



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

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## **Topic Overview: Plantation Indicators**

*To Support Public Consultation of the Forest Stewardship Council U.S.  
National Forest Stewardship Standard (NFSS)  
Draft 1 Phase 2*

*April 14, 2021*

### **Introduction**

Forest Stewardship Council U.S. (FSC US) developed this topic overview to support stakeholders who are interested in participating in the public consultation on Draft 1 Phase 2 of the revised FSC National Forest Stewardship Standard for the conterminous United States.

The first phase of our Draft 1 public consultation was held in late 2020. That consultation focused on the ‘base indicators’ that will be applicable to most FSC certified forest management organizations. We are now holding the second phase of the Draft 1 public consultation, which addresses alternate indicators for Family Forests (i.e., small and low intensity managed forests) and for Plantations, in addition to supplementary requirements for federal lands. *Please note that the Draft 1 base indicators are out of scope for this consultation.*

As the world’s most trusted forest certification system, FSC’s existing FSC US Forest Management Standard offers a solid foundation for the current revision process. This topic overview is intended to facilitate actionable, informed input as FSC works to further refine Draft 2 of the revised Standard.

Ultimately the revision process is about identifying the appropriate balance between an existing “best-in-class” standard that is practical and achievable, with targeted refinements to streamline the Standard where possible, and incorporate changes that bring it into alignment with FSC Principles and Criteria Version 5, as approved by FSC’s membership.

### **Summary**

FSC defines plantations as forest areas established by planting or sowing with regular spacing and even ages, lacking most of the principle characteristics and key elements of native forest ecosystems. Plantations can include native or non-native species, with one or few species represented. A planted stand is not automatically classified as a plantation – only a portion of planted stands meet the FSC definition of 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. As global consumption of forest products continues to grow, responsibly managed FSC-certified plantations can play a crucial role. While plantations cannot replace the richness, stability, and beauty of natural forests or the complexity of the services they provide, applying the FSC standards to plantations ensures their management is defined by transparency and fairness, and minimizes negative environmental and social effects.

While inclusion of conformance requirements for plantations isn’t new to the US standard, how these requirements are included in the standard 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 SDG believes that there would be on-the-ground environmental and social benefits resulting from additional certification of plantations in the US.

For management units that include plantations, FSC requires a portion of the management unit to be maintained in or restored to a semi-natural or natural state. In the existing standard, the portion to which this requirement applies increases with the size of the management unit, with the largest category requiring 25% to be maintained or restored to a semi-natural or natural state. For management units that are completely plantation (as opposed to a combination of natural forest and plantation), this requirement can represent a major financial impact if a large portion of the plantation has to be moved into less-intensive management.

### **Find it in the Standard**

If one or more Plantation Indicators are included with a base indicator, any portions of the management unit that are identified as plantation are to be assessed for conformance with the Plantation Indicator(s) instead of the base Indicator (i.e., they are to be treated as mandatory alternate indicators to the base Indicators). If no Plantation Indicators are included, then the plantation portions of the management unit are to be assessed for conformance with the base Indicator.

The Standard Development Group (SDG) proposes Plantation Indicators in Criterion 6.6, Criterion 6.8, and Criterion 10.2. Additionally, plantation-specific guidance is proposed in Principle 9 and Criterion 10.9. All recommended Plantation Indicators were based on Principle 10 Indicators from the existing US standard. However, not all Principle 10 indicators were included in the proposed Plantation Indicators – for many of these, the SDG felt that the Draft 1 base indicators adequately addressed any identified risk. The proposed guidance language for Principle 9 (recognizing that while HCV are less likely to occur in plantations, they are still possible) is new.

### **Rationale**

The SDG believes that there is an opportunity in the US to improve outcomes for social and environmental values associated with plantations through FSC certification. Therefore, the SDG's objective for this revision of the Plantation Indicators is to increase the accessibility to FSC certification for plantations in the US, while still addressing elevated risks associated with the increased management intensity, and thereby increase the on-the-ground, positive impact of FSC certification in a greater extent of US plantations.

In developing the proposed Draft 1 Plantation Indicators, the Standard Development Group (SDG) 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.

### **Impacts of the revision**

The revision attempts to streamline the Plantation Indicators by combining similar indicators, reducing redundancy between Plantation Indicators and base indicators, and simplifying indicators. In attempting to address perceived challenges for certifying plantations, revisions

focus on the requirement to maintain or restore a significant portion of the management unit in a semi-natural or natural state. The changes to this requirement represent the most substantive changes in the current revised draft Plantation Indicators.

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. They also add an exception to this requirement for management units where less than 5% of the management unit is classified as plantation. The SDG recognized that all management units will be required to maintain 10% of the management unit in a Conservation Areas Network, and that the 15% requirement for management units with plantations would represent an additional 5% above the Conservation Areas Network requirement for these management units. To clarify expectations, they also added guidance indicating that any areas identified to meet the Conservation Areas Network requirement may also apply to the 15% requirement, and any areas identified to meet the 15% requirement may also apply to the Conservation Areas Network requirement.

FSC does not allow certification of plantations that were created post-1994, which is the year the organization was founded. As a result, proposed changes to the Plantation indicators will not result in additional conversion of semi-natural or natural forests to plantations among existing certificate holders that have FSC-certified plantations.

### **Key questions for public consultation**

- Do any of the proposed Plantation Indicators fail to adequately address the increased risk of negative impacts on environmental or social values associated with the more intensive management within plantation stands?
- Are there any additional base indicators where there the more intensive management within plantation stands may result in a high risk of negative impacts on environmental or social values?
- Are there any base indicators that do not currently have proposed Plantation Indicators that are not feasible for management units with plantations?

### **How to provide input**

Individuals who are interested in participating in the public consultation on [Draft 1 Phase 2](#) 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 Monday, June 14, 2021.***

## ADDENDUM: Guide to the Consultation Platform

For the best user experience, FSC recommends using the consultation platform on a laptop or desktop computer instead of a tablet or other mobile device, if possible. This allows for easier referencing of the context information (yellow background). On a wider screen, the context information appears to the left of the associated consultation questions, instead of below them.

Note that at the bottom of each page in the Consultation Platform, there is a gray drop-down list of all of the sections (either between, or just below, the green “Previous Section” and “Next Section” buttons) that allows you to jump to any section at any time. *A list of these sections is also provided below.*

**IMPORTANT NOTE:** When you have completed entering your comments, you must jump to the final section (i.e., ‘Concluding Comments’) and press the ‘Submit’ button for your comments to be formally submitted.

You may save and return to your comments before you formally submit them. You may also return and edit your comments after formally submitting them until the consultation period ends.

The following provides an index to the Consultation Platform sections for the Plantation Indicators consultation.

1. Background Information  
Provides a brief description of the FSC US National Forest Stewardship Standard revision process. Introduces the second phase of the consultation
2. How to Participate in the Consultation  
Provides important information for respondents to participate in the consultation and requests information about respondents
3. Adequacy and Feasibility of Plantation Indicators  
High-level questions that address adequacy, invite suggestions for other unique issues, and provide opportunity for feedback relating to conformance with base indicators
4. Introduction: Plantations  
Questions pertaining to the “Introduction” section of the Standard
5. Principle-Specific Sections  
*Each Principle begins with any targeted questions from the Standard Development Group for indicators or issues associated with the Principle (NOTE: not all Principles contain targeted questions from the SDG). Then, respondents are provided with a framework for sharing any indicator-specific comments.*
  - Principle 6: Targeted Questions
  - Principle 6: Indicator-Specific Comments
  - Principle 9: Indicator-Specific Comments
  - Principle 10: Indicator-Specific Comments
6. Annexes: General Comments  
Requests general feedback regarding the appropriateness of the annexes for plantations
7. Concluding Comments  
Provides a final opportunity for any additional comments