conversion of forests to plantations or non-forest uses anywhere.¹³

Fire Risk and Resilience:

Like the SFI, the FSC Standard begins to recognize and encourage the use of prescribed burning to help reduce fuels and restore some forests’ natural resilience to fire.

However, the FSC Standard goes beyond the SFI in several important ways, despite not having been written to address recent heightened concerns with wildfire. For example, the FSC Standard encourages fuels management practices to be based partly natural fire regimes, especially in fire-adapted forest types. The FSC Standard also protects most remaining old growth stands, and should also be interpreted as protecting some late successional forests – forests that tend to be more naturally fire resilient. Other elements of the FSC Standard require and encourage management for relatively natural forest conditions to varying degrees. Inasmuch as this results in somewhat older, more mature forests or incrementally smaller canopy openings, it may help also reduce forests’ vulnerability to fire.

Worker Training and Rights:

Like the SFI, the FSC Standard requires training for loggers and other workers and employees.

Unlike the SFI, the FSC Standard clearly protects all workers – including employees of contractors and subcontractors -- against discrimination and other concerns, including where applicable laws do not provide sufficient protection. The FSC Standard also requires high quality job opportunities, that employee compensation meet or exceed prevailing local industry norms, and that all forest workers receive fair wages. The FSC Standard also more clearly addresses workers’ rights to organize and negotiate per the International Labor Organization (ILO) Conventions, and revisions to the Standard are likely to further address the ILO Conventions.

¹³ The FSC *Policy for Association* defines “significant conversion” as conversion of more than 10% or 10,000 ha of all forests under the company’s control, within five year periods, or any conversion of HCVs, regardless of the scale or timing.

Product Sourcing and Market Claims

As with other certification systems, the FSC's most widely used on-product label (FSC "Mix") allows inputs from forests not certified to the FSC US FM Standard or other FSC National Standards. However, unlike the SFI's Certified Sourcing Label, whose use does not require any minimum content from SFI certified forests, use of the FSC Mix label is limited to: a) the volume of products that is proportionate to the volume of FSC certified and/or recycled inputs used in their manufacture; or b) to products whose inputs are at least 70% from FSC certified forests or recycled. And unlike the SFI, the FSC also does not count wood or fiber from forests certified to other, weaker standards as certified inputs.

While there is room for improvement, the FSC's safeguards for non-certified virgin wood and fiber in "Mix" label products are also more robust than the SFI's comparable safeguards. Here the FSC's international Controlled Wood (CW) Standard requires procedures to reduce the risk of non-certified inputs coming from five categories of unacceptable sources: illegal forest management; violations of traditional and human rights; management that harms high conservation values; forests being converted to plantations or non-forest use; and forests in which genetically modified trees are planted.

The SFI allows companies to conduct their own risk assessments for non-certified inputs, and to specify their own mitigation measures where risk is found. This creates a conflict of interest, since companies have an interest in claiming zero risk of using unacceptable sources. By contrast, companies using non-certified virgin wood and fiber for FSC Mix label products must refer to FSC National Risk Assessments, and implement those Assessments' control measures where risk is identified. The FSC Controlled Wood National Risk Assessment for the United States identified risk in some specific locations for two of the five categories – high conservation values and conversion – and outlined options for control measures, including supplier education and working collaboratively to address risk factors.