

FSC Family Forests Alliance Observations Report



Pilot Testing for FSC Group Forest Management Policies and Field Testing for FSC-US Family Forests Standard

April 8-10, 2009: Madison, Wisconsin

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Photo Caption, Front Cover (Photo Courtesy of the FSC Family Forests Alliance): Pictured left to Right: Gary Dodge (FSC-US), Dave Bubser (SmartWood), Mike Ederer (Oakwood Forestry Consulting), Pina Gervassi (FSC-IC), Paul Kloppenburg (WI-DNR), Rick Livingston (WI DNR), Kate Albert Read (FFA, TCNF), Bill Carlson (WI DNR), Aaron Young (WI DNR, Paul Pingrey (WI DNR) and Kathy Nelson (WI DNR) (not pictured: Gordon Mouw, NewPage Corp.)

Executive Summary

The Family Forest specific standard is the result of 2 years of work by the Family Forest Working Group and several other technical groups providing FSC-US with information about the challenges for groups in terms of meeting indicators, needing to modify indicators or needing more specific guidance in relation to some indicators. The Family Forest Standard is the result of larger revisions to the FSC-US National Standard process where specific standards for family forests were simultaneously developed and overlaid during the revision process to demonstrate alignment with the policies of the larger National Standard.

From April 8-10, 2009 the FSC-IC, FSC-US and Wisconsin Department of Natural Resources (WI DNR) cooperated to pilot test draft policies related to group forest management (FSC-STD-30-005 and FSC-STD-20-007) and to orchestrate a field test review of the Wisconsin Managed Forest Law Certified Group against the proposed FSC-US Family Forests Standard.

The Family Forests Standard field test took place on the Wisconsin Managed Forest Law (MFL) certified group lands in Sauk County, WI and was organized by WI DNR staff. The main objective was to evaluate how applicable, reasonable and auditable the proposed indicators are through a simulated field audit and intensive critical discussion.

The objectives of the pilot test of Group Forest Management policies were:

- To discuss and provide feedback to FSC-IC on Group Certification standards, via a roundtable conference call review of the standard itself and response to an FSC-IC questionnaire aimed at securing detailed feedback and evaluation of proposed new requirements (See Appendix for Guiding Questions for the field testing)
- To have more general discussion around the issues to be considered in group certification in the U.S. (e.g., identifying particular indicators/criteria to consider evaluating at the group vs. individual scale, assessing landscape-scale impacts, etc.)

After field-testing, further revisions will be made to the Family Forests standard, and these revisions will be followed by two 60-day public comment periods. After the first comment period and another round of revisions, a board approved 'final' draft will be released for the final 60-day public comment period. Barring significant outstanding feedback, the draft will then proceed for approval by the FSC-IC board, and once approved, will carry a one-year implementation period for certified groups. This report records FFA observations of the field-testing process and is organized based on the three-day agenda for the field test.

Introduction and Background

From April 8-10, 2009 the FSC-IC, FSC-US and Wisconsin Department of Natural Resources (WI DNR) cooperated to pilot test draft policies related to group forest management (FSC-STD-30-005 and FSC-STD-20-007) and to orchestrate a field test review of the Wisconsin Managed Forest Law (MFL) Certified Group against the proposed FSC-US Family Forests Standard.

This three-day schedule of activities was organized as part of the consultation phase of standard development and designed to secure input on changes to FSC Forest Management group standards and the Family Forest standard before drafts are released for various stages of public comment. The FSC board approval processes and one-year implementation periods will follow the public comment period. This report records FFA observations of the field-testing process and is organized based on the three-day agenda for the field test.

I. April 8th, 2009 – Roundtable Conference Call and Desk Audit

Roundtable Conference Call

Introduction: Since most family forests are involved in certification as members of groups, this call focused on how FSC-IC group certification policy impacts family forest certification and the development of specific indicators for family forests within the FSC standard.

Agenda:

Discussion of the FSC-IC Group Certification Standards

- FSC-STD-30-005 – Group Entity Guidelines
- FSC-STD-20-007 – Evaluation Standard for Certifying Bodies

Discussion of the Family Forest Standards

1. FSC-IC Group Certification Standards

Background

FSC has had a group forest management certification standard since 1998. This standard applies to certifying bodies, group entities and individual group members. This roundtable discussion addressed two relevant group certification standard documents:

- FSC-STD-30-005 FSC Standard for Group Forest Managers
 - This is the set of guidelines that a group entity needs to comply with

- FSC-STD-20-007 FOREST MANAGEMENT EVALUATION
 - This is guidance for Certification Bodies when evaluating groups

a. FSC-STD-30-005 – Group Entity Guidelines

In November 2008, there was a two-month stakeholder feedback session on the group entity guidelines. FSC has a second technical draft based on that feedback, which will be released as a final draft for a 60-day public comment period at the end of April 2009. If no outstanding feedback is obtained by the end of the 60-day public comment period, minor non-controversial feedback will be integrated into the standard draft for approval by FSC-IC by the end of June 2009. If outstanding feedback is received, a third draft will be circulated. More information is available from Pina Gervassi at FSC-IC (p.gervassi@fsc.org).

Summary of Significant Changes to the Group Entity Guidelines

- Limitations on size of group members have been removed – there are no limitations on size or group composition.
- No cross-border or multinational groups that would require compliance with more than one regional standard will be recognized. Under limited circumstances this policy can be negotiated on a case-by-case basis.
- More clear guidance is provided for group monitoring.
- A typology of groups was added to the standard. The justification is that different classifications of groups have different responsibilities in terms of implementing the Principles & Criteria (P&C), intensity of monitoring, etc.
 - The group typology established in the most recent drafts of the Group Forest Management policies consists of:
 - Type 1 – “Classic” group, where the group manager has a purely administrative function;
 - Type 2 – Groups with mixed responsibilities – Group manager has an administrative role in addition to some shared responsibilities for planning, harvesting, and monitoring; and
 - Type 3 - “Resource manager”, the group entity/group manager has full responsibility for administration, forest management and harvesting activities on behalf of the group members.
- More specific guidance about record-keeping requirements, especially mapping, was added.

- A landscape approach for implementing FSC criteria was approved. The landscape level approach is for implementation and evaluation of the P&C, and it includes the following guidance:
 - Group entities can take responsibility for implementing some P&C rather than individual members having to meet each P&C
 - National Initiatives and Certification Bodies can develop their own checklist of landscape-scale P&C and FSC-IC provides a guidance document for this approach.

Questions Raised During the Conference Call Discussions

- Is the opt-out approach still an option for establishing informed consent by group members? The response is that there is no clear answer yet. The suggestion was made during the discussion that the group entity would make the commitment to FSC principles and then work with individual members to convey the fundamental information required to support informed consent.
- Participants on the conference call expressed concerns about the level of detail required for maintaining records and where they are kept. The suggestion was made to maintain flexibility regarding whether the group entity or the individual member is responsible for maintaining records.
- The discussion included expressed concerns about the classification of Type 1, 2 and 3 groups. There are reduced internal monitoring requirements for Type 2 and 3 groups, which in some instances may be the kinds of groups that need more evaluation. The justification is that the recommendations for different group classifications are for internal monitoring purposes only, and that managers of type 2 and 3 groups have more control over their members and therefore, less need for intensive monitoring.
- Individual members have to report changes in ownership or management to the group entity, so there should be a similar requirement for group managers to report changes in group membership to the Certification Bodies
- There were 2 different concerns expressed about mapping requirements:
 - In relation to High Conservation Value Forests (HCVF) and Principle 9, it is not practical and in many cases not possible to map them for all group members.
 - Natural Heritage/Natural Areas can include confidential information and can't be mapped. Public agencies encounter public information disclosure problems, even if the mapping is not done for public release and this situation and the legal implications needs to be better understood by FSC-IC.

b. FSC-STD-20-007 – Evaluation Standard for Certifying Bodies

The discussion focused on issues and concerns related to element 4.3.21 of the standard, which addresses annual surveillance audits and the sampling intensity (e.g., required number of sample Forest Management Units (FMUs)).

- For some groups, the requirement that new group members be sampled at the same rate as existing members is impractical because of the high number of members added each year. The character of new members may not be vastly different from existing member lands and so the value of this requirement is not clear. The FSC-IC response is that flexibility is in the certifying bodies' (CBs) hands to make a decision on sampling intensity based on perceived risk (e.g., HCVF, intensity of harvest cycles, social/land tenure disputes) and CBs are able to adjust sample intensity for groups of small, low-intensity managed forests (SLIMFs).

- There is a category of mid-sized forest that is bigger than a SLIMF (i.e., greater than 2,500 acres) but less than 10,000 acres. There are concerns about the drop in rigor related to monitoring for this size.

- There is a suggestion to drop the requirement that monitoring be done for *all* P&C and permit monitoring for select issues or a theme across the board.

2. Family Forest Standard

Background

The Family Forest Standard is the result of larger revisions to the FSC-US National Standard process where specific standards for family forests were simultaneously developed and overlaid to demonstrate alignment with the policies of the full National Standard.

The Family Forest specific standard is the result of 2 years of work by the Family Forest Working Group and several other technical groups providing FSC-US with information about the challenges for groups in terms of meeting indicators, needing to modify indicators or needing more specific guidance in relation to some indicators.

The draft Family Forests standard was written under the assumption that individual landowners were responsible for meeting all the P&C within a group, as per earlier FSC decisions. There was a plan to develop separate guidance about indicators that could be implemented and evaluated at the group (rather than individual) level. However, with FSC-IC's recent decision

regarding a landscape approach, staff will go back to the draft and insert relevant language directly into it that addresses this decision and incorporates the landscape approach.

Major highlights of the discussion of the drafted Family Forest Standard

- Participants would like to see the standard consider including landscape level compliance, mostly at group manager level (e.g., landscape analysis, HCVF, representative sample areas)
- The standard and guidance are written to indicate that during assessments compliance with laws and policies is generally assumed unless evidence to the contrary is identified.
- Participants shared the concern that the standard recognize that local stakeholder values aren't all necessarily applicable to family forests due to the scale and the nature of private land ownership.
- An informal process for assessing social impact is more appropriate for individual landowners on small-scale privately held lands and may include conversations between the landowner and the group manager to gauge impacts and benefits.
- Sustained yield calculations may be an overly burdensome measure for family forest owners and FSC staff will propose alternatives.
- An alternative environmental impact assessment process will be proposed for family forest owners.
- FSC staff will suggest changes to management planning and monitoring requirements.

Timeline

After field-testing, further revisions will be made to the Family Forests standard, and these revisions will be followed by two 60-day public comment periods. The first of these will be for comment on an initial draft and after another round of revisions; a board approved 'final' draft will be released for the final 60-day public comment period. Barring significant outstanding feedback, the draft will then proceed for approval by the FSC-IC board, and once approved will carry a one-year implementation period for certified groups to come into compliance.

Desk audit of MFL lands with Wisconsin DNR

The first step in the field testing process was a desk audit of family forest properties enrolled in the Managed Forest Law (MFL) tax program administered by the Wisconsin Department of Natural Resources (WI DNR). The desk audit included a review of the in-house documentation of select parcels and the record keeping and monitoring protocols of the group manager.

For details of the discussion on Principles 1, 2, 4 & 5, see section III of this report.

II. April 9, 2009 - Family Forests Standard Field Test

Background

Since December 2008, the Wisconsin DNR has managed an FSC Forest Management Group Certificate for landowners enrolled in the state's Managed Forest Law (MFL) program. Landowners enrolled in the program commit to either a 25 or a 50 year forest management plan. Landowners receive property tax reductions for enrolling, and they incur penalties if they withdraw from the program before the end of the commitment period.

The FSC Family Forest Standard field test took place in the Baraboo Hills region of Sauk County, Wisconsin. This region encompasses nearly 144,000 acres out of the MFL group's total of about 2 million acres of family forestlands. Private individuals own about 75% of the MFL enrolled lands in the Baraboo Hills region. The region also includes some ownership by The Nature Conservancy (TNC). The MFL lands are largely managed for landowner objectives that include recreation as well as timber harvesting. Wisconsin DNR area service foresters arranged for six possible sites for the field test, and the team was able to visit three from that pool.



Dave Bubser, US Region Manager for SmartWood (far right) participated in the Family Forests Standard Field Test.

Field Site #1

This site was enrolled in the MFL program in 2005 with a 50-year plan. The plan focuses on harvesting dead and mature trees for firewood, provision of hiking trails and protection of duck and beaver habitat. It encompasses three stands, two of which are set up for active timber sales. Invasive plant species have been a challenge at this site. Discussion at this site centered on Principle 6 – Environmental Impact.

- 6.1 Harvest pre-assessment activities include a review of timber resources, habitat and wildlife species, riparian areas, soils, and current and historic conditions.
 - Group mechanisms:
 - The MFL checklist ensures that all of the C.6.1 considerations are addressed in the management plan.
 - Historic conditions are determined by maps and state-level historical reports. Wisconsin DNR also has a specific mandate of restoring pre-settlement conditions to many of the lands enrolled in the MFL program.

- Rare, threatened and endangered species (RTEs) are defined by the federal ranking system (e.g., S1, S2 and S3 type forests) – all categories are attended to in management planning.
- *How do you ensure that consulting foresters are writing adequate management plans?* The MFL checklist tool is one mechanism. The MFL program also provides plan writing training for foresters to establish their qualifications to write adequate plans (Certified Plan Writer – CPW). Part of this training includes instruction on processes for identifying RTEs, mitigating for RTEs through the management plan and properly reporting RTEs.
- There was a suggestion that Best Management Practices (BMPs) are a performance-based area of the standard and that the language in Indicator 6.1 does not support performance-based evaluation
- 6.2 There was a suggestion to attend further to editing the language around RTEs; especially between 6.2a and 6.2b, for clarity.
- 6.3j This indicator relates to the monitoring for, planning for, and control of invasive species. New language is suggested for this indicator to recognize the accepted practice of completing the monitoring via an informal pre-harvest planning process. In the MFL program, the group entity does outreach on monitoring and control of invasives through information provided in newsletters. Cost sharing for mitigation is available.
- 6.4 This indicator relates to the protection of ‘representative sample areas’ of existing ecosystems. Discussion around this indicator suggested a need for further guidance on compliance for different types of groups.
- 6.5e This indicator addresses road, trail, water crossing, and landing planning and siting. There is a suggestion that this is largely a landowner-level responsibility and that a group entity can contribute to compliance through training and educational information (e.g., newsletters).
- A discussion around *sampling criteria* identified a need for FSC communication materials that are not the same as guidance. To address issues around High Conservation Value Forests (HCVFs), sampling and monitoring – these communication materials would address how to approach short-term planning around these values and would describe the need for deliberate planning and monitoring.
- 6.6 This indicator contains what is referred to as the “prohibited list” of pesticides. How does a group assure that prohibited pesticides are not being used? Are any approved management plans encouraging the use of banned chemicals? In the MFL program, the group entity posts the list of banned chemicals on its website. Plans approved prior to the development of this list may have included banned chemicals, but group-wide phase-out of use is part of the group strategy. Language in new plans has changed and guidance is provided in outreach and communications tools.
- 6.7 This indicator relates to hazardous spill prevention and mitigation. Discussion indicates that this is an indicator most groups can easily demonstrate compliance with.

Field Site #2

This site was enrolled in the MFL program in 1994 with a 25-year plan for 46 acres. Management is planned for saw timber, aesthetics, wildlife habitat and a trail system. Discussion at this site centered on Principle 9 – High Conservation Value Forests (HCVFs).

- *9.1* This indicator relates to the assessment of the property for HCVFs. In the MFL Program, the group entity utilizes the state's Ecological Landscapes Handbook and the owner or manager identifies and maps HCVFs in or adjacent to the FMU. The management plan describes the strategy for maintaining HCVF values. The Baraboo Hills area, in its entirety, might be considered an HCVF and is well monitored by The Nature Conservancy and preservation groups that are active in the region.
- *9.4* This indicator discusses requirements for ongoing monitoring of specific HCV attributes. There is a suggestion to incorporate additional guidance that makes clear that annual monitoring can take place at the HCV level rather than the FMU level for family forests (and/or members of group certificates).

Field Site #3

This site included 200 acres managed by a Rod & Gun club. Discussion at this site centered on Principle 8 – Monitoring.

- *8.1* This indicator addresses the frequency and intensity of monitoring as related to the scale and intensity of the forest management operations as well as the relative complexity and fragility of the affected environment. In the MFL program, the group entity (the WI DNR) maintains a written, replicable monitoring protocol that addresses the effects of harvesting on flora and fauna at the site level. Per the FSC standard, family forest owners and managers can conduct informal qualitative monitoring but care should be taken to adequately define the roles and responsibilities of the landowner/manager versus the group entity in conducting this monitoring. The certification body may also work with the certificate holder to determine when and where ongoing monitoring is appropriate.

III. April 10, 2009 - Field Test Review and Critique

Background

The third phase of the field test was an intensive discussion and critique of the Family Forests standard. This discussion began with a review of the Guiding Questions for the Group FM standard pilot test (see Appendix A) as well as a review of some specific themes raised during the Family Forests field visits.

- The typology of groups was analyzed relative to the Family Forests standard and annual monitoring guidelines were proposed. Type 1 “Classic” groups may have more of a challenge performing some of the group functions evaluated during the family forests field test (e.g., mechanism for enforcing adherence to management plan, tracking specific sales of products within the group, etc.). There is a suggestion that more intensive internal monitoring could address these differences in the group entity’s level of oversight of group members. A question also remains about who determines group classification claims (e.g., determination of Type 1, 2, or 3 categorization) – self determination by groups? Certification bodies? FSC?
- There was discussion of 3.5.1.iii – related to maintenance of training records and mapping. It was suggested that the language around documentation be revised so that it identifies the activities that significantly impact a group entity’s/member’s ability to sustainably manage the forest, and which activities need to be documented and reported to the group entity. There is also ongoing discussion about where the documentation of training should reside – with the group entity or with each group member. There are training activities conducted by the group entity in each type of group (via workshops, newsletters, etc.) and training conducted and/or completed by group members. There is an indication that as long as the records are auditable, where they are kept is irrelevant. There is also discussion that, for record keeping purposes, training should be understood as specific actions taken to address group challenges and gaps. Mapping was discussed relative to the difficulty in mapping some attributes (e.g., information is scarce, relative and not always reducible to geographic points) and the sensitivity in mapping others (e.g., natural heritage areas and public disclosure regulations).
- Part IV – related to chain-of-custody (CoC) sales and use of the FSC trademark – was discussed, and there is a suggestion to change the language so that it does not imply that the group entity/manager is responsible to sign off on every sale. However, when sales are conducted through the group certificate (as in some Type 2 and Type 3 groups) this may be a requirement. These policies need some additional refinement by group type.
- Additional conversations about monitoring intensity and group type included:
 - What is the basis for determining the baseline for monitoring? The point was made that additional monitoring may not address the non-conformances that were identified.
 - More work may need to be done in defining a minimum sample size based on monitoring requirements as well as other group-specific attributes.

- Would a classification of group type by size be a more effective system? There was a suggestion to further refine classification of group type by function and with guidelines based on size.
- In each type of group, how is group member commitment to FSC principles defined and demonstrated in an auditable way? What is the definition of a ‘consent form’? It was indicated that in most cases, the standard is met via an explicit consent to the FSC Principles at the group manager level and with consent by group members to group policies.

The second half of the discussion was structured by the specific indicators evaluated during the desk audit and field visits. The Family Forests standard is still in draft form pending revisions and public comment periods. The draft Family Forests standard consists of some specific guidance for family forest owners/managers, small and large group certificate holders. A summary of the discussion for individual indicators is included below.

Principle 1: Compliance with laws and FSC Principles

- Indicator 1.6b: This indicator relates to documentation of reasons for seeking partial certification when a forest owner or manager does not certify their entire holdings. Feedback was to add guidance on green washing for this indicator. A clause at the end of this indicator, “if known” (referring to natural resources on site and planned activities) will be removed.
- Indicator 1.6c: This indicator relates to notifying the Certification Body of significant changes in ownership or management planning. Feedback was to remove a clause specifying that the notification should take place “within 90 days of such change”.

Principle 2: Tenure and Use Rights and Responsibilities

- Indicator 2.1c: This indicator directs owners/managers to identify and document ownership and usufruct rights on the ground and on maps prior to commencing activities near boundaries. There is a comment that this might not be implementable for large groups.
- Indicator 2.1d: This indicator relates to conversion to non-forest use outside the control of the certificate holder (e.g., for facilities associated with subsurface mineral and gas rights). The feedback focused on the directive to identify these areas on maps and to consult with the certifying body to determine whether removal of the area(s) from the scope of the certificate is warranted. The difficulty for large groups to map the areas was raised and additional guidance is requested related to the process of consulting with CBs to determine status of those areas within the certificate.

Principle 3: Indigenous Peoples' Rights

- Indicator 3.1: The family forest guidance on this indicator - directing that indigenous peoples control forest management on their lands and territories unless management has been delegated with informed consent – specifies that the indicator is inapplicable unless the group includes collectively held tribal ownerships. The existence of trusts for tribal lands that are not collectively owned is raised to question why the guidance is specific to collective holdings. More indicators are needed for this case.

Principle 4: Community Relations and Workers' Rights

- Criterion 4.1: The communities within or adjacent to the forest management area should be given opportunities for employment training and other services. The Family Forests guidance indicates that this is inapplicable, as family forests are not expected to have the capacity to provide these opportunities. A discussion around the constitutional Commerce Clause raises the issue of the lack of mechanism to support national conformance with this criterion. It was specified that, the generic “provision of opportunities” meets the spirit of demonstrated conformance.
- Criterion 4.2: Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families. The Family Forests guidance indicates that demonstrated conformance meets this criterion. The feedback is to bring back the indicators and guidance that were stricken from a previous version of this draft (related to meeting applicable laws/regulations covering health and safety of employees, demonstrating a safe work environment, including safety requirements in contracts and other written agreements, and hiring qualified service provider to safely implement the management plan).
- Criterion 4.3: This criterion relates to guaranteeing the rights of workers to organize and negotiate with employers as outlined in ILO. The Family Forests guidance indicates that conformance is covered by U.S. Law. This needs more research, as the claim of coverage by U.S. law could be incorrect. Examples include the use of forced labor to conduct timber stand improvement (TSI), involuntarily by prisoners in some areas. What are the implications of other ILO conventions the U.S. does not ratify?
- Indicator 4.4a: This indicator directs forest owners/managers to conduct social impact assessments of management activities, incorporate the results into management planning and make a summary available for review by the CB (assessment to include archaeological, cultural and historical significant sites; public resources including air, water, and food; aesthetics; community goals for forest and natural resource protection – employment, subsistence, recreation and health; community economic opportunities; and other people affected). The Family Forests guidance for individual owners suggests that sensitivity to social impacts can be demonstrated through plans and operations. At the group level, the requirement is the same as the National Standard. Outside of the field

test case study, an issue is raised about other groups' ability (based on group type and capacity) to demonstrate conformance.

- Indicator 4.4c: This indicator relates to consulting with people subject to direct adverse effects of management activities before activities begin so that they can voice concern. Family Forests guidance indicates that signage is adequate; direct communication is not required. Removal of this indicator from family forest assessments is proposed.
- Indicator 4.5b: This indicator relates to establishing a grievance/dispute resolution process for interested stakeholders and demonstrated good faith efforts to resolve disputes. Family Forests guidance indicates that compliance can be demonstrated through informal communications with neighbors, by sharing management plan summaries with interested stakeholders, and by an absence of disputes. There is a proposal to remove this guidance and replace it with the guidance stricken from a previous draft, which lists a broader array of scenarios for demonstrating conformance.

Principle 5: Benefits from the Forest

- Indicator 5.2a: This indicator directs land managers to provide opportunities for forest product sales and services to local harvesters, value-added processing and manufacturing facilities. The Family Forests guidance is to “consider making this Demonstrated Conformance”. It is proposed that this indicator is inapplicable to family forests and should be removed.
- Indicator 5.3b: This indicator is related to designing harvest practices to protect residual trees and other forest resources. The feedback is that the specifics of this indicator are highly subjective and should be moved to guidance and that references to contract language should be removed.
- Criterion 5.6: The rate of harvest of forest products shall not exceed levels that can be permanently sustained. Note that this criterion and the final language are still being deliberated and that family forests guidance will be contingent on the final iteration of this criterion. Suggestions are that this may not be applicable to family forests, that the criterion needs a reference to an indicator, and that the criterion – as written – could become indicator level guidance for a differently constructed criterion.
- Indicator 5.6d: For FMUs in which harvesting occurs infrequently, harvest levels and/or re-entry frequencies are set so that the growing stock trends to fully stocked levels. The feedback is to remove this indicator for Family Forests.

Principle 6: Environmental Impact

- Indicator 6.2a: This indicator relates to conducting baseline for rare, threatened, and endangered species, where there is a likely presence. Part of the indicator directs that surveys be conducted by individuals with adequate experience in the species of interest and with no conflict of interest. The feedback is to remove this language from the indicator.
- Indicator 6.3.b1: This indicator relates to maintaining, enhancing, and/or restoring under-represented successional stages in the FMU that would naturally occur on the types of sites found in the FMU. The family forests guidance is extensive in relation to determining which forests meet the requirements of the indicator and the capacity of groups with diverse members to meet the indicator as written. The field test outcome indicates that this indicator is inappropriate for the WI MFL lands if the expectation is no group entity management responsibility for landscape-level issues.
- Indicator 6.3e: Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site. Feedback is that this indicator is not applicable for small holders.
- Indicator 6.3j: This indicator relates to specific actions that prevent or control invasive species. The feedback is to remove a requirement for monitoring and control and to specify that monitoring and assessment can be informal.
- Criterion 6.4: This criterion relates to protecting representative samples of existing ecosystems. The Family Forests guidance is extensive and relates to identifying representative areas and defining capacity based on group composition. Discussion of this criterion clarifies that state-level information on natural heritage areas can be used as a guide for defining existing ecosystems.
- Indicator 6.5e: This indicator relates to transportation systems – siting, construction and maintenance of roads, skid trails, landings, etc. Feedback is to consider a rewrite of the indicator to acknowledge that monitoring and controlling specific transportation system decisions is difficult to track at the group level. A general comment about indicators throughout Principle 6 relates to a need for more concise indicator language.
- Indicator 6.6e: This indicator relates to the use of chemicals and the need for a written prescription outlining hazards, environmental risks, precautions for workers to take and maps of the treatment area. Feedback is to specify that this indicator apply to *restricted* chemicals. Further feedback is to remove the indicator for family forests (inappropriate for people managing their own lands) or to differentiate between general use and restricted use chemicals and specify that use of restricted chemicals require training.

- Indicator 6.6f: This indicator relates to monitoring the effects of chemical use, record keeping and development of adaptive management based on observed effects. Feedback is to include informal options for family forests.

Principle 7: Management Plan

- Indicator 7.1a: This indicator outlines the requirements for adequate documentation related to management planning. Discussion of this indicator specified resources and approaches for different group compositions. Suggestion to build in consistency with federal forest stewardship program requirements.

Principle 8: Monitoring and Assessment

- Criterion 8.2: Forest management should include research and data collection needed to monitor, at a minimum: yield of all forest products; growth rates, regeneration, and condition of the forest; composition and observed changes in flora and fauna; environmental and social impacts of harvesting and their operations; and costs, productivity, and efficiency of forest management. Discussion around Principle 8 indicates a general need to identify the applicability of indicators for different group configurations and to specify scale in the indicators. Discussion of 8.2, in particular, suggests a need for clarity about *what* needs to be monitored. Feedback is that significant impact depends primarily on whether the scale of the harvest affects the forest and suggests that records about a harvest don't tell you anything about impact on sustained yield. Specifically, activities related to non-timber forest products (NTFP) are difficult to monitor and track. Options suggested for the Family Forests guidance are to remove a clause about determination of components to track costs, productivity and efficiency of management given that it applies mostly to commercial-scale harvesting and labeling OR to strike NTFP from the indicator. In either case, it should be made explicit that it is not reasonable to require land managers to report, or demonstrate accurate awareness of harvest yield of NTFP.

Principle 9: Maintenance of High Conservation Value Forests

- Indicator 9.3c: This indicator relates to cross-boundary maintenance and conservation coordination when HCVF values span the boundaries of the FMU. The feedback is to remove this indicator or to rewrite it to recognize the value of co-operative and voluntary management rather than formalizing coordination.
- Indicator 9.4: This indicator outlines requirements for annual assessment of the effectiveness of measures to maintain or enhance applicable conservation attributes. Discussion highlighted concerns about practicability of this requirement for land managers. Clarification of Family Forests guidance indicates that assessment can take place at the landscape scale.

Appendix A: Guiding Questions for the Evaluation of Group Forest Management Pilot Test

According to FSC-STD-30-005 V 1-0 Draft 1-0 and FSC-STD-20-007 V 2-1

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– Version for Certification Bodies–

This document should serve as a concise guide how and on what issues certification bodies participating in pilot testing the new requirements on FM Group certification are expected to provide feedback on and undertake a more detailed evaluation of their findings.

This feedback and evaluation can be compiled and submitted in one single document or may be provided in separate documents according to the structure suggested below. Under each section questions are posed to give an idea on which minimum information is expected to be provided.

① Performance of pilot participants with respect to FSC-STD-30-005

- ☞ Which requirements caused particular difficulties to achieve for the participant? What were the main non-conformities that you identified?
- ☞ Which requirements did not cause any problems and may be considered dispensable due to the underlying business practices being state-of-the-art?

② Clarity and feasibility of FSC-STD-30-005 and FSC-STD-20-007

- ☞ Did you find the standards clearly worded and easy to comprehend?
- ☞ Are the standards arranged logically?
- ☞ Are section headings clearly named?
- ☞ Are there any requirements/areas omitted?
- ☞ Is it clear what is required prior to certification issuance?
- ☞ Are there any terms that should be added to the glossaries or any definitions you would dispute?

③ Suitability of FSC-STD-30-005

- ☞ Do you agree with the classification of groups according to the different levels of responsibilities taken by the group entity? Why?
- ☞ Do you think that group members records should always be kept at the group entity level? If not, which of the required records are feasible to be kept at the group member level?

- ☞ In relation to mapping records, which are the minimum criteria that should be included in maps for the group? i.e. high conservation value forests, geographical location of each group member, etc
- ☞ Do you agree with the approach to allow only groups that are in the scope of the same FSC standard? Why?
- ☞ Do you believe that monitoring intensity should depend on the level of responsibilities taken by the group entity? Why? when more responsibilities are taken by the group entity on behalf of the group members less monitoring intensity is required
- ☞ Do you agree with the proposed sub stratification for monitoring purposes according to forest type, geographic location and management system? Would you include additional criteria, which?
- ☞ Within your group model and related to the characteristics of the group, Is it difficult to openly request group members to express their commitment to FSC certification? Why?
- ☞ Do you agree that every sale of FSC certified products should be approved by the group entity in order to keep assurance of not mixing certified and non certified material? Please explain
- ☞ Does the FSC standard that you are implementing have clear requirements to be implemented at a landscape level and at a forest management unit level? Do you think that this approach better reflect the reality of groups of SLIMFs? Why?

4 Application of draft evaluation standard FSC-STD-20-007

- ☞ Does the standard cover and adequately address Group Forest Management situations and typical organisational setups?
- ☞ During your evaluation, did you make a clear distinction on requirements to evaluate at a group entity level and requirements to evaluate at the group members level? Did your checklist properly address these different levels of assessment? If not, why
- ☞ Do you think that evaluation at the group entity level is also feasible for all types of groups, rather than only for groups of SLIMFs? Why?
- ☞ Please list the number of non conformities related to:
 - a. Failure to fulfil a group entity responsibility
 - b. Failure to fulfil group member 's responsibility
- ☞ Do you support the suggested sampling intensities according to size classes? If not, why?
- ☞ Do you think that sampling intensity could be reduced in situations where the group entity has more responsibilities? (resource manager scheme)
- ☞ Do you agree with the new requirements for mega groups? Annex 1

Overall conclusions

- ☞ Do you think the pilot is contributing to the overall quality of the tested certification and accreditation standard?

END

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