The following document summarizes the input received during and immediately following the 2018 Controlled Wood Regional Meetings and provides rationale for the resulting mitigation options for Old Growth Forest, along with definition of any identified gaps in the final set of options.

**Please note that any of the proposed mitigation options may be done individually or in collaboration with other certificate holders, or other entities that have similar desired outcomes. Collaboration is encouraged to scale up potential mitigation impact, and FSC US will seek to assist with collaboration when feasible.**

**CENTRAL THEME: Mapping Old Growth**

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| --- | --- |
| Original Proposed Options(#1) Support development and implementation of regulatory policy that requires landowners to declare and map any old growth on their lands.(#3) Work to expand the mapping efforts completed by the USFS PNW Research Station for the Northwest Forest Plan. | Topline Input* Find a way to increase extent/resolution of old growth mapping, but not linked to anything regulatory (due to unintended consequences)
* There may be restrictions on sharing information about old growth linked to sensitive information about listed species
* Remote sensing (Lidar?) would achieve similar results without imposing requirements on private landowners
* Include public AND private lands
* Must be linked to some other action, mapping alone doesn’t mitigate the risk
* Clarify how to audit or measure for effectiveness
* Clarify how an organization can contribute to USFS efforts
 |

*Consultation Insights: Stakeholders from all perspectives identified concerns related to Option #1, including: the inability of certificate holders to influence government regulations; the potential that landowners might harvest old growth in advance of new regulation implementation; that FSC is a voluntary system and shouldn’t be advancing regulations; and a perceived inability to audit or measure the effectiveness of an Organization’s efforts along these lines. However, there was still a perceived value in improving maps of old growth, on both public and private lands. The mapping should be done in a way that: doesn’t require landowner declarations; isn’t focused only on the previous USFS mapping efforts; and doesn’t require the Organization to do the mapping itself. And above all, it must link to actions that mitigate the identified risk and be auditable.*

**Proposed Revised Mitigation Option**

**The following is offered as a two-part option for ‘High Impact’ organizations:**

1. **Develop or join an alliance that is working to map or refine existing maps of old growth in areas that overlap with the specified risk area and the Organization’s supply area that will complement more recent US Forest Service and/or Northwest Forest Plan mapping efforts and that includes mapping of private lands, using remote sensing or other techniques that do not require landowner declarations regarding their ownerships; and**
2. **Use the results of the mapping work to improve implementation of another mitigation option.**

**CENTRAL THEME: Conservation Planning**

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| Original Proposed Options(#4) Promote conservation planning for endangered species that are late-successional dependent (Intent: if habitat is being managed for the species, then it likely will not be lost to/degraded by forest management)(#6) Active participation in federal resource planning processes to encourage protection of existing identified primary forest. | Topline Input* Significant support and little opposition for engagement in planning processes, both those focused on Federal lands alone and those with broader focus – consider combining?
* Not just Federal, also state and local governments
* Some concern regarding planning specifically for endangered species, but overall broad support
* ‘Conservation’ instead of ‘protection’
* ‘Engage in’ or ‘complete’ instead of ‘promote’
* Need consistent terminology – Type 1&2 old growth should be the focus, not ‘primary forest’ or ‘late-successional forest’
* Need action, not just planning
 |

*Consultation Insights: There is broad support for planning in general across all perspectives. The similar input received for both of the original actions indicates that defining the type of planning is not as crucial as ensuring that the intent of the option focuses on old growth conservation. Use of ‘Conservation’ instead of ‘Protection’ brings opportunity for restoration and enhancement, not just ‘hands off’ protection, which is particularly important within fire-dependent systems. For auditability, it is important to clarifies the action expected, with recognition that planning alone does not mitigate risk, while implementation of plans does.*

**Proposed Revised Mitigation Option**

**The following is offered as an option that could be scaled for any impact level:**

**Engage in and/or provide monetary or in-kind resources to conservation planning processes and the implementation of plans that include goals, objectives and/or actions that are intended to achieve conservation of existing Type 1 and Type 2 old growth within the specified risk area and the Organization’s supply area. This may include: federal, state and/or local resource planning and plans; planning and plans for old growth-dependent species; regional planning and plans directly for old growth itself; and/or broad-spectrum regional conservation planning and plans that include old growth conservation.**

**CENTRAL THEME: Education & Outreach**

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| Original Proposed Options(#2) Educate landowners and land managers that late successional forest is important whether it has burned or not.(#5) Produce / distribute educational communication to suppliers / landowners which includes information on identification of old growth forests, management of existing old growth forests, and proper management of young forests with a goal of developing more old growth forests. | Topline Input* Consistent overall support from all perspectives
* Many different important messages to be communicated
* Desired outcome is maintenance/enhancement of existing Old Growth forests (not recruitment)
* Many different potential audiences (landowners, foresters, forest managers, suppliers, etc.), but landowners are key
* Should provide some sense of how much is enough
* Important to clarify who produces the materials
* Support for including content specific to fire-dependent forest types: the role and potential impacts (positive & negative) of fire
* Some concern that education on its own will not mitigate risk; recognition that just producing materials will not mitigate risk
* It’s an option that can be implemented by organizations of any size
* Seen as being auditable, as long as the expectations are clear
* ‘Communicate’ instead of ‘educate’
* Consider separating options based upon location in supply chain, with procurement policy option for those closer to forest
 |

*Consultation Insights: There is broad support for education and outreach in general across all perspectives, with recognition of the need to emphasize landowner engagement on multiple topics related to old growth, but with focus on the desired outcome of maintenance or enhancement of Type 1 and Type 2 Old Growth Forests. Materials used should be either developed in collaboration with or leveraged from organizations already working on similar desired outcomes, or FSC US. Development of the materials must be linked to the delivery of messages for effective mitigation and auditability. There are multiple potential audiences and the Organization should focus on those audiences that have the greatest potential impact related to the desired outcome, and the Organization’s location in the supply chain.*

**Proposed Revised Mitigation Options**

**The following is offered as an option that could be scaled for any impact level:**

**Using materials (as described below), and with a desired outcome of engaging landowners within the specified risk area and the Organization’s supply area in conservation of Type 1 & Type 2 Old Growth, communicate to audiences (as described below) the social benefits and values of Old Growth forests, threats from forest management (and related loss of values), opportunities for conservation (i.e., conservation easements, best management practices, etc.), with recognition of differences between moist and dry sites, and in areas with fire-dependent forest systems also include the role of fire, along with the potential positive and negative impacts of fire.**

* **Materials: Developed by, or developed in cooperation with, organizations/individuals with expertise in Old Growth conservation, or FSC US, and delivered in a manner that will be the most effective in achieving the desired outcome of engaging landowners in conservation of Old Growth, while reflecting the specific context and characteristics of the Organization.**
* **Audiences: Audiences will reflect the specific context and characteristics of the Organization, but communications should be directed toward those audiences where the communications will be most effective in helping to achieve the desired outcome of engaging landowners within the specified risk area and the Organization’s supply area in conservation of Old Growth. Depending upon the Organization’s location in the supply chain, communications may be directly with landowners, or through intermediaries such as community members, forest managers or suppliers, or in collaboration with organizations/individuals already working for conservation of Old Growth.**

**The following is offered as an option for Organizations with suppliers that are land managers or that purchase directly from the source forest:**

**Develop/adapt a procurement policy that reflects the above communications themes and clearly states the expectation that suppliers will promote conservation of Type 1 and Type 2 Old Growth and will not provide materials from forests where these HCV were threatened as a result of the forest management activities that produced the forest materials. This will require providing descriptions reflective of the forest type(s) in the supply area for potential threats from forest management activities, and the kinds of activities that would maintain or enhance Old Growth forest in the supply area.**

**NOTE: Actions to demonstrate policy enforcement and communicate policies on sourcing to suppliers should be audited under the Due Diligence system requirements within the 40-005V3-1 standard section 1.1**

**CENTRAL THEME: Staff Training**

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| Original Proposed Option(#7) Annual staff training to increase knowledge about identification, ecological function, and silvicultural techniques to maintain/develop late-successional functions and structural complexity. | Topline Input* A lot of questions regarding the applicability of this idea to controlled wood
* Likely only applicable to Organizations very close to the beginning of the supply chain
* Perceived as being auditable
* Training topics should include: identification, ecological function and management techniques; public ecosystem values
* Consider allowing “or equivalent,” not just ‘training’
* Consider option of allowing an alternative of working this content into licensure requirements for licensed foresters (covered by ‘or equivalent’?)
 |

*Consultation Insights: The desired outcome for this training would need to be similar to the education/outreach option above, and the information communicated would also need to be similar. This option is applicable to only a very small portion of the Organizations (those closest to the forest), since the staff of organizations further from the forest have little ability to mitigate risks based simply upon increased knowledge about Old Growth Forests and associated management activities. Need to recognize that once is not enough, but that annual training may not be necessary if the information has not changed, and also that there may be alternatives to Organization-provided training.*

**Proposed Revised Mitigation Option**

**The following is offered as an option for Organizations with staff who have direct contact with landowners/land managers and/or who are on-site at the forest material origin prior to harvest:**

**Ensure staff receive training or the equivalent, with periodic refreshers that include any new information, on Type 1 and Type 2 Old Growth identification, ecological function, management techniques, and provision of public values. The training or equivalent shall be: a) customized for old growth associated with the forest types that occur within the Organization’s supply area; b) developed by, or developed in cooperation with, organizations/individuals with expertise in Old Growth conservation or FSC US; and c) result in staff having knowledge on these subjects to the extent that they are able to communicate the same content to the landowners and land managers with whom they are working.**

**CENTRAL THEME: Conservation Incentives**

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| Original Proposed OptionsNone | Topline Input* Multiple suggestions received for a mitigation option associated with this central theme
* Could be in support specifically of regional and national land trusts (particularly those that are acquiring working forest conservation easements), or generally in support of organizations that provide incentives to maintain or enhance old growth forests
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**Proposed Mitigation Option**

**The following is offered as an option that could be scaled for any impact level:**

**Engage with and/or provide monetary or in-kind resources to regional and national organizations that provide incentives within the specified risk area and the Organization’s supply area that result in conservation of Type 1 and Type 2 old growth, including working forest easements and other conservation easements.**

**CENTRAL THEME: Ring-counting for Avoidance/Acceptance of Individual Logs**

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| Participant Proposed OptionsA company in Pacific Coast Region cannot ‘control’ if log that exceeds 150 years of age; (to avoid purchase) policy & procedures that require that personnel who receive/scale logs to count growth rings & document /keep record.Accept young trees (regardless of size) from areas of specified risk when ring count can be used to find logs that are less than 150 years. This recognizes and allows auditing of support for regenerative ecological forest projects. Species specifically related to late succession target species i.e. ponderosa on east side dry forests in entered of removal white fir sub-canopy. Identify late succession species targets by ecological region | Summary of Input* As this was proposed at the Regional Meeting, we received a lot of input specifically in regards to this proposed option – some positive, most negative
* It was not possible to accurately determine the different perspectives of all of those providing input, but there appeared to be consistent opposition from an economic perspective, and mixed input from other perspectives
 |

*Consultation Insights: Most trees are now sectioned and sorted on site, with most Organizations receiving sections and not receiving whole trees, and therefore unable to determine (due to not knowing if they are receiving the bottom-most section) whether ring-counting would provide an accurate age for the tree. Many Organizations do not receive whole logs, but instead residuals from other manufacturers, so this would only be applicable to Organizations that are at the very beginning of the supply chain. The purpose of mitigation is to reduce the risk of receiving materials from places where the High Conservation Value (HCV) is being threatened by forest management activities, and in this case the HCV is the forest, not individual trees. Avoiding individual trees based upon age would not ensure that the other materials received did not come from places where this HCV is threatened (Old Growth forests include younger trees too). Due to the significant potential for lack of effectiveness, neither of these options are included in the revised set of mitigation options.*