

DIFFERENCES BETWEEN THE FOREST STEWARDSHIP COUNCIL (FSC) AND SUSTAINABLE FORESTRY INITIATIVE (SFI) CERTIFICATION STANDARDS FOR FOREST MANAGEMENT

KATHRYN FERNHOLZ

Dr. Jim Bowyer Dr. Sarah Stai Dr. Steve Bratkovich Dr. Jeff Howe

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## Differences between the Forest Stewardship Council (FSC) and Sustainable Forestry Initiative (SFI) Certification Standards for Forest Management

## Background

Dovetail Partners has released 30 reports addressing various aspects of forest certification since 2004.<sup>1</sup> During this time, a recurring question has been "What are the differences between the SFI and FSC standards?" Some answers to this question can be provided based upon specific land manager and auditor experiences, but a point-by-point comparison has been difficult. The fact that until recently the Forest Stewardship Council (FSC) administered nine regional standards for assessments in the United States versus a single national standard administered by the Sustainable Forestry Initiative (SFI) was a major barrier to an effective comparison. Experiences with the standards in one state or region did not always translate directly to experiences in other states or regions. Completing a comparison of the programs became easier in 2010 as the FSC moved to the use of a single national standard for forest management certification assessments conducted throughout the United States, and as the SFI completed its second 5-year standards review process.

In 2010, Dovetail released a report wherein we concluded, among other things that "Significant changes have occurred within the major certification programs in recent years, and, . . . it is increasingly difficult to differentiate between certification systems in North America."<sup>2</sup> This conclusion reflected the structural changes that had occurred in the operations of the programs, including SFI's adoption of a chain-of-custody system and achievement of international endorsement. Prior to these changes, structural differences like these could be used to easily differentiate the programs; that is no longer the case. Meaningful comparisons now rest on the details of each program's standards.

A strong case can be made that the differences between the programs' standards are significant. There are also significant parallels and similarities due to the fact that both programs build upon compliance with local laws, regulations, forestry science and best management practices.

This report summarizes some of the differences between the forest management certification standards of the Sustainable Forestry Initiative and the Forest Stewardship Council. The report focuses on the standards that apply to forest management operations and audits conducted in the United States. This report is based upon information from publicly available documents, standards and materials from the FSC and SFI programs, and is also informed by FSC and SFI auditing experiences and certification knowledge of the authors.

### Why Ask?

Before diving into a comparison of the SFI and FSC standards, it is perhaps appropriate to ask: Why is it important to identify the differences between the programs? As pointed out in the recent Dovetail messaging report,<sup>3</sup> the marketplace goes through a series of cognitive steps including Awareness, Interest, Evaluation, Trial, and Adoption. To a certain extent it appears that the broader

<sup>&</sup>lt;sup>1</sup> For the full list, see: <u>http://www.dovetailinc.org/content/dovetail-reports-certification</u>

<sup>&</sup>lt;sup>2</sup> Dovetail Partners, March 23, 2010, "Forest Certification: A Status Report" Available at: <u>http://www.dovetailinc.org/files/DovetailCertReport0310b.pdf</u>

<sup>&</sup>lt;sup>3</sup> "Effective Communication: Creating Messages That Sell Ideas, Services, and Products" (2011) Dovetail Partners, Inc. Available at: <u>http://www.dovetailinc.org/files/DovetailMessaging0211.pdf</u>

market is more aware of certification today than ever and has begun to show interest in certified materials. It now appears logical to support the next step of the process by providing the information needed to make reasonable comparisons in the process of evaluation. Land managers seeking to choose one program or the other often seek such information. Consumers, design professionals, green building administrators, and others also inquire about differences to inform purchases, materials specification, and program provision decisions. In each case, the specific deciding factors may be different (i.e., issues that the decision makers care most about aren't always the same) and may go beyond the specific requirements of the certification standard. For example, the consumer may be interested in where a product comes from (e.g., domestic vs. imported); land managers may be looking for information about available supply. Others sell or distribute lumber and products that are certified under multiple programs, and they are interested in understanding the programs so that they are better informed and can explain them to customers. Beyond these examples, there are also the certification programs themselves and their advocacy groups and members that support them and that are interested in informing the marketplace.

The bottom line is that when evaluating a product, program, system or other choice – everyone has her or his own set of values. This report provides a discussion of the SFI and FSC standards; each reader will have to translate the discussion into what is most relevant for his or her decision-making.

#### **Defining the Standards**

#### Sustainable Forestry Initiative

On January 1, 2010, the revised standard for the Sustainable Forestry Initiative (SFI) took effect and program participants were allowed up to one year to come into conformance.<sup>4</sup> When the SFI 2010-2014 Standard came into effect the SFI program released a summary of changes.<sup>5</sup> The following November (2010), SFI released a document entitled "Interpretations for the SFI 2010-2014 Program Requirements: Standards, Rules for Label Use, Procedures and Guidance".<sup>6</sup> This document is more technical than the summary of changes released earlier and provides additional insights into the changes and how auditors may interpret the revisions. The revised SFI standard has an operational time period of 2010-2014 and replaces the 2005-2009 standard. The standard is used for SFI forest management audits conducted in the United States and Canada.

### Forest Stewardship Council

In July 2010, the Forest Stewardship Council (FSC) approved a revised FSC-US Forest Management Standard<sup>7</sup> including an overview of the standard.<sup>8</sup> This new standard replaces the previous nine regional standards and is used for FSC forest management audits conducted in the

US%20Forest%20Management%20Standard%20v1.0.pdf

<sup>8</sup> The overview of the FSC changes is available at:

http://fscus.org/images/documents/standards/Standards%20launch%20overview%20July%202010.pdf DOVETAIL PARTNERS, INC. www.dovetailinc.org

<sup>&</sup>lt;sup>4</sup> SFI 2010-2014 Standard is available at: <u>http://www.sfiprogram.org/files/pdf/Section2\_sfi\_requirements\_2010-</u> 2014.pdf

<sup>&</sup>lt;sup>5</sup> SFI summary of changes is available at: <u>http://www.sfiprogram.org/files/pdf/sfi\_2010-2014\_summary\_changes.pdf</u> <u>6 http://www.sfiprogram.org/files/pdf/Interpretations\_2010-2014\_Requirements.pdf</u>

<sup>&</sup>lt;sup>7</sup> FSC-US Forest Management Standard v1.0 Recommended by FSC-US Board, May 25, 2010; Approved by FSC-IC, July 8, 2010. Available at: <u>http://fscus.org/images/documents/standards/FSC-</u>

United States.<sup>9</sup> The FSC-US National Standard pertains to forest management in the United States, with the exclusion of Alaska, Hawaii and the US territories. There are additional FSC-US requirements for federally owned properties.

#### The Quantitative Differences

To begin the process of comparing the FSC and SFI standards, it is important to first review how the standards for each program are structured. Each forest certification standard has a hierarchy. The hierarchical structure is useful for understanding the intention of the standard and directly influences how auditors apply it. As shown in Table 1, the SFI standard operates under a four-layered hierarchy while the FSC has a three-tiered structure.

	SFI Standard	FSC Standard
First Tier	Principles	Principles
Second Tier	Objectives	Criteria
Third Tier	Performance	Indicators
	Measures	
Fourth Tier	Indicators	

Table 1. Hierarchical Structure of Forest Certification Standards

Each program requires a third-party (i.e., independent) audit team to review forest management operations to determine compliance with the standard. The auditing activities associated with forest certification are diverse and include field visits to review management operations; office visits to review documents and interview employees; and consultation with stakeholders and interested parties. From the first to the last tier, each standard becomes more specific in its language and, therefore, more auditable. Indicators provide the most auditable aspect of the standard and compliance is most closely evaluated at the indicator level. Following is a theoretical example of a standard's hierarchy and the associated changes in language and auditor direction.

## **Box 1. ABC Forest Certification Standard**

Principle 1: Compliance with Forestry Laws

Performance Measure 1.1: Forest manager follows applicable laws

Indicator 1.1.a: The forest manager provides information to the auditor about any current or recent violations or legal investigations.

As illustrated in Box 1., the Principle or highest tier of the standard can provide helpful context, but is generally too vague to provide a basis for auditing or determination of compliance. The middle levels provide some additional considerations that refine the intent of the standard. Ultimately, it is the Indicator level of the standard that provides a level of detail that can most directly inform the structure of an audit and the activities of the auditors.

<sup>&</sup>lt;sup>9</sup> The previous FSC-US regional standards included the Appalachian, Mississippi Alluvial Valley, Lakes States-Central Hardwoods, Northeast, Ozark-Ouachita, Pacific Coast, Rocky Mountain, Southeast and Southwest standards. These previous standards are available at: <u>http://fscus.org/standards\_criteria/regional\_standards.php</u>

Understanding the hierarchy of a standard and how this influences auditing practice is important because it is the auditing practice that determines the impact of the standard on forest management. It is possible to compare the standards and draw conclusions about their similarities based upon a comparison of the upper levels of the standard (see Table 2). However, as this report shows, it is necessary to look at the indicator level to determine program differences, and this is where the "rubber hits the road" in an audit.

SFI Principles	FSC Principles
1. Sustainable Forestry	1. Compliance with Laws and FSC
2. Forest Productivity and Health	Principles
3. Protection of Water Resources	2. Tenure and Use Rights and
4. Protection of Biological Diversity	Responsibilities
5. Aesthetics and Recreation	3. Indigenous Peoples' Rights
6. Protection of Special Sites	4. Community Relations and Workers'
7. Responsible Fiber Sourcing Practices	Rights
in North America	5. Benefits from the Forest
8. Avoidance of Controversial Sources	6. Environmental Impact
including Illegal Logging in Offshore	7. Management Plan
Fiber Sourcing	8. Monitoring and Assessment
9. Legal Compliance	9. Maintenance of High Conservation
10. Research	Value Forests
11. Training and Education	10. Plantation Management
12. Public Involvement	
13. Transparency	
14. Continual Improvement	

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### The Impact of Indicators

Table 3 illustrates the distribution of the FSC and SFI standards across the tiers of each respective standard. As described above, the Principles represent the broadest and most encompassing language of the standard, and the level of detail and precision increases through to the Indicator level.

Table 3.	Distribution	of the Standard	<b>Across the Tiers</b>
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	Principles	Criteria	Objectives	Performance Measures	Indicators
SFI Standard	14		20	38	115
<b>FSC-US Standard</b>	10	56			192

One consideration in comparing the programs is how the standard is applied. For an FSC audit of forest management operations, the 10 Principles and 56 Criteria are all applicable. For the SFI program, the applicability of the Objectives and Performance Measures depends upon the nature of the operation being audited. The following table (Table 4) illustrates the applicability of the SFI standard to different types of forest management or fiber sourcing operations.

	Applicable	Performance	Indicators
	Objectives	Measures	
SFI Standard – Ownership/Management of	1-20	38	115
Forestlands and Sourcing of Wood or Fiber	(20 total)		
SFI Standard – Ownership/Management of	1-7  and  14-20	16 and 15	59 and 35
Forestlands	(14 total)	(31 total)	(94 total)
SFI Standard – Sourcing of Wood or Fiber	8-20	15	56
	(13 total)		

 Table 4. Applicability of the SFI Standard for Different Types of Operations

Companies that own and/or manage forestland and also source wood or fiber from other lands are audited to the full SFI standard (Objectives 1-20). Operations that only own and/or manage forestland are audited to 14 of the 20 Objectives (Objectives 1-7 and 14-20). Objectives 8-13 address fiber sourcing and are not included in forestland audits. Operations that only source wood and/or fiber but do not own or manage forestland are audited to 13 Objectives 8-20).

Based upon these differences and depending upon the operation being audited, an FSC audit in the United States may include the review of over three times as many indicators as an SFI audit (192 vs. 56). This comparison is not entirely accurate however since the FSC-US Forest Management Standard is not applied to operations that only source wood or fiber as is done under the SFI standard.<sup>10</sup> A more accurate comparison is between the SFI and FSC approaches to auditing forest management operations. For the auditing of forest management operations in the United States an FSC audit will include the review of approximately twice as many indicators as an SFI audit (192 vs. 94).<sup>11,12</sup> However, the number of indicators audited does not necessarily translate to significant differences in program effectiveness; thus, program differences must be examined further.

## Prescriptive and Numerical Differences in the Indicators

Since the Indicators provide the greatest level of detail within each standard, this is the part of the standard to look to for specific and quantifiable differences in what each standard requires or allows (i.e., numeric and measurable indicators). There are quantifiable indicators related to the topics of clearcutting (or harvest opening size), land conversion to non-forest uses, calculation of harvest levels and management plan updating.

<sup>&</sup>lt;sup>10</sup> In the FSC system, fiber and wood sourcing companies are audited under the applicable chain-of-custody standard. <sup>11</sup> The FSC system utilizes the same Principles and Criteria for auditing forest management operations globally. There are regional differences at the Indicator level of the FSC standard. In other words, FSC audits outside of the United States apply the same number of Principles and Criteria but may utilize more or fewer than 192 Indicators.

<sup>&</sup>lt;sup>12</sup> Within the SFI and FSC standards there are indicators that only apply to specific types of land managers (e.g., public land managers, American Indian lands, etc.); therefore, the exact number of applicable indicators will vary depending upon the specific operation being audited.

#### Clearcutting and Opening Size Limits

When comparing the approaches to limiting clearcutting and harvest opening sizes, the SFI has a single requirement of a maximum average size of 120 acres that is applied to all SFI audits regardless of the eco-region. The FSC approach varies by region, with limits ranging from as small as 2 acres to as large as 80 acres, with no specific numerical limits for clearcut size in non-plantation management for at least four regions (Table 5).

The SFI standard requires that the "Average size of clearcut harvest areas does not exceed 120 acres (50 hectares), except when necessary to meet regulatory requirements or to respond to forest health emergencies of other natural catastrophes (Indicator 1 for Performance Measure 5.1 within Objective 5)."

The FSC standard addresses even-aged management systems (which frequently correspond to the use of clearcutting techniques) in Indicator 6.3.g.1 (within Criterion 6.3 of Principle 6).

The FSC-US Indicator reads: "In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley and Pacific Coast Regions, when even-aged systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region. In the Lake States, Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvest, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance."

This is an instance in which the new FSC-US National Standard retained regional variability. The regional indicators, included in Appendix C, provide various harvest opening size limits for evenaged and uneven-aged management under the FSC standard (Table 5).



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	uantinable Regional Linnes	on opening bizes	
Region	Opening Size Limits for <u>Even-Age</u>	Opening Size Limits for	Additional Regional
	Management	<u>Uneven Age</u> Management	Requirements Regarding Opening Sizes
Appalachia	Limited to 10 acres (when there is no retention)	Less than 2.5 acres	
Lake States-Central Hardwoods			
Mississippi Alluvial Valley	The average regeneration harvest area is no larger than 40 acres	Canopy openings should be less than 3 acres in size*	"retention of live trees withinunits larger than 20 acres is requiredFor most stand types, retention is 20- 30%."
Northeast Region			
Ozark-Ouachita	In the Ozark subregion, harvest openings with no retention (clear- cuts) are limited to 2 acres. In the Ouachita subregioneven-aged opening sizes are limited to a maximum of 20 acres.	In the Ozark subregion harvest openings, in which at least 20-30% of the canopy is retained are limited to 20 acres.	
Pacific Coast Region	Regeneration harvest blocks in even-aged stands average 40 acres or less. No individual block is larger than 60 acres.		Within harvest openings larger than 6 acres, 10-30% of pre-harvest basal area is retained.
Rocky Mountain Region			
Southeast Region	Clear-cutting is not allowed in primary and natural forests and semi-natural forests with trees greater than 100 years old. Clearcuts [in other forest types] up to 80 acres are allowed in [some] cases.*		
Southwest Region			

 Table 5. FSC-US Quantifiable Regional Limits on Opening Sizes

\* This language is within the Guidance and therefore does not represent a strict requirement of the standard.

In addition to the information in Table 5, the FSC-US Standard includes opening size limits within Principle 10 that only apply to Plantation management (as defined by FSC<sup>13</sup>). The FSC-US limits on openings sizes in <u>Plantation management</u> include: "Indicator 10.2.c: In all regions except the Pacific Coast, openings lacking within-stand retention are limited to a 40 acre average and an 80 acre maximum. Harvest openings larger than 80 acres must have retention as required in Indicator 10.2.d and be justified by credible scientific analysis. The average for all openings (with and without retention) does not exceed 100 acres. Departures from these limits for restoration purposes are permissible but also must be justified by credible scientific analysis. In the Pacific Coast region, on plantations established on soils capable of supporting natural forests, a minimum average of four dominant and/or co-dominant trees and two snags per acre are retained in all openings. Where sufficient snags do not exist, they are recruited. Harvest openings larger than 80 acres must have retention as required in Indicator 10.2.d and be justified by credible scientific analysis. The average for all openings within average of four dominant and/or co-dominant trees and two snags per acre are retained in all openings. Where sufficient snags do not exist, they are recruited. Harvest openings larger than 80 acres must have retention as required in Indicator 10.2.d and be justified by credible scientific analysis. The average for all openings (with and without retention) does not exceed 100 acres. Departures from these limits for restoration purposes are permissible but also must be justified by credible scientific analysis. The average for all openings (with and without retention) does not exceed 100 acres. Departures from these limits for restoration purposes are permissible but also must be justified by credible scientific analysis."

<sup>&</sup>lt;sup>13</sup> In the FSC standard, plantations refer to "Forest areas lacking most of the principal characteristics and key elements of native ecosystems...which result from the human activities of either planting, sowing or intensive silvicultural treatments..." The complete definition is included in the Glossary of the standard.

#### Green-up Requirements

In forest management, it is common practice to delay harvesting activities in a particular area until such time as recently harvested adjacent areas have re-grown to a degree that provides for water quality protections, wildlife habitat, visual quality, aesthetics, and other benefits. The criteria for evaluating the relationship of a new harvest area with adjacent areas are called 'green-up requirements''.

The SFI Standard includes a numerical "green-up" requirement. The SFI Standard requires: "*Trees in clearcut harvest areas are at least 3 years old or 5 feet (1.5 meters) high at the desired level of stocking before adjacent areas are clearcut, or as appropriate to address operational and economic considerations, alternative methods to reach the performance measure are utilized by the Program Participant. (Indicator 3 within Performance Measure 5.2 of SFI Objective 5)"* 

The FSC-US Standard does not generally provide numerical "green-up" requirements for natural forests (e.g., non-plantation management). The exception is for the Pacific Coast Region where trees in adjacent units must "average at least five feet tall and three years of age" (Indicator 6.3.g.1.f included in Appendix C). The FSC-US Standard includes "green-up" requirements within Principle 10 that only apply to the management of Plantations (as defined by the FSC<sup>13</sup>). The FSC-US Indicator addressing "green up" requirements for Plantation management requires: "Indicator 10.2.e: In all regions except the Southeast, before an area is harvested, regeneration in adjacent forested areas (either natural forest or plantation) on the FMU must be of the subsequent advanced successional habitat stage, or exceed ten feet in height, or achieve canopy closure along at least 50% of its perimeter. In the Southeast Region, harvest units are arranged to support viable populations of native species of flora and fauna. For hardwood ecosystems, regeneration in previously harvested areas reaches a mean height of at least ten feet or achieves canopy closure before adjacent areas are harvested. For southern pine ecosystems, (e.g. upland pine forests, pine flatwoods forests, sand pine scrub), harvest areas are located, if possible, adjacent to the next youngest stand to enable early successional or groundcover-adapted species to migrate across the early successional continuum."

#### Land Use Conversion

The loss of forests due to conversion of forestlands to non-forest uses is a significant concern, particularly in areas of the world outside of North America. Within North America, land use conversion has and does occur, with forested areas and other open spaces being converted to developed uses or agricultural production. However, at a national scale, the total amount of forest area within the United States and Canada has remained steady for many decades. For example, according to the *State of the World's Forests Report, 2007*, "the world lost about 3 percent of its forest area from 1990 to 2005; but, in North America, total forest area remained virtually constant." National statistics for the U.S. and Canada show a near constant forest area over the past 100 years.

The SFI standard does not have a specific numerical limit regarding conversion. Language within SFI's Objective 2 regarding Forest Productivity could be interpreted as relevant, but the Indicators within the Objective focus on reforestation, regeneration and planting activities and do not directly address conversion of forests to other land uses. Objective 17 within the SFI standard addresses *Community Involvement in the Practice of Sustainable Forestry* and includes an Indicator that addresses support for conservation of forests through incentive programs and conservation

easements. Indicator 4 within Performance Measure 17.1 of the SFI 2010-2014 Standard reads, "*Participation in efforts to support or promote conservation of managed forests through voluntary market-based incentive programs such as current-use taxation programs, Forest Legacy Program or conservation easements.*" In addition, the SFI Standard includes Protection of Special Sites (Indicators within Objective 6) and Conservation of Biological Diversity (Objective 4).

The FSC-US standard addresses forest conversion within Principle 6. An indicator within this part of the FSC-US standard includes a numerical limit to conversion that is defined as less than 2% of a certified area over a rolling five year period.

[FSC-US] "Indicator 6.10.a Forest conversion to non-forest land uses does not occur, except in circumstances where conversion entails a very limited portion of the forest management unit. (Definition of "very limited portion": less than 2% of the certified forest area on the Forest Management Unit over a rolling five-year period. Lands that are converted for forest management purposes (e.g. roads, landings, management buildings) are not included in calculations of this limit.")

## Calculation of Harvest Levels

The FSC and SFI standards both identify sustainable harvest levels as an important component and requirement of their standard. The SFI standard requires periodic updates to the harvest levels and FSC requires an evaluation over a rolling period of no more than ten years.

At the Performance Measure level, the SFI standard reads: "Program Participants shall ensure that forest management plans include long-term harvest levels that are sustainable and consistent with appropriate growth-and-yield models." (Performance Measure 1.1 of Objective 1) At the Indicator level, the SFI requires: "Periodic updates of forest inventory and recalculation of planned harvests to account for changes in growth due to productivity increases or decreases (e.g. improved data, long-term drought, fertilization, climate change, forest land ownership changes, etc.). (Indicator 4 within Performance Measure 1.1 of Objective 1)"

The FSC standard requires, "Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level. (Indicator 5.6b within Criterion 5.6 of Principle 5)"

### Management Plan Updates

The FSC and SFI standards both identify updated "Management Plans" as a significant part of their standards. The SFI requires documentation of annual trends and the FSC requires a full revision of the management plan every 10 years.

The SFI Standard requires, "Documentation of annual harvest trends in relation to the sustainable forest management plan in a manner appropriate to document past and future activities. (Indicator 2 within Performance Measure 1.1 of Objective 1)"

The FSC Standard requires, "The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years. (Indicator 7.2a within Criterion 7.2 of Principle 7)"

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#### Additional Differences

Following are additional differences between the FSC and SFI forest management certification standards. These differences do not necessarily include specific numerical requirements.

#### Old Growth

The SFI and FSC standards both identify the protection of old-growth and other special sites or high conservation value areas as important in the practice of sustainable forestry. The SFI approach varies by region and the FSC approach defines specific old-growth types and protections, including variations for American Indian lands.

The SFI standard requires the "Support of and participation in plans or programs for the conservation of old-growth forests in the region of ownership. (Indicator 6 within Performance Measure 4.1 of Objective 4)"

The FSC standard addresses old-growth within Indicator 6.3.a.3 of Criterion 6.3 of Principle 6:

When they are present, management maintains the area, structure, composition, and processes of all Type 1 and Type 2 old growth. Type 1 and 2 old growth<sup>14</sup> are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.

Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate).

Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g).

On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate).

On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where:

- 1. Old growth forests comprise a significant portion of the tribal ownership.
- 2. A history of forest stewardship by the tribe exists.
- 3. High Conservation Value Forest attributes are maintained.

<sup>&</sup>lt;sup>14</sup> Applicable FSC definitions from the Glossary: Type 1 Old Growth is three acres or more that have never been logged and that display old-growth characteristics. Type 2 Old Growth is 20 acres that have been logged, but which retain significant old-growth structure and functions.

- 4. Old-growth structures are maintained.
- 5. Conservation zones representative of old growth stands are established.
- 6. Landscape level considerations are addressed.
- 7. Rare species are protected.

## Training

The SFI and FSC standards both recognize the importance of well-trained professionals in the practice of responsible forestry. The SFI approach to addressing training requirements details the specific training courses to be provided. The FSC approach is performance based.

The SFI standard addresses training within Indicator 1 of Performance Measure 16.2 of Objective 16:

"Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producers' training courses that address:

a. awareness of sustainable forestry principles and the SFI program;

b. best management practices, including streamside management and road construction, maintenance and retirement;

c. reforestation, invasive exotic plants and animals, forest resource conservation, aesthetics and special sites;

d. awareness of responsibilities under the U.S. Endangered Species Act, the Canadian Species at Risk Act, and other measures to protect wildlife habitat (e.g., Forests with Exceptional Conservation Value);

e. logging safety;

f. U.S. Occupational Safety and Health Administration (OSHA) and Canadian Centre for Occupational Health and Safety (COHS) regulations, wage and hour rules, and other provincial, state and local employment laws;

g. transportation issues;

h. business management;

*i. public, policy and outreach; and* 

j. awareness of emerging technologies

The FSC standard requires: *The forest owner or manager hires well-qualified service providers to safely implement the management plan (Indicator 4.2.c within Criterion 4.2 of Principle 4).* 

## GMOs

Genetically Modified Organisms (GMOs) have been a point of debate in environmental and policy discussions. The FSC Standard includes a comprehensive restriction on GMOs. The SFI Standard allows for research on genetically engineered trees to be conducted under applicable laws.

The SFI standard reads, "Research on genetically engineered trees via forest tree biotechnology shall adhere to all applicable federal, state, and provincial regulations and international protocols. (Indicator 2 within Performance Measure 15.1 of Objective 15)"

The FSC standard reads, "Genetically Modified Organisms (GMOs) are not used for any purpose. (Indicator 6.8.d within Criterion 6.8 of Principle 6)"

## Indigenous Peoples' Rights

The FSC and SFI standards both identify the rights of indigenous peoples as important. The differences in the way SFI and FSC approach indigenous rights are highlighted in the fact that the FSC standard identifies indigenous rights at the Principle level and requires consideration of these rights during all forest assessments. The Performance Measure and Indicators within the SFI standard that address consultation with indigenous peoples only apply to audits of public lands.

The SFI standard requires, "Program Participants with forest management responsibilities on public lands shall confer with affected indigenous peoples. (Performance Measure 18.2 within Objective 18)"

The FSC standard requires, "During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights. (Indicator 3.2.a within Criterion 3.2 of Principle 3)"

#### **Summary of Described Differences**

The following table (Table 6) summarizes the differences between the SFI and FSC standards as described in this report. This report focused on the highly quantifiable differences that are identifiable within the language of the indicators within the respective standards. This is not an exhaustive list of all of the potential differences between the programs and their standards.<sup>15</sup>

Consideration	SFI Approach	FSC Approach
Clearcutting and Opening Size	Single requirement	Regional variation and plantation
Limits		management requirement
Green-up Requirements	Single requirement	Regional variation and plantation
		management requirement
Land Use Conversion	Performance based requirement	Prescriptive requirement
Calculation of Harvest Levels	Periodic updating required; no	10 year time period required
	specific time period for calculations	
Management Plan Updates	Annual documentation; no specific	10 year time period required
	time period for planning updates	
Old Growth	Regional variation	Single requirement with variation
		for American Indian lands
Training	Prescriptive requirement	Performance based requirement
Genetically Modified	Required to comply with applicable	Not allowed
Organisms (GMOs)	laws and policies addressing GMO	
	research	
Indigenous Peoples' Rights	Required for audits of public lands	Required for audits of all lands

Table 6.	Summary	of SFI ar	d FSC App	roaches to	Considerations	within th	ne Standards
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<sup>&</sup>lt;sup>15</sup> Additional differences not addressed in this report include approaches to pesticide use and designation of special sites (e.g., high conservation value forests). The extent of these differences goes beyond the language within the standard and includes application of additional policies (e.g., the FSC Pesticides policy) and was therefore excluded from this comparison.

## **Program Impacts: Geographical Distribution and Participating Companies**

A final way to compare the FSC and SFI programs is to look at their geographical distribution and participating companies (Table 7). The FSC operates globally with impact in over 80 countries. The SFI is a North American program with direct forest management impact throughout the United States and Canada. The SFI supports global forestry through participation in the Programme for the Endorsement for Forest Certification (PEFC) with impacts in at least 35 countries.

	Certified Area	Certified Area	Certified	Certified	Certified	Certified		
	in the United	in North	Area	Companies in	Companies in	Companies		
	States	America	Globally	the United	North American	Globally		
	(acres)	(US and	(acres)	States (chain-	(US and Canada)	(chain-of-		
		Canada)		of-custody)	(chain-of-custody)	custody)		
		(acres)						
SFI	56 million	176 million	570 million*	895	1,032	7,804*		
FSC	34 million	130 million	333 million	3,855	4,745	20,689		

Tabla 7	Cartification	Activities	oftho	SEI on	4 FSC	Drograms
Table /.	Certification	Acuvines	or the	SLI and	игэс	rrograms

\* Global impact of SFI Program as a participant in the PEFC

Sources: www.pefc.org, www.fsc.org, www.fscus.org, www.sfiprogram.org

### The Green Building Context: The LEED Benchmarking Debate

In recent years, one of the reasons the question of differences between FSC and SFI has been raised is because of green building standards, including the USGBC's LEED program.<sup>16</sup> Since its inception, the LEED program has awarded credit for the use of FSC-certified wood and has not awarded credits for products certified to any other forest certification standard.<sup>17</sup> Starting in 2006 and culminating with a vote in 2010, the USGBC pursued the development of a mechanism that would potentially allow other forest certification programs to become recognized. The "Forest Certification Benchmarking" process was drafted to define acceptable standards for any forest certification program that USGBC would endorse. The benchmarks were reflective of existing forest certification programs and identified social, environmental and economic considerations that have relevancy to the responsible sourcing of all materials.<sup>18</sup> The outcome of the proposed Forest Certification Benchmark was that it did not pass the USGBC member ballot. As a result, the Certified Wood credit in LEED remains unchanged.<sup>19</sup>

### The Bottom Line

This report provides insight into differences between the FSC and SFI forest management certification standards. There are significant differences between the standards for each program and these differences can vary from region to region although to a lesser degree than they did in years past. Ultimately, the decision to choose between one program and the other will depend upon unique and perhaps personal considerations, whether they be economic, social or environmental.

https://www.dovetailinc.org/files/DovetailUSGBC1009.pdf

<sup>&</sup>lt;sup>16</sup> The United States Green Building Council (USGBC) manages the Leadership in Energy and Environmental Design (LEED) standard which is the largest green building program in the country.

<sup>&</sup>lt;sup>17</sup> LEED does not prevent a project from using wood from other certification programs nor does it restrict the use of non-certified wood (except in the case of tropical wood), but credit is only given for the use of FSC-certified wood. <sup>18</sup> Dovetail released a report in 2009 addressing the USGBC benchmarking process, available at:

<sup>&</sup>lt;sup>19</sup> http://www.usgbc.org/DisplayPage.aspx?CMSPageID=2378

## *This report was prepared by* **DOVETAIL PARTNERS, INC.**

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DOVETAIL PARTNERS 528 HENNEPIN AVE, SUITE 703 MINNEAPOLIS, MN 55403 USA INFO@DOVETAILINC.ORG WWW.DOVETAILINC.ORG 612-333-0430 (TEL) 612-333-0432 (FAX)

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