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# PINCHOT INSTITUTE FOR CONSERVATION

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## **National Forest System (NFS) Certification Study**

*An Evaluation of the Applicability of Forest Stewardship Council (FSC) and Sustainable Forestry Initiative (SFI) Standards on Five National Forest System Units*

### **QUESTIONS AND ANSWERS**

#### **1. What is forest certification?**

Forest certification is a non-regulatory, market-based means of promoting responsible forestry practices. Forest certification provides an independent third-party assurance that a forestry operation meets standards set by a certification program. Landowners apply voluntarily. Certification is focused on the forest management unit level and is often associated with eco-labeling and chain-of-custody certification for forest products removed.

While there are four certification programs operating in the U.S., the Sustainable Forestry Initiative (SFI) and Forest Stewardship Council (FSC) are the major programs and most suitable for large areas of public lands. The area of SFI and FSC certified forests in the U.S. has increased from virtually none in 1998 to over 60 million acres today. Over 14 million acres of primarily state-owned public land have been certified in the U.S., mostly to joint SFI/FSC standards.

#### **2. What work has the Forest Service undertaken so far relative to certification processes?**

The Forest Service first considered testing certification on the Lakeview Federal Stewardship Unit, a portion of the Fremont-Winema National Forests. At that time, FSC auditors had little experience on public lands, and SFI had not yet launched a third-party certification program. Based on the questions raised both inside and outside the Forest Service on how certification could apply to the National Forest System (NFS), the Forest Service decided not to pursue certification.

Over the past 15 years, the Forest Service has been approached by various outside organizations and communities about carrying out pilot tests of certification on NFS lands. Current Forest Service policy is to not seek certification. However, the Forest Service will cooperate with outside parties who wish to review management practices on national forests. In addition, the policy does allow for an outside organization to independently coordinate an evaluation relative to certification standards, with willing participation of a national forest.

The NFS Certification Study is designed to evaluate the implications of third-party certification under SFI and FSC on a number of national forests. These evaluations will

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give the Forest Service information to assess the potential benefits, costs and other implications of third-party certification.

### **3. On which national forests did the studies take place?**

The following management units (study units) participated in this study:

- Allegheny National Forest (PA)
- Lakeview Federal Stewardship Unit on the Fremont-Winema National Forest (OR)
- Chequamegon-Nicolet National Forest (WI)
- Mt. Hood National Forest (OR)
- National Forests in Florida

The Forest Service selected the study areas based on several criteria, including stakeholder inquiries about certification and the ready interest of forest supervisors and regional offices. It was also important that the study areas represent diverse geographical, socio-political, economic and ecological settings.

The evaluations were designed to closely approximate the process that a forest would undergo were they actually seeking certification. To this end, the selected firms and audit teams were required to use the same approach they would for an actual certification assessment, as accredited by the FSC and SFI certification programs. The format of the findings was also intended to emulate actual certification reports.

### **4. Will the study lead to certification of any national forests?**

Actual certification of national forests is not the objective of this effort, and is explicitly outside the scope of the study. The study will better inform the Forest Service about the ways its current management on the national forests is and is not, consistent with the requirements of internationally recognized standards for sustainable forestry. The Forest Service has not determined whether to pursue certification. This project will inform that decision.

### **5. What was the auditing process and what were auditors looking for?**

Third-party certification is based on on-site comprehensive assessments performed by firms accredited by the certification body (in this case FSC and SFI). Initially the audit team gathered and reviewed a variety of forest documents, including management plans, environmental analyses, contracting instruments, etc. Then a portion of the team spent 2-3 days with the forest staff during an initial on-site preliminary review, conduct up-front coordination with the units and then make a preliminary site visit, which is followed with a written report to the unit recommending whether it is ready to continue pursuing certification.

Two to three months later, the full team spent at least a week on the forest, conducting a broad-based management review and comprehensive assessment, which includes an evaluation of a variety of activities in the forests and whether they conform to the requirements in the certification standards. The auditors also assessed whether the unit is meeting the requirements of its own direction and management plans. The full audit teams on each forest included five or six qualified individuals, representing a broad range

of expertise. The teams typically included a lead auditor, forester, wildlife biologist, forest ecologist, hydrologist, and a social scientist and/or economist.

The evaluation also included interviews with external stakeholders, Forest Service employees, contractors, and others who are affected by, or just interested in, how the lands are managed. Through these stages, auditors pay close attention to the overall management system, including the management plan and monitoring programs, to make sure that the landowner is capable of, and committed to, tracking and maintaining healthy forests over the long-term.

A few weeks after completion of the field assessment, the auditing firm submits a draft certification report to the audited unit for comment. A final report is then completed and provided to the audited unit. FSC audits also require a peer review of the final report before it is issued. The draft and final report most often include requests for changes in management to better conform to the certification standard.

A summary of findings on all audited study units will be publicly available, as well as the report by the PIC on findings and lessons learned from the project.

**6. What audit firms were involved, how were they chosen, what specific standards and procedures did they use in evaluating the study units and how was their experience used in this study?**

Joint FSC/SFI audit firms for each of the evaluations were chosen through a competitive bid process. The Allegheny National Forest and Chequamegon-Nicolet National Forest evaluations were conducted by an audit team formed by the Rainforest Alliance's SmartWood Program and PricewaterhouseCoopers. The Lakeview Federal Stewardship Unit on the Fremont-Winema National Forest and Mt. Hood National Forest evaluations were conducted by Scientific Certification Systems and NSF International Strategic Registrations. The National Forests in Florida evaluation was conducted by SGS Systems and Services Certification, Inc.

Each NFS study unit was evaluated using both SFI and FSC standards. The SFI evaluations used the 2005–2009 Sustainable Forestry Initiative Standard (SFIS). The FSC evaluations for the five management units employed an integrated standard that included the FSC Regional Standards for the appropriate region, the DOD/DOE National-Level Indicators, and Additional Considerations (see discussion, next question). The regional standards used in the study included the:

- FSC Pacific Coast (USA) Regional Forest Stewardship Standard, v9.0 - Mt. Hood National Forest and Lakeview Federal Stewardship Unit on the Fremont-Winema National Forest
- FSC Appalachia (USA) Regional Forest Stewardship Standard, v4.6 - Allegheny National Forest
- FSC Lake States-Central Hardwoods (USA) Regional Forest Stewardship Standard, v3.0 - Chequamegon-Nicolet National Forest

- FSC Southeast (USA) Regional Forest Stewardship Standard - National Forests in Florida

A key value of these evaluations is the information they provide to the Forest Service, the certification programs, and other interested parties. PIC interviewed those involved in the certification evaluations in order to capture additional lessons learned from participants' experience. The coordination teams (Forest Service staff) for each national forest completed a questionnaire and participated in follow-up interviews in order to better understand the forests' experience with the certification evaluations. This post-evaluation included an inquiry into their perspectives on the certification process, the value and scope of the evaluations, and type of value certification may offer to the forests.

Follow-up interviews were also conducted with each lead auditor from the six participating audit firms to gather feedback on their experience. These interviews helped capture their insights on the applicability of FSC and SFI standards on national forests and the most effective manner by which the Forest Service should undergo an assessment should they wish to become certified.

PIC incorporates everything in their study report, which is available at: <http://www.fs.fed.us/projects/>.

#### **7. If the Forest Service were to seek certification of NFS lands, what process would need to be followed?**

While the Forest Service has not decided whether it will seek certification, if it were to do so, several things would need to happen. The certification programs themselves would need to make policy decisions if the Forest Service asked to become certified. Members of the Sustainable Forestry Board, and SFI program participants in general, have no standing policy expressly prohibiting the application of SFI certification of federal lands. However, SFI would likely want to consider how certain elements of the standard are applied.

FSC has imposed several conditions that must be met before any federal lands can be offered certification. There needs to be: (1) a willing landowner; (2) public consensus; and, (3) a set of standards for each new federal land type. To date, FSC has approved federal land standards for only the U.S. Department of Defense and the U.S. Department of Energy. The three pre-conditions that must be resolved before a national forest unit can seek certification have not yet been met.

Pursuant to the FSC Federal Lands Policy, FSC would need to develop and approve a separate set of standards specific to NFS management. As part of the study, each audit team developed Additional Considerations (ACs) for FSC certification of NFS lands. It is intended that the ACs developed as part of this study could inform the process that will need to be completed by FSC- US. The AC development as part of this study does not assume the role of FSC-US in developing duly approved indicators specific to the Forest Service.

The ACs developed by the three FSC audit firms taking part in this study went through a peer review and public participation process prior to each field evaluation. Each of the five national forest certification evaluation reports outline conformance to the existing FSC standards include Corrective Action Requests (CARs) for findings of non-conformance. However, CARs were not reported for the ACs, as these do not represent requirements within existing standards and, in that sense, are speculative.

A landowner seeking SFI or FSC certification must formally commit to reporting and management measures specific to each certification program. How and whether the Forest Service could make these commitments would need to be determined.

#### **8. What role did/will external stakeholders play?**

There were opportunities for public involvement as part of the evaluations, so anyone interested was able to both learn more about the certification process in each study area, and comment on the management of the national forests.

Formal public involvement occurred in several ways. First, in order to match the requirements of the FSC Federal Lands Policy, the selected audit team was required to conduct stakeholder consultation. Another stage of consultation occurred through one or several meetings local to the forest, as is typical of FSC certification assessments. Both of these processes were coordinated by the auditors.

The public will also be given an opportunity to review and comment on the overall report on the findings and lessons learned prepared by the PIC.

#### **9. What were some of the findings of the certification evaluations?**

All certification evaluations have been conducted as functional equivalents of major, broad-based management reviews of all aspects of national forest management. The draft FSC and SFI reports delivered to the five national forest units, read like other certification reports. They include a summary of the management setting, stakeholder feedback, findings of non-conformance (major and minor), and issuance of CARs.

The units evaluated meet or exceed many SFI and FSC certification requirements. However, certification under either certification scheme would not be a forgone conclusion for the Forest Service. These reports describe a number of non-conformances and gaps between national forest management activities and the standards and requirements of the certification programs. The certification programs also review how well a landowner meets their own internal policies and standards in addition to certification standards. Consequently, some of the identified non-conformances address areas where the national forest unit may be falling short of the Forest Service's own stated goals.

Some CARs were specific to only one management unit. Others showed up consistently on several units. Major and minor CARs showing on more than one unit included those related to inadequacies in: 1) addressing the backlog of road maintenance (inadequate

road maintenance and decommissioning), 2) adequately monitoring of non-wood forest products and wildlife, 3) addressing forest health and insect and disease problems, 4) old-growth protection and management issues, and 5) monitoring compliance with contractor worker safety requirements and training.

Most CARs specify a timeline for resolution. Often the CARs will establish benchmarks for progress on issues that are difficult to address within a year or two.

#### **10. What do Corrective Action Requests (CARs) require?**

The CARs proposed by the FSC and SFI auditors are associated with a timeline. Major CARs must be resolved before certification can be offered—they are pre-conditions for certification. An auditor can also determine that major CARs can be downgraded to minor CARs, provided that the issue is partially addressed and there is a plan for full resolution. In the past, minor CARs could be scheduled for resolution over the five years until the re-audit. The new accreditation guidelines for FSC restrict the time allowed to satisfy minor CARs to one year. So all CARs, whether FSC or SFI, issued as part of the study, would in a real certification, need to be addressed either prior to becoming certified or in the first year.

#### **11. Does becoming certified mean increasing focus on producing and marketing wood products?**

No. Landowners seeking certification do so with policies, management objectives, and systems already in place. Certification programs assess whether these policies and their implementation are consistent with standards for sustainable forest management. In some cases, certification has required the landowner to decrease the amount of harvesting in order to protect certain areas of the forest, or to better assure long-term sustainability. In other cases, certifiers have suggested to landowners that they make their wood products offerings more consistent and/or more equitably distributed in order to better support local businesses and also maintain the health of the forest resource. However, the purpose and extent of harvesting timber and other products is a decision the landowner must make according to the processes to which they are bound (e.g., corporate board, tribal council, public process)

The Forest Service has legislatively mandated processes for determining the amount of forest products harvested. Pursuing certification would not exempt the agency from meeting these mandates. The type and amount of harvesting taking place in each of the study areas differs. A major goal of this study is to help the Forest Service better understand what sort of changes might be required in order to become certified, and whether these could be addressed through the process by which the Forest Service makes decisions.

Furthermore, certification is meant to address forest management as a whole, including relevant and significant non-timber forest uses, resources, and impacts. Forest uses, resources and impacts which may be relevant include, in addition to timber management, non-timber forest product (NTFP) harvest, resource restoration, biodiversity protection and restoration, watershed protection and water quality restoration, roadless area and

wilderness conservation, fire fuels management, grazing, mineral and oil exploration and extraction, development of water storage and distribution facilities, motorized recreation, other recreation, and other development.

**12. Is certification compatible with ecological restoration?**

Yes. Certification is designed to assure the public that a landowner is following a given set of standards that promote sound forest stewardship, including ecological restoration. Certification requirements seek to integrate ecological, socio-cultural, and economic sustainability objectives in managing for healthy and resilient landscapes.

**13. Why do these certification evaluations need to be a study and not a complete certification process? If the forests do well in their evaluations, will they become certified?**

For many reasons, detailed in response to other questions, the degree of applicability and value of FSC and SFI certification for the NFS remains uncertain. The Forest Service has a wider range of capacities and obligations than any other land management organization. As such, both the certification programs and the Forest Service need to learn more about how certification would function in this setting. Some of the types of questions that will be answered include:

- What is the nature of the value certification can offer to the NFS (e.g., proof, management improvements, and parity with other public lands—national and international)?
- What are the barriers (technical, legal, philosophical, external-political, etc.)?
- How can certification dovetail with other tools/priorities?
- In what ways is current Forest Service management on the national forests consistent and not consistent with the requirements for certification?

**14. Will this study affect current policy issues on national forests?**

These evaluations cannot change current policy decisions, legal cases, or other issues facing the Forest Service nor does it exempt the agency from meeting legislative mandates or executive orders. The study is exploratory. However, as would occur in a real certification assessment, the auditors will consider any and all policies and practices and what they imply for conformance to certification standards. As a side benefit for the management units participating in the study, the evaluation provides an independent evaluation that could be used to help improve the quality of its management.

**15. Why did the study utilize only two of the four certification programs? Does the Forest Service endorse SFI or FSC?**

**Of the four certification programs—American Tree Farm System, FSC, Green Tag, and SFI—FSC and SFI are the two major, internationally recognized, programs operating in the U.S. The Tree Farm and Green Tag certification programs are designed for smaller, typically non-industrial private, forest landowners and so do not meet the needs of NFS lands.**