



**FOREST STEWARDSHIP COUNCIL™**  
**UNITED STATES**

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## **Message from the Standard Development Group Co-Chairs**

**On behalf of the Standard Development Group, we present to you the final pieces of our Draft 1 FSC US National Forest Stewardship Standard (Version 2) and request your feedback on their contents. These materials represent a consensus between social, economic, and environmental interests, and include:**

- ***Family Forest Indicators* for small and low intensively managed forests,**
- ***Plantation Indicators* for management units that include plantations, as defined by FSC, and**
- ***Federal Lands Supplementary Requirements* for management units that are managed by Federal agencies.**

### Your Input

The Forest Stewardship Council is built on a balanced, transparent, and multi-chambered system of governance that is open to anyone interested in participating. This inclusive approach helps make FSC the gold standard for responsible forest management, and is one way that FSC ensures our standards represent a consensus between diverse interests, and a practical approach to environmentally, socially, and economically sound forest management. So, we sincerely value your time and thank you in advance for your input. We are made stronger every time stakeholders like you engage to build and improve our shared work.

This public consultation represents the second phase of our Draft 1 public consultation. Our first consultation, held last year, focused on the 'base indicators' that will be applicable to most FSC certified forest management organizations. With this consultation, we address alternate indicators for Family Forests and Plantations, in addition to supplementary requirements for Federal lands.

### Development Process

With this public consultation, the Standard Development Group is delivering the second set of outputs from FSC's efforts to revise its 2010 US Forest Management Standard.

The process began in 2018 and represents extraordinary dedication and effort. The technical Working Group and the FSC US Board of Directors (serving as the Standard Development Group) have been informed by input from FSC US staff, consultants, technical advisors, and direct experience from across a wide diversity of US regions and stakeholder groups. The Working Group (which is listed below) strove to balance objective participation with accurate representation of their chamber perspectives and unique areas of expertise (e.g., public lands management, auditing, industrial forest management, ecology, social impacts, among others) in their recommendations to the Standard Development Group. With a similar commitment to the quality of outputs and representing the diverse contexts of the US, the Standard Development Group (also listed below) focused on feasibility of implementation, clarity of intent, and ensuring that core values of FSC forest management are respected.

Importantly, this revision process builds on a Standard that is already widely-recognized as exemplary. Revisions focused on improvements that address known challenges in the

Standard, including indicators that have been difficult for certified organizations to interpret and for Certification Bodies to audit, or that did not produce the outcomes intended. The Working Group used existing indicators when possible to maintain consistency for certified organizations, while trying to simplify and streamline the Standard's language.

We believe that FSC certification motivates positive economic, environmental, and social outcomes for the businesses, communities, individuals, and forests involved. We know that diverse forest ownerships including family forests, plantations and federal lands, are all central to achieving our mission and vision. We recognize that this opportunity is lost if the barriers to certification – real and perceived – are insurmountable. Therefore, a key objective in developing these draft materials has been to ensure that FSC-certification remains feasible for all forestlands and ownership types. The goal of these draft materials is to effectively address special contexts and the relative level of risk to important values from forest management activities that occur within these contexts.

We are looking forward to hearing from you. Further improvements to our FSC US National Forest Stewardship Standard (Version 2) depend on your comments. Thank you!

*–Brent Davies & Paul Vanderford, Co-Chairs, FSC US Standard Development Group*

### **How to participate in the consultation**

Individuals who are interested in participating in this second phase of the public consultation on Draft 1 of the revised FSC US National Forest Stewardship Standard are encouraged to [visit the web pages dedicated to the consultation](#). Within these web pages, participants will find the draft materials, plus additional resources, learn about opportunities to participate in webinars, and how to submit comments on the draft materials. Stakeholders are invited to respond to the consultation on all three topics (i.e., Family Forest Indicators, Plantation Indicators, and Federal Lands Supplementary Requirements), or only the topic(s) of interest to you.

For each topic, the consultation begins with broad overview questions, but then also includes targeted questions on issues for which the Standard Development Group is specifically looking for feedback. Finally, for each topic, the consultation provides an opportunity to share indicator- or supplementary requirement-specific comments. It is not essential to respond to all questions, and if your time is limited, we encourage you to prioritize those topics and questions where you believe your knowledge and experience best positions you to assist the Standard Development Group.

Regardless of the time that you are able to dedicate to this consultation, we greatly appreciate your input. Our goal is to deliver a standard that is both best-in-class and achievable. To help accomplish this goal, we will need clear, actionable input from an informed and diverse set of stakeholders during this consultation. Your participation makes this possible. Thank you!

***Any comments that a participant wishes to be formally recognized must be submitted via the FSC Consultations Platform by Monday, June 14, 2021.***

## **Summary of process**

In April 2017, the FSC US Board of Directors agreed to take on the role of Standard Development Group for the revision of the FSC US Forest Management Standard. FSC US staff began to organize and plan for the process before deciding to delay the effort for one year to focus on the FSC US Controlled Wood National Risk Assessment development process. In early 2018, a Working Group of technical advisors was appointed by the Standard Development Group and the real work began.

From 2018, through early 2020, the Working Group focused on the base indicators of the standard, the indicators that are applicable to most FSC-certified forest management organizations. Upon receipt of the Working Group's recommended set of indicators, guidance annexes and defined terms, the Standard Development Group began a thorough review of the materials. On August 31, 2020, the Standard Development Group approved Draft 1 of the base indicators and associated annexes for public consultation, and the Draft 1 Phase 1 consultation was held October to December 2020.

After making their recommendations on the base indicators, the Working Group turned to the alternate indicators for plantations, family forests, and the supplementary requirements for Federal Lands. These alternate and supplementary requirements were developed with the consulted Draft 1 base indicators as their foundation. The Phase 2 materials were recommended to the Standard Development Group as they were completed by the Working Group, with the final set shared in December 2020. At this point, the Working Group's active role in the overall revision process came to an end. The Standard Development Group completed similarly thorough reviews of these materials, as they had for the base indicators materials.

On March 26, 2021, the Standard Development Group approved Draft 1 of the Family Forest Indicators, Plantation Indicators and Federal Lands Supplementary Requirements for the Draft 1 Phase 2 public consultation.

### **Technical Working Group Members:**

- Karen Brenner, Independent Consultant
- Steve Grado, Mississippi State University
- John Gunn, University of New Hampshire, SIG-NAL
- Stuart Hale, The Nature Conservancy
- Daniel Hall, Guide Environmental
- Brian Kittler, American Forests
- Sean Ross, Lyme Timber Company
- Mickey Rachal, RoyOMartin
- Christopher Reeves, IKEA Purchasing Services (US) Inc. (2018-2019)
- Mark Heyde, State of Wisconsin – Department of Natural Resources

### **Standard Development Group Members\*:**

- Tim Beyer, State of Minnesota – Department of Natural Resources (Economic Chamber)
- Sarah Billig, Mendocino Redwood Company (Economic Chamber)
- Mike Houser, PotlatchDeltic Corporation (Economic Chamber)
- David Williams, Williams-Sonoma, Inc. (Economic Chamber)

- Brent Davies, Ecotrust (Environmental Chamber)
- Stuart Hale, The Nature Conservancy (Environmental Chamber)
- Tracy Stone-Manning, National Wildlife Federation (Environmental Chamber)
- Linda Walker, World Wildlife Fund – US (Environmental Chamber)
- John Fenderson, Croatan Institute (Social Chamber)
- Shoana Humphries, Individual member (Social Chamber)
- Paul Vanderford, Sustainable Northwest (Social Chamber)
- Ted Wright, Trust to Conserve Northeast Forestlands (Social Chamber)

*\* FSC US Board of Directors at the time of the March 26, 2021 approval for public consultation.*

### **Family Forest Indicators**

Globally, FSC refers to family forests as Small and Low Intensity Managed Forests (SLIMF). Non-public management units are eligible to use the Family Forest Indicators if they meet the size criteria (less than 2470 acres or 1,000 hectares) or the management intensity criteria (represents a very low level of harvest). Non-federal public lands may only achieve eligibility through the size criteria, and not through the management intensity criteria. Federal lands are proposed to be ineligible to use the Family Forest Indicators, regardless of size or management intensity. Approximately 4.5 Million acres of family forests are FSC-certified in the US, but there is huge potential for a great many more to become so.

To increase the potential for positive impact from FSC-certification on family forests, the revision focuses on increasing the feasibility for these kinds of lands to be certified, while still ensuring conformance with the FSC Principles and Criteria (when deemed possible for family forests). This meant streamlining the Family Forest Indicators (i.e., simplifying language and reducing prescriptiveness), improving how the risk to economic, social and environmental values from forest management on these lands is characterized, clarifying how the Family Forest Indicator framework is to be applied during audits (i.e., how is an auditor to handle “not applicable” and “low risk” indicators?), and ensuring that the framework would not at any point leave a family forest in a critical situation where they would be unable to conform with a requirement due to their size or level of management intensity.

There are a total of 102 base indicators proposed to have Family Forest Indicators, which represents a significant increase over the existing standard with 70. Similar to the existing standard, the revised draft includes Family Forest Indicators in all Principles. However, the proposed indicators are not spread evenly throughout the standard – Principle 9 (High Conservation Values) has only four Family Forest Indicators proposed, whereas Principle 7 (Management Planning) has twenty-six.

### **Plantation Indicators**

FSC defines plantations as forest areas established by planting or sowing with regular spacing and even ages, and lacking most of the principle characteristics and key elements of native forest ecosystems. However, not all planted stands are classified as plantation. FSC supports the responsible management of existing plantations, and the products derived from harvesting activities in these areas, as a strategy to complement conservation and the sustainable use of native forests.

While conformance requirements for plantations are not new to the US Standard, how these requirements are included will change. Previously, Principles 1-9 applied to all management units (including those with plantations), and Principle 10 applied only to management units with plantations. In the revised standard, all ten Principles will apply to all management units. Conformance requirements specifically for management units with plantations are now included as alternate indicators in Principle 6 (Environmental Values and Impacts) and Principle 10 (Implementation of Management Activities).

In the United States, there are currently only three certificate holders with FSC-certified plantations covering approximately 335,000 acres. The vast majority of this area is owned by a single certificate holder. The Standard Development Group believes that there would be on-the-ground environmental and social benefits resulting from additional certification of plantations in the US.

In developing the proposed Draft 1 Plantation Indicators, the Standard Development Group considered the increased risk to environmental and social values linked to the increased intensity of management activities in plantations, the existing Principle 10 indicators, changes already proposed in the base indicators, and perceived barriers to FSC certification for plantations in the US. The most prominent identified barrier is a requirement in the existing standard for up to 25% of the management unit (scaled to the size of the management unit) to be maintained in or restored to a semi-natural or natural state if the management unit includes any plantations. The revised Plantation Indicators define a consistent expectation (15%) for the percentage of the management unit to be maintained in or restored to a semi-natural or natural state, regardless of management unit size. The Standard Development Group also added an exception to this requirement for management units where less than 5% of the management unit is classified as plantation.

### **Federal Lands Supplementary Requirements**

Federal lands, particularly National Forests, are intended to reflect the values and interests of all Americans. These lands are held to higher standards, requiring managers to balance a wide array of values. Supplementary Requirements for USDA Forest Service lands were first incorporated into the existing US standard in 2019. Supplementary Requirements for lands managed by the Department of Defense and the Department of Energy were developed and approved by FSC US Board of Directors in 2004 and have been in use until very recently. The FSC US Federal Lands Policy requires similar considerations for any other Federal agency that wishes to consider FSC certification for lands that they manage.

As part of this revision, the Standard Development Group fully reconsidered the existing Supplementary Requirements, including changes needed to address the transfer to a revised set of Principles and Criteria (i.e., from Version 4 to Version 5), how to align the existing Supplementary Requirements for different Federal agencies, and consideration of opportunities for strengthening the Supplementary Requirements identified by stakeholders.

The Draft 1 materials include supplementary requirements and/or supplementary guidance, intent or applicability language for Federal lands in all ten Principles. However, the requirements predominantly occur in Principle 6 (Environmental Values and Impact). Most of these requirements are “add-ons” to the base indicators; that is they represent supplementary requirements with which certified Federal lands would need to conform, in addition to the requirements of the base indicators. The Standard Development Group believes that the supplementary requirements and additional language proposed in this Draft 1 are adequate to address the unique conditions and critical roles of lands managed by any Federal agency, and

therefore have not separated out specific supplementary requirements for particular Federal agencies.

At this time, there is only one FSC-certified management unit that is managed by a Federal agency. However, once this revised set of Federal Lands Supplementary Requirements is finalized, FSC US looks forward to working with the USDA Forest Service and other Federal agencies to explore FSC certification of the lands they manage. As with any land manager, the decision to seek FSC-certification for a Federal management unit is completely voluntary and will be made at the discretion of the Federal agency responsible for managing those lands.

### **What to expect after the consultation**

Following the close of this second phase of consultation, FSC US staff and the Standard Development Group will work to organize and evaluate comments received. Comments will be considered by the Standard Development Group as they work to develop Draft 2 of the revised standard.

A consultation report that covers both Phase 1 and Phase 2 of the first consultation will be developed by staff and the Standard Development Group. The report will summarize issues raised, who commented (how many by chamber, etc.), and general responses to comments along with how comments were taken into account during development of Draft 2. Finally, the report will include a copy of all formal comments received (with attribution). This report will be available to stakeholders during the public consultation on Draft 2.

FSC US and the Standard Development Group are planning for the second consultation on Draft 2 (for all elements of the standard – base indicators, alternate indicators and supplementary requirements) to begin during the third quarter of 2021. During the consultation, FSC US will coordinate field testing of new or significantly changed requirements. Insights gained from the second consultation and field testing will be used to develop a final Draft 3 of the revised standard. Our goal is to submit Draft 3 to FSC International for approval in early 2022. The approval process will likely take at least six months, possibly longer. Following approval and publication of a revised FSC US National Forest Stewardship Standard (Version 2), certified organizations will have one year to transition to the revised standard and meet its requirements.