



**FOREST STEWARDSHIP COUNCIL™
UNITED STATES**

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FSC® F000232

Message from the Standard Development Group Chair

On behalf of the Standard Development Group, I present to you this draft FSC US National Forest Stewardship Standard (Version 2) and request your feedback on its contents.

The standard represents a consensus between social, economic, and environmental interests. It maintains consistency with the previous version, and accomplishes the following:

- **Aligns the US standard with the new FSC Principles and Criteria (V5-2), and FSC International Generic Indicators (IGI);**
- **Addresses high priority issues identified by stakeholders;**
- **Incorporates guidance that has been in use, but not formally adopted; and**
- **Addresses needed editorial and grammatical clarifications.**

Your Input

The strength and value of the Forest Stewardship Council standard is built on our balanced, transparent, and multi-chambered system of governance open to anyone interested in participating. This is what makes it the gold standard for responsible, climate-smart wood and fiber sourcing.

Our system requires participation from all three chambers (Social, Environmental, and Economic) to maintain positive impact and balance. We value your time and ask for your involvement during this process.

This public consultation represents only the first phase of our Draft 1 public consultation. This consultation focuses on the 'base indicators' that will be applicable to most FSC certified forest management organizations. In the coming months, we will initiate the second phase of the Draft 1 public consultation which will address alternate indicators for Family Forests (i.e., small and low intensity managed forests) and for Plantations, in addition to supplementary requirements for certain federal lands.

Development Process

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

The revision process began over two years ago, representing extraordinary dedication and effort on the part of a technical Working Group and the FSC US Board of Directors (serving as the Standard Development Group). The Working Group drew from inputs provided by FSC US staff, consultants and other technical advisors, as well as their vast knowledge and experience, coming from a wide diversity of US regions and stakeholder groups. The Working Group strove to balance objective participation with representing 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 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 was already exemplary. In doing so, the Working Group emphasized addressing 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, trying to simplify and streamline standard language. They also increased internal consistency in language, and identified practical solutions to challenges. Overall, the standard has significantly more guidance, and leaner indicators with clearer intent. This will result in more consistent application by certified organizations and auditing by Certification Bodies, and improved outcomes overall.

FSC's revised Principles and Criteria (Version 5), with which we are now aligning the US standard, introduced new concepts and expanded on others to strengthen the attention and protections given to valued elements of responsible forest management, including:

- A formal dispute resolution process;
- Workers' rights;
- Free, prior, and informed consent (FPIC);
- Estimates of externalities;
- Identifying and addressing damage to environmental values;
- Modified Representative Sample Area (RSA) expectations; a
- A conservation areas network;
- More structured management planning and monitoring;
- A modified High Conservation Value (HCV) construct; and
- Scale, Intensity, and Risk (SIR) considerations.

These changes are the result of a rigorous, diverse global development process which represented the values and approval of the FSC membership. While recognizing the importance of these concepts in the revised Principles and Criteria, the Working Group and Standard Development Group looked for ways to simplify and streamline these additions, add flexibility for achieving the desired outcomes, and adapt them to the US context.

Although not required by the revised Principles and Criteria, the revised National Forest Stewardship Standard introduces climate change considerations for the first time in structured, practical ways. This is a critical element, as it directly addresses a global crisis that is already influencing the ecological integrity and productivity of forests in the United States.

The result is more than just a new FSC Standard that is more relevant and directly addresses the dominant issues affecting US forests. It also represents years of consensus building and

compromise between diverse interests. The conversations and debates held by the Working Group and Standard Development Group are similar to ones dominating conversations across the US and around the globe about responsible forest management.

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

–Paul Vanderford, Chair, FSC US Standard Development Group

How to participate in the consultation

Individuals who are interested in participating in first 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 revised standard, plus additional resource materials, learn about opportunities to participate in webinars, and how to submit comments on the draft.

Any comments that a participant wishes to be formally recognized must be submitted via the FSC Consultations Platform by Friday, December 18, 2020.

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 so they could 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.

Using the existing forest management standard and the International Generic Indicators, FSC US staff suggested an initial set of indicators for each Criterion in the revised Principles and Criteria. The Working Group evaluated these suggestions and worked to improve, refine or replace the indicators. Along the way, the Working Group also developed a number of new guidance annexes. The Working Group emphasized streamlining indicators when possible, addressing known problem areas to increase the consistency of interpretation.

Upon receipt of the Working Group's recommended set of indicators, guidance annexes and defined terms in early 2020, the Standard Development Group began a thorough review of the materials. They focused on clarity of intent, feasibility of implementation for certified forest management organizations, and ensuring that core values of FSC are respected. This review and subsequent revisions addressed all elements of the draft standard.

On August 31, 2020, the Standard Development Group approved Draft 1 of the base indicators and associated annexes for public consultation. This approval included a number of conditions that were resolved over the following weeks.

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 – Dept. of Natural Resources

Standard Development Group Members*:

- Sophie Beckham, International Paper (Economic Chamber)
- Tim Beyer, State of Minnesota – Dept. of Natural Resources (Economic Chamber)
- Mike Houser, PotlatchDeltic Corporation (Economic Chamber)
- Sarah Billig, Mendocino Redwood Company (Economic Chamber)
- Brent Davies, Ecotrust (Environmental Chamber)
- Tracy Stone-Manning, National Wildlife Federation (Environmental Chamber)
- Rolf Skar, Greenpeace USA (Environmental Chamber)
- Linda Walker, World Wildlife Fund – US (Environmental Chamber)
- John Fenderson, Fellow, Croatan Institute (Social Chamber)
- Cece Headley, Northwest Forest Worker Center (Social Chamber)
- Paul Vanderford, Sustainable Northwest (Social Chamber)
- Shoana Humphries, Individual member (Social Chamber)

** FSC US Board of Directors at the time of the August 31, 2020 approval for public consultation.*

Major changes

- There are a number of changes in the overall structure of the FSC Principles and Criteria between Version 4 (the framework for the existing FSC US forest management standard) and Version 5 (the framework for the revised FSC US National Forest Stewardship Standard). The most significant changes:
 - Principle 2 is dedicated to Workers' Rights and Employment Conditions
 - Principle 4 is dedicated to Community Relations
 - The former Principle 2 (Use & Tenure Rights) and related criteria have been distributed among Principles 1 through 5
 - Principle 10 now addresses implementation of management activities (although very little of the content is new to the standard)
- While resolution of disputes was previously a component of the US standard, certified organizations were not required to develop a dispute resolution process. The indicators of Criterion 1.6 and guidance in Annex D add a more formal requirement and establish sideboards for the scope of this requirement.
- Principle 2 is now dedicated to Workers, with a new Criterion (2.2) addressing promotion of gender equality, more explicit requirements for training (Indicator 2.5.1), and an extension of worker protections to contractors, subcontractors and their employees. The Standard Development Group has identified concerns regarding the feasibility of verifying conformance with some of the draft indicators, specifically in regard to workers who are not direct employees of the certified organization. These issues will be further explored during the public consultation period through a Forest Workers' Forum.
- The concept of Free, Prior and Informed Consent (FPIC) is now a core component of Principle 3 (Indigenous Peoples' Rights; Criterion 3.2) and Principle 4 (Community Relations; Criterion 4.2). It provides a pathway for certified organizations to work with Native American groups and certain local communities that is fair, lucid, and inclusive of the right to withhold approval for management activities to proceed. An early draft of Free, Prior and Informed Consent guidance was available from FSC International, but input from a US-based consultant, as well as the Working Group, suggested that it was not well aligned with the US context. Annex F provides US-oriented guidance for assessment and confirmation of rights, outreach, and agreements intended to circumvent management activities that will have negative impacts on rights.
- The revised Principles and Criteria introduced a new concept, externalities of operations (Criterion 5.3). The Working Group provided some clarity to the overall concept of externalities, and because they recognized that related estimates could quickly become quite extensive and expensive, they focused on the use of best-available information "that can be obtained through reasonable effort and cost..."
- Climate change is explicitly incorporated into the US standard for the first time. Certificate holders are expected to consider how it may affect their ability to conserve important environmental values (Indicator 6.1.1) and achieve management objectives (Indicator 7.2.4). The revisions include new expectations on monitoring the impacts of

climate change (Indicator 8.1.2) and provide flexibility for implementing adaptation strategies (Indicator 10.2.2).

- The Standard Development Group included a new indicator (Indicator 6.3.2) focused on the practice of whole-tree harvesting. However, they would like to further explore the value added by the new indicator during this consultation.
- The revised Principles and Criteria brought a greater emphasis on restoration, including through the Representative Sample Area approach (see below) and strengthened requirements for identifying and addressing damage to environmental values (Indicator 6.3.3 and Indicator 6.7.7). This includes addressing existing damage that is the result of activities by previous landowners. The Working Group and Standard Development Group included sideboards on the scope of what is expected of certified organizations.
- One of the priority issues for the revision was a need to address the regional requirements that are a legacy from the original US regional standards, held within annexes in the existing US standard. Draft 1 of the revised standard has streamlined and incorporated these regional requirements into the main body of the standard, both for even-aged management (Indicator 6.6.5) and Riparian Management Zones (Indicator 6.7.5). Additionally, the Standard Development Group has proposed increasing the accessibility and flexibility of the two indicators that allow for departures from these regional requirements (Indicators 6.6.6 and 6.7.6). Finally, there is a new indicator focused on encouraging longer rotations that also provides additional flexibility in opening sizes (Indicator 6.8.3).
- The expectations on Representative Sample Areas (Criterion 6.5) changed significantly with the revised Principles and Criteria and International Generic Indicators. Previously, certified organizations were allowed to identify existing protected areas *outside* of their management unit, but the focus is now on establishment of Representative Sample Areas *within* the management unit. Another change is that instead of looking for and protecting *existing* representative examples of native ecosystems, they are now expected to consider *restoring* examples of native ecosystems that do not currently occur within the management unit but could potentially be present. The Standard Development Group worked to ensure that Annex G provides flexibility in how these changes are achieved, while still reflecting the desired intent.

The revised Criterion language also requires that establishment of Representative Sample Areas be “proportionate to the conservation status and value of the ecosystems at the landscape level, and the scale, intensity and risk of management activities.” The guidance in Annex G will help certified organizations determine what this means in their context and help to ensure greater consistency in establishment of Representative Sample Areas across organizations.

- The concept of a Conservation Areas Network (Indicator 6.5.6) was added through the International Generic Indicators. Generally, the Network is a set of areas within the Management Unit* that is managed primarily to conserve environmental or cultural values for the long term. The Network does not necessarily require additional conservation outcomes, so much as it puts together a complete picture of conservation-oriented objectives and resulting conservation areas that address other parts of the

Standard. The Standard Development Group expects that for many organizations, these will be adequate for conforming with this new requirement (see Annex H).

- The revised Principles and Criteria added expectations for more-structured management planning and monitoring. Certified organizations must now demonstrate that they have policies with visions and values aligned with the standard (Indicator 7.1.1) and have established verifiable targets for achieving their management objectives (Indicator 7.3.1). New monitoring requirements build on this structure (Indicator 8.1.1) and expand on monitoring of environmental and social values (Indicator 8.2.1), but this draft revised standard has also eliminated some other specific monitoring requirements. The draft requirements attempt to introduce additional flexibility on how a certified organization may design their monitoring program.
- While technically not a new requirement, the revised standard includes Chain of Custody requirements for certified organizations (Criterion 8.5). Organizations have already been held to similar requirements by their Certification Body. Inclusion of the requirements in the US standard will increase transparency and consistency overall.
- A draft FSC US High Conservation Value Assessment Framework has been accessible to certified organizations for nearly a decade, but was never finalized or approved. A priority for this revision process is to formally adopt a High Conservation Value Framework, which aligns well with a requirement in the International Generic Indicators. The Framework (Annex K) provides guidance on identifying, assessing, managing and monitoring High Conservation Values in conformance with Principle 9. Additionally, the annex includes much needed US-specific guidance on terminology and expectations. The Working Group's perception is that certified organizations have generally over-identified High Conservation Values. They wished to establish clearer thresholds for High Conservation Values versus other environmental and social values. With this guidance, Principle 9 outcomes should become more focused on those values that are deserving of the additional protections afforded by Principle 9 requirements and become more consistent in implementation across the certificate holder base.
- A revised FSC Pesticides Policy approved in 2019 moved away from requiring derogations for Highly Hazardous Pesticide use, and instead implemented a more risk-based approach for pesticide use. The Policy includes a greater emphasis on integrated pest management, development of Environmental and Social Risk Assessments by certified organizations and monitoring of pesticide use. Requirements around pesticides in the draft revised standard (Criterion 10.7) are aligned with the revised Policy.

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What to expect after the consultation

Soon after this Phase 1 first public consultation on the Draft 1 base indicators and associated annexes closes, FSC US will initiate the Phase 2 first consultation on the Draft 1 alternate indicators for Family Forests and Plantations, as well as supplementary requirements for certain federal lands.

Following the close of the Phase 1 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. The same process will occur following the close of the Phase 2 consultation.

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 and who commented (how many by chamber, etc.), and provide general responses to comments along with how they 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) to occur during the third quarter of 2021. During the consultation, FSC US will coordinate field testing of new and significantly changed requirements in the standard. Insights gained from the second consultation and forest 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.