

## National Forest Certification Study

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

#### BRIEFING GUIDE

#### Overview

“National Forest Certification Study: An Evaluation of the Application of Forest Stewardship Council (FSC) and Sustainable Forestry Initiative (SFI) Standards on Five National Forest System Management Units” has been released. This report, produced by the Pinchot Institute for Conservation (PIC), documents the study in which third-party auditors evaluated current forest management practices on five study national forest units with standards set by two certification programs, Sustainable Forestry Initiative (SFI) and Forest Stewardship Council (FSC). The report summarizes and discusses the five third-party evaluations and captures lessons learned through a review of participant experiences.<sup>1</sup>

The study was designed to:

1. Evaluate the potential benefits and costs of third-party certification of national forests and grasslands,
2. Provide a better understanding of how national forest management practices align with FSC and SFI standards, and
3. Study the lessons learned as a basis for determining what policy and management direction may be needed in the event forest certification were pursued in the future.

Actual certification by FSC or SFI was outside the scope of these evaluations and was not a possible outcome on any of the study units. However, this study provides the Forest Service an opportunity to examine the consistency of current national forest resource management activities with the requirements of the two major forest certification programs now operating in the U.S.

#### *Participating Units*

The NFS management units evaluated include the:

- Allegheny National Forest (ANF) in Pennsylvania
- Lakeview Federal Stewardship Unit (LFSU) on the Fremont-Winema National Forest in Oregon
- Chequamegon-Nicolet National Forest (CNMF) in Wisconsin
- Mt. Hood National Forest (MHNF) in Oregon
- National Forests in Florida (NFF)

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<sup>1</sup> “Independent third-party certification” indicates certification to standards derived by a group external to the organization being audited. FSC certification standards and related information can be viewed at: [www.fscus.org](http://www.fscus.org). The SFI Web site is at: <http://www.sfiprogram.org>.

## ***Background***

Independent, third-party certification is one of the most significant developments in the field of forest management in the last two decades. Its use has expanded dramatically as the public and consumers have increased their interest in practical ways to ensure good management practices are being properly applied to both domestic and international forests. Certified acres have expanded to an estimated 7% of forests globally. In the U.S., the area of forests certified by FSC and SFI has increased from virtually none in 1998 to over 60 million acres today. About 14 million acres of state-owned lands have been certified, mostly to both FSC and SFI standards.

In the United States, certification was first applied to private lands. Due to the perceived benefits of the process, public lands are now becoming involved as well. Eight state forest systems in the U.S. are now certified. Some state forestry officials believe that certification has served to demonstrate their commitment to ecological, social, and economic values of forests. They believe that it has often been more about accountability and public education than providing certified wood to the marketplace.

Certifying National Forest System (NFS) lands has been debated for several years. It is a sensitive and complex issue—perhaps more so for the National Forest System (NFS) than any other type of ownership in the U.S. NFS planning is exceedingly complex and management practices and objectives are closely scrutinized by both the public and U.S. Courts. The Forest Service is seeking to assess the value and implications of certification. With the broad-scale adoption of certification by landowners of all kinds, both in the U.S. and overseas, the U.S. Forest Service recognizes that the question of whether they should become certified should be considered carefully.

## ***Role of the Pinchot Institute for Conservation***

The Pinchot Institute for Conservation (PIC) was the logical partner for this study. The Institute is an independent nonprofit research and education organization dedicated to investigating new approaches to forest conservation. Over several years, PIC has carried out certification tests in a variety of settings which have given a diversity of public, private, tribal, and university forest lands owners the chance to know whether their management aligns with FSC and SFI standards. For this project the Institute:

- Worked to secure some third-party funding for the certification evaluations
- Contracted with third-party auditors accredited by FSC and SFI through an open bid process
- Provided coordination between the Forest Service and auditors
- Reviewed and evaluated the auditors' reports
- Interviewed those involved in the certification evaluations to assess their views as to potential benefits and downsides of the process
- Prepared the study findings, results and a lessons learned report

## **Study Results and Findings**

The certification evaluations were designed to closely approximate the process that a national forest would undergo were they actually seeking certification. The audit firms were required to

be fully accredited to carry out FSC and SFI certification audits and to use the same approach they would for an actual certification assessment, as accredited by the FSC and SFI certification programs.

All certification evaluations were the functional equivalents of major, broad-based management reviews of all aspects of national forest management. The FSC and SFI reports delivered to the five national forests, read like other certification reports. They include a summary of the management setting, stakeholder feedback, findings of performance gaps or non-conformances (major and minor), and issuance of corrective action requests (CARs).

The study unit national forests addressed FSC and SFI requirements in standards applicable to private, state-owned and Department of Defense and Department of Energy (DOD-DOE ) lands in the U.S. The complexity of the Forest Service planning process, the scope of the Forest Service mission, and the professionalism and expertise of NFS staff contributed to one of the most comprehensive reviews the auditors had conducted. During the course of their review, the auditors commended the study unit national forests for conforming well with many of the requirements of the FSC and SFI audit standards used in the study.

### ***Performance against FSC and SFI standards used in the study***

Much of what the audit teams observed was considered exemplary, and provided evidence of good overall conformance with most of the FSC and SFI standards used in the study. All teams noted that the national forests benefit from a depth and wide range of expertise. Notable strengths recognized on most forests included exceptional programs of planning, assessment, and monitoring. Auditors praised how well national forests integrate complex direction and management considerations. They reported that the broad range of objectives established for national forests are supported by a remarkable degree of scientific and consultative review. The outcomes of these processes are designed into plans and projects, and are well addressed throughout implementation. Auditors also commended the means and degree of consultation with stakeholders, particularly with First Nation organizations. NFS staff were commended for their consultation with local tribes and state historic preservation officers to identify and conserve culturally-important sites.

Auditors also commended the forests for having an “excellent” system in place to identify threatened and endangered species and manage for their key habitat requirements across the landscape. The comprehensive systems used by the participating NFS units to identify and manage culturally important sites were also found to exceed the certification requirements.

The numerous areas of conformance with FSC and SFI standards used in the study are described more fully in the detailed report.

### ***Some performance gaps were found***

The auditors did cite a number of areas where the Forest Service is not meeting FSC or SFI certification standards applicable to private, state-owned and DOD-DOE lands in the U.S. This is not unusual. Under certification of either private or public lands, auditors virtually always find some non-conformances or performance gaps with the certification standards. Such performance gaps can be minor and so would not preclude certification. Minor performance gaps can be remedied within a given time period after certificate is issued. Other gaps are major and would preclude FSC or SFI certification until mechanisms are put into place to address them. Auditors also issue observations or opportunities for improvement that suggest things that may improve compliance with standards.

Table 1 and 2 provide a summary of minor and major performance gaps with FSC and SFI standards by study unit.

Some performance gaps common to several forests included:

- The road maintenance backlog was noted as a potential problem under both SFI and FSC especially for the western study units (LFSU and MHNF). On these units there are either some or, in other cases, numerous inadequately maintained roads, many of which are no longer needed for land management. Although the environmental impacts so far are largely controlled, the auditors urged the Forest Service is to be more proactive in moving toward a more manageable road system that meets current and prospective management objectives.
- Several national forests are not adequately treating enough forest vegetation to address critical and emerging forest health, insect risk, and fire risk issues, and in one case, a threatened species issue—red cockaded woodpecker recovery on the FNF.
- Inadequate monitoring is an issue with respect to removal of non-timber forest products (NTFPs) (ANF, CNNF and LFSU) and terrestrial wildlife population surveys (LFSU and MHNF).
- The Forest Service is not requiring logger training as part of its timber sale and stewardship contracts (SFI requirement) (all NFs) or adequately addressing timber contract employee safety issues (checking to see that employees of timber purchasers have and are using required safety equipment) (ANF). Logger training includes both health and safety issues and environmental and best management practices.

#### ***Performance gaps unique to one or two forests***

- Difficulties in coordination with subsurface owners of mineral rights was cited as a significant issue on the ANF
- Existing plans allowing for harvest of old growth timber under the Northwest Forest Plan (NWFP), was inconsistent with existing requirements of the FSC Pacific Coast Standard even though little or no harvest of old growth is occurring on the MHNF.
- Operation under outdated land management plans was cited as a significant issue under the LFSU and MHNF.
- OHV issues, their environmental effects, and the difficulty that the Forest Service is having in addressing them, is being cited as an issue on two national forests (MHNF & CNNF).

#### ***Key findings on technical gaps arising because certification is not being sought***

A number of performance gaps arise only because the national forests are not actually seeking certification at this time and so are essentially not applicable in the context of these studies. These “technical gaps” include requirements such as statements of commitment to the programs, formal reporting to FSC and SFI, and related issues.

#### ***Feedback from Participants***

The geographic representation of the study unit national forests provided an ideal backdrop to test certification in different NFS settings. Each participating forest faces similar agency-wide

challenges (e.g., limited resources and overextended staff, appeals and litigation, etc.) and yet is faced with their own ecological and socioeconomic issues.

Most of the NFS study coordinators felt that the certification programs impose requirements that are relevant to determining whether a forest is meeting its management objectives and improving their management practices over time. Forest staff indicated that certification can be a valuable tool if carried out in an effective manner that does not impose an additional, unsupported burden, on staff and resources.

Audit teams often pressed forest staff to think critically about their management rationale and priorities. Staff found the evaluations to be a comprehensive review—often more so than the Forest Service’s own targeted, internal audits—of the many integrated management activities occurring on the forest. The Forest Service has de-emphasized regular program-wide management reviews, and for this reason coordinators felt that the certification evaluations were especially insightful. To this end, they were impressed with the wide range of issues addressed by the evaluations.

Coordinators also reported that the FSC and SFI evaluations provided positive, independent reinforcement of their management activities while identifying those areas where improvements are needed. In many cases, these identified improvements were not unfamiliar to forest staff but would not be addressed unless additional funding and/or staff resources were available. Participating staff also recognized the value of third parties communicating publicly on the successes and difficulties of national forest management—especially difficulties arising from factors they feel are “beyond their control.” NFS study coordinators identified Corrective Action Requests that would be difficult or impossible to fix, and would likely need to be addressed by the Forest Service Washington Office (WO).

### ***Possible Next Steps***

Recognizing that the Forest Service has not decided whether it will seek certification, the following are relevant considerations:

The FSC Federal Lands Policy establishes three criteria to be met before any new federal land base such as the Forest Service could seek certification. In summary, the criteria include *stakeholder consensus*, *a willing landowner*, and the development of a *set of standards* specific to each new category of federal forestland (e.g., Forest Service, BLM, etc.). Because the Forest Service has not determined whether it will seek certification, FSC has not yet determined how and when they will address these criteria for the Forest Service.

SFI has stated that it would welcome NFS participation in SFI certification. A landowner seeking SFI certification must formally commit to reporting and management measures specific to the SFI Program. How and whether the Forest Service could make these commitments would also need to be determined.

Corrective Action Requests addressing gaps between national forest management activities and the standards and requirements of the certification programs—in many cases—may be unattainable without fixes that are partially or fully addressed by the Forest Service’s Washington Office. Potential policy changes that would be required to address the auditors’ suggested improvements include:

- 1) Develop viable strategies and secure the financial resources, and secure the necessary resources, to substantially improve the condition of overstocked stands and meet desired forest conditions.
- 2) Develop a strategy for reconciling the differences between the old growth standards of the Northwest Forest Plan and the FSC Pacific Coast Regional Standards.
- 3) Complete forest roads analyses to determine necessary transportation networks essential for management needs while identifying surplus roads ready for decommissioning. Additionally, NFS units would need to pursue strategies to secure the necessary financial resources to maintain the needed road system to accomplish management activities.
- 4) Develop programs to manage and monitor the abundance, regeneration, habitat conditions and yield of NTFPs that are harvested.
- 5) Require contractors to participate in training or certified logger programs to ensure harvesting operations are completed safely and with the requisite skill levels.

## **Conclusion**

1) The NFS Certification Study has provided a valuable opportunity to learn about FSC and SFI certification and the third-party auditing processes associated with them and to evaluate how NFS approaches align with these systems.

- This the first time NFS management has been evaluated with reference to FSC and SFI standards
- The objective is to employ these tests to help us better understand the SFI and FSC certification programs and the process of independent third-party audits generally—this objective has been met.

2) Under this project no national forest will be certified under either FSC or SFI

- Actual certification of national forests is not the objective of this effort and is explicitly outside the scope of the study.
- The study is designed to inform the Forest Service about the ways its current management on the national forests is and is not, consistent with the requirements for certification.

3) The Forest Service has not yet determined whether it will seek certification as a result of this study

- The Forest Service is in the process of reviewing the results of the certification evaluations
- After the Pinchot Institute issues a report on the results and lessons learned, the Forest Service will evaluate its options in consultation with key stakeholders and then determine how to proceed

**Table 1.** Summary of performance gaps for FSC certification (M=major; m=minor; O=observation; C=Conformance)

Performance Gap	LFSU	ANF	MHNF	CNNF	NFF
• Road maintenance backlog	m	C	m	C	C
• OHV use planning, access, and impact	C	C	m	m	C
• Backlog in vegetation management programs threatens forest health, habitat maintenance and/or community stability	m	O	m	C	M
• Forest using highly hazardous chemicals	m	m	m	O	m
• Late Successional OG entry/management/retention	C	O	M	m	C
• Woods worker's safety and/or training	O	m	O	O	M
• Management and monitoring of NTFPs	m	m	O	m	C

**Table 2.** Summary of SFI performance gaps SFI certification (M=major; m=minor; OFI=Opportunity for improvement; C=Conformance)

Performance Gap	LFSU	ANF	MHNF	CNNF	FNF
• Road maintenance and decommissioning	m	OFI	M	C	C
• Maintenance of forest health	M	m	M	OFI	m
• Requiring use of trained or certified timber harvesters	M	OFI	M	OFI	M
• Implementation of planned harvest levels	OFI	C	M	C	M
• Utilization of small logs	OFI	OFI	C	C	C
• Program to implement state and/or federal BMPs	m	OFI	OFI	OFI	C